



AMROBA™
Safety All Around

RECREATIONAL & PRIVATE PILOT MEDICAL CERTIFICATION

REFORM PROPOSAL 2022

AUSTRALIAN GENERAL AVIATION ALLIANCE

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CONTENTS

About the Australian General Aviation Alliance	Page 3
Introduction	Page 4
Table 1: AGAA Proposed Medical Certification Standards	Page 5
Table 2: AGAA Proposed Standards versus Existing Australian Standards	Page 6
Table 3: AGAA Proposed Standards versus New Zealand, United Kingdom & United States of America	Page 7
CASA Public Consultation Questionnaire:	
Question 1: Medical Certification Structure	Page 9
Question 2: Medical Certification Structure	Page 10
Question 3: Medical Certification Structure	Page 11
Question 4: Expanding DAME Delegations	Page 12
Question 5: Self-Declared Medicals for Private Pilots	Page 13
Question 6: Self-Declared Medicals for Private Pilots	Page 14
Question 7: Standards for DRONE Pilots	Page 15
Question 8: Flight Instructors in Sport & Recreational Aviation	Page 16
Question 9: Modernising the Rules	Page 17
Question 10: Final Feedback	Page 18
Source References	Page 19



ABOUT THE AGAA

The Australian General Aviation Alliance was formed in 2017 to promote and protect our freedom to fly.

Founded by the Aircraft Owners and Pilots Association of Australia, the Sport Aircraft Association of Australia and the Aircraft Maintenance Repair Overhaul Business Association, the AGAA brings together aviation peak-bodies and member representative organisations to advocate for safe and positive improvements to Australia's aviation regulatory frameworks.

The AGAA is the largest collective representative body for general aviation in Australia, with members including:

- Aircraft Owners and Pilots Association of Australia
- Sport Aircraft Association of Australia
- Aircraft Maintenance Repair Overhaul Business Association
- Gliding Federation of Australia
- Sports Aviation Federation of Australia
- Cessna 182 Association
- Cessna 200 Association
- Cirrus Owner Pilots Association
- Australian Beech Society
- Australian Mooney Pilots Association
- International Comanche Society Australasia
- Lancair Owner Builders Organisation
- RV Association of Australia
- Experimental Light Aircraft Association of Australia
- Victa Airtourer Association
- Colour Vision Deficient Pilots Association
- Regional Airport Users Action Group
- Your Central Coast Airport
- Aero Clubs Nationwide

In total, the AGAA represents the direct interests of over 25,000 members nationwide, including:

- Recreational, Sport, Experimental, Amateur-built, Certified General Aviation, Helicopter, Warbird and Gyro Aircraft Owners
- Recreational, Private and Commercial Pilots
- Licenced Aircraft Maintenance Engineers and Aircraft Maintenance Engineers
- Recreational and General Aviation Flying Schools
- General Aviation Charter Businesses and Business/Corporate Aviation
- Aircraft Maintenance Business and MRO's
- Aero Clubs and Community Flying Groups
- Local Government and Community Airport Owners and Operators
- Aviation Professionals

For more information regarding the Australian General Aviation Alliance, please visit: <http://www.agaa.org.au>



AGAA PROPOSAL

The Australian General Aviation Alliance (AGAA) is seeking the introduction of new self-declaration pilot medical certification standard (detailed in Table 1 of this document) for Recreational Pilot License and Private Pilot License holders, along with key reforms to existing Civil Aviation Safety Authority (CASA) Class 2 Basic and Class 2 certification standards to safely unlock general aviation participation and growth.

The reforms that AGAA is seeking, have been implemented by aviation safety regulators in the United States of America (US) and the United Kingdom (UK), and across the past five (5) years have proven to be a safe method of pilot medical certification. Both regulators based their reforms on the use of conditional private vehicle motor car license medical standard, with options for both self-declaration and General Practitioner assessment certification.

In the US, the FAA BasicMed pilot medical certification is widely regarded as one of the most successful aviation regulatory reforms in modern history, with over 66,000 pilots now accessing flying through this standard, with no demonstrated negative impact on aviation safety. The UK reforms mirror the success of those delivered in the US and have opened up their local general aviation industry to growth.

