

Title:	<b>Balloon Working Group Recommendations Paper Work Strand 3: Pilot requirements for the base Balloon Pilot Licence and associated ratings</b>
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Purpose:	To set out a consolidated working group viewpoint regarding base requirements for the Balloon Pilot Licence. Once adopted by the working group, this paper would form the basis of a chapter on this topic in the CAA Phase 2 balloon public consultation.
NOTE:	The content of this paper is draft material for discussion purposes only. While it constitutes the views of the Balloon Working Group, it does not represent, in whole or in part the corporate views/policies of the Civil Aviation Authority.

## Background

1. The consultation response document committed us in Phase 2 to review the requirements for the base Balloon Pilot Licence (BPL) as set out in UK Part-BFCL. Of particular focus is ensuring that the requirements reflect best practices for the UK when this is implemented as the single balloon licence for Part-21 balloons when it supersedes the ANO Private Pilot Licence (Balloons and Airships) [PPL(BA)] by September 2025.
2. A working group of balloon subject matter experts has been formed to put forward proposals in areas related to the Balloon Pilot Licence. The group comprised experts in the British Balloon & Airship Club, the Panel of Balloon Examiners, the Commercial Ballooning Association, and experts on instructing and examining of balloon pilots across the available licences and ratings.
3. The purpose of this paper is to summarise key areas relating to the base BPL where the provisions in UK Part-BFCL can be reviewed and amended.

## Regulatory context

4. Requirements for the base Balloon Pilot Licence (BPL) are set out in UK Part-BFCL Subparts GEN and BPL, while ANO licences are covered under ANO Schedule 8. There are approximately 400 balloon pilots in the UK, with a flow of about 50-80 students producing 20-30 new qualified balloon pilots per year.
5. **Important note on scope:** this consultation focuses on amendments to *the current BPL licence and ratings*, with a view to updating the Part-BFCL regulation. We have described transitional considerations facing pilots in implementing these proposed changes in the Workstreams 4 & 5 paper. However, while we do mention differences between the existing BFCL requirements and those of the ANO balloon licence system for illustration, it is *not* meant to describe the transition process from ANO licences to their equivalents in Part-BFCL which is already being managed by the CAA under an existing conversion process.

## Current Issues

6. The working group found that the Part-BFCL regulations were largely satisfactory in delivering an appropriate standard of baseline balloon pilot licensing regulation. However, the following issues were raised for which recommendations were made:
  - A. BPL instruction arrangements: reduction in the required number of dual training flights with a Flight Instructor (Balloons) [FI(B)] and the creation of an Assistant Instructor authorisation.
  - B. Simplifying the licensing structure concerning hot air balloon tethered flights.
  - C. Recency requirements for additional classes of balloons (gas balloon, hot-air airship).
7. Participants tabled to the group written submissions across each of these areas, which were discussed in turn resulting in the positions set out in this paper.

## A. BPL instruction arrangements

### **Context/current situation**

8. Currently candidates seeking the base BPL must have obtained at least 12 hours of dual flight instruction with a FI(B), as set out in BFCL.130. This is a significant difference to the ANO PPL(BA) system where only four flights were required with an instructor. This is also an increased burden on the limited number of FI(B)s. The BBAC, which has long delivered balloon training in the UK, notes that the sparse nature of FI(B) coverage in some geographic areas creates difficulties for candidates to obtain the amount of training they need, resulting in longer periods between training flights, which affects candidate performance. The BBAC also notes the fact that it has successfully managed a non-instructor training proposition in the past. The change to all instructor training represents a cultural shift to which the community may find difficult to adapt, potentially leading to students abandoning their aspirations to become balloon pilots.

### **Proposals and rationale**

9. To relax the burden on FI(B)s while still ensuring that BPL candidates receive a sufficient number of hours of dual instruction, members of the working group have proposed reducing the number of hours of dual instruction that must be undertaken with a FI(B) and creating an 'Assistant Instructor' authorisation that would be able to undertake the remaining dual instruction for the base BPL. The overall 12 hours under dual instruction pursuant to BFCL.130(b) would not change, rather just reducing the minimum number using a FI(B) from 12 hours to 4 hours and 4 flights. It would be the responsibility of the DTO to ensure flights with a FI(B) take place at appropriate times during the training and are not bunched at the beginning or end of the training. This management would be comparable to the way ANO instructor flights are intended to occur.
10. The Assistant Instructor authorisation would be created in Part-BFCL. Details for doing this are set out in *Work Strand 2 paper: Instructor and examiner requirements*, Section B.
11. Such an Assistant Instructor could remove the burden from FI(B)s by conducting significant parts of the dual flight training for BPL candidates.

