

European Aviation Safety Agency

Explanatory Note to Decision 2018/011/R

Regular update of Acceptable Means of Compliance and Guidance Material to Commission Regulation (EU) No 1178/2011

RELATED NPA/CRD: 2016-03(A)(B)(C)(D)(E)(F) — RMT.0595

RELATED Opinion No 16-2016 and Opinion No 03-2017 — RMT.0587

EXECUTIVE SUMMARY

This Decision addresses various non-controversial issues dealt with in the context of the activities of RMT.0595 and RMT.0587. They pertain to the Acceptable Means of Compliance (AMC) and Guidance Material (GM) to Part-FCL and Part-ARA of Regulation (EU) No 1178/2011 as regards:

- (a) the detailed theoretical knowledge syllabi and learning objectives (Los) for airline transport pilot licence (ATPL), multi-crew pilot licence (MPL), commercial pilot licence (CPL) and instrument rating (IR) for aeroplanes (A) and helicopters (H);
- (b) the amended examination procedures related to the syllabus; and
- (c) the automatic validation of Union flight crew licences and MPL take-off and landing training.

Action area: Human factors and competence of personnel
Affected rules: AMC & GM to Part-FCL; AMC & GM to Part-ARA

Affected stakeholders: Pilots; operators; a pproved training organisations (ATOs); competent authorities (CAs); student pilots;

providers of textbooks and training material; European Central Question Bank (ECQB)

Driver: Safety^{RMT.0595}; Rulemaking group: Yes^{RMT.0595}; No^{RMT.0595}; No^{RMT.0597}

efficiency/proportionality^{RMT.0587}

Impact assessment: Light^{RMT.0595}; No^{RMT.0587} Rulemaking Procedure: Standard^{RMT.0595};

AcceleratedRMT.0587

RMT.0595



11.3.2015 9.6.2016 6.11.2018

RMT.0587



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1. About this Decision

This Decision addresses various non-controversial issues in the AMC & GM to Part-FCL and Part-ARA of Commission Regulation (EU) No 1178/2011. The Decision consists of:

- (a) amended AMC & GM as well as additional ones to the recently published Decision 2018/001/R¹ of 8 February 2018. This part of the Decision is a follow up. In the Explanatory Note to Decision 2018/001/R, under 2.5 'The review and update over a number of steps', it is explained that in a third step the examination procedures will be amended in the relevant AMC to ARA.FCL.300(b) 'Examination procedures'. This Decision contains those amended examination procedures. This Decision also corrects some editorials in the LOs (AMC1 FCL.310; FCL.515(b); FCL.615(b) 'Theoretical knowledge examination') as amended through Decision 2018/001/R.
- (b) new AMC & GM associated with the amendments introduced through the new Commission Regulation (EU) 2018/1065² of 27 July 2018 to Regulation (EU) No 1178/2011 as regards the automatic validation of Union flight crew licences and take-off and landing training.

The European Aviation Safety Agency (EASA) developed ED Decision 2018/011/R in line with Regulation (EU) 2018/1139³ (hereinafter referred to as the 'Basic Regulation') and the Rulemaking Procedure⁴.

This Decision addresses issues from two different rulemaking activities. Both rulemaking activities RMT.0595 and RMT.0587 are included in the EASA 5-year Rulemaking Programme⁵. The scope and timescales of the tasks were defined in the related Terms of Reference (ToR RMT.0595 Issue 1⁶ and ToR RMT.0587⁷).

The text of this Decision regarding RMT.0595 has been developed by EASA based on the input of the RMT.0595 Rulemaking Group (RMG), which was led by industry representatives and comprised EASA staff acting as group members and also providing the secretariat. All interested parties were consulted through Notices of Proposed Amendment (NPAs) 2016-03(A)(B)(C)(D)(E)(F)⁸⁹.

https://www.easa.europa.eu/document-library/notices-of-proposed-amendment



^{1 &}lt;u>https://www.easa.europa.eu/document-library/agency-decisions/ed-decision-2018001r</u>

