



European Union Aviation Safety Agency
Comment-Response Document 2018-07 (B)

RELATED NPA 2018-07 (B) — RMT.0599 — 16.12.2019

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1. Summary of the outcome of the consultation

Please refer to Section 2.4 of Opinion No 08/2019 (A).



2. Individual comments and responses

In responding to the comments, a set of standard terminology has been applied to attest EASA's position. This terminology is as follows:

- (a) **Accepted** — EASA agrees with the comment and any proposed amendment is wholly transferred to the revised text.
- (b) **Partially accepted** — EASA either partially agrees with the comment, or agrees with it but the proposed amendment is only partially transferred to the revised text.
- (c) **Noted** — EASA acknowledges the comment, but no change to the existing text is considered to be necessary.
- (d) **Not accepted** — The comment or proposed amendment is not agreed by EASA.

(General Comments)	-
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comment 20

comment by: *FNAM*

The FNAM (Fédération Nationale de l'Aviation Marchande) is the French Aviation Industry Federation/ Trade Association for Air Transport, gathering the following members:

- **CSTA: French Airlines Professional Union (incl. Air France)**
- SNEH: French Helicopters Operators Professional Union
- CSAE: French Handling Operators Professional Union
- GIPAG: French General Aviation Operators Professional Union
- GPMA: French Ground Operations Operators Professional Union
- **EBAA France: French Business Airlines Professional Union**

And the following associated members:

- FPDC: French Drone Professional Union
- UAF: French Airports Professional Union

The comments hereafter shall be considered as an identification of some of the major issues the French industry asks EASA to discuss with third-parties before any publication of the proposed regulation. In consequence, the following comments shall not be considered:

- As a recognition of the third-parties consultation process carried out by the European Parliament and of the Council;
- As an acceptance or an acknowledgement of the proposed regulation, as a whole or of any part of it;
- As exhaustive: the fact that some articles (or any part of them) are not commented does not mean the FNAM has (or may have) no comments about them, neither the FNAM accepts or acknowledges them. All the following



comments are thus limited to our understanding of the effectively published proposed regulation, notwithstanding their consistency with any other pieces of regulation.

FNAM thanks EASA for the will of harmonizing applicable European requirements with ICAO disposals. Requirements and guidance are proposed to introduce more precisely the EBT concept, NPA 2018-07 may thus facilitate the implementation and the development of an EBT programme. Since EBT is proposed on a voluntary basis, it would ensure to fit to all operators needs and capabilities. This concept would be more adapted to the different needs of training which depend on crew members experiences, specific operations, aircraft, etc. It may increase the flight safety level.

Nevertheless, transpositions of ICAO and IATA guidance in the EASA's proposed disposals may sometimes be clumsy and even non-consistent for some items. Minimum EBT instructor training course is for instance different between EASA requirements and ICAO & IATA guidance. This distinction may impact the aim of level-playing-field between third-countries and Member States since training provisions may be lighter depending on the country.

Additionally, the main challenge for EBT implementation is the modification of training, roles and responsibilities for instructors and examiners. These points should be clearly identified and described in the EASA's proposed disposals which modify AirOps but also in Aircrew. It seems that examiners responsibilities would not fit with its means of assessment. Examiners would have to assess and validate license solely on the basis of instructors' declarations. FNAM wonders what is EASA's level of apprehension of this issue and its associated risk. Plus, instructors and examiners could be SFI, TRI, SFE, TRE, CRI, CRE, etc. EASA's proposed disposals should clearly differentiate each type of instructors and examiners since they don't benefit of the same training. Currently, they don't have equal responsibilities; it is therefore necessary to present adapted disposals for training and requirements for each type of instructors and examiners. These two points may have significant impacts on flight safety since the EASA's proposed disposals would allow license validation solely based on declarations and would allow to perform EBT trainings by instructors and examiners with inhomogeneous competences.

Then, EASA's proposed disposals proposes to differentiate two types of EBT concept with: (i) EBT programme (deemed to be generic) and (ii) approved EBT programme (deemed to be specific). First, the similarity of these two wordings would ensure confusion between these two concepts. Then, the EASA's proposed disposals are mixing (i) baseline EBT programme requirements from ICAO with (ii) approved EBT programme in European regulations. Requirements for (i) EBT programme and (ii) approved EBT programme are not clearly distinguished and introduce therefore complexity in this EASA's proposed regulation. This confusion would lead to inefficient interpretations and inefficient implementations of European EBT requirements.

Plus, EASA's proposed disposals present guidance *via* a new vector : the 'safety promotions'. FNAM wonders what is the legal status of these guidance. Is it a FAQ? Is it a hard law or is it a soft law? 'Safety promotions' are not GM nor AMC: they could be proposed without any stakeholders consultation. If these guidance are necessary,



FNAM suggests to regroup all guidance in European regulations by integrating 'safety promotions' into GM; if not, to suppress 'safety promotions'.

Finally, EBT principle would mainly benefit large operators since the implementation would imply heavy costs and lot of resources (personnel, time, etc.). EBT principle should however be encouraged to small operators in order to enhance flight safety level and improve the global European training efficiency. Flexible provisions should be provided for small operators in order to facilitate and organize resources and data pooling thanks to manufacturers or between operators to implement EBT.

