

# **Comment response document:** Conducting paid-for initial pilot training in amateur built UK National Permit to Fly microlights

CAP 1927

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## Chapter 1

# Executive Summary

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- 1.1 In keeping with our approach to make the regulation of General Aviation (GA) more proportionate, and as requested by the BMAA and LAA, we launched a public consultation to propose extending paid-for initial (Ab initio) pilot training to be conducted using amateur built microlights which hold a UK national Permit to Fly (PtF). Furthermore, we proposed that this training can be undertaken by those pilots who are not owners of the aircraft. Currently, to undertake initial training in amateur built microlights, the student would need to be an owner or part-owner for this to be acceptable.
- 1.2 Student pilots can already pay and undertake flight training on a microlight if it has been granted Type Approval (factory-built). Student pilots cannot pay for flight training if the microlight only holds a Type Acceptance (amateur-built) if they are not an owner.
- 1.3 The consultation closed in February 2020 and resulted in 387 unique responses. The majority of responses (97%) agreed with the proposal. This document includes a summary of the responses received to the consultation questions, identifies the approach we plan to take and the next steps.
- 1.4 After an internal review of this proposal and the conclusion of the analysis of the consultation responses, we, and the collaborative stakeholder working group, were keen to progress. We must satisfy ourselves that the safety mitigations needed for amateur built microlights to be utilised in this way would result in an acceptable level of safety when compared to factory-built microlights which are currently used for training.
- 1.5 In summary, we are planning to permit paid-for initial pilot training in (serial number specific) amateur built microlights which hold a BMAA or LAA administered PtF.
- 1.6 We believe by permitting paid-for initial pilot training on serial number-specific amateur built microlights it will enable safety data to be captured. This data can be analysed for the purposes of determining if an acceptable level of safety can be established to allow the activity to continue on such aircraft on an enduring basis.

## Chapter 2

## Purpose and overall background

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### Purpose of this document

- 2.1 In January 2020, the CAA sought views on whether to extend paid-for initial (Ab initio) pilot training to be conducted using amateur built microlights which operate on a UK national Permit to Fly (PtF) by those pilots who are not registered owners of the aircraft.
- 2.2 This paper explains how we have responded to your feedback to that consultation, and how we intend to progress this project. It is not seeking further views.

### Background

- 2.3 This proposal was originally made by our stakeholders and was developed with a working group<sup>1</sup> comprising of key stakeholders from the sector.
- 2.4 Many factors were considered by the CAA over the last few months. There were two options considered which were:

**Option 1.** To allow paid-for initial pilot training in amateur-built microlights which hold a British Microlight Aircraft Association (BMAA) or Light Aircraft Association (LAA) administered PtF

**Option 2.** No change to the existing regulatory framework

- 2.5 Both options and their associated risks and opportunities were considered. The risks included:
- There is a risk that the use of some microlights with undesirable handling characteristics or construction could lead to an increase in accidents
  - There is a risk that the proposed safety mitigations are not adequate when compared to the current factory-built fleet.
  - There is a risk that the liability of the original amateur builder is not considered in sufficient detail.
  - There is risk that student informed consent may not be appropriately considered

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<sup>1</sup> A list of these representative organisations is set out in Appendix C