

BCAR Section L (CAP468) – Outline of changes to the document and rationale

British Civil Airworthiness Requirements, Section L, Licensing - Aircraft Maintenance Engineers, was last amended in February 2003 (Issue 15) and is no longer fit for purpose in the current regulatory framework. At that time, the regulatory requirements in the UK were based on the Air Navigation Order 1995 and any adopted Joint Aviation Authorities (JAA) requirements, such as JAR-66, JAR-145 and JAR-147.

For engineering licensing, the applicability of BCAR Section L was limited to aeroplanes and helicopters of 5700 kg Maximum Take Off Mass (MTOM) and below, with JAR-66 being applicable to aeroplanes and helicopters above that weight. This included the training and examination standards of JAR-147 and JAR-66.

At that time, there was a transition process whereby holders of BCAR Section L licences that had type ratings for aircraft above 5700 kg MTOM were issued with a JAR-66 licence on application or renewal.

In September 2003, the UK regulatory framework changed with the introduction of the European Aviation Safety Agency (EASA), whereby responsibility for aviation regulations for aircraft within the scope of the European Council and Commission Regulations transferred to the European Union (EU) and EASA. Included in these new regulations was Part 66, replacing JAR-66 and bringing in aircraft below 5700 kg MTOM that were previously not included in JAR-66, and excluding others that were above 5700 kg MTOM. A transition period was given for Member States to convert their national engineering licencing system for applicable aircraft, to EASA Part 66. This resulted in the majority of BCAR Section L licences being replaced with Part 66 licences.

In the 23 years since BCAR Section L was last amended, the aviation regulatory framework in the UK has changed considerably, with some aircraft being regulated under the UK Regulation (EU) 2018/1139 (UK Basic Regulation), and the remaining aircraft being regulated under the Air Navigation Order 2016 (ANO). Aircraft regulated under the UK Basic Regulation and associated implementing regulations are termed 'Part 21 aircraft', and those regulated under the ANO are termed 'non-Part 21 aircraft'.

The current UK framework for engineering licensing is that UK Part 66 is applicable to Part-21 aircraft, and BCAR Section L is applicable to non-Part 21 aircraft, and this is not reflected in the current issue of BCAR Section L. One of the main differences that needed to be addressed in this revision of BCAR Section L is that unlike JAR-66, there is no weight limit in Part 66 and the applicability is based on the criteria detailed in Article 2 of the UK Basic Regulation.

Due to the relatively low number of non-Part 21 aircraft that are eligible to hold a Certificate of Airworthiness (CofA) and hence certified under a BCAR licence or company authorisation issued by a BCAR maintenance organisation, and the low

number of applicants for BCAR Section L licences, a decision was taken in 2008 to no longer maintain the database for written licensing exams under BCARs. Today, all UK CAA engineer licensing written examinations for the issue of basic licences is to the UK Part 66 standard. As a result, the mechanism by which engineers can apply for a BCAR Section L licence is currently not transparent. This issue of BCAR Section L has been revised to provide clarity on the pathway for engineers to gain a BCAR Section L licence.

As the CAA no longer maintains a database for exam questions under BCAR Section L, all reference to BCAR basic licence examinations has been removed. The pre-requisite for gaining a BCAR Section L licence is that the applicant must first hold a UK Part 66 licence in the appropriate category or sub-category. A table has been introduced in Appendix 3, which outlines applicable UK Part 66 licence without type rating (LWTR) required for each BCAR Section L LWTR.

Because there are no certification privileges granted as part of a LWTR, applications for BCAR Section L licences will only be accepted if an application for a type rating is made at the same time. Type ratings will be granted on the basis of an application demonstrating acceptable experience on the non-Part 21 aircraft type or group being applied for and passing an oral exam. For the first type rating, the oral exam will include aircraft legislation applicable to non-Part 21 aircraft, e.g. the Air Navigation Order 2016 and associated documents (Including CAP468, CAP562, Leaflets H-20 and H-30).

We have not provided any visible tracked changes within the CAP 468 document as part of this consultation. This is due to a comprehensive revision of the text.

Below is a list of the proposed amendments to BCAR Section L in this issue:

- Revising the Forword section and changing the applicability to non-Part 21 aircraft.
- Revising the section on licences and categories, including reference to the requirement to hold UK Part 66 LWTR in the appropriate category or sub-category, updating regulatory references.
- Bringing the validity of licence in line with UK Part 66.
- Revising the section on application for the grant or extension of a licence, including links to forms, removing reference to Airworthiness Notice 10 and replacing with Civil Aircraft Airworthiness Information and Procedures (CAAIP, CAP 562) , Aircraft Maintenance Engineers Licences – Type Ratings Under BCAR Section L (Leaflet H-30, CAP 562), throughout the document, updating type rating paragraphs and other typographical corrections.
- Updating the licence renewal section in line with the requirements for UK Part 66.

- Revising the examination section in line with the above changes.
- Revising the Appendix 1 to CAP 468 for the oral exam syllabus by removing the reference to the knowledge level for LWTR, making it only applicable to the knowledge level requirements for type ratings, adding back Module 5 for pressurised aeroplanes exceeding 5700kg MTOM (which was removed under JAR 66), and the knowledge level requirements for a Type Rating in modules 30, 31 and 32.
- Revising Appendix 1 to CAP 468, Table 1 to show which modules are applicable to type ratings in all LWTR categories.
- The requirement to retake examinations for licences that have expired for greater than 24 months has been removed, however applicants will be required to show 6 months experience on operating non-Part 21 aircraft in the last 24 months in order to have their licence reissued.
- The Ground Proximity Warning System (GPWS) endorsement under licence Category R Radio has been deleted as there are no current licence holders with this endorsement and GPWS is covered under licence Category X Instruments.
- Appendix 2 to CAP468, items of work required for completing the type rating record of experience for application for type / group ratings. This was previously included Appendix 6 to CAP 468.
- Revision to Appendix 3 to CAP 468, previously showing specimen examination questions, to incorporate a table showing a cross reference between UK Part 66 LWTR and BCAR LWTR categories and sub-categories.
- In Appendix 4 to CAP 468, the example of a completed application form has been replaced with a table detailing a list of applicable LWTR and type rating categories and sub-categories.
- In Appendix 4 to CAP 468, the addition of new type rating paragraphs that align with the weight limitations associated with Part 66 B3 and L2 (B3 aeroplanes of 2000 kg MTOM and below, and L2 aeroplanes of 1200kg MTOM and below).
- Appendix 5 to CAP 468, covering type training, the training needs analysis has now been deleted.

To align the changes made to BCAR Section L (CAP 468), Leaflets H-20 and H-30 (CAP 562) have been updated, as reflected by the underlined text.

Leaflet H-20 is updated to reflect the responsibilities of holders of Part 66 and Part 66 category L licence holders, as well as updating the responsibilities for other categories and sub-categories.

The amendment to Leaflet H-30 removes the aircraft types eligible for aircraft type ratings that now come under UK Part 66, and updated paragraphs to reflect the aircraft types that are only eligible for a type rating under the applicable paragraph of Section L. New type rating paragraphs for aircraft 2000 kg MTOM and below, and 1200 kg MTOM and below have been added.

Clarification has also been added to the applicability of BCAR and Part 66 licences with respect to the issue of authorisations within approved organisations.

Paragraphs 14.6 and 15.5, which may have caused confusion about the privileges of Part 66 licence holders in respect to non-Part 21 under the ANO aircraft, have been deleted.