Therefore, in order to benefit of EBT concept and improve the flight safety level, FNAM would appreciate that EASA's proposed disposals:

- Clarify and harmonize in all European regulations (current and future) EBT requirements and new definitions;
- Ensure examiners responsibilities correspond to examiners assessment means;
- Ensure adapted demonstrations and trainings depending of types of instructors and their experiences;
- Clarify definitions, requirements and guidance for EBT programme and approved EBT programme;
- Gather all guidance and requirements in this regulation without creating new vectors;
- Allow flexibilities for small operators and encourage the EBT implementation thanks to pooling resources and data.

These main objectives would ensure a better understanding from operators but also from competent authorities. It is necessary to warrantee a harmonized implementation of regulations. Therefore, the level-playing-field and the level of flight safety would be improved by a homogeneous implementation of EBT requirements.

response Noted

comment 197 comment by: *Luftfahrt-Bundesamt*
The LBA has no comments on NPA 2018-07(B).

response Noted

comment 241 comment by: *Swedish Transport Agency, Civil Aviation Department (Transportstyrelsen, Luftfartsavdelningen)*

Sweden supports the implementation of EBT and the possibility for an operator to revalidate a type rating for pilots enrolled in an EBT program.

We fully support that an EBT is voluntary for operators and believe that this is important.

We would however like to reduce unnecessary workload for both the operator and the competent authority of the pilot/license holder. Hence, we have some comments in this regard.



response

Noted

comment

245

comment by: HEAD OF TRAINING PROGRAMS AZ FLEET

To whom it may concern,

the Alitalia Group, Alitalia and Alitalia CityLiner are presently working in a mixed EBT environment and with great interest, we are looking at the NPA 2018 -07 (A) and NPA 2018 -07 (B) published by you. Our working group consisting of Mr. Luciano Pisano, EBT project leader and Mr. Massimo Giavalisco EBT implementation manager for Alitalia and respectively Mr. Lelio Buzzi and Mrs. Mia Zinhobl for Alitalia CityLiner would like to have more information regarding the NPA's, specially the NPA (B)

Architecture:

- NPA (B) page 8 (3) (ii) validity period. Is it referring to the validity of the type rating or EBT period?
- FCL. 740 a) in reference to the appendix 10:.... should be excluded of 3 months preceding the expiry date. Is this still applicable to the EBT program? In our understanding the EBT program performs a continuous practical assessment (all modules) and not a single check as the operator proficiency check.
- FCL940.TRI (a) (i) conduct one of the following parts of a complete type rating training course? For an operator it could be difficult to adhere to this requirement. It's advisable to allow revalidation also by the completion EBT training session.
- In reference to ORO.FC.230 (b) (1) the legacy OPC requires that the check shall be completed by each pilot as part of a normal crew complement (Captain and Co-pilot). Does the EBT program require a specific crew complement for the evaluation and training phases? If yes, must it be the same persons for each day? i.e. CPT Brown and Copilot Rossi do the evaluation together on day1 . On day 2 the crew composition again must be CPT Brown and Copilot Rossi or can it also be Copilot Bianco in case that copilot Rossi go sick?
- ORO.FC.231 (a) (3) (ii) this ORO provides indication of a separation time between two modules (minimum 3 months). It does not indicate any time frame between Day1 and Day2 of a module. Is there any?
- Page 212 NPA 2018-07 B
 - Up to now revalidation of a license is done by the examiner at the end of the proficiency check (this can happen out base – usually at FSTD location)
 - In the EBT program an applicant has to present himself with his license at headquarters to have the license endorsed. Two problems might arise:



- the applicant cannot be employed in line flying until he has the license revalidated, which can be tricky in case that the FSTD is in another country or in case the person has his transfer back to a different base than where the license endorsement takes place
- the person delegated to sign must be always available in the office. What happens when simulator sessions are performed during weekends and holidays? There should be the possibility that the EBT TRI can sign the license on the occasion of the last simulator session that completes the EBT cycle.

Contents

- ORO.FC.231 (a)(2)(iii)(A) today, Alitalia and Alitalia CityLiner, in order to satisfy individual training needs, has created a “customized training space” in the day 2 of each module. In case of individual training needs emerged in day one, the trainer can choose from different set scenarios according to the core competence to be trained.

I hope all the questions and statements are clear, if not, don't hesitate to contact us.

Best regards

response

Noted

- *NPA (B) page 8 (3) (ii) validity period. Is it referring to the validity of the type rating or EBT period?*

It refers to the validity period of the EBT module. The principle follows the concept already established in the ATQP (ORO.FC.A.145) and the OPC (ORO.FC.230) where the OPC has a validity period, while FCL.740 and FCL.740.A provide the same or different period.

- *FCL. 740 a) in reference to the appendix 10:.... should be excluded of 3 months preceding the expiry date. Is this still applicable to the EBT program? In our understanding the EBT program performs a continuous practical assessment (all modules) and not a single check as the operator proficiency check.*

The administrative action should be done within the 3 months. The EBT modules can be done as per ORO.FC.231.

- *FCL940.TRI (a) (i) conduct one of the following parts of a complete type rating training course? For an operator it could be difficult to adhere to this requirement. It's advisable to allow revalidation also by the completion EBT training session.*



The intention is that the operator develops a combined training course for both qualifications. If needed, SPT.012 may develop safety promotion material to clarify this point. Please contact EASA for more information.