Commission Regulation (EU) 2018/1065 of 27 July 2018 a mending Regulation (EU) No 1178/2011 as regards the automatic validation of Union flight crew licences and take-off and landing training (OJ L 192, 30.7.2018, p. 31) (https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1534338844011&uri=CELEX:32018R1065)

Regulation (EU) 2018/1139 of the European Parliament and of the Council of 4 July 2018 on common rules in the field of divil aviation and establishing a European Union Aviation Safety Agency, and amending Regulations (EC) No 2111/2005, (EC) No 1008/2008, (EU) No 996/2010, (EU) No 376/2014 and Directives 2014/30/EU and 2014/53/EU of the European Parliament and of the Council, and repealing Regulations (EC) No 552/2004 and (EC) No 216/2008 of the European Parliament and of the Council and Council Regulation (EEC) No 3922/91 (OJ L 212, 22.8.2018, p. 1) (https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1536149403076&uri=CELEX:32018R1139)

⁴ EASA is bound to follow a structured rulemaking process as required by Article 115(1) of Regulation (EU) 2018/1139. Such a process has been adopted by the EASA Management Board (MB) and is referred to as the 'Rulemaking Procedure'. See MB Decision No 18-2015 of 15 December 2015 replacing Decision 01/2012 concerning the procedure to be applied by EASA for the issuing of opinions, certification specifications and guidance material (http://www.easa.europa.eu/the-agency/management-board/decisions/easa-mb-decision-18-2015-rulemaking-procedure).

^{5 &}lt;u>http://easa.europa.eu/rulemaking/annual-programme-and-planning.php</u>

⁶ https://www.easa.europa.eu/document-library/terms-of-reference-and-group-compositions/tor-rmt0595

https://www.easa.europa.eu/document-library/terms-of-reference-and-group-compositions/tor-rmt0587

⁸ In accordance with Article 115 of Regulation (EU) 2018/1139, and Articles 6(3) and 7 of the Rulemaking Procedure.

1 164 individual comments were received from interested parties, including industry, national aviation authorities (NAAs) and other stakeholders. The majority of the comments contained multiple statements, mostly relating to the amended LOs.

EASA reviewed the comments received during the public consultation. To assist EASA in reviewing the comments, an NPA Review Group was formed. This Group, led by EASA, was made up of representatives from industry and NAAs. The related comments received and EASA's responses thereto are presented in Comment-Response Documents (CRDs) 2016-03(A)(B)(C)(D)(E)(F) 10 .

The final text of this Decision regarding RMT.0595 has been developed by EASA.

The text of this Decision regarding RMT.0587 has been developed by EASA in order to ensure alignment of the AMC & GM to Regulation (EU) No 1178/2011 following the amendments introduced to it through Commission Regulation (EU) 2018/1065. The latter Regulation is based on Opinion No 16-2016 and Opinion No 03-2017. Both Opinions were developed by EASA in accordance with Article 15 of Management Board (MB) Decision No 18-2015.

The major milestones of the above-mentioned rulemaking activities are presented on the title page.

https://www.easa.europa.eu/document-library/comment-response-documents



2. In summary — why and what

2.1. Why we need to change the AMC & GM

The need for the amended and additional AMC & GM stemming from the activities of RMT.0595 is explained in 1(a) above.

The reasons behind the new AMC & GM stemming from the activities of RMT.0587 and associated with Regulation (EU) 2018/1065 are:

- Amendment 174 to ICAO Annex 1, which allows for the automatic validation of Union flight crew licences and take-off and landing training in third countries; and
- the pursuit of the Union to have a more competency-based approach to ensure implementation (b) of proportionate and performance-based requirements for flight crew licences. Therefore, the take-off and landing training requirements during the advanced phase of an MPL training course are amended to align them with the ICAO recommendations in Doc 9868 'Procedures for Air Navigation Services — Training' (PANS-TRG).

2.2. What we want to achieve — objectives

The overall objectives of the EASA system are defined in Article 1 of the Basic Regulation. This proposal will contribute to the achievement of the overall objectives by addressing the issues outlined in Chapter 2.

