



BMAA Guidance on CAA CAP2974

General Aviation Pilot Licensing Review Phase 2: Detailed Proposals

See BMAA news item for details:

<https://www.bmaa.org/news/bmaa-news/caa-licence-simplification-consultation>

The BMAA CEO Rob Hughes and former CEO Geoff Weighell both sat on the licence review panel. We are pleased to say that the CAA listened to our views and the consultation presents opportunities for microlight (and other) pilots.

Chapter 2: ICAO PPL(A) – (less relevant to microlight pilots, though some may be flying microlights with their ICAO PPL)

Question: Do you agree with our proposal to discontinue issuing new UK PPL (and higher) licences under the Air Navigation Order?

Yes. To simplify the licence system in the UK, it would be preferable to have one sub-ICAO (national) licence and one ICAO (international) licence.

Question: Do you agree with including a 35-hour PPL option for students training at an ATO under an approved course of training?

Yes. This may benefit some pilots and encourage more to learn to fly.

Question: Do you agree with our proposed changes to FCL. 210.A(a) regarding the qualifying experience requirements for issue of a PPL(A)?

Yes – strongly agree. This involves the minimum number of hours required before sitting a GST. The change is from flight “instruction” to flight “time”, meaning you could be credited for the time you have spent flying an aeroplane, rather than the amount of instruction you received on that aeroplane. This is particularly relevant for pilots wanting to use their microlight hours to count towards other licence types.

Do you have any comments on this?

The fundamental issue is ‘can you fly an aeroplane’ and not ‘have you done a set number of hours of training’. Experience in one aeroplane should be credited towards flying another.

Question: What changes should we consider for experience crediting towards the PPL(A) from other licences, as set out in FCL.210 (b), (c) and (d)?

• Answer: To allow PPL(A) students to count all of their previous flying hours as credit towards their PPL training.

Question: Where a PPL(A) student has previous microlight aeroplane flight time, should this count towards the PPL(A) qualifying experience?

Yes.



Do you have any comments on this, including under what circumstances should this be counted?

It can be reasoned that flying a (lighter weight) microlight requires at the very least an equal level of pilot skill and arguably more fine control (particularly in the landing phase) than heavier aircraft, so skills acquired on microlights should be equally as valid.

Question: Which approach would you support to the theoretical knowledge exams?

- Combine exams into seven

(For PPL exams). Combining into two would create a higher barrier to achieve a pass than being able to sit each subject separately. Many flying schools also ask students to pass Air Law and Navigation before completing solo or navigational flights.

Chapter 3 Class ratings– again, less relevant directly to microlights.

Do you agree with revising the SEP class rating to incorporate pure electric and non-turbine hybrid-electric power plants, and introducing new variant groups to the class requiring differences training, covering pure-electric and hybrid-electric propulsion systems?

- Yes, I support this option as described above, with pure-electric and non-turbine hybrid introduced as variant groups requiring formal differences training. Different power plants require different skills and differences training promotes safety.

Question: Do you agree with applying the variant groups from the SEP class rating to the MEP class rating, thus removing the need for differences training between every multiengine type?

- Yes, I support this approach.
- In line with the licence simplification objective of this review

Question: Do you agree that we should look further at the system of aeroplane class ratings, with a view to simplifying the single and multi-engine class ratings and potentially removing the whole reference to propulsion type from the class rating?

Yes

Pilots should be able to gain a pilot licence with their choice of power plant and then undertake differences training should they wish to switch to another.

Question: If you do agree that we should look further into the class rating system, which one of the following statements best describes your view?

- I think extending electric/hybrid technology to multi-engine would not go far enough.

We should explore removing reference to the propulsion systems and any safety concerns could be mitigated.

A pilot may choose only to fly one particular power plant; they could then train on that system, undergoing differences training at a later point for other systems.

Question: Do you have any comments about the class rating system, including any further thoughts on the above choices, or suggestions for alternative approaches?

New power systems need to be addressed and included in licence privileges.

Chapter 4: Sub-ICAO aeroplane licence

Question: Do you agree with our approach to the flight training syllabus for the sub-ICAO licence?

Yes

Do you have any comments on this?

A single, national licence is clearly the simplest system.

Question: Do you support a skills test or differences training when moving between class privileges within the sub-ICAO licence?

- Differences training

The system of differences training is well proven within NPPL (A) (microlight) and is suitable for all aircraft that could be flown with an NPPL. An instructor currently has the responsibility to progress a student to solo flight; the same should apply for class privileges.

Question: Do you support a fixed or rolling validity period for the privileges of the sub-ICAO licence?

- Fixed

In practice, a fixed system is clearer. Experience with the rolling system indicates confusion and errors.

Question: Do you agree that the existing microlight theoretical knowledge syllabus provides an adequate basis for the proposed sub-ICAO licence?

Yes

Do you have any comments on this?

The emphasis is on 'basis'. The set of microlight exams is comprehensive and well proven. Some exams are specifically tailored to microlight aircraft and would need to become more general. We would not want to see many different options of exams but instead to adjust those questions that are microlight-specific.