- *In reference to ORO.FC.230 (b) (1) the legacy OPC requires that the check shall be completed by each pilot as part of a normal crew complement (Captain and Co-pilot). Does the EBT program require a specific crew complement for the evaluation and training phases? If yes, must it be the same persons for each day? i.e. CPT Brown and Copilot Rossi do the evaluation together on day1 . On day 2 the crew composition again must be CPT Brown and Copilot Rossi or can it also be Copilot Bianco in case that copilot Rossi go sick?*

No. The intention is to follow the same approach as for legacy training.

- *ORO.FC.231 (a) (3) (ii) this ORO provides indication of a separation time between two modules (minimum 3 months). It does not indicate any time frame between Day1 and Day2 of a module. Is there any?*

No specific provisions are foreseen regarding the separation time between DAY 1 and Day 2. However, the proposed CS OPS.EBT.231.1 states 'timely'. AMC or GM may be developed if there is a safety concern around this provision.

- *Page 212 NPA 2018-07 B*
 - *Up to now revalidation of a license is done by the examiner at the end of the proficiency check (this can happen out base – usually at FSTD location)*

GM has been developed to clarify that on the last day of the module the instructor may have a signature delegation to be able to sign the licence.

- *In the EBT program an applicant has to present himself with his license at headquarters to have the license endorsed. Two problems might arise:*
 - *the applicant cannot be employed in line flying until he has the license revalidated, which can be tricky in case that the FSTD is in another country or in case the person has his transfer back to a different base than where the license endorsement takes place*

See the response above.

- *the person delegated to sign must be always available in the office. What happens when simulator sessions are performed during weekends and holidays? There should be the possibility that the EBT TRI can sign the license on the occasion of the last simulator session that completes the EBT cycle.*

See the response above.

comment 320

comment by: CAA-NL



response	At first we must complement the Agency with the extensive explanatory material given for almost all of the proposed changes at individual paragraphs. Noted
comment	357 comment by: <i>Finnish Transport Safety Agency</i> Trafi supports the proposal and has no other comments.
response	Noted
comment	396 comment by: <i>European Powered Flying Union</i> European Powered Flying Union (EPFU) thanks the Agency for NPA 2018-07(B). We looked at texts and tables, in the end we are of the opinion that a good job was delivered by all involved. There are some characters missing in the CRT index, but this does not reduce the completeness of the work done. The text written in blue has been very helpful in many cases, we think particularly of ORO.FC.145 and ORO.FC.231.
response	Noted
comment	592 comment by: <i>Czech Technical University</i> We appreciate EASA work on the evidence-based training subtask. We support voluntary implementation of EBT. Further expansion of EBT to OCC, initial type rating, and eventually even to initial pilot training is deemed desirable.
response	Noted

Executive summary	p. 1
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comment	21 comment by: <i>FNAM</i> ISSUE '... to determine the relevance of existing pilot training according to aircraft generation'. Precisions should be added to the executive summary. Indeed, pilots trainings are adapted to aircraft generation but also to operators activities and operation characteristics, this is the basic principle of EBT programme and approved EBT programme. PROPOSAL Add precisions that trainings should be adapted also to operators activities and operations characteristics
response	Partially accepted The text has been redrafted to link the sentence to the objective of ICAO.



comment	22	comment by: <i>FNAM</i>
	<p>AGREEMENT FNAM agrees that EBT should be implemented by operators on a voluntary basis. In that way, operators which have not sufficiency resources and data to implement EBT would not be affected.</p>	
response	Noted	

1. About this NPA

p. 3-4

comment	23	comment by: <i>FNAM</i>
	<p>ISSUE One of the next step after this NPA would be Operator Conversion Course and type rating training for CAT. FNAM wonders if this NPA dedicated to OCC would be the result of current work of RMT.0599 on EBT and the A4A's proposals for simplified OCC.</p> <p>PROPOSAL Precise implicated RMTs for future EBT works</p>	
response	<p>Noted According to the 2019-2023 EPAS, the 2nd phase of RMT.0599 will address the operator conversion course, in order to have a single philosophy of training across the operator.</p>	
comment	602	comment by: <i>IATA</i>
	<p>IATA welcomes the release of the NPA 2018-07 which represents the Agency's continuous efforts to implement EBT as an alternative to traditional training in the European regulatory framework. The feedback received from our European member airlines demonstrates that the EBT principles describes in ICAO Document 9995 are globally satisfactory transposed in the NPA 2018-07 and the comments are concerning wording issues, request for clarifications and sometimes proposal for amendments.</p>	
response	Noted	

Definitions used in Annexes II to VIII

p. 5-6

comment	12	comment by: <i>Michel Lacombe AF Training department and AF ATO</i>
	<p>The definition of an EBT instructor should be inserted:</p> <p>proposed text :</p> <p>EBT instructor. A person who has undergone a screening and selection process, successfully completed an approved course in delivering competency-based training, and is subsequently authorized to conduct recurrent assessment and training within the approved EBT programme where he is himself enrolled.</p>	



