

General Aviation Pilot Licensing & Training Simplification – Phase 1: Strategic Direction Consultation Response Document

CAP 2532



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Contents

Chapter 1: Purpose and background	6
Chapter 2: Overall approach	8
We asked	8
You said	8
We did	11
Chapter 3: Private Pilot Licence reforms	12
We asked	12
You said	12
We did	13
Chapter 4: Sub-ICAO licence reform	14
We asked	14
You said	14
We did	22
Chapter 5: Balloon flight crew licensing	23
We asked	23
You said	23
We did	26
Chapter 6: Sailplane flight crew licensing	27
We asked	27
You said	27
We did	27
Chapter 7: Existing licences/ratings	29
We asked	29
You said	29
We did	30
Chapter 8: Next steps	32
Appendix A: Abbreviations	33
Appendix B: Phase 1 working group	34

Executive Summary

This paper sets out the findings from the consultation on the strategic phase of the GA pilot licensing and training simplification project and sets out key decisions to proceed with the second detail phase of the project.

The consultation was run between 18 October and 16 December 2022, was widely promoted by CAA communications activity, and elicited 1,246 unique formal responses.

Overall direction:

- 85% of respondents agreed with the need for licensing system simplification, including over half agreeing strongly, indicating a clear mandate from the community to proceed with this project.
- 74% agreed that this review should go beyond just a simple consolidation of the UK and retained European regulations.

ICAO-compliant PPL:

- 82% of respondents who had a view (53% overall) supported our proposal for consolidating the full PPL and undertaking a gold-plating assessment of the retained Part-FCL provisions against the requirements in ICAO Annex 1.

Sub-ICAO aeroplane licence consolidation:

- 90% of those who had a view supported our proposal to consolidate the NPPL(A) and LAPL(A) into a single sub-ICAO aeroplane licence, and even counting those who were undecided still suggests a two-thirds majority in favour.

Sub-ICAO helicopter licence consolidation:

- 85% of respondents who had a view supported our proposal to simplify the NPPL(H) and LAPL(H) to create a single sub-ICAO helicopter licence.

Syllabus consolidation creating ICAO PPL and PPL(Light):

- 70% of those who had a view believed our proposal would work in their opinion, with several leaving statements such as; '*fantastic idea*', '*very smart*', and '*just what is needed*' in the comments.
- Only 1 in 20 thought the idea was unworkable or was in excess of what is necessary.

IR(R) rating for sub-ICAO licence holders:

- 65% overall (nearly 90% of those who had a view) supported our proposal of extending the IR(R) to sub-ICAO licence-holders.

Commercial ballooning:

- There was strong support (65% of respondents who had a view) to maintain a single balloon pilot licence such as the Part-BFCL Balloon Pilot Licence (BPL) with an appropriate rating for commercial non-passenger operations.
- A single balloon pilot licence with a rating for commercial passenger operations was the approach preferred by 58% of the respondents who had a view; suggesting support for the UK Part-BFCL BPL framework.

Sailplane licensing:

- There was overwhelming support (88% of respondents who had a view) for proceeding with the implementation of the Sailplane Pilot Licence (SPL).

Honouring/converting licences from the legacy system:

- Aside from the unsurprising dislike for ‘immediate mandatory conversion’, there were no *overwhelming* views towards the other three options.
- The most popular (40% in favour) was the ‘deemed valid’ option whereby we would accept the legacy licence as valid as the equivalent new licence; but the second preferred option was our preferred approach of ‘deemed valid until a sunset’, with 25% in favour.

Next steps:

- We will brief the community on these findings and also take forward some of the reflective questions set out in this paper to guide further discussion and exploration.

Chapter 1

Purpose and background

Purpose of this document

- 1.1 We published CAP2335 from 18 October to 16 December 2022 to publicly consult on the first ‘strategic direction’ phase of our General Aviation (GA) pilot licensing and training simplification project.
- 1.2 The consultation was substantially promoted by CAA communications activity, including multiple SkyWise announcements, a video podcast, two audio podcasts, an on-line interview in *Flyer* magazine, and posts on social media including Twitter, Facebook and LinkedIn.
- 1.3 We received a total of 1,246 responses to this consultation. All respondents answered the survey questions and most left detailed comments. 275 registered a view in response to the two specific balloon questions and 757 did so in response to the sailplane-specific question. The consultation questions were worded in such a way to form a survey that could be quantitatively analysed. Most of the questions also gave respondents the opportunity to also leave detailed written comments.
- 1.4 The results of this consultation set out the direction for the second phase focusing on the details of specific licences, ratings and certificates. At several points in this Consultation Response Document, we set out specific decisions arising from the consultation regarding proceeding with the next phase of this project.

Background

- 1.5 A request from the community to simplify and rationalise GA pilot licensing featured prominently in the responses received to a consultation we undertook on opportunities to improve aviation regulation having left the European Union.¹ We have decided to undertake this strategic project to look at the licensing and training landscape focusing on the following:

¹ See CAP1985, UK General Aviation Opportunities after leaving EASA – a consultation, 10 Nov 2020.

- Consolidating the two-tiered regulatory structure for general aviation pilot licensing that is currently in place reflecting the former European system;² and ‘national’ regulations set out in the Air Navigation Order 2016 (ANO)³ to create a simpler set of regulations for the UK GA community.
- Maintaining compliance with our obligations under the Chicago Convention, in respect of international standards and recommended practices for Personnel Licensing which we are obliged to follow.
- Identifying and reviewing areas where multiple licences and ratings cover a relatively narrow range of aircraft.
- Exploring simplifying pathways between licences while maintaining safety.

1.6 We aim to create a simpler set of regulations for the UK GA community. This project will be complex, covering most of the flying within GA, subject to the scope limitations we will describe in more detail below. This consultation is the first of a multi-phase process, exploring the strategic steps that are required across four major themes:

- Creating a single set of Private Pilot Licences (PPL) for aeroplanes and helicopters that are compliant with International Civil Aviation Organisation (ICAO) standards and recommended practices.
- Creating a single set of aeroplane and helicopter pilot licences that do not meet the ICAO standards. Such ‘Sub-ICAO’ licences are designed for flight in UK airspace only and are subject to certain limitations.
- Developing an approach for sailplanes and balloons considering recent developments in the EASA regulations in these areas shortly before the UK departed from the EU.
- Developing an approach to preserve the validity of existing licences under any new system we create, while minimising undue disruption and costs on users, flying schools and the CAA.

1.7 At the beginning of this project, we had formed a community Working Group comprising experts from across GA. Further to several requests during the consultation, the members of this group are listed in Appendix B of this paper.

² By ‘European system’ we mean the suite of European Union regulations comprising the Basic Regulation and its various implementing regulations. References to Basic Regulation in this consultation refer to UK Regulation (EU) 2018/1139, which was retained and amended into UK law by The Aviation Safety (Amendment etc) (EU exit) Regulations 2019. These regulations can be downloaded for reference only from the CAA website. For a legally definitive version, please see legislation.gov.uk website as Regulation (EU) 2018/1139.

³ References to Air Navigation Order (ANO) in this consultation refer to the Air Navigation Order 2016 (SI 2016 no.765, as amended) which can be downloaded for reference only from the CAA website. For the legally definitive version, please see the latest ANO on the legislation.gov.uk website.

Chapter 2

Overall approach

2.1 Before developing strategic proposals on the framework of GA pilot licensing going forward, this first chapter gauges the community's views towards the broad direction of our GA pilot licensing and training simplification project.

