

Position Paper

04 October 2010

EASA Flight Crew Licensing (FCL) Outstanding major AEA concerns in Part FCL

Summary:

This paper describes the AEA's major outstanding concerns related to the EASA Opinion Nr 04-2010 (Flight Crew Licensing (FCL)). We note in particular that several aspects of this EASA Opinion are not in line with the guidelines adopted by the EASA Management Board in September 2009 (for EASA to build on JAR-FCL unless justified on safety grounds).

It is of utmost importance that those outstanding AEA concerns are properly addressed. This is essential to prevent a reduction in flight safety and to prevent increased unjustified costs for the airline industry as result of a poor EASA rulemaking process.

In the interest of safety and efficiency, the AEA therefore calls on the EU Commission, EU Member States and European Parliament to reject the EASA Opinion on Flight Crew Licensing (Opinion Nr 04-2010) unless those outstanding AEA concerns are properly addressed by EASA.

DETAILED AEA CONCERNS

Cruise Relief Co-Pilots / Background

Following the adoption of some comments in Part FCL this will require subsequent changes in parts of the rules to accommodate them. Cruise Relief Co-Pilots (CRCP's) into the Opinion the privileges allowed under that rating need to be reflected in the training requirements for the issue of that rating. As Ops are only allowed above FL200. Appendix 9 should be amended to reflect this as shown below:

1. FCL 725 (b) (4) Requirements for the issue of class and type ratings

The proposal of EASA does not provide for specific training and checking requirements for CRCP's therefore AEA proposes the following as AMC to Appendix 9 Part FCL

To be compliant with Annex III of the Basic Regulation articles 1.d and 1.e

1.d. Practical skill

1.d.1. A pilot must acquire and maintain the practical skills as appropriate to exercise his/her functions on the aircraft.

Such skills must be proportionate to the risks associated to the type of activity and must cover, if appropriate to the functions exercised on the aircraft

1.e. Demonstration and maintenance of practical skill

- Adria Airways
- Aegean Airlines
- AeroSvit
- airBaltic
- Air France
- Air Malta
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- Austrian
- bmi
- British Airways
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- KLM
- LOT
- Lufthansa
- Luxair
- Malev
- Montenegro Airlines
- Olympic Air
- SAS Scandinavian Airlines
- SWISS
- TAP Portugal
- TAROM
- TNT Airways
- Turkish Airlines
- Ukraine International Airlines
- Virgin Atlantic Airways

1.e.1. A pilot must demonstrate the ability to perform the procedures and manoeuvres with a degree of competence appropriate to the functions exercised on the aircraft.

AEA proposal:

Copy the original table out of Appendix 9 and;

add a double asterix (**) to the following manoeuvres/procedures, indicating that these manoeuvres/procedures are not required for training or skill testing for a type rating restricted to a cruise relief co-pilot for Operations Above FL200:

- section 2
- 2.1
- 2.2
- 2.3
- 2.4
- 2.5
- 2.6
- section 6
- 6.1
- 6.2
- 6.3
- 6.4

To add a triple asterix (***) to the following manoeuvres/procedures, indicating that these manoeuvres/procedures are required to be performed as PNF only in a simulator, for training and subsequent skill testing for a type rating restricted to a cruise relief co-pilot for Operations above FL200:

- section 3
- 3.6.5
- 3.9
- section 4
- 4.1
- 4.2
- 4.3
- 4.4
- 4.5
- 4.6
- 4.7
- 4.8
- section 5
- 5.1
- 5.2
- 5.3
- 5.4
- 5.5
- 5.6

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- Adria Airways
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- airBaltic
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- Cargolux
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- Luxair
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This comment has been completely ignored by EASA. As a consequence of the introduction of CRCP's this needs to be addressed. In fact, it's a new comment done by the AEA after the consultation period.

This omission supports the need to begin the FCL 004 a & b Task as a matter of urgency.

