

**ADVICE TO PILOTS CONCERNING THE AIR NAVIGATION (AMENDMENT)(No. 2)
ORDER 2007 AND EXEMPTION ORS 4 No. 711**

IMPORTANT NOTE

There are two specific issues to which pilots' attention is drawn:

1. SEP AND SSEA CLASS RATINGS.

Pilots must be aware of the clear distinction between the SEP aircraft class rating and the SSEA aircraft class rating. Despite the fact the both SEP and SSEA aircraft class ratings confer privileges on simple single piston engine aircraft, the ratings are not the same. The SEP aircraft class rating confers more extensive privileges than the SSEA class rating, and has more stringent requirements for issue, revalidation and renewal.

Please see Section 5 for further information.

2. EXEMPTION ORS 4 NO. 711 AND PRIVILEGES.

Exemption ORS 4 No. 711 exempts pilots from the requirement to hold a JAA medical certificate when exercising SSEA, SLMG and Microlight aircraft privileges using a valid SEP class rating included in a UK issued pilot licence other than a NPPL. The Exemption imposes a number of conditions on the exercise of licence privileges in such circumstances and pilots wishing to make use of this exemption shall comply with these conditions.

Pilots must clearly understand that the Exemption does not exempt pilots from the requirement to hold a JAA medical certificate when exercising the normal privileges of the SEP class rating. Pilots may not fly commercially, exercise the privileges of a night qualification or rating, instrument rating, IMC rating or any other rating, qualification or licence for which a JAA medical certificate is required.

Please see Section 7 for further information.

1.0 Introduction.

- 1.1 The National Private Pilot's Licence (NPPL) was introduced to satisfy demands, from the General Aviation community, for a recreational flying licence with less onerous requirements for issue than the JAR-FCL PPL(A). The NPPL was introduced on 30 July 2002, and, whilst it has been a well utilised addition to the pilot licences available in the UK, it was correctly anticipated that the provisions for the NPPL in the Air Navigation Order (ANO) would require amendment in the light of practical experience with the NPPL.
- 1.2 Following discussions with industry representatives, amendments to the Air Navigation Order were drafted to:
 - a. Rationalise the different revalidation requirements for pilots holding SSEA, SLMG and Microlight class ratings; and
 - b. Permit the inclusion of certain flying instructor ratings in a NPPL; and
 - c. Permit the inclusion of SSEA, SLMG and Microlight ratings in pilot licences other than the NPPL.
- 1.3 The amendments were published in the Air Navigation (Amendment)(No.2) Order 2007, which came into force on 01 February 2008.
- 1.4 Consequent to this the NPPL Medical Declaration Exemption, which exempted Microlight pilots holding UK PPL(A) from the requirement to hold a JAR-FCL medical certificate if they were flying Microlights, was re-issued in an amended form to exempt SLMG and SSEA class rating holders likewise. This exemption has been published in the Official Record Series 4, No. 711.
- 1.5 While applying the changes to all licence holders flying SSEA, SLMG and Microlights, would have simplified the licensing system, the general aviation community were opposed to the changes should being applied to holders of a UK PPL, so it was agreed that the existing privileges of UK PPL holders would be preserved.
- 1.6 As with any change there is a period of adjustment by those affected by new requirements, and in relation to the Air Navigation (Amendment)(No. 2) Order 2007 and Exemption ORS 4 No. 711 two areas of confusion have arisen. These are addressed in the Important Note at the beginning of this document.

2.0 General Information.

- 2.1 Holders of NPPL with SSEA class rating must not exercise the privileges of this class rating on SLMG or Microlights. The law requires that a licence holder, in order to fly aircraft of a particular class, must have the appropriate aircraft class rating included in his licence.
- 2.2 Holders of other UK issued pilot licences with SEP class ratings have been able to exercise privileges of that aircraft class rating on SLMG and Microlights. In accordance with the agreement to preserve privileges, those licence holders will not be obliged to have the specific SLMG or Microlight aircraft class rating included in their licence.
- 2.3 Where reference is made in this circular to revalidation requirements, such as "12 hours in 24 months", such a reference should be read to include, where necessary, all associated revalidation requirements, such as flights with an instructor.
- 2.4 Pilots must be aware that Exemption ORS 4 No. 711 applies only within United Kingdom airspace. Pilots intending to fly under this Exemption outside United Kingdom airspace must obtain permission from the competent authority of the airspace concerned.