We asked

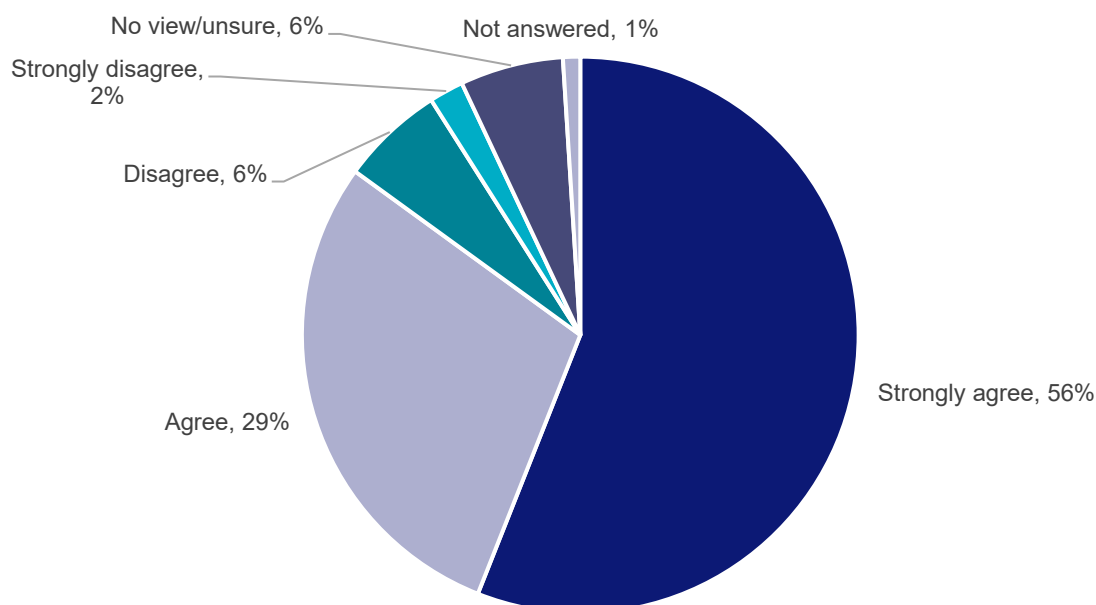
2.2 After describing the nature of our project and its scope in Chapter 2 of the consultation, we wanted to ascertain attitudes to our overall thinking regarding reforming and simplifying GA pilot licensing and training. For example, we argued in the consultation that this licensing simplification project should be a major overhaul of the regulations with a complete review of ICAO and sub-ICAO licences, as opposed to just consolidating existing rules and introducing minor reforms.

You said

2.3 Respondents indicated strong support for our project, not just to consolidate the retained regulations with the national rules under the ANO, but also to overhaul the licence offerings themselves.

Consultation Question 1: To what extent do you agree that the GA pilot licensing system needs simplification?

(1,246 respondents)

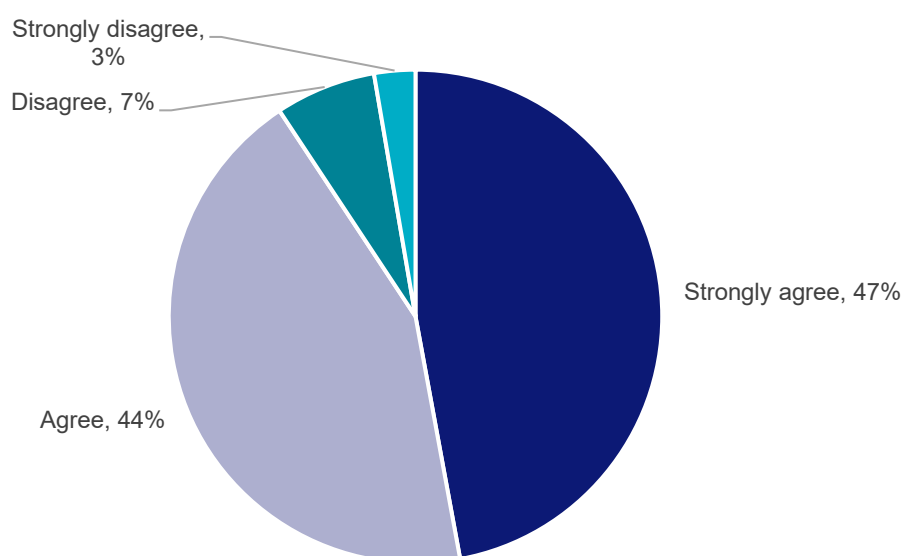


2.4 In response to the first question, 85% of respondents agreed with the need for licensing system simplification, including over half agreeing strongly. This indicates a clear mandate from the community to proceed with this project.

2.5 We then posed Question 2 asking for the communities views towards our argument that this project should be a major overhaul of GA licences as opposed to just consolidation and minor changes, and an overwhelming 91% of those who had a view supported our approach (see chart below). Even counting those who did not have a view (either were unsure or they simply did not respond), there is still a comfortable 73% majority in favour (agree/strongly agree) of this approach (see table below).

Consultation Question 2: To what extent do you agree with our approach that this exercise should go beyond just consolidating the current two-tiered regulatory system?

(1,109 respondents who expressed a view)



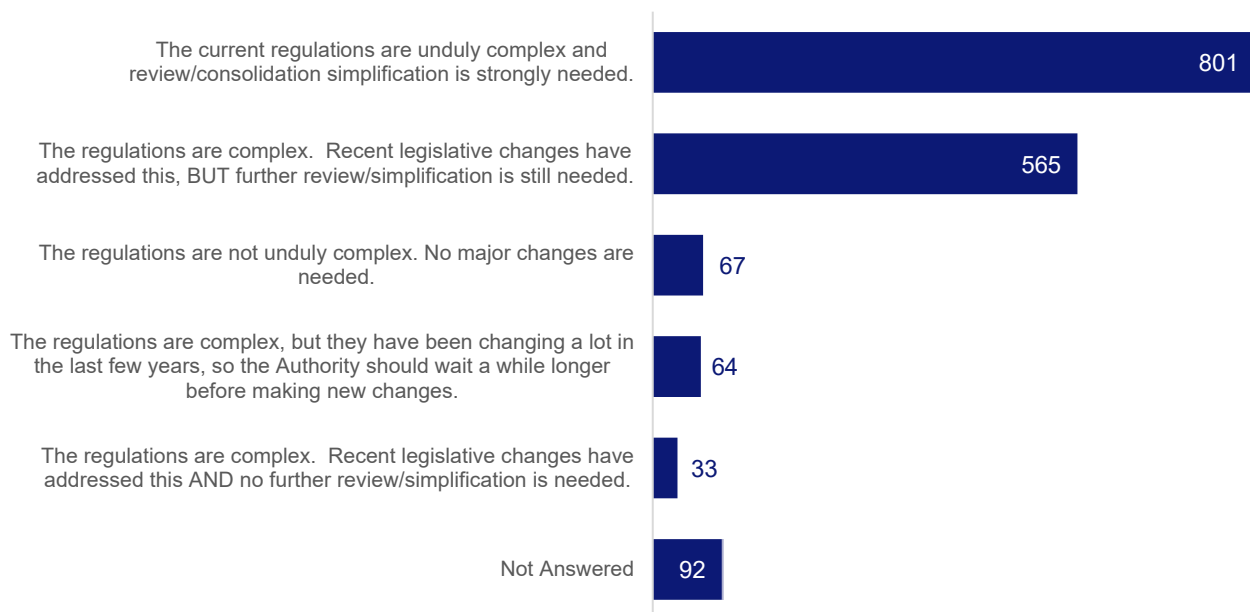
Consultation Question 2: To what extent do you agree with our approach that this exercise should go beyond just consolidating the current two-tiered regulatory system? (All respondents)

Option	Total	Percent
Strongly agree	475	38%
Agree	440	35%
Disagree	67	5%
Strongly disagree	27	2%
No view/unsure	215	17%
Not answered	22	2%
Total	1,246	100%

2.6 We then asked a third question giving respondents the opportunity to register any misgivings towards our overhaul proposals in the light of recent market and especially legislative developments. Respondents were offered a series of choices and asked to select two statements that capture their views. The results of this are indicated below and they serve to confirm the sentiments for reform and appetite for overhaul versus just consolidation in the previous questions.