2. FCL.935.TRI (b)(2) Assessment of competence

Relevant Text :

- (b) This assessment shall include:
- (1) the demonstration of the competencies described in FCL.920, during preflight, post-flight and theoretical knowledge instruction;
 - (2) oral theoretical examinations on the ground, pre-flight and post-flight briefings and in-flight demonstrations during skill tests in the appropriate aircraft class, type or FSTD;

AEA Comment:

The TRI undertaking the assessment of competence does not perform skill tests and it

FCL.935 Assessment of competence

- (a) Except for the multi-crew co-operation instructor (MCCI), the synthetic training instructor (STI), the mountain rating instructor (MI) and the flight test instructor (FTI), an applicant for an instructor certificate shall pass an assessment of competence in the appropriate aircraft category to demonstrate to an examiner qualified in accordance with Subpart K the ability to instruct a student pilot to the level required for the issue of the relevant licence, rating or certificate.
- (b) This assessment shall include:
- (1) the demonstration of the competencies described in FCL.920, during pre-flight, post-flight and theoretical knowledge instruction;
 - (2) oral theoretical examinations on the ground, pre-flight and post-flight briefings and in-flight demonstrations during skill tests in the appropriate aircraft class, type or FSTD;
 - (3) exercises adequate to evaluate the instructor's competencies.
- (c) The assessment shall be performed on the same class or type of aircraft or FSTD used for the flight instruction.
- (d) When an assessment of competence is required for revalidation of an instructor certificate, an applicant who fails to achieve a pass in the assessment before the

The reference to 'Skill tests' needs to be removed.

3.FCL.930.CRI CRI Training course

Relevant Text:

- (a) An applicant for the CRI certificate shall have completed at an approved training organisation a course of theoretical knowledge and flight instruction.
- (b) The course shall include, at least:
- (1) 25 hours of theoretical knowledge instruction;

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- Aegean Airlines
- AeroSvit
- airBaltic
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- British Airways
- brussels airlines
- Cargolux
- Croatia Airlines
- Cyprus Airways
- Czech Airlines
- DHL
- Finnair
- Iberia
- Icelandair
- Jat Airways
- KLM
- LOT
- Lufthansa
- Luxair
- Malev
- Montenegro Airlines
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(2) 10 hours of instructional techniques, including revision of technical knowledge, the preparation of lesson plans and the development of classroom/simulator instructional skills;

(3) 5 hours of flight instruction for multiengine aeroplanes, or 3 hours of flight instruction for single engine aeroplanes, given by an instructor nominated by a training organisation for this purpose.

(c) Applicants holding or having held an instructor certificate shall be fully credited towards the requirement of (b)(1).

AEA Comment:

Requirements (2) and (3) are new from JAR-FCL. Instructional techniques and flight training are useful in the CRI course but the amount of hours is much more too demanding.

Proposal:

Change the new requirements into a syllabus

(2) Instructional techniques:

- revision of technical knowledge,
- the preparation of lesson plans
- the development of classroom/simulator instructional skills.

If a CRI rating for multi-pilot aircraft is sought, particular attention shall be given to multi-crew cooperation;

(3) Flight training: flight instruction in the appropriate aircraft or a simulator representing that aircraft

Result:

Comment 2223:

Not accepted

These requirements were already included in Appendix 1 to JAR-FCL 1.380. The Agency considers that the text in the rule is general enough to allow for tailored courses.

AEA comment:

JAR-FCL 1.380 requires only 5 hours instead of the 15(10) hours (combined (2) en

(3))

AEA suggest to revert back to paragraph 3, Appendix 1 to JAR-FCL 1.380. There is no need safety justification to have the same amount of training for CRI than for TRI. This is not the same job!

AEA Comment on Opinion 04-2010

Comment ignored by EASA. Even if this article is consistent with the previous one (FCL.930.TRI TRI rating training course):

- same amount of theoretical knowledge instruction
- same amount of instructional techniques
- Flight instructions of 5 hours on multiengine aeroplanes (10 hours for the TRI) and 3 hours on single engine aeroplanes (5 hours for the TRI).