response	Not accepted ORO.FC.146 already provides sufficient clarity.
comment	24 comment by: <i>FNAM</i> ISSUE FNAM thanks for defining new concepts and updating previous ones. Nevertheless, these definitions should be harmonized for all European regulations. FNAM suggests to modify all regulations definitions in order to be harmonized. Then, definitions meanings and interpretations should remain the same for all part of this regulation. For example, Part-ORO and Part-FCL should use same wordings for the same interpretations. Plus, modified definitions should not have impacts on operators and should be only wordings. Otherwise, this would be against this NPA main objective which is to introduce requirements only for volunteer operators. PROPOSAL Ensure that all definitions are equally interpreted in AirOps and Aircrew regulations; and Ensure that all definitions are the same throughout all European regulations; and Ensure that modified definitions would not impact all operators
response	Noted
comment	25 comment by: <i>FNAM</i> ISSUE The definition of an EBT instructor should be inserted. Roles and responsibilities of EBT instructors are important and it would not be acceptable that different interpretations are possible. PROPOSAL Add the following definition: 'EBT instructor. A person who has undergone a screening and selection process, successfully completed an approved course in delivering competency-based training, and is subsequently authorized to conduct recurrent assessment and training within the approved EBT programme where he is himself enrolled.'
response	Not accepted ORO.FC.146 already provides sufficient clarity.
comment	330 comment by: <i>UK CAA</i> Page No: 6 Paragraph No: Definitions 69(a), and sub-paragraphs (a) and (b), In seat Instruction Comment: We believe the definition of 'In-seat instruction (ISI)' is not very clear and in sub-paragraph (b) there is potential for misinterpretation; we suggest the text '...of intervention by the other pilot, should read '... for intervention by the other pilot' . However, we suggest that the textual changes proposed below will improve the readability and context.

	<p>Justification: Clarity</p> <p>Proposed Text:</p> <p>(69a) 'in-seat instruction (ISI)' means part of the scenario-based training phase. ISI contains predetermined scripted scenarios the facility within the scenario-based training phase where the instructors can:</p> <p>(a) provide confidentially simple and confidential instructions to one pilot; or</p> <p>(b) perform predetermined exercises acting, in a pilot seat, as pilot flying (PF) or pilot monitoring (PM) for the purposes of demonstration of techniques or and of intervention by the other pilot interaction/intervention.</p>
response	Accepted
comment	<p>443 comment by: <i>European Cockpit Association</i></p> <p>2.1 Annex I (Definitions)</p> <p>(69a) 'in-seat instruction (ISI)' means part of the scenario-based training phase. ISI contains predetermined scripted scenarios within the scenario-based training phase where the instructors can:</p> <p>Comment: Include MT, since ISI can also be part of the maneuvers phase, e.g. UPRT, the recovery part is more a maneuver than a scenario (even if stated otherwise in the document).</p>
response	Accepted
comment	<p>491 comment by: <i>Vereinigung Cockpit</i></p> <p>2.1 Annex I (Definitions)</p> <p>(69a) 'in-seat instruction (ISI)' means part of the scenario-based training phase. ISI contains predetermined scripted scenarios within the scenario-based training phase where the instructors can:</p> <p>Comment: Include MT, since ISI can also be part of the maneuvers phase, e.g. UPRT, the recovery part is more a maneuver than a scenario (even if stated otherwise in the document)</p>
response	Accepted
comment	<p>553 comment by: <i>EBT Foundation</i></p> <p>69(a), and sub paragraphs (a) and (b), In Seat Instruction</p> <p>Comment: We believe the definition of 'In-seat instruction (ISI)' should be amended as with the removal of sub para (a) and a text amendment to the leading statement. EBT practice worldwide indicates that this is inappropriate and it</p>



compromises the notion that the operating crew should respond and manage as a crew to threats. The idea that even simple secret instructions can be given to one pilot undermines the confidence of one pilot in the other. Although this was published in ICAO Doc 9995, it is not a good option and the definition gives rise to the possible use of one pilot to "trap" the other into errors. ISI should really be treated separately from the remainder of Scenario Based Training, because of its unique nature. The statement in 69(a) gives rise to potential confusion in that ISI may be used at any point during SB. It should be a separate and distinct phase to resolve this ambiguity. In addition, any certified instructor always has the capability to demonstrate exercises from a pilot seat. This does not need to be made explicit here and may apply to any phase of an EBT module.

Justification: Best practice and removing ambiguity

Proposed text:

(69a) 'in-seat instruction (ISI)' means **the facility after part** of the scenario-based training phase, where instructor can ~~ISI contains predetermined scripted scenarios the facility within the scenario-based training phase where the instructors can:~~

~~(a) provide confidentially simple and confidential instructions to one pilot; or~~

perform predetermined exercises acting, in a pilot seat, as pilot flying (PF) or pilot monitoring (PM) for the purposes of ~~demonstration of techniques or and of~~ intervention by the other pilot interaction/intervention, according to the training topics Monitoring, cross checking, error management, mismanaged aircraft state (reference here is ICAO Doc 9995 Appendices 2-6)

response Not accepted
The proposal provided by the UK CAA is considered to be better.

comment 603 comment by: IATA

Concerning the Annex I (Definitions) to Regulation (EU) No 965/2012, proposition to add the definition of the EBT instructor as per ICAO DOC 9995 per below:

EBT instructor. A person who has undergone a screening and selection process, successfully completed an approved course in delivering competency-based training and is subsequently authorized to conduct recurrent assessment and training within an approved EBT programme.

response Not accepted
ORO.FC.146 already provides sufficient clarity.