### **Issues and discussion**

12. Initially, there was some objection to this proposal. Some questioned the need for such an authorisation in the first place, arguing that the current cadre of FI(B)s is sufficient to support the needs of the balloon community and therefore take-up of both candidates seeking this authorisation as well as BPL candidates seeking training by anyone other than FI(B)s would be quite limited.
13. Others argued that creating a new level of instructor could create confusion among BPL candidates. There should only be one category of instructors, with training delivered by them only, and any additional categories could dilute the public's perceptions of the standard of instruction.

### **Recommendation**

14. The proposal would be achieved through a combination of changes to Part-BFCL Subpart FI (discussed in the *Work Strand 2 paper: Instructor Examiner requirements*) and the following changes to BFCL.130:

#### **BFCL.130 BPL and experience requirements**

Applicants for a BPL shall complete a training course at an ATO or a DTO. The course shall be tailored to the privileges sought and shall include:

- (a) theoretical knowledge as specified in point BFCL.135(a);
- (b) at least 16 hours of flight instruction in either hot-air balloons that represent group A of that

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class, or gas balloons, including at least:

- (1) 12 hours of dual flight instruction, of which at least 4 hours and 4 flights with a FI(B), the remainder to be undertaken with an Assistant Instructor;
  - (2) 10 inflations and 20 take-offs and landings; and
  - (3) One supervised solo flight with a flight time of at least 30 minutes
15. It is necessary in sub-paragraph (b)(1) to stipulate 'with the remainder undertaken with an Assistant Instructor', if that was created, to avoid creating a loophole through which any qualified pilot could supervise the remainder of the instruction. We may need to include further detail in an AMC over the division of responsibilities between an AI(B) and a FI(B). It is not proposed to relax the requirement that solo flying must be supervised by a FI(B). See our reference to this in the Work Strand 2 paper on instructors and examiners.

***Dissenting views?***

16. There were no dissenting views from any working group member to this recommendation.

***Possible consultation question***

17. Do you agree with our approach of introducing an Assistant Instructor authorisation, and changing the minimum required number of dual instruction flights and hours to be undertaken with a FI(B) to at least 4 hours and 4 flights (instead of 12 hours)?
18. Possible answers:
- Yes
  - No, prefer Part-BFCL to remain unchanged
19. Do you have any comments?

## **B. Simplifying the licensing structure concerning hot air balloon tethered flight**

***Context/current situation***

20. Currently, Part-BFCL allows the practice of tethered flights in hot-air balloons only if the pilot has added a tethered hot-air balloon flight rating to their licence under BFCL.200. This requires the pilot to have conducted two tethered hot-air balloon instruction flights for first issue of the rating. To maintain the rating, the pilot must undertake either:
- one tethered flight every 48 months as PIC; or
  - a tethered flight dual or under solo supervision of a FI(B).

***Proposals and rationale***

21. The working group argued that the existence of a separate rating for tethering was not necessary, and better simplicity and workability could be achieved by deleting this tethered rating and embedding these requirements into the base BPL licence and training syllabus.
22. This would simplify the regulations and make it easier for a pilot to undertake tethering and maintain privileges as part of the licence.

***Issues and discussion***

23. The one issue is whether the addition of tethering to the standard BPL syllabus will add an unnecessary burden to pilots who might never practice tethering in their flying career. (This burden has existed for the ANO PPL(BA) licence and every currently held BPL includes the

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tether rating.)

**Recommendation**

24. To summarise, the working group recommends:
  - Deleting the existing tethering rating;
  - Embedding the tethering requirements into the base BPL licence.
25. This would be achieved by the following amendments:

**BFCL.200 Tethered hot-air balloon flight rating**

[Delete this section]

GM1 BFCL.200 and AMC1 BFCL.200(b)(2) would be incorporated into AMC2 BFCL.130(c) and GM1 BFCL.130(c) accordingly.