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- Cargolux
- Croatia Airlines
- Cyprus Airways
- Czech Airlines
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- Iberia
- Icelandair
- Jat Airways
- KLM
- LOT
- Lufthansa
- Luxair
- Malev
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- SWISS
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It's much more demanding than JAR FCL 1. Only Flight instruction as in b)3) of FCL 930. CRI were required by JAR-FCL 1.380. As all CRIs are already FIs, they fulfil with the b)1) paragraph requirements. b)2) is new for CRI and is not relevant. CRI Instruction is for 'Non complex, non high performance single pilot aeroplanes. As such, requiring 10 hours of instruction is not necessary. The regulation is requiring as much work in this area for a CRI course as for a TRI course who will then deliver training on complex mutlicrew, high performance commercial jet aircraft.

This part of the EASA Opinion which deviates from JAR-FCL (whereas EASA has not provided any safety justification) is as such not in line with the guidelines of the EASA Management Board as adopted in September 2009.

4. FCL 940.TRI

Relevant Text:

(a) Revalidation. For revalidation of a TRI certificate, the applicant shall, within the validity period of the certificate, fulfil 2 of the following requirements:

- (1) complete 50 hours of flight instruction in the appropriate aircraft category or FSTDs, of which at least 15 hours shall be within the 12 months preceding the expiry date of the TRI certificate. In the case of TRI(MPA) and TRI(PL), these hours of flight instruction shall be flown as a type rating instructor or examiner, or synthetic flight instructor or examiner. In the case of TRI(H) time flown as flight instructor, instrument rating instructor, synthetic training instructor or as any kind of examiner shall also be relevant for this purpose;

AEA Comment:

(a) (1) New requirements for revalidation of a TRI rating are much more demanding than the previous requirements of JAR-FCL 1.370. This is not acceptable

Proposal:

Come back to the JAR-FCL 1.370 text

a) For revalidation of a TRI(MPA) rating, the applicant shall within the last 12 months, preceding the expiry date of the rating:

- (1) conduct one of the following parts of a complete type rating/refresher/recurrent training course:

- (i) one simulator session of at least 3 hours; or
- (ii) one air exercise of at least 1 hour comprising a minimum of 2 take offs and landings; or

- (2) receive TRI(A) refresher training acceptable to the Authority.

(b) If the rating has lapsed the applicant shall have:

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- bmi
- British Airways
- brussels airlines
- Cargolux
- Croatia Airlines
- Cyprus Airways
- Czech Airlines
- DHL
- Finnair
- Iberia
- Icelandair
- Jat Airways
- KLM
- LOT
- Lufthansa
- Luxair
- Malev
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- TAROM
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- Turkish Airlines
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- Virgin Atlantic Airways

(1) completed within the 12 months preceding the application at least 30 route sectors, to include take-offs and landings as pilot-in-command or co-pilot on the applicable aeroplane type, or a similar type as agreed by the Authority, of which not more than 15 sectors may be completed in a flight simulator;

(2) successfully completed the relevant parts of an approved TRI(MPA) course, agreed by the Authority (see Appendix 1 to JAR-FCL 1.365 and AMC FCL 1.365), taking into account the recent experience of the applicant; and

(3) conducted on a complete type rating course at least 3 hours of flight instruction related to the duties of a TRI(MPA) on the applicable type of aeroplane and/or flight simulator under the supervision and to the satisfaction of a TRI(A) notified by the Authority for this purpose.

Result:

Not accepted

The changes made in relation to the requirements of JAR-FCL 1 were the result of a decision to try to harmonise the requirements with those applicable to the TRI(H), which were considered by the Agency to be the most adequate to the role of the TRI.

The Agency sees no reason why the difference between the requirements for the TRI(H) and (A) in the aspect should be maintained.

AEA comment:

Harmonisation might be a goal for EASA but can never be a rationale for a change. Helicopters and aeroplanes can not be compared! What considerations were made and what safety data (analysis) has been reviewed? Only a proper safety case should be used to support this change. AEA again suggests to revert to JAR-FLC 1.370 as there is no clear reason to harmonise towards the more demanding requirements for a TRI(H).