The specific objectives of this Decision are to:

- update the theoretical knowledge syllabi and LOs whilst also improving teaching methodologies and accommodating evolving learning needs; and
- facilitate the updating the European Central Question Bank (ECQB), thus ensuring that it is current and relevant to evolving training needs;
- introduce the format of the ICAO attachment in electronic or paper format and give guidance regarding remark item XIII on the licence regarding this ICAO attachment;
- give guidance on the assessment of student competency during take-off and landing training during the advanced phase of an MPL training course.

2.3. How we want to achieve it — overview of the amendments

This Decision amends the AMC & GM to Part-FCL and Part-ARA in order to remove existing inconsistencies and editorial errors, and improve the quality of the existing text. Additionally, it introduces some new AMC & GM associated with the new Commission Regulation (EU) 2018/1065.

2.3.1. AMC/GM to Part-FCL

- Development of the new GM1 FCL.015(a) regarding the submission of an application for the remark on the automatic validation of licences to be added under licence item XIII.
- Amendment of AMC1 FCL.310; FCL.515(b); FCL.615(b) to correct some editorials in the LOs and to add source material to some of the LOs in Subject 010. The references to the Basic Regulation

- 216/2008 are left unmodified, and will be reviewed at a later date when the Aircrew Regulation will be amended in accordance with Article 21 of Regulation (EU) No 2018/1139.
- Development of the new GM2 to Appendix 5 regarding the assessment of student competency during take-off and landing training in accordance with the standard operating procedures (SOPs) and recommended techniques of the original equipment manufacturer (OEM).

2.3.2. AMC/GM to Part-ARA

- Because of the introduction of Area 100 KSA as published with Decision 2018/001/R, AMC1 ARA.GEN.220(a)(5) 'Record-keeping' has been updated to include documentation for record-keeping for the course Area 100 KSA assessment.
- Development of the new AMC1 to ARA.FCL.200(a)(1) to indicate that when issuing the licence with the remark 'This licence is automatically validated as per the ICAO attachment to this licence' on the licence item XIII, the competent authority should provide the holder of the licence with the ICAO attachment. The attachment has been made available by the Agency on its website for use by competent authorities and affected pilots, as needed.
- Development of the new AMC1 to ARA.FCL.200(a)(2) providing the ICAO attachment in electronic or paper format.
- AMC1 ARA.FCL.300(b) 'Examination procedures Theoretical knowledge examinations for professional licences and instrument ratings' has been updated with the numbers of questions and timing for the final TK examination per subject in accordance with the amended LO tables as published with Decision 2018/001/R (note that the publication of Subject 090 'Radio Communications' is only possible once Regulation (EU) No 1178/2011 has been amended to combine the subjects. This amendment is proposed in Opinion No 06/2017). During the development of the amendments, the following activities have been undertaken:
 - The impact of the revisions to the syllabi and LOs on the ECQB regarding the depth of knowledge to be examined and the average time needed to work through questions was assessed.
 - As the subset of LOs required for the CB-IR(A) and EIR have been merged into the same tables as those containing the LOs for the ATPL, MPL, CPL, and IR, the exam blueprints for all these licences/ratings are also likewise placed in one table.
- AMC2 ARA.FCL.300(b) 'Examination procedures Theoretical knowledge examinations for the
 en-route instrument rating (EIR) and the instrument rating (IR) obtained through the competencybased modular training course' has been deleted. Its updated content has been incorporated into
 the revised AMC1 ARA.FCL.300(b).
- Development of the new AMC1 to Appendix I to ANNEX VI (Part-ARA) Flight crew licence' indicating that in the case of using privileges outside the Union territory on an aircraft registered in a Member State other than the one that issued the flight crew licence, the following remark should be added to licence item XIII: 'This licence is automatically rendered valid as per the ICAO attachment to this licence'.
- Global overview of the changes to AMC1 ARA.FCL.300(b)