comment	<p>26</p> <p style="text-align: right;">comment by: <i>FNAM</i></p> <p>ISSUE – (c)(2)(iii) FNAM thanks EASA for listing all operators capabilities to be overlooked. Nevertheless, the meaning of ‘the suitability of the operator’s grading and assessment scheme’ is confusing. FNAM fears that these concept may be interpreted differently depending on the competent authorities. It could therefore impact the European level-playing-field objective. FNAM suggests to precise how should the authority handle the oversight of ‘the suitability of the operator’s grading and assessment scheme’ in dedicated AMC or GM.</p> <p>PROPOSAL Precise how should the authority handles the oversight of ‘the suitability of the operator’s grading and assessment scheme’ in dedicated AMC or GM</p>
response	<p>Accepted</p> <p>Further guidance on the grading and assessment scheme is provided in ORO.FC.231 (d) and the associated AMC and GM.</p>

comment	<p>321</p> <p style="text-align: right;">comment by: <i>CAA-NL</i></p> <p>ARO.OPS.226 We are of the opinion that:</p> <ul style="list-style-type: none"> · ARO.OPS.226(a) can be deleted, as mentioned in the explanatory material, this is already covered in ARO.GEN.200(a)(2). The related AMC1 ARO.OPS.226(a) can be included in the text as AMC1 to the currently proposed ARO.OPS.226(b) · AMC1 ARO.OPS.226(a), item (b) can be deleted as it is stating the obvious, point (2) is already captured in GM1 to the AMC1. We do agree with the proposal to add some words referring to AMC4 to ARO.GEN.200(a)(2). · ARO.OPS.226(c)(ii) can be deleted, as mentioned in the explanatory material, this is already covered in ARO.GEN.220 and ORO.MLR.115. This point including the wording from the explanatory material can be included as new GM to the current point (c). · ARO.OPS.226(d) can be deleted, this is not special for EBT but a general applicable principle already regulated through ARO.GEN.350. · AMC1 ARO.OPS.226 (d), items (a) and (b) can be deleted as they are stating the obvious and repeating general applicable principles for the Authority. The resulting text may be changed into GM. <p>This would lead to the following proposed text for the rule and the related AMC/GM:</p> <p>ARO.OPS.226 Approval and oversight of evidence-based training programmes</p> <p>(a) The competent authority shall assess and oversee the EBT programme, together with the processes that support the implementation of the EBT programme.</p> <p>(b) Before approving an EBT programme, the competent authority shall:</p> <p>(1) ensure the resolution of significant findings in the areas that will support the application of the EBT programme;</p> <p>(2) assess the capability of the operator to support the implementation of the EBT programme. The following elements shall be considered as a minimum:</p> <p>(i) the maturity and capability of the operator’s management system, and this programme’s suitability;</p>
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- (ii) the suitability of the operator's grading and assessment scheme;
- (iii) the experience of the relevant personnel, fundamentally of the flight crew instructors, in the use of the processes and procedures that support the implementation of the EBT programme; and
- (iv) the operator's implementation plan and a safety risk assessment supporting the EBT programme in order to demonstrate how an equivalent level of safety to that of the current training programme can be achieved;

AMC1 ARO.OPS.226(a) Approval and oversight of evidence-based training programmes

QUALIFICATION AND TRAINING — INSPECTORS — EVIDENCED-BASED TRAINING

(a) In addition to the requirements of AMC4 ARO.GEN.200(a)(2), for the initial approval and oversight of an operator's EBT programme, the inspector of the competent authority should undertake EBT as part of their required technical training (see AMC2 ARO.GEN.200(a)(2)). At the conclusion of the inspector training, the inspector should:

- (1) know the principles of EBT, including the following underlying principles:
 - (i) competency-based training;
 - (ii) learning from positive performance;
 - (iii) building resilience; and;
 - (iv) data-driven training;
- (2) know the structure of an EBT module;
- (3) know the method of training delivery for each phase of an EBT module;
- (4) know the principles of adult learning and how they relate to EBT;
- (5) recognise effective observations based on a competency framework, and document evidence of observed performance;
- (6) recognise and relate specific performance observations of competencies;
- (7) recognise trainee performance to determine competency-based training needs and recognise strengths;
- (8) understand methods for the evaluation of performance using a competency-based grading system;
- (9) recognise appropriate teaching styles during simulator training to accommodate trainee learning needs;
- (10) recognise and facilitate trainee learning, focusing on specific competency-based training needs; and
- (11) understand how to conduct a debrief using facilitation techniques.

GM1 to AMC1 ARO.OPS.226(a) Approval and oversight of evidence-based training programmes

INSPECTOR'S EBT PROGRAMME — FEATURES OF AN OPERATOR'S EBT PROGRAMME

In order to recognise and evaluate the features of an operator's EBT programme, the inspector's training programme may include those features as training objectives. AMC1 ORO.FC.231(a)(2) provides the list of minimum features that should be contained within an approved EBT programme.

AMC1 ARO.OPS.226(b) Approval and oversight of programmes

INITIAL APPROVAL — VERIFICATION OF COMPLIANCE

When approving an EBT programme, the competent authority should ensure that the operator fulfils all the applicable criteria of ORO.FC.231 and its associated AMC. In particular, it should recognise the features of the operator's EBT programme (AMC1 ORO.FC.231(a)(2)).