Harmonisation has not been applied in other areas, e.g. FCL 915 TRI Prerequisites see below:

Aircraft

(ab) for a TRI(MPA) certificate:

(1) have completed **1500** hours flight time as a pilot of multi-pilot aeroplanes; and

(2) have completed, within the 12 months preceding the date of application, 30 route

Helicopter

(bd) for TRI(H):

(1) for a TRI(H) certificate for single-pilot single-engine helicopters, completed 250 hours as a pilot of helicopters;

(2) for a TRI(H) certificate for single-pilot multi-engine helicopters, completed 500 hours as pilot of helicopters, including 100 hours as pilot-in-command of single-pilot multi-engine helicopters;

(3) for a TRI(H) certificate for multi-pilot helicopters, completed **1000** hours flight time as a pilot of helicopters, including:

AEA Comment on Opinion 04-2010

EASA stays on a dogmatic position arguing for an harmonization between TRI(A) and TRI(H) although it's two different worlds and one rule cannot be applied to every category of aircraft without safety justification.

11. The present Opinion contains the Agency's proposals for Implementing Rules to the Basic Regulation concerning the licensing of all pilots involved in the operation of aircraft referred to in Article 4(1)(b) and (c) of the Basic Regulation, and the certification of instructors and examiners involved in the training and checking of those pilots. These proposals are based on the requirements of JAR-FCL 1 and 2, the Standards and Recommended Practices of ICAO Annex 1 and also on existing national regulations.

The content of the Opinion are based on the content of JAR-FCL 1 and 2. EASA does not have the written mandate to harmonise rules within JAR-FCL as and when they see fit. This is an extremely important point of principle. Substantive changes of this magnitude should only be recommended and accepted following detailed work identifying areas of sub optimal performance. There is no validated evidence to suggest that this change will improve the quality of the TRI. There are numerous examples throughout the opinion where there are different requirements for different types of aircraft reflecting the different operations including TRE and those detailed above.

This part of the EASA Opinion which deviates from JAR-FCL (whereas EASA has not provided any safety justification) is as such not in line with the guidelines of the EASA Management Board as adopted in September 2009.

5.FCL.905.SFI SFI privileges and conditions

Relevant Text:

- (a) *General.* The privileges of an SFI are to carry out synthetic flight instruction for:
- (1) the initial issue, revalidation and renewal of type ratings;
 - (2) multicrew cooperation; and
 - (3) the issue, revalidation or renewal of an instrument rating, provided he/she has completed an IRI training course.

(b) *Additional privileges for the SFI(A).* Additionally, the privileges of an SFI(A) are to carry out synthetic flight instruction for the MPL course on the basic, intermediate and advanced phases, provided that, for the basic phase of training, he/she holds or has held an FI(A) or an IRI(A) certificate.

(c) The privileges of the SFI shall be restricted to the FTD 2/3 or FS of the aircraft type in which the SFI training course was taken.

The privileges may be extended to other FSTDs representing further types of aircraft when the holder has:

- Adria Airways
- Aegean Airlines
- AeroSvit
- airBaltic
- Air France
- Air Malta
- Alitalia
- Austrian
- bmi
- British Airways
- brussels airlines
- Cargolux
- Croatia Airlines
- Cyprus Airways
- Czech Airlines
- DHL
- Finnair
- Iberia
- Icelandair
- Jat Airways
- KLM
- LOT
- Lufthansa
- Luxair
- Malev
- Montenegro Airlines
- Olympic Air
- SAS Scandinavian Airlines
- SWISS
- TAP Portugal
- TAROM
- TNT Airways
- Turkish Airlines
- Ukraine International Airlines
- Virgin Atlantic Airways

- Adria Airways
- Aegean Airlines
- AeroSvit
- airBaltic
- Air France
- Air Malta
- Alitalia
- Austrian
- bmi
- British Airways
- brussels airlines
- Cargolux
- Croatia Airlines
- Cyprus Airways
- Czech Airlines
- DHL
- Finnair
- Iberia
- Icelandair
- Jat Airways
- KLM
- LOT
- Lufthansa
- Luxair
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- Montenegro Airlines
- Olympic Air
- SAS Scandinavian Airlines
- SWISS
- TAP Portugal
- TAROM
- TNT Airways
- Turkish Airlines
- Ukraine International Airlines
- Virgin Atlantic Airways

(1) fulfilled the prerequisites for the applicable type of aircraft; and

(2) satisfactorily completed the simulator content of the corresponding SFI course

AEA Comment:

Many SFI, in major operators, are previous TRI that have problem with their medical requirements or have retired.