Consultation Question 3: Please select two statements that best describes your view of the current overall GA pilot licensing regulation

(1,246 respondents: selecting 2 options)



Comments left by respondents

2.7 Respondents were also given the chance to leave detailed comments on each of the questions. The vast majority of the comments left by the “agree/strongly agree” respondents were around the need to address current unnecessary complexity and confusion in the licensing system. The following themes were cited:

- a) Touring Motor Gliders,
- b) differences training,
- c) differing revalidation requirements across licences and ratings,
- d) multiple licences across a narrow field of aircraft, and the difficulty in moving between licences.

2.8 Others argued that the licensing system is too complex and varied compared to other countries, especially following our departure from the EU.

2.9 One respondent left a comment at this early stage in the consultation (i.e. before the other proposals were summarised) that seemed to call for exactly what we are suggesting:

“There needs to be a ‘ladder’ of easy to understand licences, starting from basic LAPL/NPPL right up to restricted IR PPL with night & aerobatic ratings to encourage new pilots. They can then progress up the ladder while gaining solo flight experience as early as possible. Try explaining the current system to a prospective pilot. It’s impossible and full of unnecessary jargon. So start with a basic solo, day VFR no passenger limited licence and progress at your own pace & cost while building solo experience and confidence.”

We did

2.10 We interpreted the results of these three questions as sufficient evidence of the community’s interest in us proceeding with this project further to the overall direction consulted in Chapter 2 of CAP2335.

2.11 We have therefore taken the following decisions:

Phase 1 Consultation Outcome – CAA Decision no.1

We will proceed to Phase 2 of our GA Pilot Licensing & Training Simplification Project as consulted in CAP2335. We have reconvened the community working group described above with a view to developing the details within the framework proposed in this consultation.

Phase 1 Consultation Outcome – CAA Decision no.2

We will work together with the community working group to develop in Phase 2 detailed reforms as a major overhaul of the GA pilot licensing framework set out in this consultation, as opposed to just consolidation and incremental changes.

Chapter 3

Private Pilot Licence reforms

We asked

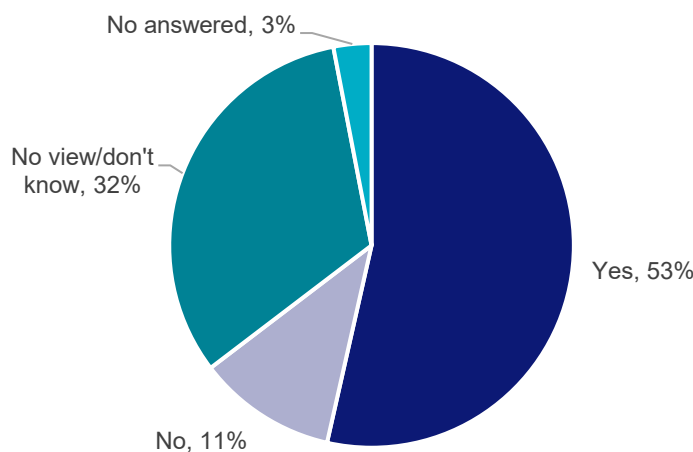
- 3.1 We described in this chapter our intentions to review the requirements for the Private Pilot Licence (PPL) for aeroplanes and helicopters. We first described our proposal to phase out the UK PPL so that all PPLs would be issued in accordance with the UK Flight Crew Licensing part (UK Part-FCL) of the UK Aircrew Regulation.
- 3.2 Then we described how we will analyse the specific PPL requirements in UK Part-FCL against the ICAO Annex 1 Standards & Recommended Practices for Personnel Licensing, in order to review and determine the continued existence of any requirement that goes beyond this.

You said

- 3.3 The community expressed its support for our proposal to review the UK Part-FCL PPL requirements for both aeroplanes and helicopters.

Consultation Question 4: Do you agree with our approach about reassessing provisions in UK Part-FCL that go beyond the ICAO standards?

(1,246 respondents)



- 3.4 We then asked respondents whether they could identify any specific area that we should focus on when reassessing the need to go beyond ICAO standards:
- No: 599 respondents, 48%
 - Yes: 409 respondents, 32%
 - Not answered: 238 respondents, 19%

Specific points left by respondents

- 3.5 There were several recurring themes emerging from the detailed comments left by respondents:
- a) There were at least 100 comments centred around the theme of undue complexity in the Part-FCL regulations compared to those in other ICAO contracting states such as the US or Australia.
 - b) Another very popular comment theme was by sailplane respondents noting concerns about the need for a towing rating for the PPL(A), believing this should be left to the discretion of the BGA or local gliding clubs.
 - c) Another popular comment concerned instrument ratings and the need for these for PPL as well as sub-ICAO licences. Although this is dealt with later in the consultation with a specific question, we counted about 30 comments relating to this in response to this question.
 - d) There were also several dozen comments around the number and complexity of theoretical knowledge exams and their detailed nature. Many argued that the exam questions are too complex and detailed, considering what GA pilots should be reasonably expected to know.
 - e) Several respondents also left comments around instructor ratings, particularly the lack of a purpose-built career path for instructors, noting that the current system seems to favour prospective commercial/air transport pilots looking to use instructing as a form of hour-building.

We did

- 3.6 We interpreted these findings as a clear mandate from the community to proceed with this decision:

Phase 1 Consultation Outcome – CAA Decision no.3

We will proceed in Phase 2 with the reassessment of the UK Part-FCL PPL(A) and PPL(H) requirements that go beyond those set out in ICAO SARPs Annex 1 Personnel Licensing, with respect to safety standards.

- 3.7 We have reconvened the community working group and will be providing instruction for it to undertake the analysis described.
- 3.8 We will also consider other measures to improve the PPL(A) and PPL(H) requirements, especially its training syllabus under UK Part-FCL Acceptable Means of Compliance (AMC) in line with emerging market, regulatory and accident investigation findings.

Chapter 4

Sub-ICAO licence reform

- 4.1 A key proposal across chapters 5 and 6 of our consultation concerned simplifying the sub-ICAO licence offerings (including licence/class rating combinations for aeroplanes) and then bringing the syllabus into line with the ICAO-compliant PPL to ease transition.

We asked

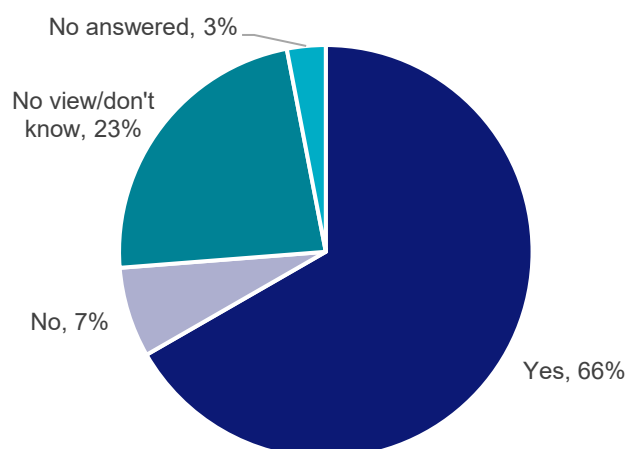
- 4.2 For aeroplanes, we described our thinking behind a proposal to create a single sub-ICAO licence for aeroplanes that would replace the NPPL(A) (including its relevant licence/class rating combinations) and LAPL(A) with a single sub-ICAO aeroplane licence, tentatively entitled the PPL(Light)(Aeroplane) or PPL(L)(A). We also suggested using the existing syllabus for the existing NPPL(A) with Microlight Aeroplane class rating as a starting point on the proposed new licence. In a separate section, we described how we would replace the NPPL(H) and LAPL(H) with a single sub-ICAO helicopter licence, the PPL(Light)(Helicopter) or PPL(L)(H).
- 4.3 We then proposed simplifying the requirements for the aeroplane licences to facilitate upgrading the sub-ICAO PPL(L) to a full ICAO-compliant PPL, thereby encouraging flight training and licences that are more targeted to pilots' actual prospective flying needs. We believed this would allow prospective pilots access to flying privileges in a more cost effective and tailored manner.
- 4.4 We also asked whether the existing sub-ICAO instrument rating, the Instrument Rating (Restricted) should be allowed to be added to the PPL(L)(A), citing the benefits to safety.