- The table below summarises the length and number of questions allocated to each subject and licence/instrument rating. Note that Subject 090 is not included in this Decision and therefore it is not discussed.
- More time is allocated in total to candidates for their exams, with the exception of the IR(A) & (H). This increase in time arises through amendments in the structure of the exams for specific subjects, and an increase in the percentage of LOs that target higher levels of understanding. Therefore appropriate questions must be used in the TK examinations that require the student to demonstrate the ability to apply acquired knowledge, to solve problems and understandscenarios. Such questions on average take more time to read and answer than a question targeting memory recall. The overall increase in the length of the exams will allow for the ECQB to be modified in line with the new LOs. The revised exam blueprints provide the scope to apply the new questions while ensuring that candidates have a fair means of successfully passing their examinations.
- There are small changes to the number of questions that a candidate will be asked for most licences and ratings. In the case of the ATPL(H)/IR, ATPL(H)/VFR, CPL(A) and IR(A) & (H), there is a slight reduction in the number of questions set. For the ATPL(A) and CPL(A), there is a slight increase. For the CB-IR(A) and EIR, there is no change.

Summary of the length and number of questions per subject and licence/rating

Subject	ATPL(A)	CPL(A)	ATPL(H)/IR	ATPL(H)/VFR	CPL(H)	IR(A&H)	CB-IR(A) & EIR
010 Air Law &	01:00 hrs	00:45 hrs	01:00 hrs	00:45 hrs	00:45 hrs	00:45 hrs	00:30 hrs
ATC	44 quest.	33 quest.	44 quest.	33 quest.	33 quest.	30 quest.	18 quest.
021 AGK	02:00 hrs	01:30 hrs	02:00 hrs	02:00 hrs	01:30 hrs	XX	XX
	80 quest.	60 quest.	80 quest.	80 quest.	60 quest.		
022	01:30 hrs	01:00 hrs	01:30 hrs	01:30 hrs	01:00 hrs	00:30 hrs	00:20 hrs
Instrumentation	60 quest.	40 quest.	60 quest.	60 quest.	40 quest.	20 quest.	12 quest.
031 Mass &	01:15 hrs	01:00 hrs	01:15 hrs	01:15 hrs	01:00 hrs	XX	XX
Balance	25 quest.	21 quest.	25 quest.	25 quest.	21 quest.		
032	02:00 hrs	01:15 hrs	XX	XX	XX	XX	XX
Performance (A)	45 quest.	28 quest.					
033 Flight	02:00 hrs	01:30 hrs	02:00 hrs	01:30 hrs	01:30 hrs	01:15 hrs	01:00 hrs
Planning &	42 quest.	33 quest.	42 quest.	33 quest.	33 quest.	27 quest.	22 quest.
Monitoring							
034	XX	XX	01:15 hrs	01:15 hrs	00:45 hrs	XX	XX
Performance (H)			35 quest.	35 quest.	20 quest.		
040 Human	01:30	01:00	01:30	01:30	01:00	01:00	00:30
Performance	48 quest.	35 quest.	48 quest.	48 quest.	35 quest.	35 quest.	16 quest.
050	02:00 hrs	01:30 hrs	02:00 hrs	02:00 hrs	01:30 hrs	01:30 hrs	0:50 hrs
Meteorology	84 quest.	63 quest.	84 quest.	84 quest.	63 quest.	63 quest.	35 quest.
061 Gen.	02:15 hrs	02:00 hrs	02:15 hrs	02:15 hrs	02:00 hrs	XX	XX
Navigation	55 quest.	45 quest.	55 quest.	55 quest.	45 quest.		
062 Radio	01:30 hrs	00:30 hrs	01:30 hrs	01:00 hrs	00:30 hrs	01:00 hrs	00:40 hrs
Navigation	66 quest.	22 quest.	66 quest.	44 quest.	22 quest.	44 quest.	24 quest.
070 Operational	01:15 hrs	01:00 hrs	01:15 hrs	01:00 hrs	00:45 hrs	XX	XX
Procedures	42 quest.	30 quest.	40 quest.	32 quest.	32 quest.		
081 Principles of	01:30 hrs	01:15 hrs	XX	XX	XX	XX	XX
Flight (A)	46 quest.	37 quest.					
082 Principles of	XX	XX	01:15 hrs	01:15 hrs	01:15 hrs	XX	XX
Flight (H)			42 quest.	42 quest.	42 quest.		

