

## 1. BACKGROUND TO PROPOSED POLICY CHANGE

The requirements for microlight pilot licensing in Ireland are detailed in IAA Aeronautical Notice P.17 and for Acceptance of Flight Crew Licences in IAA AIC14/04.

The National Microlight Association of Ireland (NMAI) has made a number of representations to the IAA in 2009 that the licensing requirements in Ireland are over-restrictive, more restrictive than our nearest neighbour, the United Kingdom (UK), and that these restrictions are preventing the growth of microlight flying in Ireland.

The IAA has performed a comparative safety analysis of accident and serious incidents reported between Ireland and UK and concluded that accident and incident rates are comparable in both countries despite differing licensing requirements. In other words, the more restrictive IAA requirements are not leading to a greater level of safety in microlight flying in Ireland when compared to the UK.

With regard to the acceptance of flight crew licences from another jurisdiction presented for validation, a recent review of aviation related complaints and incidents has identified that a lack of knowledge of Irish aviation legislation was a major contributing factor in many instances.

## 2. CONSULTATION

If you wish to make a comment on this proposal please submit them to the IAA using the following contact details:

By e-mail to: [john.steel@iaa.ie](mailto:john.steel@iaa.ie)  
By post to: Captain John D. Steel  
Manager General Aviation Standards  
Flight Operations Department  
Aviation House  
Hawkins Street,  
Dublin 2.

Closing date for comments: Monday 8<sup>th</sup> March 2010

## 3. DESCRIPTION OF PROPOSED CHANGES

The current requirements for the issue of a microlight licence are detailed in Aeronautical Notice P.17 as follows:

### 2. Pilot Licence Ratings and Validity Periods

2.1 The pilot licence ratings for single-engine piston (SEP) microlight aeroplanes are as follows:-


- 2.1.1 three-axis SEP microlight (land);
- 2.1.2 weightshift flex wing SEP microlight (land); and
- 2.1.3 powered-parachute SEP microlight (land).

2.2 The ratings in paragraph 2.1 may be varied to include microlight seaplanes and flying boats. Pilot licences valid for microlight amphibians shall include both land and sea ratings for the relevant microlight aeroplane.

2.3 Microlight aeroplane ratings are valid for two years from the date of issue, or from the date of expiry if revalidated within the validity period. They shall be subject to revalidation in accordance with the requirements of sub-paragraph 7.1 of this Direction or renewal in accordance with the requirements of sub-paragraph 7.2 of this Direction.

2.4 Type Ratings may be issued, as appropriate, for microlight aeroplanes having more than one engine and for microlight aeroplanes with turbojet or turboprop propulsion or with hybrid flight control systems. Such Type Ratings will have such maximum validity period and shall be subject to such revalidation or renewal requirements as are prescribed by the Authority in the particular case.

2.5 FI(M) ratings will have a maximum validity period of 3 years and shall be subject to revalidation or renewal in accordance with requirements of sub-paragraph 7.3 of this Direction.

 <p>ÚDARÁS EITLIÓCHTA NA HÉIREANN IRISH AVIATION AUTHORITY</p>	<p>Version No. 01 Issue Date: 30/09/2009 Form No. SRD.F.203</p>	<p><b>REQUEST FOR COMMENT POLICY CHANGE</b></p>
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### 3. Age Limits

3.1 Article 38 of the Irish Aviation Authority (Personnel Licensing) Order, 2000, (S.I. No. 333 of 2000) shall apply to the applicant for a Student Pilot Licence or Private Pilot Licence for microlight aeroplanes.

3.2 An applicant for an FI(M) (Restricted Privileges) or an FI(M) shall be not less than 18 years of age.

### 4. Medical Requirements

An Applicant for a Student Pilot Licence or Private Pilot Licence for microlight aeroplanes shall hold a Class 2 Medical Certificate, issued in accordance with Article 39 of the Irish Aviation Authority (Personnel Licensing) Order, 2000, (S.I. No. 333 of 2000) and the requirements of JAR-FCL Part 3 (Medical).