You said

Aeroplanes

- 4.5 All in all, each of the questions we asked on this theme returned at least a reasonably strong support from the community towards taking forward these proposals in Phase 2.

Consultation Question 6: Do you agree with our approach to create a single sub-ICAO licence for aeroplanes that would replace the NPPL(A) and LAPL(A)? (1,246 respondents)



4.6 Clearly two-thirds majority of the community are in favour of our proposal to consolidate the NPPL(A) and LAPL(A) into a single sub-ICAO aeroplane licence, even counting the No View/Don't Know and Not Answered respondents. Of those who expressed a view, the majority increases to 90% (see below).

Consultation Question 6: Do you agree with our approach to create a single sub-ICAO licence for aeroplanes that would replace the NPPL(A) and LAPL(A)? (Those who expressed a view)

Option	Total	Percent
Yes	824	90%
No	91	10%
Total views expressed	915	100%

4.7 We received similar strong support for our proposal in Question 7 to base the syllabus for the sub-ICAO aeroplane licence on that for the existing NPPL(A) with microlight class rating. Of those who expressed a view, 85% (609 respondents) supported this, with just 15% (9% overall: 108 respondents) against the idea.

4.8 Question 8 of our consultation was posed in case we received a high number of respondents against our proposal in Question 7, the aim being to better understand drivers for the lack of interest. As it turned out, only 107 respondents did not support our proposal so the 164 comments they left were too varied to analyse with any degree of confidence, especially given the large number of 'other reasons' chosen (note the respondents could make multiple selections). We certainly noted multiple comments suggesting that the microlight syllabus was not the ideal base for the single sub-ICAO licence syllabus, so we are inclined to leave the details of this, as well as the other comments, to explore in Phase 2 of this project.

Consultation Question 8: As you do not agree with our proposal, which of these statements best describes your views? (108 respondents who answered 'no' to Question 7)

Option	Total
I have a Microlight Class Rating and it works perfectly well and extending it to other privileges would complicate things for me.	5
I have a LAPL(A) and it works perfectly well and extending it would complicate things for me.	13
Consolidating to a single licence would create confusion where there is no issue currently.	35
It would introduce complications for training organisations.	41
Other reasons: syllabus should be based on SSEA, microlight course not appropriate, question the need for Sub-ICAO licence at all, simplification is not needed given existing pathways in regulations	71

Helicopters

4.9 Consultation question 9 proposed creating a single Sub-ICAO licence for helicopters that would replace the NPPL(H) and LAPL(H). Just 3% opposed the idea. Stripping out the large proportion of 'No view/don't know' responses (Invariably left by many people not familiar with helicopter licensing) and the 'Not answered', reveals 90% of those who had a view in favour of this approach.

Consultation Question 9: Do you agree with our approach to create a single sub-ICAO licence for helicopters that would replace the NPPL(H) and LAPL(H)?

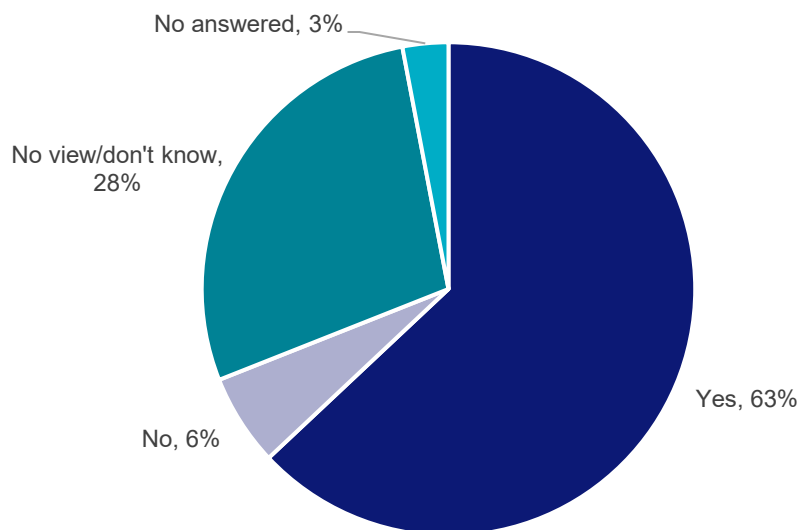
Option	Total	Percent
Yes	402	32%
No	41	3%
No view/don't know	764	36%
Not answered	39	3%
Total respondents	1246	100%

Syllabus consolidation

4.10 We also noted a very strong response in favour of our proposal of consolidating the PPL syllabus with ICAO and sub-ICAO variations. This question assesses the appetite to simplify and consolidate the syllabus and training structure between the two types of licences, thereby creating clearer and more intuitive pathways between

them, and increasing the attractiveness of the sub-ICAO licence as an entry-point for GA pilots.

Consultation Question 10: Do you agree with our preferred approach to create a single PPL for aeroplanes or helicopters each with ICAO and sub-ICAO variations? (1,246 respondents)



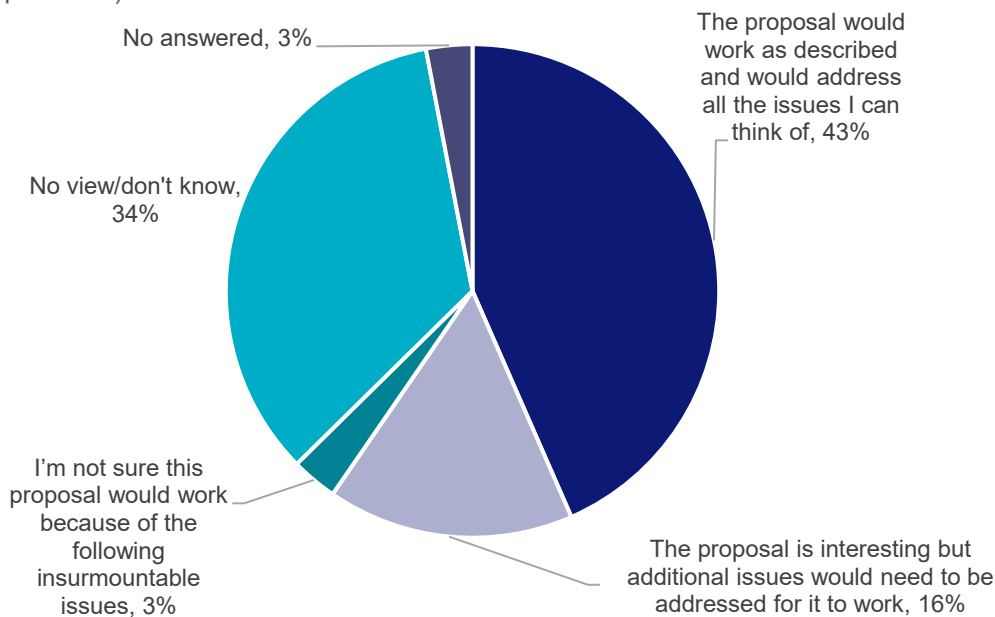
4.11 The overall findings indicate a strong 63% majority in favour of this proposal.

Stripping out the nearly 350 'No view/don't know' responses plus the 'Not answered' group leaves an overwhelming 91% of those who had a view supporting this idea.

4.12 We then asked Question 11 to gauge respondent views towards the likely barriers to the proposals and also to give a second opportunity for respondents to leave detailed qualitative comments outside the quantitative data. We found it encouraging that the largest single response was that the proposal 'would work as described and would address most of the issues'. Stripping out the 425 No view/don't know responses and 43 'Not answered' leaves 69% selecting this option. Only one in twenty respondents thought this approach was unworkable.

Consultation Question 11: Which of the following statements best describes your view towards this proposal of offering such single PPLs for aeroplanes and helicopters each with full and light variations?

(1,246 respondents)



4.13 We analysed the comments left by respondents to this question and noted the following in relation to sentiments beyond the statistics that inform us on next steps.