Subject	ATPL(A)	CPL(A)	ATPL(H)/IR	ATPL(H)/VFR	CPL(H)	IR(A&H)	CB-IR(A) & EIR
090	Reserved						
Communications							
Total (excl. 090)	19:45 hrs	14:15 hrs	18:45 hrs	17:15 hrs	13:30 hrs	6 hrs	03:50 hrs
	637 quest.	447 quest.	621 quest.	571 quest.	446 quest.	219 quest.	127 quest.
Change from	+02:30 hrs	+02:00 hrs	+01:45 hrs	+01:30 hrs	+01:00 hr	No change	+00:30 hrs
ʻold' exam	+3 quest.	+3 quest.	-6 quest.	-3 quest.	-4 quest.	-6 quest.	No change
blueprints (excl.							to no. of
090)							questions

• Overview of changes introduced per subject

Subject 010 — AIR LAW

- o Topic 010 03 (of the old syllabus) is merged into topic 010 02.
- The following topics are covered by a reduced number of questions: 010 02, 010 04, 010 08, 010 10, 010 11, 010 12, 010 13.
- The exams give greater emphasis on the following topics: 010 05, 010 06, 010 07, 010 09.
- For the IR exam, the total number of questions is increased by 1, so that the relationship between the total number of questions and examination duration is closer to that for the ATPL and CPL exams.

Subject 021 — AIRCRAFT GENERAL KNOWLEDGE — AIRFRAME/SYSTEM/POWERPLANT

 Greater emphasis is placed in the ATPL(A) exam on topic 021 09, with a reduction in the number of questions allocated to topics 021 01, 021 02, 021 07, 021 08, 021 11, 021 012 and 021 03. Similar changes are made to the exam structure for the other licences.

${\bf Subject 022-AIRCRAFT\,GENERAL\,KNOWLEDGE-INSTRUMENTATION}$

- The LOs of (the old) 062 05 04 on Flight Management Systems have been transferred to 022 11 01, 022 11 02, 022 11 03, and revised/merged with other LOs in those sections of the syllabus. The LOs of (the old) 062 05 05 have been transferred into 022 11 04, 022 13 03 and revised/merged with other LOs in those sections of the syllabus. As a result of these moves to Subject 022, the exam blueprint is modified for the ATPL(A), ATPL(H)/IR, IR(A/H) and CB-IR/EIR exams. This Decision also amends the LO table for 022 11 02 and 022 11 03, where four LOs transferred from Radio Navigation that were applicable to the CB-IR and EIR exams were inadvertently not selected for those groups in the new subject. Annex II to this Decision corrects this by placing crosses for those exams against the appropriate LOs.
- o For the ATPL(A) exam, there is a reduction in focus regarding 022 01 and 022 03 in order to allow capacity to increase the focus of the exam on more safety-critical elements such as autoflight control systems, autothrottle/automatic thrust control systems and alerting & proximity systems.

Subject 031 — MASS AND BALANCE

- There is less focus on topic 031 01 because there are so few LOs available. Greater focus is given on topics 031 02 and 031 05.
- The time limit for the exam for an ATPL is increased to 1:15, as the focus of the exam shifts further towards calculation-based and annex-based problems, for which adequate time must be available to the candidate.
- The ATPL(A) exam will have greater focus on load and trim sheets for large aeroplanes, and shifting of load.
- The number of questions for the CPL exams is reduced, still ensuring appropriate coverage of the syllabus and enabling candidates to have sufficient time to work through the paper.

Subject 032 — PERFORMANCE (AEROPLANE)

- The number of questions and the time limit is increased significantly, which allows the exams to have sufficient time to focus on the application of theory via (multistep) calculations and use of graphs.
- For the CPL(A), an additional exam topic is covered because LOs on contamination have been moved from 070 into 032.

Subject 033 — FLIGHT PLANNING AND MONITORING

- There is an increase in the allocation of questions to topics 033 01, 033 02, 033 03, and a reduction in the number of questions addressing topics 033 04 and 033 05.
- The number of questions for the ATPL(A) and ATPL(H)/IR exams is reduced from 43 to 42.
- The IR exam is reduced to 27 questions and the duration is also reduced by 15 minutes.
- The CB-IR(A) and EIR exams are reduced to 22 questions but more time is available, to allow for sufficient time to consult graphs/tables.