2.5 Pilots may not exercise the privileges of their licence under Exemption ORS 4 No. 711 on aircraft registered in a state other than the United Kingdom, without first obtaining permission from the state of registration. The regulations of some states may appear to permit pilots to do so, but such regulation may have been drafted on the basis of the pilot holding an ICAO compliant licence. As a UK issued pilots licence with a medical declaration is not ICAO compliant, pilots must ascertain from the state of registration whether the exercise of licence privileges under such circumstances is acceptable.

3.0 NPPL holders.

3.1 All NPPL holders will be required to change from the “continuous experience/rolling revalidation” requirement in the case of SSEA class ratings, and from the “5 hours in 13 months” requirement in the case of SLMG and Microlights, to the new “12 hours in 24 months” revalidation requirements.

3.2 This process must be completed by the end of the transition period, 30 June 2009.

3.3 In order to change to the new revalidation requirement, pilots holding NPPL with existing SSEA, SLMG or Microlight class ratings must, during the transition period, have these class ratings revalidated by an Examiner. On revalidation the Examiner will make the necessary entries in the Certificate of Revalidation pages of the holder's licence, including the “Date of Test/Check” and “Valid Until” columns. Provided the holder meets the validity requirements for the rating, the Date of Check is entered as the date the Examiner checks the holder's validity, and the Valid Until date is entered as 24 months after the date of check.

3.4 UK pilot licence holders must not exercise the privileges of a SSEA class rating on SLMG or Microlights. Such licence holders are required to have the specific class ratings for all those aircraft classes which they actually fly included in their licence. Such licence holders should have an Examiner revalidate their class ratings in their licence. If the holder's licence has only a SSEA class rating but the holder has been flying SLMG and/or Microlights, then the Examiner should make the associated entry for SLMG and/or Microlight in the Certificate of Revalidation page in the holder's licence, provided that the Examiner is satisfied that the pilot meets the validity requirements for that class rating at the point of check by the Examiner. The “Date of Test/Check” and “Valid Until” columns are completed as in Paragraph 3.3 above. The Examiner may not make entries in the Ratings section (Section XII) of the holder's licence, so the holder must then apply to PLD for the inclusion of the relevant SLMG and/or Microlight aircraft class rating in their NPPL. The form for the addition of an aircraft class rating to a NPPL should be used for the application, and versions of this form are available from the NPLG, BMAA and BGA web sites.

3.5 An Examiner may revalidate any or all of the SSEA, SLMG or Microlight aircraft class ratings for which the holder meets the existing validity requirements.

3.6 Where a licence holder is obliged by the introduction of the ANO changes to have aircraft class ratings added to his licence, PLD has agreed that there will be **no charge** for this service. Generally this will only apply to those NPPL holders who, prior to 01 February 2008, were exercising SLMG or Microlights privileges using a SSEA class rating.

4.0 Holders of licences other than NPPL.

4.1 From 01 February 2008 holders of UK issued aeroplane pilot licences other than a NPPL may add SSEA, SLMG or Microlight aircraft class ratings to their licences. Some UK PPLs have been issued as SLMG or Microlight only and will have the SLMG or Microlight class

rating included, but the majority of non-NPPL UK pilot licences include an SEP class rating as a minimum.

- 4.2 Holders of UK issued pilot licences who exercise SLMG or Microlight privileges using SEP class ratings may continue to do so.
- 4.3 Holders of UK issued pilot licences other than NPPL who, prior to 01 February 2008, had SLMG or Microlight class ratings included in their licence may either continue to revalidate according to the existing "5 hours in 13 months" requirements, or opt to switch to the new "12 hours in 24 months" requirements.
- 4.4 Holders of UK issued aeroplane pilot licences other than NPPL who have SSEA, SLMG or Microlight class ratings added to their licences after 01 February 2008 shall revalidate according to the new "12 hours in 24 months" requirements.