4.14 Among the respondents who selected the first option above (that the proposal would be workable), comments were around the following themes:

- a) The idea was strongly welcomed in that it would simplify the GA licensing framework. There were several comments like '*Fantastic idea*', '*Very smart*', and '*Just what is needed*'.
- b) Several highlighted that it would remove the complexity and confusion around different ratings for broadly similar aircraft, encourage gradual progression for new pilots without being overwhelming, allow pilots to make informed choices about the type of licences they actually require, and present a viable option for pilots who only ever wish to fly to sub-ICAO standards.
- c) Several pointed out that the challenge will be in the development details, with some highlighting the need for a common syllabus, focus on differences training for the wide range of microlight aeroplane disciplines.
- d) The concept of operational limitations such as those currently used for the microlight aeroplane class rating appears to be an attractive proposition in the consultation, presenting a graduated career path for sub-ICAO licence holders who only wish to exercise privileges in a limited fashion, with pathways to progressing their career thereafter. Respondents were given an example of the microlight operational limitations as an example of how these could look in practice.

- e) Some sailplane respondents wanted clarification of where gliders, TMGs and SLMGs sit within this framework.

4.15 The respondents who selected the 'interesting but needs work' option said the following:

- a) Most were broadly happy with the idea but wanted to reserve judgment until we proposed how to address the difficult issues like upgrade path and revalidation/renewal. One argued that the current system is so opaque that solutions to addressing them are similarly unclear.
- b) Some comments centred on the need for an avenue for pilots to reverse their licence (re-grade), e.g., previous full PPLs who wished to just revalidate as a PPL(Light).
- c) A few comments centred around potential confusion and lack of recognition by other ICAO States, if the UK approach is not understood. However, whatever the pathways that lead to the issue of a full PPL, whether it is directly from ab initio training or from an upgrade from the sub-ICAO PPL(Light), the requirements must be seen to comply with Annex 1 Standards & Recommended Practices.

4.16 The small number of respondents selecting the 'don't think the proposal would work' option said the following:

- a) Most were concerned that they would lose recognition in EASA member states. However, as stated in the consultation, any UK-issued licence no matter how aligned with EASA regulation will always be treated by EU member states as a third-country licence anyway, so there is little benefit in aligning.
- b) Others questioned the benefit of reforming the structure of licences that would likely be the same as the existing ones. One respondent argued that pathways between the existing NPPL, LAPL and PPL are already in place, and that these licences should be kept, and that only minor changes are necessary to make them more compatible. However, the responses above suggest a far greater majority in favour of major reforms and consolidation of the sub-ICAO licences.
- c) A few questioned the need for a sub-ICAO licence at all, disagreeing with the point we made in the consultation that there actually are discernible differences between the ICAO and sub-ICAO licence standards.

Training for full-ICAO PPL

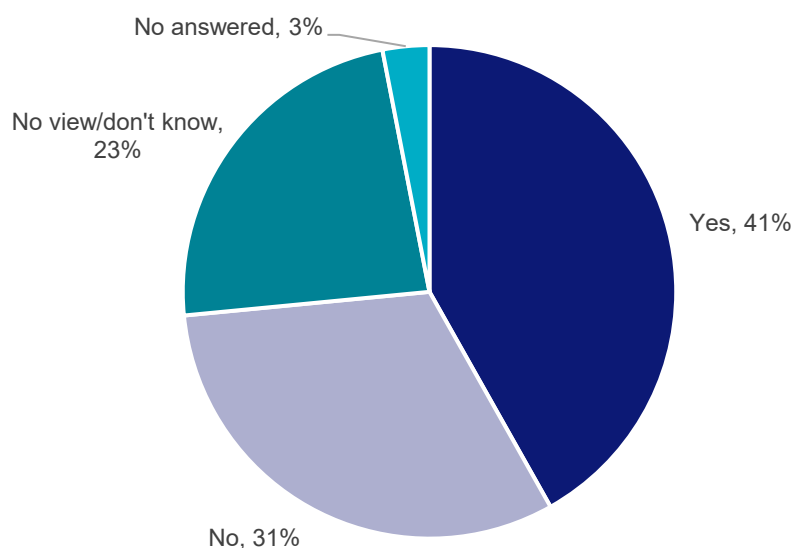
4.17 We proposed in Question 12 that organisations that do not have Declared Training Organisation (DTO) or Approved Training Organisation (ATO) status should continue to be allowed to conduct training towards the sub-ICAO PPL (Light), but the training to upgrade pilots to ICAO PPL should be restricted to DTOs/ATOs.

4.18 Although we received a large proportion of ‘no view’/‘don’t know’ responses, those in favour of this approach outnumbered the others by a significant enough majority. Considering that many of the ‘no view’/‘don’t know’ responses were likely down to unfamiliarity of the ATO/DTO system, we note that stripping out these and the ‘not answered’ respondents still returns a 56% majority in favour.

4.19 We looked at the comments left by respondents to provide more insight into the relatively narrow range of responses:

- a) Many respondents in favour of this approach argued the need for standardisation and oversight of training for this sort of application, especially ahead of issuing an ICAO PPL.

Consultation Question 12: Do you agree with our view to only permit DTOs/ATOs to lead training towards the full ICAO PPL? (1,246 respondents)



- b) Several even argued that at least DTOs should be required for all types of pilot training including the sub-ICAO PPL (Light).
- c) Those respondents against the idea cited bureaucracy and cost of ATO/DTOs as prohibiting competent freelance instructors from giving good training locally, in so doing, making training less accessible.
- d) Others against the idea cited the US example where training is allowed by individuals.
- e) Similarly, some sailplane respondents argued that the DTO regime does not apply to training for the SPL, and therefore questioned its validity for anything other than commercial flight training.

- f) Of those who selected the 'no view'/'don't know' option, most of the comments suggested they did not understand the DTO/ATO system.

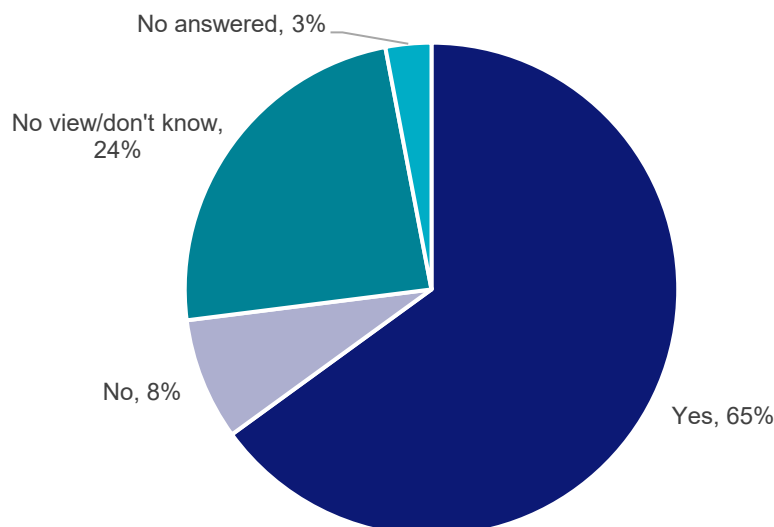
Instrument ratings for sub-ICAO licence holders

4.20 Presently, the Instrument Rating (Restricted), previously known as the Instrument Meteorological Conditions (IMC) Rating, is a national rating that qualifies holders of an ICAO PPL to operate safely in IMC outside controlled airspace, and to conduct instrument approaches or let-downs into aerodromes in uncontrolled airspace that are equipped with certain radio navigational and approach aids. We consulted in this project on allowing sub-ICAO licence-holders to train for and hold this rating.

Consultation Question 13:

Do you agree that PPL(L) holders should be allowed to hold an Instrument Rating (Restricted)?

(1,246 respondents)



4.21 There was clearly strong support from the community to our proposal of extending the IR(R) to sub-ICAO licence-holders, with a strong majority of nearly 65% in favour, even counting the respondents who left a 'no view'/'don't know' response. Discounting those respondents who did not have a view or did not answer, this majority rose to an overwhelming nearly 90%.