GM1 to ARO.OPS.226(b)(1) Approval and oversight of evidence-based training programmes

THE OPERATOR'S ABILITY TO MAINTAIN RELIABLE AND ACCURATE FLIGHT CREW TRAINING RECORDS;

An EBT programme require extensive use of data and suitable records systems, This is already required in the operator's requirements ORO.GEN.220 and ORO.MLR.115; therefore, it is part of the oversight program. The competent authority should verify that the operator is compliant as EBT will increase the workload and usability of the record system; therefore, it may be a first indication of an operator's maturity to implement EBT.

AMC1 ARO.OPS.226(b) Approval and oversight of evidence-based training programmes

OVERSIGHT PLAN — PERIODIC ASSESSMENT TO VERIFY COMPLIANCE OF THE APPROVED EBT PROGRAMME

(a) Audits and inspections, on a scale and frequency appropriate to the operation, should cover at least:

- (1) management supervision of the EBT programme;
- (2) ongoing identification of operational risk and inclusion into the operator's approved EBT programme;
- (3) relevance of the operator's approved EBT programme to address its operational and training needs;
- (4) effectiveness of the operator's approved EBT programme to improve pilot competencies. When there is an ineffective programme, the competent authority should examine the operator processes which identify the lack of effective results;
- (5) compliance with all requirements of ORO.FC.231;
- (6) delivery of instructor training in accordance with AMC1 ORO.FC.145(a)(3), including inspections of the training delivery;
- (7) conduct of assessments of competence for EBT instructors, including periodic inspections of FSTD training;
- (8) maintenance of crew records;
- (9) administration of programme enrolment and compliance with the requirements of Annex I (Part-FCL) for licence revalidation and renewal;
- (10) continuing standardisation of EBT instructors, including inspections of the training delivery; and
- (11) (11) verification that the operator fulfils the requirements detailed in AMC1 ORO.FC.231(a).

GM1 to AMC1 ARO.OPS.226(b) Approval and oversight of evidence-based training programmes

EFFECTIVENESS OF THE OPERATOR'S APPROVED EBT PROGRAMME

- (a) This can be determined by periodic review of pilot competencies across several domains, such as role fleet (e.g. CPT/FO, A320, B737) and airline, so that the continuing improvement of the approved EBT programme is linked to an improvement of the pilot core competencies.
- (b) The analysis of the pilot competencies across the domains should also take into account the operator's experience in the approved EBT programme and the level of difficulty contained within the scenario elements of the programme, which may result in variations of the grading results.

response	Partially accepted Please see the new proposal in the Opinion.
comment	<p>331 comment by: UK CAA</p> <p>Page No: 6</p> <p>Paragraph No: ARO.OPS.226 Approval and oversight of evidence-based training programmes</p> <p>Comment: The IR does not provide any details for instructor training and evaluation. We recommend that a syllabus with appropriate certification/attestation is created.</p> <p>Justification: Standardisation.</p>
response	Partially accepted ORO.FC.146 has been redrafted to provide more guidance.
comment	<p>332 comment by: UK CAA</p> <p>Page No: 6</p> <p>Paragraph No: ARO.OPS.226, Approval and oversight of evidence-based training programmes</p> <p>Comment: We recommend providing clear guidance/criteria on minimum standards to be achieved. This will assist both the operator and the NAA in ensuring the correct metrics are being used.</p> <p>Justification: Standardisation.</p>
response	Accepted AMC1 ORO.FC.231(a), on EBT programme suitability, is proposed to provide clear guidance/criteria. A reference to this AMC is introduced in the AMC and GM to Part-ARO.
comment	<p>367 comment by: European Cockpit Association</p> <p>Commented text: ARO.OPS.226 (c) (2) (i) (c) Before approving an EBT programme, the competent authority shall: (2) assess the capability of the operator to support the implementation of the EBT programme. The following elements shall be considered as a minimum: (i) the maturity and capability of the operator's management system, this programmes suitability;</p> <p>ECA comment: Guidance must be provided to enable authority to assess what is meant by maturity, when capability is linked to ressources, maturity is too subjective.</p>

response	Partially accepted AMC1 ORO.FC.231(a), on EBT programme suitability, is proposed to provide clear guidance/criteria. A reference to this AMC is introduced in the AMC and GM to Part-ARO.
comment	368 comment by: <i>European Cockpit Association</i> Commented text: ARO.OPS.226 (c) (2) (iv) (c) Before approving an EBT programme, the competent authority shall: (2) assess the capability of the operator to support the implementation of the EBT programme. The following elements shall be considered as a minimum: (iv) the experience of the relevant personnel, fundamentally of the flight crew instructors, in the use of the processes and procedures that support the implementation of the EBT programme; and ECA comment: ECA supports this requisite, and will therefore propose amendments to support EBT.
response	Noted
comment	447 comment by: <i>European Cockpit Association</i> Annex II (Part ARO) ARO.OPS.226 Approval and oversight of evidence-based training programs <i>(iii) the suitability of the operator's grading and assessment scheme;</i> Comment: Include GM defining "suitability of the assessment scheme"
response	Partially accepted Further guidance is provided in ORO.FC.231 (d) and the associated AMC and GM.
comment	471 comment by: <i>LBA Germany</i> easa should help in the approval for EBT baseline programmes to ensure consistency and level playing field accross europe. Therefore we proposed that before the national authority approves the EBT programme an assesment of EASA is made for a positive or negative feedback.
response	Noted
comment	472 comment by: <i>Norway CAA - Ståle Rosland</i> I agree with the German suggestion. This to ensure equal understanding of the prerequisites, consistency between NAAs and a level playing field. So the Norwegian CAA supports the Spanish and German proposal that EASA should be consulted for a positive or negative feedback, prior to approving an EBT baseline program.
response	Noted