**BFCL.130 BPL – Training course and experience**

Applicants for a BPL shall complete a training course at an ATO or a DTO. The course shall be tailored to the privileges sought and shall include:

- (a) theoretical knowledge as specified in point BFCL.135(a);
- (b) at least 16 hours of flight instruction in either hot-air balloons that represent group A of that class, or gas balloons, including at least:
  - (1) 12 hours of dual flight instruction;
  - (2) 10 inflations and 20 take-offs and landings; and
  - (3) One supervised solo flight with a flight time of at least 30 minutes.

(c) in the case of hot-air balloons, at least two tethered flights under instruction, with the final tethered flight supervised by a FI(B) and signed off as satisfactory.

26. There would be an additional consequential amendment to BFCL.315 to remove reference to the tethered flight rating:

**BFCL.315 FI(B) certificate – Privileges and conditions**

(a) Subject to compliance of applicants with point BFCL.320 and with the following conditions, an FI(B) certificate shall be issued with privileges to conduct flight instruction for:

- (1) a BPL;
- (2) the extension of privileges to further classes and groups of balloons provided that the applicant has completed at least 15 hours of flight time as PIC in each relevant class;
- (3) a night rating or a tethered flight rating or a commercial operation rating, provided that the applicant has received specific training in providing instruction for the relevant rating at an ATO or at a DTO; and...

**Dissenting views?**

[Any WG member who feels the recommendation as drafted above does not represent their viewpoint, please give specific reasons here]

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**Possible consultation question**

27. Do you agree with our approach of deleting the existing tethering rating from the licensing regulations and instead embedding tethering into the base BPL licence requirements?
28. Possible answers:
- Yes
  - No, prefer Part-BFCL to remain unchanged
29. Do you have any comments?

**C. Recency requirements for additional classes of balloons****Context/current situation**

30. Currently, if a pilot is qualified to fly more than one class of balloon, Part-BFCL requires the pilot to have completed at least three hours of flight time on each additional balloon class within the last 24 months (in order to exercise privileges in that additional class).

**Proposals and rationale**

31. The working group discussed this in relation to gas balloons and hot-air airships classes. It was suggested that this could be achieved by adjusting the requirement to be three flights or three hours of flight time in the additional class. There was agreement within the group for this proposal.
32. A secondary suggestion was to adjust the period of time in which the flights must be done, extending this from 24 months to 48 months. The group did not reach a decision regarding this point.
33. This change would provide routes to maintenance of recency appropriate for disparate classes, where flights may be of short duration (hot-air airship) or long duration (gas balloon).

**Issues and discussion**

34. The group had received information that for hot-air airships, three hours of flight time in 24 months may be difficult to achieve. Some in the group that hold a gas balloon rating felt that for gas balloons, the three hours would normally be achievable, although adjusting this to allow for three flights or three hours would give additional flexibility, while maintaining a recency requirement for additional classes.
35. The group discussed the suggestion of extending the period of time in which the flights must be done from 24 months to 48 months. It was noted that the period for the hours / flight based recency for the primary class (hot air) recency (BFCL.160(a)(1)(i)) is 24 months, so retaining 24 months for additional classes is consistent.
36. The group also discussed the possibility of removing the requirement altogether, but it was felt that some form of requirement is required due to the differences in aircraft between classes.

**Recommendation**

37. To summarise, the working group recommends:
- Adjusting the requirement in BFCL.160(b) to be three flights or three hours of flight time.
38. This would be achieved by the following amendments:

**BFCL.160 BPL – Recency requirements**

(b) In addition to the requirements in paragraph (a), in the case of a pilot who is qualified to fly more than one class of balloons, in order to exercise his or her privileges in the other balloon class or the other balloon classes, he or she shall have completed at least **three flights or**

three hours of flight time, as PIC or flying dual or solo under the supervision of an FI(B), on each additional balloon class within the last 24 months.

***Dissenting views?***

39. A group member was uncertain how practical “within 24 months” would be in relation to hot air airships and would suggest 48 months.

***Possible consultation question***

40. Do you agree with our approach of adjusting the existing recency requirements for additional classes in the base BPL licence requirements?
41. Possible answers:
- Yes
  - No, prefer Part-BFCL to remain unchanged
42. Do you have any comments?