Proposal:

(a)(3) Change in:

“The issue of an instrument rating provided he/she has completed an IRI rating training course;
 , the revalidation or renewal of an instrument rating, provided he/she holds or have held an IR or TRI rating”

Result:

Partially accepted

Please see the replies to comments 672 and 2225 above.

Comment 672

Partially accepted

Requirement to hold or have held a valid IR is going to be included.

Comment 2225

Not accepted

The Agency considers that in order to be able to instruct for an instrument rating, the SFI needs to have completed the IRI training course.

See also the reply to comment 672 above.

AEA comment:

With the second bullet “, the revalidation or renewal of an instrument rating, provided he/she holds or have held an IR rating” AEA meant to split the issue of an IR v.s. the revalidation and renewal. Normally for the revalidation and renewal (see TRI privileges) a IRI training course is not necessary. AEA suggests to re-evaluate our suggestion to split for better consistency between SFI and TRI.

(a) Change to:

(1) “The issue of an instrument rating provided he/she has completed an IRI training course;

(2) the revalidation or renewal of an instrument rating, provided he/she holds or have held an IR rating”

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- Turkish Airlines
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- Virgin Atlantic Airways

FCL.905.SFI SFI - Privileges and conditions

The privileges of an SFI are to carry out synthetic flight instruction, within the relevant aircraft category, for:

- (a) the issue, revalidation and renewal of an IR, provided that he/she holds or has held an IR in the relevant aircraft category and has completed an IRI training course;

Once more EASA is not aware of the detail of our suggestion. This is a clear example where EASA' working knowledge and understanding of how Training is conducted is very poor. In most of major airlines, SFI's are previous TRI's that have problem with their medical requirements or have retired.

These SFI's had never completed an IRI course but as TRI, they were allowed to renew or revalidate IR during proficiency checks. They have to keep this privilege in order to be able to be used for that.

This part of the EASA Opinion which deviates from JAR-FCL (whereas EASA has not provided any safety justification) is as such not in line with the guidelines of the EASA Management Board as adopted in September 2009.

AEA proposal:

FCL.905.SFI SFI - Privileges and conditions

The privileges of an SFI are to carry out synthetic flight instruction, within the relevant aircraft category, for:

- (a) (i) *The issue of an instrument rating provided that he/she has completed an IRI rating training course*
- (ii) *The revalidation or renewal of an instrument rating provided he/she holds or has held an IR on the relevant aircraft category*

This is quite reasonable and reflects the actual world. It continues the principle of retaining experienced trainers that through no fault of their own have lost their medicals. This will allow them to continue to impart valuable knowledge.

THIS IS A HOT TOPIC

6. APPENDIX 9 SKILL TEST AND PROFICIENCY CHECK FOR ATPL, TYPE AND CLASS RATINGS, AND PROFICIENCY CHECK FOR INSTRUMENT RATINGS

B. Specific requirements for the aeroplane category

CONTENT OF THE SKILL TEST/PROFICIENCY CHECK

2. Multi pilot aeroplanes

Relevant Text:

The following symbols mean:

- Adria Airways
- Aegean Airlines
- AeroSvit
- airBaltic
- Air France
- Air Malta
- Alitalia
- Austrian
- bmi
- British Airways
- brussels airlines
- Cargolux
- Croatia Airlines
- Cyprus Airways
- Czech Airlines
- DHL
- Finnair
- Iberia
- Icelandair
- Jat Airways
- KLM
- LOT
- Lufthansa
- Luxair
- Malev
- Montenegro Airlines
- Olympic Air
- SAS Scandinavian Airlines
- SWISS
- TAP Portugal
- TAROM
- TNT Airways
- Turkish Airlines
- Ukraine International Airlines
- Virgin Atlantic Airways

P = Trained as Pilot in command or Copilot and as Pilot Flying (PF) and Pilot Not Flying (PNF) for the issue of a type rating as applicable.

X = Simulators shall be used for this exercise, if available; otherwise an aircraft shall be used

if appropriate for the manoeuvre or procedure.