4.22 Comments left by the majority who favoured this proposal were as follows:

- Most cited flight safety and the risk of inadvertent flight into IMC as the main rationale for their choice
- Some said there seemed to be no logical reason why the restriction to ICAO licence-holders should continue
- Many took this option on the proviso that the rating itself be updated to reflect modern navigation aids that are increasingly prevalent at GA aerodromes.

4.23 Comments left by those who were against this idea:

- a) Most argued that only the full ICAO PPL should be the basis of further training.
- b) Others cited the argument that medical reasons (particularly colour perception) restrict PMD-holders from training for the IR(R). However, we did state in the consultation that this problem could be addressed by requiring those undergoing or revalidating their IR(R) to pass an additional ophthalmology test to a certain minimum colour acuity standard.
- c) Another flight instructor respondent argued that the current standard of IMC flying by IR(R) holders is poor, and the IR(R) itself should be replaced by a more accessible full Instrument Rating based upon ICAO requirements and straightforward theory requirements, similar to the US system.

We did

4.24 We intend to proceed with exploring the details for the sub-ICAO pilot licences as consulted. We have reconvened the working group to focus on developing these details, as well as considering some of the qualitative comments raised in this consultation.

Phase 1 Consultation Outcome – CAA Decision no.4

We will proceed in Phase 2 with the details around consolidating the existing LAPL(A) and NPPL(A) including that licence's different class rating combinations in favour of a single sub-ICAO private pilot aeroplane licence, tentatively entitled the Private Pilot Licence (Light)(Aeroplanes) or PPL(L)(A), and then consolidating the syllabus with the ICAO PPL(A).

Phase 1 Consultation Outcome – CAA Decision no.5

We will proceed in Phase 2 with the details around consolidating the existing LAPL(H) and NPPL(H) in favour of a single sub-ICAO private pilot helicopter licence, tentatively entitled the Private Pilot Licence (Light)(Helicopters), and then consolidating the syllabus with the ICAO PPL(H).

Phase 1 Consultation Outcome – CAA Decision no.6

We will proceed in Phase 2 with the details around allowing an Instrument Rating (Restricted) to be added to a PPL(L)(A).

Chapter 5

Balloon flight crew licensing

We asked

- 5.1 In the consultation, we explored whether a separate balloon licence should be required for commercial ballooning operations not involving the carriage of paying passengers. We highlighted that commercial non-passenger ballooning (what used to be termed ‘aerial work’) including activities like aerial advertising have more in common with private ballooning than commercial passenger ballooning operations.
- 5.2 We noted in the consultation that we have already decided to implement the Balloon Flight Crew Licensing (UK Part-BFCL) regulations which involve transitioning the former licences under the Air Navigation Order, namely the Private Pilot Licence (Balloons & Airships) [PPL(BA)] and the Commercial Pilot Licence (Balloons) [CPL(B)] into the single Balloon Pilot Licence (BPL) with appropriate ratings.

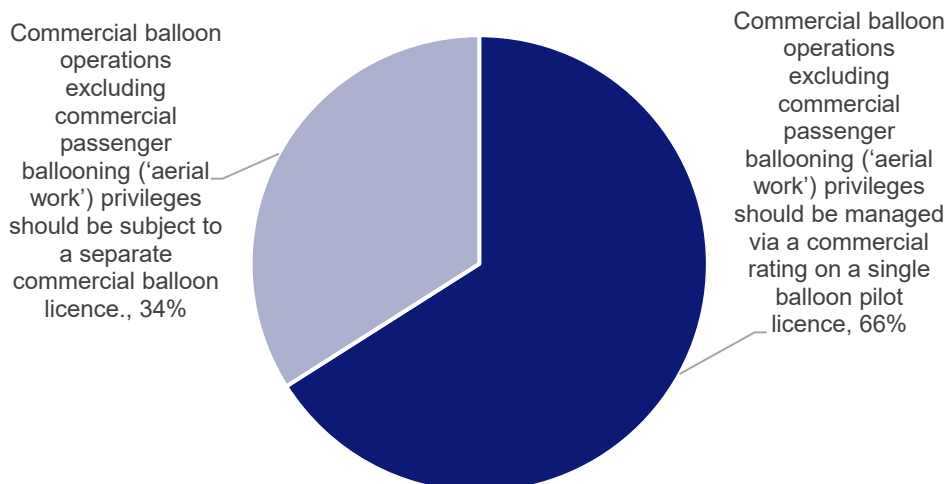
You said

Commercial Non-Passenger Ballooning

- 5.3 Our first question focused on commercial non-passenger balloon operations, and whether this should use the single balloon pilot licence framework with a rating for commercial non-passenger balloon operations.

Consultation Question 13: What is your preference regarding the licensing required to act as a pilot-in-command for commercial balloon operations excluding commercial passenger ballooning (‘aerial work’) operations?

(275 respondents who expressed a view)

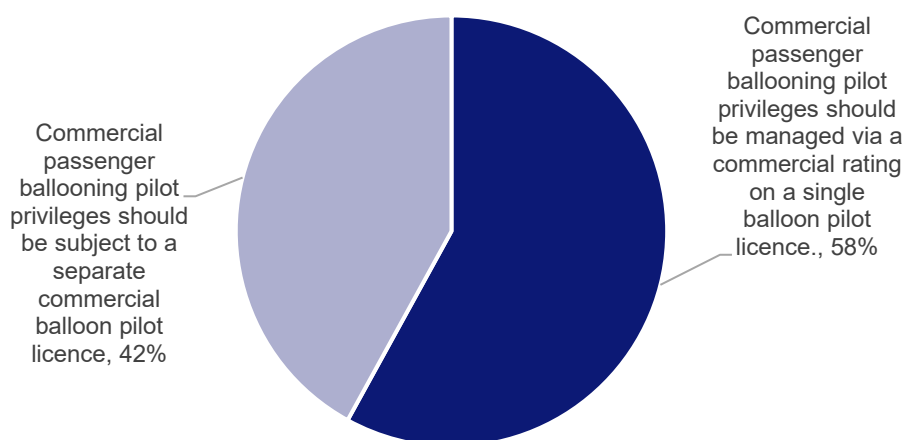


- 5.4 Due to the very specialised nature of the two balloon questions in this consultation, we removed the 939 ‘No view/don’t know’ responses plus those 32 who did not answer the question.
- 5.5 Of the remaining 275 who had a view, there is a clear majority in favour of a single balloon pilot licence with a commercial non-passenger carrying rating.
- 5.6 The majority of respondents who left a comment in support of their choice for the single balloon pilot licence model cited the need for simplification as their rationale for keeping a single licence, or that the requirements under the retained regulations are appropriate for this activity.
- 5.7 There was broad support among the respondents’ comments in favour of retaining the BPL, that the requirements were appropriate, and that making these more stringent would go against the simplification exercise.
- 5.8 Some commentators argued about the relative merits of the BPL with commercial ratings versus CPL(B), with concerns about the lack of safety data showing any difference in safety between the UK (where examinations for the commercial licence have been required since 1989) and the rest of EASA (where there have never been exams for the commercial rating on the national or EASA licence).
- 5.9 Conversely, those supporting a separate commercial licence cited the need for considerable knowledge and experience over and above that required for a standard balloon pilot licence for commercial operations.

Commercial Passenger Ballooning

Consultation Question 14: What is your preference regarding the licensing required to act as a pilot-in-command for commercial passenger balloon operations?

(275 respondents who expressed a view)



- 5.10 Again, for clarity we stripped out the 932 ‘No view/don’t know’ responses and the 39 ‘Not answered’. Although the majority is narrower compared to the responses to

other questions in this consultation, the preference favours a single balloon pilot framework for this type of operation, with a rating for commercial operations.

5.11 Most of the respondents who supported the single balloon licence approach cited that a separate commercial balloon licence would run contrary to the simplification exercise, and there was no data to support the need for a separate licence.