comment	485	comment by: RV
	<p>Comments: EASA should help in the approval of the EBT programmes to ensure consistency and level playing field across EU.</p> <p>Proposal: Therefore we proposed that before EBT baseline approval EASA should be consulted to provide a positive or negative assessment.</p>	
response	Noted	

comment	493	comment by: Vereinigung Cockpit
	<p>ARO.OPS.226 (c) (2) (i)</p> <p>(c) Before approving an EBT programme, the competent authority shall:</p> <p>(2) assess the capability of the operator to support the implementation of the EBT programme. The following elements shall be considered as a minimum:</p> <p>(i) the maturity and capability of the operator's management system, this programmes suitability;</p> <p>Comment: <i>Guidance must be provided to enable authority to assess what is meant by maturity, when capability is linked to resources, maturity is too subjective.</i></p> <p>ARO.OPS.226 (c) (2) (iv)</p> <p>(c) Before approving an EBT programme, the competent authority shall:</p> <p>(2) assess the capability of the operator to support the implementation of the EBT programme. The following elements shall be considered as a minimum:</p> <p>(iv) the experience of the relevant personnel, fundamentally of the flight crew instructors, in the use of the processes and procedures that support the implementation of the EBT programme; and</p> <p>Comment: <i>ECA supports this requisite, and will therefore propose amendments to support EBT.</i></p> <p>Annex II (Part ARO)</p> <p>ARO.OPS.226 Approval and oversight of evidence-based training programs</p> <p>(iii) the suitability of the operator's grading and assessment scheme;</p> <p>Comment: <i>Include GM defining "suitability of the assessment scheme"</i></p>	
response	<p>Partially accepted</p> <p>AMC1 ORO.FC.231(a), on EBT programme suitability, is proposed to provide clear guidance/criteria. A reference to this AMC is introduced in the AMC and GM to Part-ARO.</p> <p>Further guidance on the grading and assessment scheme is provided in ORO.FC.231 (d) and in the associated AMC and GM.</p>	

comment	506	comment by: SNPL FRANCE ALPA technical committee
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	<p>SNPL FRANCE ALPA proposes the following remark :</p> <p>ARO.OPS.226 (c) (2) (i) (c) Before approving an EBT programme, the competent authority shall: (2) assess the capability of the operator to support the implementation of the EBT programme. The following elements shall be considered as a minimum: (i) the maturity and capability of the operator’s management system, and this programmes suitability;</p> <p>REMARK : Guidance must be provided to enable authority to assess what is meant by maturity, when capability is linked to ressources, maturity is too subjective.</p>
response	<p>Accepted AMC1 ORO.FC.231(a), on EBT programme suitability, is proposed to provide clear guidance/criteria. A reference to this AMC is introduced in the AMC and GM to Part-ARO.</p>
comment	<p>507 comment by: SNPL FRANCE ALPA technical committee</p> <p>SNPL FRANCE ALPA proposes the following remark :</p> <p>ARO.OPS.226 (c) (2) (iv) (c) Before approving an EBT programme, the competent authority shall: (2) assess the capability of the operator to support the implementation of the EBT programme. The following elements shall be considered as a minimum: (iv) the experience of the relevant personnel, fundamentally of the flight crew instructors, in the use of the processes and procedures that support the implementation of the EBT programme; and...</p> <p>SNPL FRANCE ALPA supports this requisite, and therefore will propose amendments to support EBT.</p>
response	<p>Noted</p>
comment	<p>622 comment by: European Cockpit Association</p> <p>ECA proposes EASA to provide and be responsible for the training, guidance, oversight and final approval of EBT programs, at least in the initial stages of mixed and base line implementation.</p> <p>Commented text: ARO.OPS.226 (a) (b) (c) <i>Where a competent authority grants an approval for EBT programmes, inspectors must receive qualification and training in EBT principles, application, approval processes and continuing oversight.</i> <i>The competent authority shall assess and oversee the EBT programme, together with the processes that support the implementation of the EBT programme</i> <i>Before approving an EBT programme, the competent authority shall:</i></p>

	<p>ECA comment: By whom and how will the national authorities (NAs) be trained? How can we ensure that the training aligns with EASA principles?</p> <p>Rationale: Due to the lack of experience and the newness of EBT concept, we are going to observe a disparity of criteria amongst NAs, which may affect crews, operators, and therefore might create an unfair competition by different requirements.</p>
response	Noted
comment	<p>650 comment by: IATA</p> <p>Where a competent authority grants an approval for EBT programmes, inspectors must receive qualification and training in EBT principles, application, approval processes and continuing oversight.</p> <p>Comments: Who can deliver this training for an NAA that is going to issue approvals for an EBT training programme?</p> <p>Proposal: Create a standardized training program that states clearly who (person or business) can deliver this approved training for the NAA.</p>
response	<p>Noted</p> <p>EPAS foresees a safety promotion task (SPT.012).</p>