P# = the training shall be complemented by supervised aeroplane inspection

AEA Comment:

The definition of P# is too restrictive

Proposal:

P# = the training shall be complemented by supervised aeroplane inspection or suitable distance learning package

Result:

Not accepted

The text that was proposed in the NPA is coming from JAR-FCL. The Agency considers that at this point it should remain unchanged.

Comment 2394

Not accepted

The Agency considers that even if software has been used a walk around at the aircraft is still necessary. At that step (SKT) it must have been completed. This was already a requirement in JAR-FCL and the Agency considers that it should not be changed.

AEA comment:

- Aircraft visits are normally conducted in the life operating/engineering environment with all the additional **safety** hazards. It is not possible to demonstrate to the student all off the capabilities of the aircraft e.g. operation of all types of doors and exists.
- CBT training is a very effective tool and uniform way of teaching this subject. It will enhance the student's knowledge to a greater level than the current FCL requirement.
- At the time of writing of the JAR-FCL CBT's were not as efficient as today.
- Stick to old FCL rule inhibits progress in modern day learning environment
- The current requirement to complete the walk around before the SKT gives logistical problems when training at remote facilities.

Current FCL requirements are met using CBT's only at a significant number of ATO's. EASA should allow grandfather rights.

AEA suggest reconsidering our proposal of making it possible to use CBT as a substitute for an actual walk around.

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This point has hardly been discussed during the EASA/AEA meeting in CGN. We faced an unreasonable position from JM Cluzeau. The only argument is that we have to stick to JAR. This statement is clearly not true and on some occasions EASA will vary from JAR-FCL as they see fit with no valid experience.

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The safety case from AEA, as above, is still valid and another argument is that JAR does not reflect the improvement of learning techniques and technology (CBT interactivity). It should be amended taking into account the last improvement in learning medias.

7. Appendices 1 to 12

Relevant text

As applicable

AEA Comment:

The requirements in Appendices 1 to 12 are forming part of the implementing rules. This doesn't allow any innovation in training means or adaptation with new training tools. Some items are incompatible with modern aircrafts (i.e. fly-by-wire, glass cockpit ...). Some new features are not taken into account in the theoretical knowledge or in the skill tests (i.e. FMS)

Proposal:

Transfer the requirements of Appendices 1 to 12 into AMC and GM to Part FCL.

Result:

Noted

Please see the reply to comment 3665 above.

Comment 3665

Noted

Taking into account the comments received, the Agency will change the status of some of the proposed appendices to AMCs after assessing them. However, in the case of this particular appendix, since credit towards requirements is being established, it is necessary to leave it in the rule.

AEA comment:

The EASA's answer (comment 3665) reflects that EASA will assess the need to transfer App to AMC.

We cannot see any reasoning about this assessment and EASA gives no justification of their choices.

Only safety issues should be taking into account in the assessment of the app.

1. There is no consistency in the changes made by EASA. The answer to comment 3665 precludes that Cross crediting need to stay in Appendix 1 but Appendix 11 has been changed in AMC.

In one appendix, some requirements for the skill test have been transferred to AMC (App 12), in other appendices they have been let in the rule (app 4, 7 and 9).

It looks like changes have been done by different people with different reasoning.

Please ensure consistency referring to Essential requirements

2. AEA reasoning is that there is nothing in the Essential Requirements who justify letting syllabi and amount of training in the rule. Annex III contains the requirements for pilot licensing. These requirements have to be described in the app to the rule and it's enough.

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- Alitalia
- Austrian
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- British Airways
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- DHL
- Finnair
- Iberia
- Icelandair
- Jat Airways
- KLM
- LOT
- Lufthansa
- Luxair
- Malev
- Montenegro Airlines
- Olympic Air
- SAS Scandinavian Airlines
- SWISS
- TAP Portugal
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- Ukraine International Airlines
- Virgin Atlantic Airways

As technologies, media and techniques of training are always in constant evolution, we need flexibility in the description of the courses. These descriptions and credits should be in AMC.