5.12 We analysed in detail the comments left by those who favoured a separate CPL(B) for passenger-carrying balloons. From this, we can draw the following conclusions:

- a) There were several statements of personal opinion that were not supported by sufficient tangible evidence as to why they are relevant to the current argument or why they should dictate the overall framework of balloon licensing policy.
- b) Some argued that we should instead focus our efforts on making UK balloon licensing valid in EU countries. As explained in our consultation, all UK issued flight crew licences no matter what their international reputation, including those compliant with retained EU regulation, are still viewed as Third Country licences by EU member states. Negotiating such recognition is outside of our control.
- c) Some argued that the public would better recognise a CPL(B) compared to a standard BPL. This is a public perception issue, not a policy matter. It can be addressed not by revising the licences and ratings themselves, but by better communicating to the public what the licence and ratings actually mean.
- d) Many argued that a unique CPL provides a level of public protection, similar to other professional pilot licences. The UK Balloon Rulebook currently in force provides a proportionate regulatory approach to balloon operations, including commercial operations and licensing as part of that, all providing appropriate levels of safety assurance to the parties involved, including commercial clients. Its introduction followed a debate about the treatment of commercial ballooning differently from other aspects of commercial aviation, culminating in regulations that are retained in UK law. It is not within the scope of this project to revisit those debates about that framework of balloon regulation. Rather it is to revise the details of the licence and ratings within that framework.
- e) The most popular concern was that the knowledge and experience requirements of the BPL with commercial rating was far inferior to what should be in place for fare-paying passengers. While we do not think this is a sufficient reason to revert to the ANO licensing structure and the CPL(B); we nevertheless do respect the *underlying argument* that perhaps the regulatory knowledge and experience requirements for pilots involved in such operations should be reviewed, which will therefore be a focus for Phase 2 of this project.

We did

- 5.13 The majority of respondents who expressed a view favoured retaining a single balloon pilot licence with appropriate ratings for commercial non-passenger and passenger ballooning respectively, thereby suggesting support for the continued implementation of the UK Part-BFCL regulations.
- 5.14 We will therefore proceed with implementing this regulation as already decided. We do not believe the results of this consultation are sufficient to support a change of direction regarding UK Part-BFCL implementation for all types of operations in Part-21 balloons including commercial operations.
- 5.15 We are however aware of the time pressure faced by the community to transition existing licences to the UK Part-BFCL licences by December 2023 to operate Part-21 balloons. To address this, we have worked with the Department for Transport (DfT) to revise the statutory deadline to September 2025. Please note that this cannot be extended any further.

Phase 1 Consultation Outcome – CAA Decision no.7

We will proceed with the previous decision to finalise implementation of the UK Part-BFCL regulations for all operations in Part-21 balloons, including commercial operations. The statutory deadline to implement this will be revised to September 2025.

- 5.16 We will proceed with examining the detailed requirements for commercial ratings as part of Phase 2 of this project. This detail will include the considerations raised by those who supported the continuation of a separate commercial balloon licence, and the Phase 2 discussions will determine how required standards for two different types of commercial operations should be reflected in the appropriate rating, and this *could* result in the creation of a separate Commercial Passenger Ballooning rating that could be added to a BPL.
- 5.17 The timeline for this work (as described in more detail in Chapter 8) will be to develop changes for detailed consultation in late 2023/early 2024, with a view to enacting changes to UK Part-BFCL in the spring 2025 legislative slot. This will also correspond with the above-mentioned deadline for licensing transition which will be September 2025.

Phase 1 Consultation Outcome – CAA Decision no.8

We will undertake discussions in Phase 2 exploring the necessary standards for pilots involved in commercial passenger ballooning as opposed to commercial non-passenger ballooning in terms of training, experience and technical knowledge, to reflect the appropriate standard of safety for those two types of operations. This is with a view to amending the UK Part-BFCL provisions and requirements accordingly, for consultation in late-2023/early-2024 towards legislative changes implemented by spring 2025.

Chapter 6

Sailplane flight crew licensing

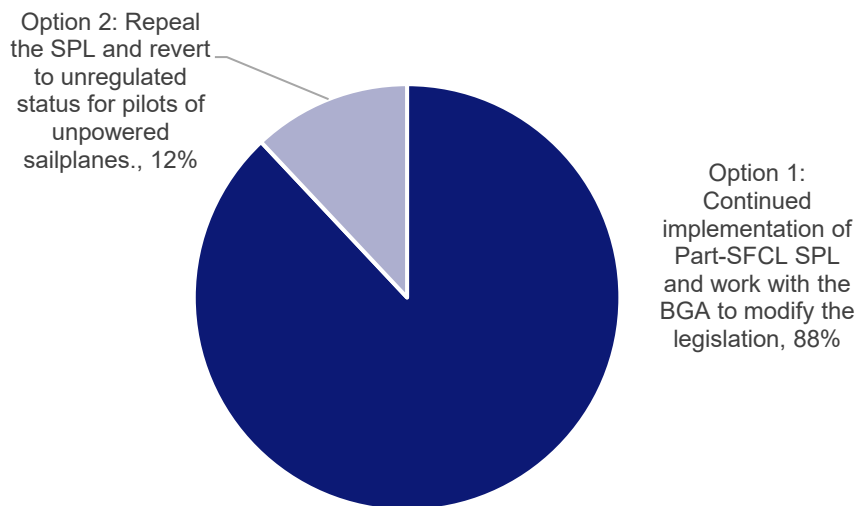
We asked

- 6.1 The sailplane community are also undergoing a transition from the self-regulatory Glider Pilot Certificate (GPC) to the SPL under UK Part-SFCL.

You said

Consultation Question 16: What is your preferred option for sailplane licensing?

(757 respondents who expressed a view)



- 6.2 Among the vast majority who favoured continued implementation of the SPL, most who left a verbatim comment argued that the Part-SFCL system is already well understood by the UK gliding community, with many asserting that it is a far more advanced and internationally recognised regime than the self-regulatory certificates.
- 6.3 Several respondents cited the inclusion of Self-Launching Motor Gliders as an important advantage in the retained regulations compared to the PPL/NPPL.

We did

- 6.4 We will therefore proceed with implementing this regulation as already decided. We have been minded by the pressure the community is under to transition existing licences to the UK Part-SFCL licences by December 2023 to operate Part-21 Gliders. Therefore, to give extra time, we and the DfT will be revising the statutory deadline to September 2025.

Phase 1 Consultation Outcome – CAA Decision no.9

We will proceed with the previous decision to finalise implementation of the UK Part-SFCL regulations for all operations in Part-21 Gliders. The statutory deadline to implement this will be revised to September 2025.

We will proceed in Phase 2 with analysing detailed requirements within UK Part-SFCL and develop any changes to those regulations. The timeline for this work (as described in more detail in Chapter 8) will be to develop changes for detailed consultation in late 2023/early 2024, with a view to enacting changes to UK Part-SFCL in the spring 2025 legislative slot. This will also correspond with the above-mentioned deadline for licensing transition which will be September 2025.

Phase 1 Consultation Outcome – CAA Decision no.10

We will undertake discussions in Phase 2 exploring any required changes to the requirements in the existing UK Part-SFCL regulations. This is with a view to amending the UK Part-SFCL provisions and requirements accordingly, for consultation in late-2023/early-2024 towards legislative changes implemented by spring 2025.

Chapter 7

Existing licences/ratings

7.1 The last consultation chapter gauged views towards how we would treat licences and ratings issued under current regulations that this project would replace.