5.0 SEP and SSEA Aircraft Class Ratings.

- 5.1 Holders of UK issued aeroplane pilot licences which include SEP class ratings who are unable, or no longer wish, to maintain JAA Class 2 medical certification may have SSEA class ratings included their licences. Provided that the SEP class rating is valid at the time, an Examiner may revalidate the SEP class rating as a SSEA class rating. The Examiner makes the relevant entry in the Certificate of Revalidation page in the holder's licence, entering the revalidation date in the "Date of Check or Test" column and entering the "Valid To" date as 24 months later. Holders must then apply to PLD for the inclusion of the SSEA class rating in their licences as the Examiner may not make entries in the Ratings section (Section XII) of the holder's licence
- 5.2 The holder of a licence which includes a SEP aircraft class rating may not exercise privileges appropriate to that rating without holding a JAA Class 2 medical certificate. However, where such licence holders wish **only** to exercise privileges appropriate to a SSEA class rating, they may do so on the basis of holding a medical declaration in accordance with Exemption No. 711 in the Official Record Series 4. This may seem a somewhat academic distinction given that many SEP class aircraft can also be considered as SSEA, but is important that the distinction is made and understood. Whereas a SSEA class rating confers day VMC-only privileges on aircraft of less than 2000 kg MTOW with no more than 4 persons on board (including the pilot), a SEP class rating confers greater privileges and has more stringent requirements for issue, revalidation and renewal.
- 5.3 The following table summarises the differences between SSEA and SEP aircraft class ratings:

SUMMARY OF DIFFERENCES BETWEEN SSEA AND SEP AIRCRAFT CLASS RATINGS		
Item	SSEA Class Rating	SEP Class Rating
ICAO Compliant?	NO	YES
JAR-FCL Rating?	NO	YES
Class 2 Medical Certificate required?	NO	YES*
Can add/use a Night Qualification/Rating?	NO	YES
Can add/use an IMC Rating?	NO	YES
Can add/use an Instrument Rating?	NO	YES
Can add/use a FI Rating?	NO	YES
Can fly commercially?	NO	YES
Can fly aircraft over 2,000Kg?	NO	YES
Can fly aircraft with more than 4 PoB including the pilot?	NO	YES
Can fly SLMG and Microlights?	NO	YES
* Unless operating under Exemption ORS 4 No. 689		

5.4 The provision to include SSEA aircraft class ratings in UK issued aeroplane pilot licences other than the NPPL will principally appeal to those who do not wish, or are unable, to continue JAA Class 2 medical certification.

6.0 SLMG and TMG Aircraft Class Ratings.

6.1 Pilots flying SLMG should be aware that a NPPL, UK national or JAR-FCL licence that includes a SLMG class rating does not confer the privileges of a TMG rating simply because the aircraft they are flying can be regarded as both SLMG and TMG. Pilots who wish to exercise the privileges of a TMG class rating must hold a UK national or JAR-FCL licence with a valid TMG class rating and Class 2 medical certificate.

6.2 Again this may seem an academic distinction given that, in the UK, all TMG are considered also to be SLMG, and this would appear to render the TMG class rating redundant. However, pilots wishing to credit flight time in TMG towards the revalidation of a SEP class rating must also hold a valid TMG class rating. Flight experience under the privileges of a SLMG class rating will not count towards TMG or SEP revalidation requirements as the SLMG class rating is not recognised under JAR-FCL.

7.0 Exemption ORS Series 4 Number 711.

7.1 Exemption ORS 4 No. 711 exempts pilots from the requirement to hold a JAA medical certificate when exercising SSEA, SLMG or Microlight privileges included in a UK issued pilot licence other than a NPPL. The Exemption imposes a number of conditions on the exercise of licence privileges in such circumstances and pilots wishing to make use of this exemption shall comply with these conditions.

