



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>

This is the abbreviated version, focussing on the more relevant questions for microlighters. There is a full version available on the BMAA website covering all questions.

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**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 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.

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**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, SDDR 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.

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## **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.

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## **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 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.

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#### Chapter 8: Other issues

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.