Subject 034 — PERFORMANCE (HELICOPTER)

- The time limit for the ATPL exams is increased to take into account exam questions requiring application of knowledge, changing the proportion towards more applied parts of the syllabus.
- For the CPL(H), the focus of the exam is more appropriately spread across the two available topics, taking into account the number of available LOs.

Subject 040 — HUMAN PERFORMANCE AND LIMITATIONS

 The time limit is increased in general across all exams, and questions are more evenly distributed between topics 040 02 and 040 03.

- The number of questions for the CPL exams is decreased by 1, to reach a similar average time available per question as is achieved by the ATPL exam blueprint.
- The number of questions on the CB-IR and EIR exam paper is increased, and the time limit is extended to 30 minutes.

Subject 050 — METEOROLOGY

Given that the overall structure of 050 has changed little with EDD 2018/001/R, there
are only minor changes in the distribution of the questions across the syllabus. Given
that several important new LOs are added to topic 050 09, the number of questions
allocated there has been increased.

Subject 061 — GENERAL NAVIGATION

- Subject 061 was completely rewritten with EDD 2018/001/R. The time limit is revised to 2:15 for the ATPL exams and 2:00 for the CPL exams, following comments made to the CRD. In addition, the number of questions is reduced to 55 for the ATPL exams. This will allow candidates adequate time to work through an exam paper, as there is greater focus on applied/practical application of the theory. The reduction in the number of questions also takes into account the much smaller number of LOs available for examination (93 in the new syllabus, compared to 297 in the old syllabus) while still ensuring that the examination will be able to cover the full scope of the subject.
- o In all exams, the average time available per question is 2.5 minutes.

Subject 62 — RADIO NAVIGATION

- The revised exam blueprint tables reflect what was published with the NPA. Given the movement of LOs into Subject 022, topic 062 05 now contains no LOs and therefore no exam questions.
- The number of exam questions for the ATPL(H)/VFR exam is increased from 34 to 44, while ensuring that the average time available for each question is the same as for the examinations for the other licences.

Subject 070 — OPERATIONAL PROCEDURES

- The balance between the time limit and the number of questions per paper is made more consistent across the different exam categories.
- The focus of the exam shifts towards topic 02, with a reduction in emphasis on topic
 01. Topic 03 has been removed from the syllabus.
- There is an increase in the number of questions for the ATPL(H)/IR,: extra LOs are added in topic 03 and topic 04 is new. Therefore additional time is also needed for the exam.

Subject 081 — PRINCIPLES OF FLIGHT (AEROPLANE)

- The time limit for both exams is increased. Basic Knowledge (BK) is applied in all parts of this subject, and this will then tend towards exam questions focusing on LOs that more often need more than 1 minute to be examined.
- Upset prevention and recovery training (UPRT) LOs are added throughout this subject, and given the importance of this topic, the time limit and number of questions are increased.

Subject 082 — PRINCIPLES OF FLIGHT (HELICOPTER)

 The time limit for the exams is increased, to allow for an increase in the number of exam questions that focus on practical applications. There is a slight reduction in the number of allocated questions.

Subject 090 — COMMUNICATIONS (RESERVED)

2.4. What are the benefits and drawbacks

The proposed changes address non-controversial issues and, as explained above, are triggered by the need to remove existing inconsistencies and editorial errors, as well as to improve the existing AMC & GM. The proposed amendments are neither controversial nor difficult to implement and do not impose any burden to the competent authorities, training organisations or pilots.

Therefore, EASA does not expect any drawbacks in the implementation of the above -mentioned AMC & GM.

2.5. How we monitor and evaluate the rules

EASA will monitor and evaluate the new AMC & GM through its regular standardisation activities.

The updated AMC & GM to Regulation (EU) No 1178/2011 might be subject to evaluation. Through this evaluation, it will be assessed how well the adopted AMC & GM have performed or are currently performing. The decision whether an evaluation will be necessary will be taken based also on the monitoring results.