7.2 This Exemption was based on a previous Exemption, which applied only to those holding Microlight class ratings.

7.3 **Pilots must clearly understand that the Exemption does not exempt pilots from the requirement to hold a JAA medical certificate when exercising the normal privileges of the SEP class rating. Pilots may not fly commercially, exercise the privileges of a night qualification or rating, instrument rating, IMC rating or any other rating, qualification or licence for which a JAA medical certificate is required.**

7.4 This Exemption does not grant exemption from any of the requirements for remunerated commercial operation, for which a JAR-FCL CPL(A) and JAA Class 1 medical certificate are required.

7.5 In essence, the privileges of any UK issued pilot licence exercised on the basis of a medical declaration are constrained to those of the NPPL.

8.0 Summary.

8.1 Changes to the NPPL provisions of the Air Navigation Order, introduced in February 2008, were intended to harmonise revalidation requirements for NPPL aircraft classes.

8.2 NPPL holders will be required to change to the new revalidation requirements before the end of the transition period ending 30 June 2009. Holders of other UK issued pilot licences will not be so obligated.

8.4 Pilots whose applications for initial issue of SSEA, SLMG or Microlight ratings are received after 01 February 2008 shall meet the new "12 hours in 24 months" revalidation requirements.

9.0 Advice to Examiners.

9.1 Following the changes to the NPPL provisions of the Air Navigation Order it is anticipated that Examiners will receive requests from NPPL and other licence holders for the revalidation of their SSEA, SLMG and/or Microlight aircraft class ratings. This section provides advice to Examiners on the revalidation process; additional advice is available from NPLG at:

<http://www.nppl.uk.com/documents/NOTETOEXAMINERS.pdf>

9.2 Prior to revalidating any SSEA, SLMG and Microlight aircraft class ratings, Examiners are strongly advised to familiarise themselves with the revised revalidation requirements for these aircraft classes. The version of CAP 393 (Air Navigation: the Order and the Regulations) available through the CAA website includes the latest changes:

<http://www.caa.co.uk/docs/33/CAP393.pdf>

The bulk of the change has occurred to Schedule 8; the main changes are:

- a) Requirements for addition of SSEA, SLMG and Microlight aircraft ratings moved from Part A of Schedule 8 to Part B;
- b) Differences training requirements moved from Part A to Part B;
- c) Provision for SLMG and Microlight Flying Instructor ratings to be added to the National Private Pilots' Licence;
- d) Harmonisation and change to revalidation requirements to "12 hours in 24 months";
- e) Introduction of a requirement for differences training for pilots of aircraft taking off from and landing on water.

9.3 Two general exemptions, numbers 678 and 679 of the Official Record Series 4, provide for NPPL SLMG and Microlight pilots to continue to fly those aircraft without the specific aircraft class rating being included in their licence, until 30 June 2009 or until the expiry of

the validity period of the SSEA aircraft class rating, whichever is the sooner. These exemptions may be found here:

http://www.caa.co.uk/docs/33/ORS4_678.pdf

http://www.caa.co.uk/docs/33/ORS4_679.pdf

9.4 NPPL - Revalidation of SSEA, SLMG and Microlight Class Ratings by Flight Test.

- 9.4.1 Where a NPPL holder revalidates by flight test with an Examiner, on successful completion of the flight test the Examiner shall make an entry in the Certificate of Revalidation page in the applicant's licence for the aircraft class rating for which the flight test was conducted in the usual way. The date of revalidation should be entered in the "Date of Test/Check" column and the date 24 months later in the "Valid Until" column.
- 9.4.2 The applicant should then be advised that the aircraft class ratings thus revalidated are to be revalidated from that point on according to the new "12 hours in 24 months" requirement, or by flight test.