Final Opinion

APPENDIX 1 - CREDITING OF THEORETICAL KNOWLEDGE

APPENDIX 2 - Language Proficiency Rating Scale – Expert, extended and operational level

APPENDIX 3 - TRAINING COURSES FOR THE ISSUE OF A CPL AND AN ATPL

- A. ATP integrated course - Aeroplanes
- B. ATP modular course – Aeroplanes
- C. ATP modular course – Aeroplanes
- D. CPL integrated course - Aeroplanes
- E. CPL modular course - Aeroplanes

- F. ATP/IR integrated course — Helicopters
- G. ATP integrated course — Helicopters
- H. ATP modular course — Helicopters
- I. CPL/IR integrated course — Helicopters
- J. CPL integrated course — Helicopters
- K. CPL modular course — Helicopters

- L. CPL/IR integrated course — Airships
- M. CPL integrated course — Airships
- N. CPL modular course — Airships

APPENDIX 4 - SKILL TEST FOR THE ISSUE OF A CPL

APPENDIX 5 - INTEGRATED MPL TRAINING COURSE

APPENDIX 6 - Modular training courses for the IR

APPENDIX 7 - IR SKILL TEST

APPENDIX 8 - CROSS-CREDITING OF THE IR PART OF A CLASS OR TYPE RATING PROFICIENCY CHECK

APPENDIX 9 - TRAINING, SKILL TEST AND PROFICIENCY CHECK FOR MPL, ATPL, TYPE AND CLASS RATINGS, AND PROFICIENCY CHECK FOR IRS

The initial NPA had 12 appendices. There are only 9 now.

- Adria Airways
- Aegean Airlines
- AeroSvit
- airBaltic
- Air France
- Air Malta
- Alitalia
- Austrian
- bmi
- British Airways
- brussels airlines
- Cargolux
- Croatia Airlines
- Cyprus Airways
- Czech Airlines
- DHL
- Finnair
- Iberia
- Icelandair
- Jat Airways
- KLM
- LOT
- Lufthansa
- Luxair
- Malev
- Montenegro Airlines
- Olympic Air
- SAS Scandinavian Airlines
- SWISS
- TAP Portugal
- TAROM
- TNT Airways
- Turkish Airlines
- Ukraine International Airlines
- Virgin Atlantic Airways

The three last appendices have been transferred to AMC

APPENDIX 10- COURSE OF ADDITIONAL THEORETICAL KNOWLEDGE FOR A CLASS OR TYPE RATING FOR HIGH PERFORMANCE SINGLE-PILOT AEROPLANES

19. Apart from the changes mentioned above, the Agency has received reactions on the content of Appendices 1 - 9 from two important stakeholder groups:
- a. an organisation representing a group of airlines. This organisation requested that the content of Appendices 1 - 9 should be transferred to AMC to enable Member States to develop alternative AMCs for the implementation of competency-based and evidence-based training and checking immediately after the completion of the related ICAO document;
 - b. an organisation representing a group of airline pilots. This organisation requested that the content of Appendices 1 - 9 should remain in the rule text to avoid that training, testing and checking of pilots would follow different regulations in different Member States as they consider that as a threat to safety.

The Agency is actively involved in the ICAO work on competency and evidence-based training and recognises the importance of this new training method and supports its implementation. However, the future ICAO document will cover entirely new training, testing and checking methods which will have an impact on the whole set of the corresponding regulations and result in major changes. This should be dealt with in a separate rulemaking task that has already been introduced in the Rulemaking Programme in accordance with the Rulemaking Procedure. For this reason, and also to stay in line with present regulations, the Agency therefore decided to keep the content of Appendices 1 - 9 in the rule.

It is interesting that EASA has taken the position of an organisation representing pilots. Pilots are the recipients of training and not the SME's. EASA refer to ITQI in para 19 which will result in major changes to the way we can conduct training.

However, just like the ATQP programme it is not a replacement for the previous way of completing the check cycle and for some airlines the investment required is too much. The ITQI programme will allow SOME airlines the opportunity to tailor type conversion courses based on a training needs analysis but is not a replacement.

Competency based training already exists and has been in use under the current system, the argument that they use is potentially flawed.

For more info please contact:

Vincent De Vroey,

General Manager Technical & Operations, AEA, vincent.de.vroey@aea.be