

Consultation: Pilot Medical Declaration (PMD) review

CAP 2408

Published by the Civil Aviation Authority, 2022

Civil Aviation Authority
Aviation House
Beehive Ring Road
Crawley
West Sussex
RH6 0YR

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Chapter 1

Introduction

- 1.1 [CAP1284](#) (Public consultation: UK Private Pilot Licence and National Private Pilot Licence Medical Requirements) was released in June 2015 and resulted in 1,823 responses; one of the largest responses to a consultation we have ever seen.
- 1.2 The response document published to this was [CAP1397](#) (Comment Response Document: UK Private Pilot Licence and National Private Pilot Licence medical requirements) which goes into some detail on the areas the CAA wanted to take forward and implement. This document was published in May 2016.
- 1.3 Pilot Medical Declarations (PMD) were launched in October 2016. Subsequent to the launch, following further community feedback, a number of modifications were made to the PMD system and guidance. This included the alternative criteria for a less than 2000kg category. To date we have had over 14,000 PMD's submitted.
- 1.4 Following a post implementation review in October 2020, by our internal audit team, of the PMD process, the audit team summarised the review and proposed 3 options based on what they found.
 - Option 1: Make no material changes to the PMD process
 - Option 2: Strengthen the PMD process by means of amendment
 - Option 3: Remove the PMD scheme
- 1.5 Based on the findings of the audit and the highlighted risks, we did not feel option 1 was the best course of action. A project was launched to review the whole PMD process and the basic data we hold for PMD holders. From the initial findings which are highlighted in 1.7 and 1.8 below, we felt that option 3 was also not the best course of action based on the finding that the vast majority of PMD holders are declaring correctly. We therefore believe that option 2 would be the best direction to go in.
- 1.6 In November 2020, we also released a consultation on UK General Aviation (GA) opportunities for change now that the UK has left EASA ([CAP 1985](#)), followed by the UK General Aviation opportunities after leaving EASA Comment Response Document ([CAP 2146](#)) in April 2021. This resulted in 46 initiatives that we wanted to take forward. One of those being a review of the PMD process in order to enhance the end user experience and identify opportunities in the context of the simplification and rationalisation of GA flight crew licensing.

- 1.7 We have currently reviewed 800 out of 14400 PMD holders. We looked at around 400 pilots who had previously had a medical status of unfit or had a medical referred. We also looked at another sample of 400 pilots who had no previous unfit or referred status.
- 1.8 We have found 4% of the 800 PMD holders that we reviewed should not be self-declaring for various reasons. If this percentage represents the whole number of PMD holders, the number made in error is of concern to the CAA. These errors included disqualifying heart conditions, neurological conditions and drug/alcohol misuse. It is not clear to us whether this is due to unclear guidance material or a misunderstanding on the pilot's part.
- 1.9 As part of the project based on our findings above, our next step is to revisit the questions originally asked as part of the consultation prior to the launch of PMD. As such we have released this consultation paper. The responses provided will provide us with guidance for the development of the PMD process and whether any changes need to be made

How to respond and next steps

How to respond

- 1.10 We would welcome your views on the questions that were originally asked in the consultation prior to implementation. A full list of the consultation questions can be found in Chapter 3.
- 1.11 Responses to this consultation can be submitted via our [online consultation](#) by no later than 5 December 2022.
- 1.12 Any enquiries regarding this consultation should be submitted via email to gaconsultations@caa.co.uk.

Next steps

- 1.13 We will review all the comments received following the closure of this consultation. Based on these comments, we will consider any need to amend the direction of the PMD review project and will issue a Comment Response Document (CRD) outlining the decision. A summary of the comments received will be provided in the CRD.

Chapter 2

Current Pilot Medical Declaration regulations

- 2.1 Current regulations within the ANO that apply to Pilot Medical Declarations can be found in Article 163 (Appendix 1)
- 2.2 Current guidance is also found on our website (Appendix 2)
- 2.3 Current exemptions ORS 4 No. 1542 and ORS 4 No. 1543 are in place to allow for the difference in criteria for the sub 2000kg weight category (Appendix 3).

Chapter 3

Consultation questions

3.1 We are now seeking feedback from stakeholders on the following questions which were asked in the original consultation. Some of the questions have been updated due to Pilot Medical Declarations being active. Some questions have also been removed. We welcome your responses to the questions below via the online consultation tool. The overall feedback from these questions will help determine our next steps.

3.2

Question 1

What medical do you currently hold?

Class 1 Class 2 Class 3 LAPL PMD None

Question 2

What age group do you belong to?

0-20 21-30 31-40 41-50 51-60 61-70 71-80
81-90 91+ Prefer not to answer

Question 3

Do you believe that private pilots do not generally take part in recreational flying if they feel unwell?

YES SOMETIMES NO NO OPINION/DON'T KNOW

Question 4

Do you believe that private pilots who develop medical conditions that disqualify them from PMD and that may affect flight safety are likely to consult with their GP/AME prior to flying?

GP AME NO CONSULT NO OPINION/DON'T KNOW

Question 5

What do you believe is the probability of a private pilot becoming incapacitated during a flight?

1 2 3 4 5

Question 6

Do you feel that the PMD contributes to flight safety and is proportionate to the risk involved in recreational flying?

YES

NO

NO OPINION/DON'T KNOW

Question 7

To minimise the risk of private pilots not being fit to fly (through illness or degeneration of senses) do you believe that we should require private pilots to self-certify themselves more regularly than what is currently in place?

YES

NO

NO OPINION/DON'T KNOW

Question 8

Based on the evidence presented in the original consultation, or other evidence which you can reference, do you believe the current age at which you redeclare, should remain at 70?

If you believe the age at which you redeclare should change, what do you think the new age should be? Please give an exact figure and rationale

YES

NO

NO OPINION/DON'T KNOW

New age should be:

Question 9

Do you believe that private pilots who have a history of significant psychiatric condition (i.e. that requires medication) should still have to be assessed by their GP/AME rather than use a self-certification system?

YES

NO

NO OPINION/DON'T KNOW

Reasons:

Question 10

Do you believe that the current restriction of 3 passengers that a pilot may carry whilst flying with a PMD is acceptable? If no, what do you believe the number of passengers should be?

YES

NO

NO OPINION/DON'T KNOW

Number of passengers:

Rationale:

Question 11

Do you believe that private pilots taking advantage of our PMD, should have to fly with a safety pilot or with no passengers?

YES

NO

NO OPINION/DON'T KNOW

Question 12

Do you believe that the current medical criteria of 2000kg and 5700kg weight categories should remain in place?

YES

NO

NO OPINION/DON'T KNOW

Question 13

Are you aware of the disqualifying conditions for the PMD, dependant on weight category declared for, or are you aware of where to find the information?

YES

NO

NO OPINION/DON'T KNOW

Comments:

Question 14

Do you have any other specific comments which you would like to be considered as part of this consultation?

YES

NO

NO OPINION/DON'T KNOW

Chapter 4

Appendices

Appendix	Location
Appendix 1	The Air Navigation Order 2016 (legislation.gov.uk)
Appendix 2	Medical requirements for private pilots - LAPL Civil Aviation Authority (caa.co.uk)
Appendix 3	ORS4 No. 1542 (caa.co.uk) & ORS4 No. 1543 (caa.co.uk)