In summary, recreational/private pilots in both the US and UK who use either a self-declaration or General Practitioner assessed medical certification standards;

- a. must meet the medical fitness requirements of the 'conditional' private motor vehicle license standard
- b. can fly both single and multi-engine aircraft
- c. can fly aircraft weighing up to 5700 kg
- d. can participate in both VFR and IFR operations
- e. can carry up to a maximum of six (6) passengers
- f. can participate in aerobatic flight

The US now has in excess of 66,000 private pilots accessing aviation through BasicMed, with pilots participating in VFR and IFR operations in aircraft ranging between recreational light sport, experimental/amateur-built, general aviation certified singles and twins, helicopters, gyrocopters, warbirds and more.

AGAA regards both the introduction of a new self-declaration pilot medical certification standard and the reform of the CASA Basic Class 2 standard as a powerful gateway for the industry to sustain itself, reducing the regulatory burdens and costs currently imposed on the private general aviation sectors. Such reform would make aviation more accessible nationwide, with strong benefits to pilots and aviation users throughout regional Australia, driving growth back into Australia's ailing general aviation sectors.

Importantly, the introduction of a new self-declaration pilot medical certification standard and a reformed Basic Class 2 medical certification by CASA would deliver safe deregulation that is in alignment with the Minister's Statement of Expectations and the Government's broader deregulation agenda.

Sincerely,

MR BENJAMIN MORGAN

Chairman - Australian General Aviation Alliance

Chief Executive – Aircraft Owners and Pilots Association of Australia

C/O Aircraft Owners and Pilots Association of Australia

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TABLE 1: AGAA Proposed Medical Certification Standards

Proposed Class 4 (Reformed CASA Basic Class 2) and Proposed Class 5 (NEW Self-Declaration)

	AGAA PROPOSED – CLASS 4 MEDICAL REFORMED CASA BASIC CLASS 2 (BASED ON US FAA BASIC MED – GP ASSESSED)	AGAA PROPOSED – CLASS 5 MEDICAL NEW SELF-DECLARATION STANDARD (BASED ON UK CAA – PILOT MEDICAL DECLARATION)
Operation	Private	Private
Flight Rules	VFR and IFR (including NVFR)	VFR and IFR (including NVFR)
Aircraft Type	Single & Multi-Engine Piston & Turbines	Single & Multi-Engine Piston & Turbines
Aircraft Size	Pilot + 5 Pax (6)	Pilot + 3 Pax (4)
Aircraft MTOW	Up to 5700 kg	Up to 5700 kg
Controlled Airspace	Yes	Yes
Licence	Student Pilot, RPL and PPL	Student Pilot, RPL and PPL
Examination or Self-Declared	GP or DAME Examination	Self-Declared
Validity Period	4 Years	Under 70 – Indefinite Over 70 – 3 years
Medical Requirement	Private Driver's Licence Meets the medical fitness requirements to hold a 'Conditional' AUSTRROADS Private Driver's License.	Private Driver's Licence Holds a valid Private Driver's Licence and Meets the medical fitness requirements of the 'Conditional' AUSTRROADS Private Driver's License standards.
Briefing Requirements	None	None
Altitude Limitations	No Limitation	No Limitation
Aerobatics	Yes	Yes

TABLE 2: AGAA Proposed Standards versus Existing Australian Standards

AGAA Proposed Class 4 & 5, Existing Recreational Aviation Australia, Gliding Australia & Civil Aviation Safety Authority