9.5 NPPL - Revalidation of SSEA, SLMG and Microlight Class Ratings by experience.

- 9.5.1 Pilots whose NPPL currently includes SSEA, SLMG and/or Microlight aircraft class ratings will hitherto have been revalidating either by flight test, or by "continuous experience/rolling revalidation" in the case of SSEA and/or "5 hours in 13 months" flying experience in the case of SLMG or Microlights. All NPPL holders are required to change to the new "12 hours in 24 months" requirement before the end of the transition period on 30 June 2009.
- 9.5.2 A NPPL holder who presents their licence for revalidation of SSEA, SLMG or Microlight aircraft class ratings may have any of those ratings included in their licence revalidated, provided that they meet the existing revalidation requirements on the date of revalidation.
- 9.5.3 The Examiner, on being satisfied that the applicant meets the revalidation requirements for the required aircraft class rating or ratings, shall make an entry in the Certificate of Revalidation page in the applicant's licence in the usual way. The date of revalidation should be entered in the "Date of Test/Check" column and the date 24 months later in the "Valid Until" column.
- 9.5.4 The applicant should then be advised that the aircraft class ratings thus revalidated are to be revalidated from that point on according to the new "12 hours in 24 months" requirement.

9.6 NPPL - Revalidation of SSEA Class Rating as SLMG or Microlight Class Ratings.

- 9.6.1 Some NPPL holders with SSEA class ratings have been exercising SLMG or Microlight privileges using that rating on or before 31 January 2008. This is not compatible with Articles 26(7), 28(2) and 29(2) of the Air Navigation Order. Furthermore such licence holders may have been required to meet revalidation requirements for a class of aircraft which they may no longer wish to fly.
- 9.6.2 Such an NPPL holder who presents his licence for rating revalidation may have the SSEA class rating revalidated as a SLMG or Microlight aircraft class rating, provided that the existing revalidation requirements for the SSEA class rating are met on the date of revalidation. If the applicant does not intend to revalidate a SSEA class rating thereafter,

he will subsequently only be required to meet the revalidation requirements for those aircraft class ratings which he wishes to revalidate.

- 9.6.3 The Examiner, on being satisfied that the applicant meets the validity requirements for the required aircraft class rating(s), shall make an entry in the Certificate of Revalidation page in the applicant's licence in the usual way. In such cases the Examiner will make new entries for SLMG and Microlight class ratings, as appropriate, on the Certificate of Revalidation page of the applicant's licence. The date of revalidation should be entered in the "Date of Test/Check" column and the date 24 months later in the "Valid Until" column. The Examiner may not make any entries in the Ratings section (Section XII) of the applicant's licence.
- 9.6.4 The applicant must then be advised that they must apply to CAA PLD for the addition of the required ratings to their licence. The application may be made using the form available on the NPLG website:

<http://www.nppl.uk.com/documents/InclusionofAdditionalClassRatingsinanexistingNPPLSSEA.pdf>

The applicant should also be advised that the aircraft class ratings thus revalidated are to be revalidated from that point on according to the new "12 hours in 24 months" requirement.

- 9.6.5 Where a licence holder is obliged by changes to the NPPL provisions of the Air Navigation Order to have a SLMG or Microlight aircraft class rating added to their licence, CAA PLD have agreed to make **no charge** for the service.

9.7 Non-NPPL – Revalidation of existing SLMG or Microlight Class Ratings.

- 9.7.1 Pilots holding licences other than NPPL may already have SLMG or Microlight aircraft class ratings included in their licences. This will generally only apply to some UK PPL(A) issued prior to the introduction of the NPPL, which were issued as PPL(M) or PPL(SLMG) and can be distinguished by the ratings section including a rating endorsed "SLMG Only" or "Microlight Only".
- 9.7.2 The privileges of these pilots in respect of SLMG and Microlights were established before 01 February 2008, and thus they may choose to revalidate according to the existing "5 hours in 13 months" requirements, or may elect to switch to the new "12 hours in 24 months" requirements. If pilots elect to change to the "12 hours in 24 months" revalidation requirements, they may not later revert to the previous "5 hours in 13 months" requirement.
- 9.7.3 Those pilots electing to change to the new revalidation requirements should advise the Examiner on revalidation. The Examiner, on being satisfied that the applicant meets the revalidation requirements for the required aircraft class rating or ratings, shall make an entry or entries in the Certificate of Revalidation page in the applicant's licence in the usual way. The date of revalidation should be entered in the "Date of Test/Check" column and the date 24 months later in the "Valid Until" column.