### 5. Technical Requirements

Technical requirements for microlight pilot licences and associated aircraft or FI(M) ratings and for skill tests for the issue of such licences / ratings are contained in sub-paragraphs 5.1 to 5.4 of this Direction, as follows-

5.1 An applicant for a PPL(M) shall have completed –

- (a) at least 40 hours flight time as a pilot of microlight aeroplanes of the relevant class or type, including at least 25 hours dual instruction and at least 10 hours supervised solo flight time of which at least five hours shall be solo cross-country flight time; and,
- (b) a successful examination in the knowledge requirements for issue of a PPL(M) and for the microlight aeroplane class or type rating applied for; and
- (c) the required radiotelephony training to pass the skill test for the Flight Radiotelephony Rating (Restricted).

5.4 An applicant for a microlight aeroplane rating shall have received the required dual flight instruction in the relevant class or type from a duly authorised FI(M) and shall have passed the appropriate knowledge and skill tests in the format issued by the Authority pursuant to this Direction.

**The IAA propose to make the following changes:**

#### Change 1

At items 2.1.1; 2.1.2, 2.1.3 re-classify microlight licence ratings to Three Axis SEP Microlight (Land) and Weightshift Flex Wing SEP (Land). Powered-parachute SEP Microlight (Land) ratings would be dealt with by the introduction of a separate Aeronautical Notice covering the operation of foot launched parachutes. The notice will then state:

2.1 The pilot licence ratings for single-engine piston (SEP) microlight aeroplanes are as follows:-

2.1.1 three-axis SEP microlight (Land); **and**

2.1.2 weightshift flex wing SEP microlight (Land); ~~and~~

~~2.1.3 powered-parachute SEP microlight (land).~~

#### Change 2

Reduce the hours requirement to a minimum of 30 hours flight time of which at least 20 hours shall be dual instruction. The Notice will then state:

5.1 An applicant for a PPL(M) shall have completed –

- (a) at least ~~40~~ **30** hours flight time as a pilot of microlight aeroplanes of the relevant class or type, including at least ~~25~~ **20** hours dual instruction and at least 10 hours supervised solo flight time of which at least five hours shall be solo cross-country flight time;

#### Change 3

At item 5.4 the requirement to pass appropriate theoretical knowledge examinations will be revised to include examinations based on a syllabus appropriate to the operation of microlight aeroplanes. The notice will then state:

5.4 An applicant for a microlight aeroplane rating shall have received the required dual flight instruction in the relevant class or type from a duly authorised FI(M) and shall have passed the appropriate **theoretical knowledge examinations based on a syllabus appropriate to the operation of microlight aeroplanes** and skill tests in the format issued by the Authority pursuant to this Direction.

#### Change 4

it is the intention of the IAA to form a dedicated Panel of Examiners to cater for the increasing number of requests for initial skill tests for microlight operations.

The current requirements for the validation of a Private Pilot Licence (Microlight), not issued in accordance with ICAO Annex 1 are based on the guidance given in AAA AIC 11/04 as follows:

#### **4. PROCEDURES FOR VALIDATION OF A PRIVATE PILOT LICENCE, NOT ISSUED IN ACCORDANCE WITH ICAO ANNEX 1, AND FOR ACCEPTANCE OF OTHER SPORT AVIATION QUALIFICATIONS**

##### **4.1 Private Pilot Licences (Three-Axis, Weight-Shift or Powered-Parachute Microlights and Rotorcraft-Gyroplanes)**

The holder of a PPL (Microlight or Gyroplane), not issued in accordance with Annex 1 and restricted to operation of microlight or gyroplane category aircraft, may exercise the privileges of such PPL within the State under a Certificate of Validation (period not exceeding 12 months or such shorter period as the Authority deems fit), provided that the applicant:-

- (1) submits to the Authority a completed application form with the required documentary evidence;
- (2) holds or obtains an ICAO Annex 1 or JAR-FCL Class 1 or 2 Medical Certificate;
- (3) has not less than 50 hours total flight experience as pilot of the relevant aircraft class, including at least 25 hours dual instruction and 10 hours PIC time including not less than 5 hours PIC cross-country time; and
- (4) holds a Radio Telephony (Restricted) Rating endorsed on the licence submitted, or a separate Radio Telephony Licence, entitling the holder to use VHF radio-telephony communication equipment, in the English language.

##### **4.3 Sport Aviation Qualifications (e.g. Foot-Launched Powered Flying Machines)**

The holder of a sport aviation qualification, not issued in accordance with ICAO Annex 1 (Personnel Licensing), may exercise the privileges of such qualification within the State subject to an Exemption being issued for a period not exceeding 12 months (or such shorter period as the Authority deems fit).