We asked

7.2 We presented four options:

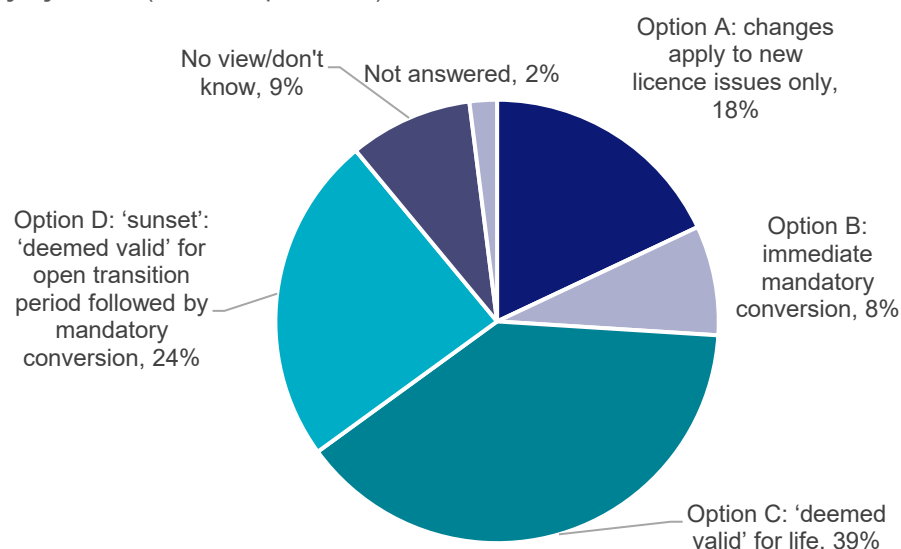
- a) New structure applies to new licences only, whereas existing ones would remain in force
- b) Immediate mandatory conversion of all licences to the new framework;
- c) ‘Deemed valid for life’: existing licences ‘deemed valid’ as their equivalent new licence for as long as the holder lives;
- d) ‘Deemed valid until sunset’: existing licences ‘deemed valid’ as their equivalent new licence but only until a determined deadline (which could be several years).

7.3 We then analysed these options in the consultation with respect to three underpinning principles of this exercise: to avoid more complexity, avoiding creating an unsafe situation, while minimising disruption. In so doing, we concluded by stating our own interest in Option (d), especially if the deadline itself would not even be announced for a few years, giving people time to convert licences naturally.

You said

Consultation Question 17:

Which option do you prefer for accepting licences issued under a legacy system? (1,246 respondents)



- 7.4 This question was the most difficult to draw any firm conclusions, because aside from the unsurprising dislike for ‘immediate mandatory conversion’, there were no *overwhelming* views towards the other three options, and a very small ‘No view/don’t know’ group.
- 7.5 Amongst the remaining three choices, the most popular was the ‘deemed valid permanently’ option whereby we would accept the legacy licence as valid as the equivalent new licence; but this was followed in popularity by our preferred proposal for a gradual transition to the new licence.
- 7.6 Therefore, we interpret these findings as suggesting that Option A ‘New licences only’ and Option B ‘Immediate mandatory conversion’ are the least preferred approaches and therefore should be discounted.
- 7.7 That left the remaining two choices: Option C ‘Deemed valid permanently’ and Option D ‘Deemed valid until sunset’ which we will proceed with further analysis in Phase 2.
- 7.8 ‘Deemed valid’ supporters argued this was the easiest option, though some caveated their reply by saying only if the recency requirements for ratings/privileges are identical otherwise it will be confusing and difficult to administer and errors will occur as they do now.
- 7.9 Some respondents’ comments suggested they might actually favour the ‘sunset option’, saying for example *‘that existing licences should be "deemed valid" and only re-issued with one of the new licences if a change in circumstance dictates (change of address, addition of privileges, etc).’* which is exactly what we proposed under the ‘sunset’ option.
- 7.10 By far the most popular reason was cost: many argued that having to pay a fee for conversion was the biggest determinant in their choice for the simpler ‘deemed valid’ idea.

We did

- 7.11 The results do not clearly support proceeding with any one option at this time. However, they do provide sufficient evidence to discount Option A ‘New licences only’ and Option B ‘Immediate mandatory conversion’. That leaves Option C ‘Deemed valid permanently’ and Option D ‘Deemed valid until sunset’.
- 7.12 We are minded to pursue the ‘Deemed valid until sunset’ approach at this stage, however we believe there are too many details such as cost and practicalities before we settle on this option as our preferred approach.
- 7.13 Therefore, in Phase 2, we will ask the working group to analyse the merits of both remaining options from the following four respects:

- a) **Safety:** determine whether safety risks of ‘deemed valid’ e.g. pilots being inadvertently given access to aircraft they are not qualified to operate is actually an issue.
- b) **Transition costs:** model the transition costs of the two options.
- c) **Practicality:** consider details such as differences training, logbook endorsements, technology, and model the number of licences likely to convert.
- d) **Wider ICAO developments:** such as Electronic Personnel Licensing and whether this could present a *de facto* sunset for some types of GA licences.

7.14 We will work towards developing a final position which we will present along with an impact assessment in the Phase 2 consultation.

Phase 1 Consultation Outcome – CAA Decision no.11

We have shortlisted the options and will proceed in Phase 2 with analysing options C ‘Deemed valid permanently’ and D ‘Deemed valid until sunset’, looking particularly at safety, practicality, transition costs and wider ICAO developments, with a view to settling on one preferred option.

Chapter 8

Next steps

- 8.1 We are reconvening the working group, and intend to enlarge it and split it into 5 aircraft category-specific sub-groups:
- a) Aeroplanes including microlights
 - b) Helicopters
 - c) Sailplanes including SLMGs and TMGs
 - d) Balloons
 - e) Gyroplanes: this is one theme that was not covered in this consultation, but we will convene experts to explore the state of current regulations and make proposals if any.
- 8.2 We have circulated a Terms of Reference explaining how this will be done.
- 8.3 Each sub-group will be given an instruction document setting out the scope, a series of objectives (arising from the consultation), deliverables and problem statements/issues that will serve as a starting point for their work to develop detailed proposals. They will then report back to the main working group periodically.
- 8.4 The working group will continue to meet periodically to consider cross-cutting issues.
- 8.5 The working group/sub-groups will develop detailed proposals for each category, with a view to setting these out in a Phase 2 consultation. This consultation (or suite of consultations) would be published in late 2023/early 2024. We expect final rulemaking to enact amendments to the ANO and UK implementing regulations to take place in the second half of 2024, aiming for the spring 2025 legislative slot for legislative amendment, aligned with publishing Official Record Series 9 decisions to enact changes to acceptable means of compliance and guidance material.

APPENDIX A**Abbreviations**

ANO	Air Navigation Order 2016
AOC	Air Operator's Certificate
BFCL	Balloon Flight Crew Licensing
BPL	Balloon Pilot Licence
CPB	Commercial Passenger Ballooning
DBO	Declared Balloon Operator
DfT	Department for Transport
EASA	European Aviation Safety Agency
FCL	Flight Crew Licensing
GA	General Aviation
ICAO	International Civil Aviation Organisation
IR	Instrument Rating
IR(R)	Instrument Rating (Restricted): a national rating that can be added to the PPL(A) allowing the holder to exercise privileges in Instrument Meteorological Conditions (IMC) outside of controlled airspace. Formerly known as the IMC Rating.
LAPL	Light Aircraft Pilot Licence
NPPL	National Private Pilot Licence: can be issued for an Aeroplane (A) or Helicopter (H)
PPL	Private Pilot Licence: can be issued for an Aeroplane (A), Helicopter (H), Balloons & Airships (BA) or Gyroplane (G)
PPL(L)	Private Pilot Licence (Light): the suggested title for the sub-ICAO variation of the PPL as proposed in Chapter 4 of this consultation paper.
SARPs	Standards & Recommended Practices (ICAO Annexes)
SEP	Single Engine Piston: an aeroplane class rating that could be added to a PPL. Can be issued as a Landplane (L) or Seaplane (S) rating.
SFCL	Sailplane Flight Crew Licensing
SLMG	Self-Launching Motor Glider
SPL	Sailplane Pilot Licence
SSEA	Simple Single-Engine Aeroplane
TMG	Touring Motor Glider
VFR	Visual Flight Rules

APPENDIX B

Phase 1 working group

The working group in Phase 1 of this project comprised of individuals from the following organisations. It must be noted that these participants were *operating in their individual capacity*, not as formal representatives of those organisations:

Aircraft Owners & Pilots Association

Balloon Panel of Examiners

British Balloon & Airship Club

British Gliding Association

British Microlight Aircraft Association

Commercial Ballooning Association

Light Aircraft Association

Individual PPL instructor

Individual PPL holder x2