The sub-ICAO exam set must be compared against the ICAO standard so that progression to an ICAO licence does not require duplication of learning and instead the sub-ICAO exam must be able to be (part?) credited towards the ICAO standard.

Question: Do you agree that we should not expand the concept of operational limitations beyond the microlight category?

Yes

Do you have any comments regarding operational limitations?

The restricted microlight NPPL is popular, particularly among Sub-70kg pilots who recognise the value of the syllabus and who benefit from having gained an NPPL licence that they may wish to use in the future for SSDR or permit aircraft. Some students also achieve a restricted licence before continuing to an unrestricted licence to adhere to exam/hours validity periods.

Question: Do you agree that we should allow the IMC Rating/Instrument Rating (Restricted) to be added to the NPPL(A) and LAPL(A) licence?

Yes

It may be in the future that some microlight aircraft are approved for IMC and the licence system should not preclude that.

Question: Do you agree that we should allow pilot medical declarations to be made for the initial issue of the sub-ICAO licence?

Yes

(This is to correct the anomaly of a LAPL student requiring a Class 2 medical to apply for a LAPL but who can subsequently fly using a PMD)

Question: What do you believe the revised sub-ICAO licence should be titled?

- NPPL

Do you have any comments or suggestions on the naming of this licence?

The great majority of those who would fly on this new licence already have or had an NPPL or have strong awareness of the system.

The name should reflect the nature of the licence – it is a national licence for private pilots.

Lighter weight pilots (example: Sub-70, SSDR or lightweight flexwings) would not identify with a 'LIGHT AIRCRAFT' pilot licence.

The cost in money, time and human resources in rebranding the entire NPPL ecosystem is considerable and unnecessary. It would be unfair to force the cost of a rebranding exercise onto the industry when the label 'NPPL' is already well known, successful and entirely suitable.

Question: Which option for the revised sub-ICAO licence would you support?

- Option 1: single sub-ICAO licence

Do you have any comments, including any objections or alternative proposals?

To achieve the objective – simplifying the licensing system – the clear solution is one licence.

Question: Do you agree with our approach to existing licence holders?

Yes

Do you have any comments on this?

Existing licence holders should not be obliged to undertake additional cost or training as a result of this review in order to continue to fly. Additions to existing licences may understandably come with extra costs/training requirements, as is the current system.

Chapter 5: Maintenance of privileges

Question: Do you maintain your microlight or SLMG in accordance with General Exemption no.1582? e.g., your class rating was issued prior to 1 Feb 2008, and you comply with 5 hours' experience in 13 months, with no refresher training required.

Free answer as per your experience.

Question: Would you object to requiring all microlight and SLMG class rating holders (regardless of date of issue) to comply with the requirement to undergo at least refresher training with an instructor every 24 months?

Yes

There are many microlight pilots operating under the 5-in-13 system and enforcing a mandatory hour of training would add cost and complexity. There is no reliable safety data to indicate that this change is necessary; the AAIB asked CAA to review this issue but did not provide evidence that the 5-in-13 system was a cause of incidents.

Question: Do you support our approach to create Acceptable Means of Compliance and/or Guidance Material covering the conduct of Refresher Training?

Yes

Please provide us with any comments or suggestions you have in this area.

As GUIDANCE material, to ensure that the hour with an instructor is meaningful and brings additional safety through enhanced pilot skill. The instructional hour should still be flexible according to the needs of the pilot and as directed by their instructor.

Question: Do you agree with this proposal of removing the experience element from the revalidation requirements?

Undecided – free answer

Do you have any comments on this?

Removing the requirement to fly a certain number of hours within a certain time period (i.e. 12hrs in 24 months) and instead relying on a flight with an instructor. Removing this requirement may lead to less flying and lower currency among pilots.

Currently, a pilot without sufficient hours is able to take a GST to revalidate their licence.

Question: If we were to remove the experience element from the requirements to maintain validity of a class rating, which of the following do you think is most appropriate?

- Pass a proficiency check with an examiner during the validity period.

Do you have any comments, including any objections or alternative proposals?

An instructor should have the ability to oblige an unsafe pilot to carry out further training if their skill level is insufficient – this is in the pilot's best interests.



Question: Do you agree with the approach of having a single revalidation requirement across all single-engine non-turbine aeroplane class ratings for the sub-ICAO licence?

▪ Yes

Do you have any comments, including any objections or alternative proposals?

This would meet the objective of simplifying the licensing system.

Chapter 6: Theoretical knowledge common elements

Question: Do you agree that if we use the NPPL(A) Microlight syllabus and examinations, we should bring the sub-ICAO theoretical knowledge examinations into the eExams system?

No

Examiners provide feedback to students and are able to offer dedicated further assistance, depending on a student's performance.

Computer equipment and a reliable internet connection may not be available at a microlight examination site.

Setting exams is a source of income for microlight examiners.

The eExams system encountered a lot of problems on introduction.

Question: Do you agree that we should encourage the use of mobile devices with flight planning and monitoring software during the Navigation exercises?

Yes

Do you have any comments?

It is sensible to train and examine students according to how they will fly post-licence.