	AGAA PROPOSED CASA BASIC CLASS 2 (CLASS 4)	AGAA PROPOSED CASA SELF-DECLARATION (CLASS 5)	EXISTING Recreational Aviation Australia	EXISTING Gliding Australia	EXISTING CASA Basic Class 2	EXISTING CASA Class 2
Operation	Private	Private	Private	Private	Private	Private & Limited Commercial Aerial Ag, Parachute Drop, Glider Tow, Heli Sling Loads
Flight Rules	VFR and IFR (including NVFR)	VFR and IFR (including NVFR)	VFR Day Only	VFR Day Only	VFR Day Only	VFR and IFR
Aircraft Type	Single & Multi-Engine Piston & Turbines	Single & Multi-Engine Piston & Turbines	Single Engine Piston only	GFA Registered Gliders & Motor Gliders	Single & Multi-Engine Piston & Turbines	Single & Multi-Engine Piston & Turbines
Aircraft Size	Pilot + 5 Pax (6)	Pilot + 3 Pax (4)	Pilot + 1 Pax (2)	Pilot + 1 Pax (2)	Pilot + 5 Pax (6)	No Limitation
Aircraft MTOW	Up to 5700 kg	Up to 5700 kg	Up to 760 kg	No Limit	Up to 8618 kg	Up to 8618 kg
Controlled Airspace	Yes	Yes	No	Yes	Yes	Yes
Licence	Student Pilot, RPL and PPL	Student Pilot, RPL and PPL	RPC Certificate	GFA Certificate	Student Pilot, RPL and PPL	Student Pilot, RPL and PPL
Examination or Self-Declared	GP or DAME Examination	Self-Declared	Self-Declared	Self-Declared	GP or DAME Examination	DAME Examination
Validity Period	4 Years	Under 70 – Indefinite Over 70 – 3 years	Under 75 – Indefinite Over 75 – Annually	Under 75 – Indefinite Over 75 – Annually	Less than 40 – 5 years Between 40 and 70 – 2 years Greater than 70 – annually	Less than 40 – 4 years Greater than 40 – 2 years
Medical Requirement	Private Driver's Licence Meets the medical fitness requirements to hold a 'Conditional' AUSTRROADS Private Driver's License.	Private Driver's Licence Holds a valid Private Driver's Licence	Private Driver's Licence Meets the medical fitness requirements to hold a Private Motor Vehicle Drivers Licence	Private Driver's Licence Meets the medical fitness requirements to hold a Private Motor Vehicle Drivers Licence	Commercial Driver's Licence Meets the medical fitness requirements to hold an Unconditional AUSTRROADS Commercial Driver's License	CASA AvMed Requirements
Briefing Requirements	None	None	None	None	Yes Pilot required to disclose they hold a non-standard medical certificate to passengers prior to flight.	None
Altitude Limitations	No Limitation	No Limitation	Below 10,000 ft	None	Below 10,000 ft	No Limitation
Aerobatics	Yes	Yes	No	Yes	No	Yes