An applicant for an Exemption shall:-

- (1) submit to the Authority a completed Exemption application form and the required documentary evidence;
- (2) hold or obtain an ICAO Annex 1 or JAR-FCL Class 1 or 2 Medical Certificate;
- (3) submit satisfactory evidence to the Authority of approved or accepted training completed in any State or completed with an aviation association holding a recognition from any State; and
- (4) hold a Radio Telephony (Restricted) Rating or hold a separate Radio Telephony Licence, entitling the holder to use VHF radio-telephony communications equipment, in the English language if flight inside controlled airspace is required - for which authorisation or permission will only be granted in exceptional circumstances.

##### **4.4 Requirement to hold Radio-Telephony (Restricted) Rating**

A PPL holder should note that flight in controlled airspace in Ireland requires that the licence contains, at least, a Radio Telephony (Restricted) Rating or that a separate Radio Telephony Licence is held, entitling the licence holder to use VHF radio-telephony communications equipment, in the English language.

**The IAA propose to make the following changes:**

#### Change 5

Introduce a formal requirement for an applicant to demonstrate an adequate knowledge of Irish Aviation Legislation. It is proposed that this be achieved at the time of application, when an applicant will be provided with a written summary of the differences in Irish Air Law identified by the IAA. Once the applicant has made him/herself aware of the differences they will then be required to sign an attestation stating that they are satisfied with their knowledge of Irish Air Law. Item 4.1 (1) will then state:

- (1) submits to the Authority a completed application form with the required documentary evidence, ***including an attestation that they have read and are satisfied with their knowledge of Irish Air Law***

Change 6

In accordance with the current guidance a validation would be issued for a period not exceeding 12 months or such shorter period as the Authority deemed fit. This would be amended to include that a validation would only be issued for two consecutive years, should an applicant wish to continue to fly beyond the two year period then they would need to convert their NPPL(M) to an Irish issued PPL(M). Item 4.1 will then state:

The holder of a PPL (Microlight or Gyroplane), not issued in accordance with Annex 1 and restricted to operation of microlight or gyroplane category aircraft, may exercise the privileges of such PPL within the State under a Certificate of Validation (*initial validation period will be for a period* not exceeding 12 months or such shorter period as the Authority deems fit. An applicant may apply for a further validation, however, only two such validations shall be approved over a period of two consecutive years).

Change 7

The IAA is currently evaluating the possibility of issuing a Short Term Validation which would allow an applicant to operate within the State for the purpose of attending Fly-Ins, etc. The requirement for an Irish Air Law attestation would also apply to such validations. New text will be added which shall state:

*The holder of a PPL (Microlight or Gyroplane), not issued in accordance with Annex 1 and restricted to operation of microlight or gyroplane category aircraft, may exercise the privileges of such PPL within the State under a Certificate of Validation for a period not exceeding two weeks by submitting an application with the following details*

Change 8

In all instances requests for validation will be at the behest of the Authority and validations may be refused if the authority has been notified or given evidence that the applicant has not complied with Irish Air Law.

**4. ASSESMENT OF OPTIONS**

4.1	<p><b>No change to existing requirements.</b></p> <p>No safety impact to Irish registered fleet and pilots.</p>
4.2	<p><b>Make changes as outlined above.</b></p> <p>No safety impact has been identified.</p> <p>Although it is proposed to reduce the minimum hours requirement, the comparative analysis with the UK indicates that there will be no related increase in accidents and incidents. In addition, analysis of PPL(M) licences issued in the last year indicate that the average number of hours completed prior to a licence being issued was in excess of 55 hours. Reducing the minimum number of hours for the issue of a PPL(M) is not anticipated to impact on the actual hours it takes for a pilot to attain a satisfactory standard for testing.</p>
4.3	<p><b>Introduce PPL(M) licensing requirements identical to UK.</b></p> <p>A Safety Impact cannot be completed at this time due to a lack of required data. However, the IAA intends to continue a trend monitoring comparison with the UK and may carry out a further review at a later date.</p>

**5. CONCLUSION**

The IAA believe the most appropriate licensing requirements for microlight aeroplanes in Ireland at this time are those outlined in section 3 above.

The IAA welcome your comments on the proposed changes and these comments will be reviewed by the IAA prior to any change being introduced.