9.8 Non-NPPL – SLMG and Microlight Privileges on a SEP Class Rating.

- 9.8.1 Pilots holding UK issued pilot licences which include SEP class ratings who have been exercising SLMG or Microlight privileges using that rating on may continue to do. Whilst this does not help to simplify what is a complicated system of revalidation requirements, it has been agreed to allow preservation of the existing privileges of such license holders.

- 9.8.2 Pilots may elect to have a SLMG or Microlight rating added to a UK issued pilot licence other than a NPPL, particularly if they are unable to maintain the JAA medical certification required to maintain an SEP class rating. Provided that their SEP class rating is valid, and that they have completed the requirements for differences training, the appropriate SLMG or Microlight class rating may be added to their licence without the requirement for a flight test. In such cases pilots should have their SEP class ratings revalidated as SLMG or Microlight class ratings by an Examiner.
- 9.8.3 The Examiner, on being satisfied that the applicant meets the requirements for the required class rating or ratings, shall make an entry in the Certificate of Revalidation page in the applicant's licence in the usual way. In such cases, the Examiner will make new entries for SLMG and Microlight class ratings, as appropriate, on the Certificate of Revalidation page of the applicant's licence. The date of revalidation should be entered in the "Date of Test/Check" column, and the date 24 months later in the "Valid Until" column. The Examiner may not make any entries in the Ratings section (Section XII) of the applicant's licence.
- 9.8.4 The applicant must then be advised that they must apply to CAA PLD for the addition of the required ratings to their licence. The application may be made using the form available on the NPLG website:

<http://www.nppl.uk.com/documents/InclusionofAdditionalClassRatingsinanexistingNPPLSSEA.pdf>

The applicant should also be advised that the aircraft class ratings thus revalidated are to be revalidated from that point on according to the new "12 hours in 24 months" requirement.

- 9.8.5 Pilots should be aware that, where a licence has a time limited validity, the licence may not be renewed without an aircraft rating and medical appropriate to the licence. For example, a JAR-FCL PPL(A) cannot be renewed on the basis of a valid SSEA, SLMG or Microlight class rating, or on the basis of a medical declaration – a SEP class rating and JAA Class 2 medical certificate are the minimum requirements.

9.9 Non-NPPL – SEP and SSEA Class Rating.

- 9.9.1 Pilots holding UK issued pilot licences with SEP aircraft class ratings may elect to have a SSEA aircraft class rating added to their licence, particularly if they are unable to maintain the JAA medical certification required for the SEP class rating. Provided that their SEP class rating is valid the SSEA class rating may be added to their licence without the requirement for a SSEA skill test. In such cases, pilots should have their SEP class ratings revalidated as SSEA class ratings by an Examiner.
- 9.9.3 The Examiner, on being satisfied that the applicant meets the validity requirements for the SEP aircraft class rating, shall make an entry in the Certificate of Revalidation page in the applicant's licence in the usual way. In such cases, the Examiner will make a new entry for the SSEA class rating on the Certificate of Revalidation page of the applicant's licence. The date of revalidation should be entered in the "Date of Test/Check" column, and the date 24 months later in the "Valid Until" column. The Examiner may not make any entries in the Ratings section (Section XII) of the applicant's licence.
- 9.9.4 The applicant must then be advised that they must apply to CAA PLD for the addition of the required rating to their licence. The application may be made using the form available on the NPLG website:

<http://www.nppl.uk.com/documents/InclusionofAdditionalClassRatingsinanexistingNPPLSSEA.pdf>

The applicant should also be advised that the aircraft class ratings thus revalidated are to be revalidated from that point on according to the new “12 hours in 24 months” requirement.

- 9.9.5 Pilots should be aware that, where a licence has a time limited validity, the licence may not be renewed without an aircraft rating and medical appropriate to the licence. For example, a JAR-FCL PPL(A) cannot be renewed on the basis of a valid SSEA, SLMG or Microlight class rating, or on the basis of a medical declaration – a SEP class rating and JAA Class 2 medical certificate are the minimum requirements.