TABLE 3: AGAA PROPOSED & EXISTING AUSTRALIAN, NEW ZEALAND, UNITED KINGDOM & USA

	AOPA AUSTRALIA PROPOSED CASA BASIC CLASS 2 (CLASS 4)	AOPA AUSTRALIA PROPOSED CASA SELF-DECLARATION (CLASS 5)	EXISTING Recreational Aviation Australia	EXISTING Gliding Australia	EXISTING CASA Basic CLASS 2	EXISTING CASA Class 2	EXISTING New Zealand DL9	EXISTING United Kingdom LAPL	EXISTING United Kingdom PMD	EXISTING US FAA Light Sport	EXISTING US FAA BasicMed
Operation	Private	Private	Private	Private	Private	Private & Limited Commercial	Private	Private	Private	Private	Private
Flight Rules	VFR and IFR	VFR and IFR (including NVFR)	VFR Day Only	VFR Day Only	VFR Day Only	VFR and IFR	VFR and NVFR	VFR and NVFR	VFR and IFR	VFR Day Only	VFR and IFR
Aircraft Type	Single & Multi-Engine Piston & Turbines	Single & Multi-Engine Piston & Turbines	Single Engine Piston only	GFA Registered Glders & Motor Glders	Single & Multi-Engine Piston & Turbines	Single & Multi-Engine Piston & Turbines	Single & Multi-Engine Piston & Turbines	Single or Multi-Engine Aircraft Piston & Turbines	Single or Multi-Engine Aircraft Piston only	Single Engine Light Sport Aircraft (LSA) only	Single or Multi-Engine Aircraft Piston & Turbines
Aircraft Size	Pilot + 5 Pax (6)	Pilot + 3 Pax (4)	Pilot + 1 Pax (2)	Pilot + 1 Pax (2)	Pilot + 5 Pax (6)	No Limitation	Pilot + 5 pax (6)	Pilot + 3 Pax (4)	Pilot + 3 Pax (4)	Pilot + 1 Pax (2)	Pilot + 6 Pax (7)
Aircraft MTOW	Up to 5700 kg	Up to 5700 kg	Up to 760 kg	No Limit	Up to 8618 kg	Up to 8618 kg	Up to 2730 kg	Up to 2000 kg	Up to 5700 kg	Up to 600 kg	No limitation
Controlled Airspace	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Licence	Student Pilot, RPL and PPL	Student Pilot, RPL and PPL	RPC Certificate	GFA Certificate	Student Pilot, RPL and PPL	Student Pilot, RPL and PPL	Student Pilot & PPL	Student Pilot, LAPL & PPL	Student Pilot, LAPL & PPL	Sport Pilot Certificate Broadly an equivalent to the Australian RAAUS RPC	Student Pilot & PPL
Examination or Self-Declared	GP or DAME Examination	Self-Declared	Self-Declared	Self-Declared	GP or DAME Examination	DAME Examination	GP Examination	GP or AME Examination	Self-Declared	Self-Declaration	GP or AME
Validity Period	4 Years	Under 70 – Indefinite Over 70 – 3 years	Under 75 – Indefinite Over 75 – Annually	Under 75 – Indefinite Over 75 – Annually	Less than 40 – 5 years Between 40 and 70 – 2 years Greater than 70 – annually	Less than 40 – 4 years Greater than 40 – 2 years	Less than 40 – 5 years Greater than 40 – 2 years	Less than 40 – 5 years Greater than 40 – 2 years	Less than 70 – indefinitely Greater than 70 – 3 years.	None Pilot must hold a valid driver's licence	Physical Exam – 4 Years Online Course – 2 years
Medical Requirement	Private Driver's Licence Meets the medical fitness requirements to hold a 'Conditional' AUSTRROADS Private Driver's Licence.	Private Driver's Licence Holds a valid Private Driver's Licence	Private Driver's Licence Meets the medical fitness requirements to hold a Private Motor Vehicle Drivers Licence	Private Driver's Licence Meets the medical fitness requirements to hold a Private Motor Vehicle Drivers Licence	Commercial Driver's Licence Meets the medical fitness requirements to hold an Unconditional AUSTRROADS	CASA AvMed Requirements	Commercial Driver's Licence	UK LAPL Requirements	Private Driver's Licence Meets the fitness requirements to hold a UK Group 1 (Car) private driver's licence	Private Driver's Licence Fit to hold a US private driver's licence	Private Driver's Licence Fit to hold a US private driver's licence



	AOPA AUSTRALIA PROPOSED CASA BASIC CLASS 2 (CLASS 4)	AOPA AUSTRALIA PROPOSED CASA SELF- DECLARATION (CLASS 5)	EXISTING Recreational Aviation Australia	EXISTING Gliding Australia	EXISTING CASA Basic Class 2	EXISTING CASA Class 2	EXISTING New Zealand DL9	EXISTING United Kingdom LAPL	EXISTING United Kingdom PMD	EXISTING US FAA Light Sport	EXISTING US FAA BasicMed
Briefing Requirements	None	None	None	None	Yes Pilot required to disclose they hold a non-standard medical certificate to passengers prior to flight.	None	None	None	None	None	None
Altitude Limitations	No Limitation	No Limitation	Below 10,000 ft	None	Below 10,000 ft	No Limitation	No Limitations	VFR Airspace	Nil Limitation	Below 10,000ft	Below 18,000ft
Aerobatics	Yes	Yes	No	Yes	No	Yes	Yes Solo Aerobatics above 3000 ft	Yes	Yes	Yes	Yes



CASA PILOT MEDICAL REVIEW QUESTIONS

AGAA encourages association partners and industry supporters to use the following as a guide for your response to the CASA Public Consultation Questions.

MEDICAL CERTIFICATION STRUCTURE

Question 1: What do you see as issues and risks for using the AUSTRROADS standard (with additional guidance for medical practitioners to help with interpretation and decision making)?

None.

CASA should adopt the AGAA Pilot Medical Certification Proposal, that is based on safe and proven international standards.

CASA should discontinue the use of the Unconditional AUSTRROADS Commercial Motor Vehicle Medical Standards and implement the Conditional AUSTRROADS Private Motor Vehicle Medical Standards.

The reforms that AGAA is seeking (Table 1 of this document), have been implemented by aviation safety regulators in the United States of America (US) and the United Kingdom (UK), and across the past five (5) years have proven to be a safe method of pilot medical certification. Both regulators based their reforms on the use of conditional private vehicle motor car license medical standard, with options for both self-declaration and General Practitioner assessment certification.