Question: Do you agree that we should encourage the use of mobile devices with flight planning and monitoring software in the Navigation and Flight Performance and Planning training?

Yes

Do you have any comments?

It is sensible to train and examine students according to how they will fly post-licence.

Question: Do you agree with amending the validity period of the examinations to change the 18-month period in which all examinations must be passed within a certain period to a rolling validity period?

Yes (*this is for PPL exams, the period for NPPL currently is 24 months*)

Question: Do you agree with amending the period in which a completed set of examinations are valid towards licence issue from 24 months to 36 months?

No

Very few NPPL (microlight) students require more than 24 months and that time period is considered to be the limit before knowledge fade.



Question: In the event that a student fails any one exam four times, is the requirement to retake all of the examinations again a factor in a student pilot stopping their course?

Don't know.

Do you have any comments?

We have no evidence on which to form an opinion.

Question: Do you have any suggestions how we could replace the requirement to retake all the examinations, where a candidate has failed to pass an examination within four attempts?

Answer: There could be three reasons: 1) the student is actually not able to pass (which leads to: is the qualification necessary?), 2) the student should change instructor (or method of learning) for a different approach, 3) the examining body should review the exam for suitability.

Chapter 7: Instrument Rating Review – *of less relevance to today's microlight pilot*

Question: Do you agree that we should consider review the TK syllabus for the IR(A)?

Don't know

Do you have any comments?

Insufficient experience to comment.

Question: Do you agree that we should consider consolidating the IR(A) examinations?

Don't know

Do you have any comments?

Insufficient experience to comment.

Question: Do you agree that we consider expanding the scope of the training courses offered by a DTO to include the flight training for the IR(A) via the competency-based route?

Don't know.

Question: Do you agree that if DTOs are permitted to offering the IR(A) course by the CB training route, they should be required to meet the additional requirements mentioned above?

Don't know.

Do you have any comments?

Insufficient experience to comment.

Question: Do you agree that we should keep the validity period of the IR(A) to 1 year?

Don't know.



Question: Do you agree that if DTOs are permitted to offering the IR(A) course by the CB training route, that we consider amending the renewal requirements for the IR(A) to allow the assessment and any refresher training required to be delivered by a DTO that has declared to deliver the IR(A) course?

Don't know.

Question: Do you agree with removing the EIR from the regulations and the transitional arrangements set out in paragraph 7.41?

Don't know.

Do you have any comments?

Insufficient experience to comment.

Question: Do you agree that we should require the delivery of the IMC/IRR Rating within either an ATO or DTO?

Don't know.

Question: Do you agree with our proposal to change the validity period of the IMC/IRR rating from 25 to 24 months?

Don't know.

Chapter 8: Other issues

Question: We would appreciate your views on how we can improve the prerequisite theoretical knowledge, course teaching, learning and theoretical knowledge instruction requirements for the FI.

Views: **Free answer according to experience**

Question: Should an aerobatics rating be required for all licence holders conducting this activity?

No

Do you have any comments?

In the absence of safety data requiring a change, there should be no change. Also, many current NPPL pilots have undertaken training or else perform aerobatics, including competitively. This demonstrates there is no need for a rating and also raises the question of grandfather rights should a rating be imposed.

Question: Should a sailplane towing rating be required for all licence holders conducting this activity?

No

Do you have any comments?

There's no safety or utility justification for a sailplane towing rating, which was introduced into the UK by FCL after decades of the UK managing without it. It is an unnecessary complexity.

Do you believe any additional requirements for ATOs or DTOs should apply for using non-Part 21 aircraft, above those required for permit aircraft under ANO article 42?

Don't know.

Do you have any comments?

Insufficient experience to comment.

Question: Do you have any further comments or issues regarding aeroplane flight crew licensing that you wish to raise?

The primary objective of a simplification review must surely be to encourage aviation. To this end, changes should never lose sight of what is the most suitable, efficient or accessible way to learn to fly. Pilots should be able to progress from hang gliding to commercial air transport without duplicating learning or incurring unnecessary cost.

Credit must be given according to performance. If a pilot can demonstrate that they can fly an aeroplane, any additional requirements to proceed to a more complex or heavier aircraft must recognise the current skill level of the pilot and not the path they took to achieving that level.

If we are to encourage new entrants into aviation, we must look to keep costs and complexities to a minimum. The aim of this review must be to allow a student to train at low cost and then build on their experience as they choose to develop their skills further.

NPPL instructors (and examiners) must be able to retain the ability to assess (and examine) students and pilots. If closer alignment to the Part-FCL PPL system is preferred, this must not come at the cost of unnecessary additional administrative processes.

When environmental concerns rightly take greater precedence in society, the UK's pilot licence system should enable students and pilots to train in as environmentally sustainable a manner as possible, using unleaded fuels and more efficient aircraft. Students should be able to gain skills in lighter weight, quieter and more efficient aircraft and then build on that solid foundation for their future aviation careers.

Question: Do you agree with this addition to the syllabus to cover partial power failure situations in aeroplanes?

Yes

Do you have any comments?

Microlight training according to the NPPL syllabus already includes power failure and partial power loss in various aspects of flight (take-off, cruise, landing).