2.6. Considerations for the transition period

Although each competent authority will determine how to manage exam provision during the transition period, EASA anticipates that for part of this transition period the competent authorities will be offering exams on both the old and the new syllabi. Some LOs are moved between subjects with EDD 2018/001/R, and care needs to be taken during the transition period to ensure that the exams delivered to each candidate provide the opportunity to cover the entire syllabus. The table below covers for each licence/instrument rating the following:

- Group 1: subjects where LOs are moved to/from one of the other subjects listed in this group:
 - For example, for an ATPL(A) or CPL(A) the new syllabus for Subject 022 contains LOs moved from the old syllabus for Subjects 061, 062 and 070, the new syllabus for 032 contains LOs moved from the old syllabus for Subject 070, the new syllabus for Subject 033 contains LOs

- moved from the old syllabus for Subject 061, and the new syllabus for Subject 061 contains LOs moved from the old syllabus for Subjects 032 and 062;
- To avoid the risk that a candidate is not examined on LOs that are 'moved' between subjects, the exams for the subjects listed in Group 1 should all be based on the same syllabus.
- The same reasoning has been applied to generate the group content for the other two rows of this table.
- Group 2: subjects where LOs are not affected by changes in another subject :
 - Each subject in this group is not affected by changes in another subject, and therefore the exams can be based on the new or old syllabi during the transition period.

Licence/rating	Group 1	Group 2			
	LOs are moved between these subjects	Subjects are not affected by changes in			
	- exams for these subjects should be	another subject - exams can be based			
	based on the same syllabus	on the new or old syllabus			
ATPL(A),	022 AGK – Instrumentation	010 Air Law & ATC			
CPL(A)	032 Performance (A)	021 AGK – Airframe, Systems & Power			
	033 Flight Performance & Planning	Plant			
	061 General Navigation	031 Mass & Balance			
	062 Radio Navigation	040 Human Performance			
	070 Operational Procedures	050 Meteorology			
		081 Principles of Flight (A)			
ATPL(H)/IR,	021 AGK – Airframe, Systems & Power	010 Air Law & ATC			
ATPL(H)/VFR,	Plant	031 Mass & Balance			
CPL(H)	022 AGK – Instrumentation	040 Human Performance			
	033 Flight Performance & Planning	050 Meteorology			
	034 Performance (H)	070 Operational Procedures			
	061 General Navigation				
	062 Radio Navigation				
	082 Principles of Flight (H)				
IR(A) & (H),	022 AGK – Instrumentation	010 Air Law & ATC			
CB-IR(A) & EIR	062 Radio Navigation	033 Flight Performance & Planning			
		040 Human Performance			
		050 Meteorology			

3. References

3.1. Related regulations

- Commission Regulation (EU) No 1178/2011 of 3 November 2011 laying down technical requirements and administrative procedures related to civil aviation aircrew pursuant to Regulation (EC) No 216/2008 of the European Parliament and of the Council (OJ L 311, 25.11.2011, p. 1)
- Commission Regulation (EU) 2018/1065 of 27 July 2018 amending Regulation (EU) No 1178/2011 as regards the automatic validation of Union flight crew licences and take-off and landing training (OJL 192, 30.7.2018. p. 31)

3.2. Affected decisions

- Decision No 2011/016/R of the Executive Director of the European Aviation Safety Agency of 15 December 2011 on Acceptable Means of Compliance and Guidance Material to Commission Regulation (EU) No 1178/2011 of 3 November 2011 laying down technical requirements and administrative procedures related to civil aviation aircrew pursuant to Regulation (EC) No 216/2008 of the European Parliament and of the Council 'Acceptable Means of Compliance and Guidance Material to Part-FCL'
- Decision No 2012/006/Directorate R of the Executive Director of the Agency of 19th April 2012 on Acceptable Means of Compliance and Guidance Material to Commission Regulation (EU) No 1178/2011 of 3 November 2011 laying down technical requirements and administrative procedures related to civil aviation aircrew pursuant to Regulation (EC) No 216/2008 of the European Parliament and of the Council 'Acceptable Means of Compliance and Guidance Material to Part-ARA'

3.3. Other reference documents

N/A