In the US, the FAA BasicMed pilot medical certification is widely regarded as one of the most successful aviation regulatory reforms in modern history, with over 66,000 pilots now accessing flying through this standard, with no demonstrated negative impact on aviation safety. The UK reforms mirror the success of those delivered in the US and have opened up their local general aviation industry to growth.

In summary, recreational/private pilots in both the US and UK who use either a self-declaration or General Practitioner assessed medical certification standards;

- a. must meet the medical fitness requirements of the 'conditional' private motor vehicle license standard*
- b. can fly both single and multi-engine aircraft*
- c. can fly aircraft weighing up to 5700 kg*
- d. can participate in both VFR and IFR operations*
- e. can carry up to a maximum of six (6) passengers*
- f. can participate in aerobatic flight*

MEDICAL CERTIFICATION STRUCTURE

Question 2: What do you see as issues and risks if CASA was to develop a new guideline informed by the approaches of other jurisdictions?

There is no risk, as demonstrated by both the US and UK examples.

CASA should adopt the AGAA Pilot Medical Certification Proposal, that is based on safe and proven international standards.

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- k. can carry up to a maximum of six (6) passengers*
- l. can participate in aerobatic flight*

MEDICAL CERTIFICATION STRUCTURE

Question 3: Considering the above which options would work best?

CASA should adopt the AGAA Pilot Medical Certification Proposal, that is based on safe and proven international standards.

The CASA Basic Class 2 should be based on a Conditional AUSTRROADS Private Motor Vehicle Medical Standards and should follow the AOPA Australia proposal, that aligns Australia to the US & UK reforms.

The reforms that AGAA is seeking (Table 1 of this document), have been implemented by aviation safety regulators in the United States of America (US) and the United Kingdom (UK), and across the past five (5) years have proven to be a safe method of pilot medical certification. Both regulators based their reforms on the use of conditional private vehicle motor car license medical standard, with options for both self-declaration and General Practitioner assessment certification.

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- o. can fly aircraft weighing up to 5700 kg*
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- q. can carry up to a maximum of six (6) passengers*
- r. can participate in aerobatic flight*

EXPANDING DAME DELEGATIONS

Question 4: What other things do you think we should explore to extend or improve DAME delegations?

CASA should adopt the AGAA Pilot Medical Certification Proposal, which is based on safe and proven international standards – without delay.

CASA should remove itself entirely from private pilot medical certification and focus exclusively on Class 1 commercial applicants, freeing up resources and staff.

DAME's have both the experience and the professional qualification to assess then approve or decline Class 2 private pilot medicals. CASA AvMed involvement with Class 2 medicals, consumes the limited organisational resources of CASA and creates unnecessary delays and costs to end-users.

The reforms that AGAA is seeking (Table 1 of this document), have been implemented by aviation safety regulators in the United States of America (US) and the United Kingdom (UK), and across the past five (5) years have proven to be a safe method of pilot medical certification. Both regulators based their reforms on the use of conditional private vehicle motor car license medical standard, with options for both self-declaration and General Practitioner assessment certification.

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- u. can fly aircraft weighing up to 5700 kg*
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- w. can carry up to a maximum of six (6) passengers*
- x. can participate in aerobatic flight*

SELF DECLARED MEDICALS FOR PRIVATE PILOTS

Question 5: What do you consider to be the benefits of the Class 5 medical certificate concept?

CASA should adopt the AGAA Pilot Medical Certification Proposal, which is based on safe and proven international standards – without delay.

CASA should introduce a Self-Declaration Pilot Medical Certification for Australian private pilots (RPL & PPL).

The reforms that AGAA is seeking (Table 1 of this document), have been implemented by aviation safety regulators in the United States of America (US) and the United Kingdom (UK), and across the past five (5) years have proven to be a safe method of pilot medical certification. Both regulators based their reforms on the use of conditional private vehicle motor car license medical standard, with options for both self-declaration and General Practitioner assessment certification.

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- aa. can fly aircraft weighing up to 5700 kg*
- bb. can participate in both VFR and IFR operations*
- cc. can carry up to a maximum of six (6) passengers*
- dd. can participate in aerobatic flight*

SELF DECLARED MEDICALS FOR PRIVATE PILOTS

Question 6: What do you consider to be issues and risks regarding the Class 5 medical certificate concept?

There are NO risks.

CASA should adopt the AGAA Pilot Medical Certification Proposal, which is based on safe and proven international standards – without delay.

The reforms that AGAA is seeking (Table 1 of this document), have been implemented by aviation safety regulators in the United States of America (US) and the United Kingdom (UK), and across the past five (5) years have proven to be a safe method of pilot medical certification. Both regulators based their reforms on the use of conditional private vehicle motor car license medical standard, with options for both self-declaration and General Practitioner assessment certification.

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STANDARDS FOR DRONE PILOTS

Question 7: Do you think there are any aviation medical considerations that should be considered for pilots of remotely piloted aircraft systems (eg. Drone size category, type, distance flown, type of operation)?

CASA should adopt the AGAA Pilot Medical Certification Proposal, which is based on safe and proven international standards – without delay.

CASA should adopt the same medical certification standards for drone pilots in the US.



FLIGHT INSTRUCTORS IN SPORT AVIATION

Question 8: Should a higher level of medical certification (eg. CASA Class 2 medical certificate) be required for flight instructors in the sport and recreational sector?

YES, the Class 2 Medical Certification Standards should apply to flight instructors within the sport and recreational sector.

CASA should adopt the AGAA Pilot Medical Certification Proposal, which is based on safe and proven international standards – without delay.

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MODERNISING THE RULES

Question 9: Are there any other things we should consider to make sure Part 67 is up to date and fit for purpose?

CASA should adopt the AGAA Pilot Medical Certification Proposal, which is based on safe and proven international standards – without delay.

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FINAL FEEDBACK

Question 10: In addition to the information you have already provided, do you have any final suggestions to help shape our review of aviation medical policy?

CASA should adopt the AGAA Pilot Medical Certification Proposal - *TIME IS OF THE ESSENCE!*

Australia needs the safe and reliable US and UK self-declaration pilot medical certification reforms to help unlock general aviation revitalisation and to bring thousands of safe and fit pilots back into flying.

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SOURCE REFERENCES

UNITED STATES OF AMERICA

BasicMed – FEDERAL AVIATION ADMINISTRATION:

https://www.faa.gov/licenses_certificates/airmen_certification/basic_med/

BasicMed Five Years of Safety, Efficiency & Growth – AOPA USA REPORT:

https://download.aopa.org/advocacy/2021/BasicMed_report_FINAL.pdf

BasicMed Pilot & Physician Guide – AOPA USA

https://basicmedicalcourse.aopa.org/pub/bundles/course_61001/downloads/AOPABasicMed_Pilot_and_Physicians_Guide.pdf

UNITED KINGDOM

Introduction to Medical Requirements – CIVIL AVIATION AUTHORITY of the UNITED KINGDOM:

<https://www.caa.co.uk/General-aviation/Learning-to-fly/Introduction-to-medical-requirements/>

Medical Requirements for Private Pilots – CIVIL AVIATION AUTHORITY of the UNITED KINGDOM:

<https://www.caa.co.uk/general-aviation/pilot-licences/applications/medical/medical-requirements-for-private-pilots/>

NEW ZEALAND

New Medical Standard to Make Flying More Accessible – CAA NZ:

<https://www.aviation.govt.nz/about-us/media-releases/show/New-medical-standard-to-make-flying-more-accessible>

Medical Certification – CAA NZ:

<https://www.aviation.govt.nz/licensing-and-certification/medical-certification/>

AUSTRALIA

Classes of Medical Certificates – CIVIL AVIATION SAFETY AUTHORITY

<https://www.casa.gov.au/licences-and-certificates/aviation-medicals/medical-certificates/classes-medical-certificate>

Medical Requirements – RECREATIONAL AVIATION AUSTRALIA:

<https://www.raa.asn.au/fly-with-us/learn-to-fly/beyond-recreational/recreational-certificate-vs-rpl-faqs/#medical-requirements>

Statement of Expectations – DEPARTMENT OF INFRASTRUCTURE, TRANSPORT AND REGIONAL DEVELOPMENT

<https://www.legislation.gov.au/Details/F2022L00061>