ORO.FC.145 Provision of training	p. 7
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comment	<p>1 comment by: Michel Lacombe AF Training department and AF ATO</p>
	<p>Annex III (Part-ORO) to Regulation (EU) No 965/2012 ORO.FC.145 Provision of training</p> <p>(a) All the training required in this Subpart shall be conducted:</p> <p>(1) in accordance with the training programmes and syllabi established by the operator in the operations manual;</p> <p>(2) by appropriately qualified personnel. In the case of flight and flight simulation training and checking, the personnel providing the training and conducting the checks shall be qualified in accordance with Annex I (Part-FCL) to Regulation (EU) No 1178/2011;</p> <p>(3) in addition to the above, for an approved EBT programme:</p> <p>(i) personnel providing assessment and training shall hold an Annex I (Part-FCL) instructor or examiner certificate; and</p> <p>(ii) have completed the operator's EBT instructor standardisation</p> <p>Successful completion of the operator's EBT standardisation will qualify the instructor to perform practical assessment in competencies.</p>



	<p>(iii) be enrolled in the operator EBT recurrent training programme.</p> <p>As EBT programme is depending of the operator context, and want to assess and trained about operational situations that will guarantee that the instructors will know the operator lines context and that the SFI or SFE will have a recent expertise of lines operations.</p>
response	<p>Not accepted</p> <p>Traditional recurrent training allows SFIs to perform such training. To ensure level playing field, it is necessary to maintain the approach regarding SFIs. However, EBT has proposed additional requirements for SFIs — they need to attend the EBT instructor course.</p> <p>In addition, when the validity of the line evaluation of competence (old line check) is extended, an instructor enrolled in the airline (with a valid line evaluation of competence) is necessary to deliver the module once a year.</p>
comment	<p>27 comment by: <i>FNAM</i></p> <p>ISSUE</p> <p>EBT programme depends on the operator context and specificities. EBT instructors should assess, train and be trained on specific operational situations representing the operator lines context. All instructors (including SFI and SFE) should therefore be trained and have a recent expertise of specific operator lines operations.</p> <p>PROPOSAL</p> <p>Add:</p> <p>‘(3) in addition to the above, for an approved EBT programme:</p> <p>(i) personnel providing assessment and training shall hold an Annex I (Part-FCL) instructor or examiner certificate; and</p> <p>(ii) have completed the operator’s EBT instructor standardisation</p> <p>Successful completion of the operator’s EBT standardisation will qualify the instructor to perform practical assessment in competencies.</p> <p>(iii) be enrolled in the operator EBT recurrent training programme.’</p>
response	<p>Not accepted</p> <p>However, the review group took into account the safety objective of this comment, and they decided to modify the requirement in point (a) of AMC2 ORO.FC.231(h)(3) to ensure during the EBT modules the trainee maintains a regular exposure to an instructor with valid line experience.</p> <p>One of the purposes of a line check is to verify the ability of a pilot to undertake normal line operations in the real aircraft. The validity of the line evaluation of competence is extended on the condition that the pilot ability to undertake normal line operations is maintained.</p> <p>Therefore as line checks are replaced by FFS evaluations, to have the credits to extend the validity of the line evaluation of competence, the operator is required to integrate into these modules as much as possible the ‘experience’ of a line check.</p> <p>For that matter, it is important that the evaluation is well designed, but also that at least once a year, the person delivering this EBT evaluation, which is a ‘mirror of the</p>



line check', is an instructor who has a valid line evaluation of competence with that particular operator in order to be able to provide the necessary relevance of line flying experience.

comment

279

comment by: *Brussels Airlines*

ORO.FC.231 (a)(1)
EBT PROGRAMME

How can a equivalent level of safety being demonstrated in case of implementing the new concept ?

response

Partially accepted
EPAS includes a new safety promotion task (SPT.012) to provide guidance on the implementation of EBT.

comment

333

comment by: *UK CAA*

Page No: 7

Paragraph No: ORO.FC.145 Provision of training, sub-paragraph (a)(3)(ii)

Comment: We believe the additional paragraph after (a)(3)(ii) regarding the instructor's EBT qualification would be better placed as a new sub-paragraph (b) as shown.

Justification: Clarity.

Proposed Text:

(ii) have completed the operator's EBT instructor standardisation.

(b) Successful completion of the operator's EBT standardisation will qualify the instructor to perform practical assessment in competencies

response

Accepted

comment

369

comment by: *European Cockpit Association*

ECA believes that Instructors must be trained for EBT and standardised as per AMC1 to ORO.FC.145 therefore ECA proposes the following wording:

ORO.FC.145 Provision of training

(a) All the training required in this Subpart shall be conducted:

...

(3) in addition to the above, for an approved EBT program:

(i) personnel providing assessment and training shall hold an Annex I (Part-FCL) instructor or examiner certificate; and

(ii) have completed the operator's EBT instructor **training and** standardisation.



	<p>Successful completion of the operator's EBT training and standardisation will qualify the instructor to perform practical assessment in competencies, and</p> <p>Rationale: to align ORO.FC.145 with the AMC1</p>
response	<p>Not accepted</p> <p>Both AMC1 and AMC2 ORO.FC.146 deal with 'instructor standardisation'. It is true that training is required during the initial standardisation. However, for simplicity reasons the wording is maintained.</p>
comment	<p>370 comment by: <i>European Cockpit Association</i></p> <p>ECA proposes the following amendment:</p> <p>ORO.FC.145 Provision of training</p> <p>(a) All the training required in this Subpart shall be conducted: (...)</p> <p>(3) in addition to the above, for an approved EBT programme: (iii) be enrolled in the operators EBT program and have successfully completed the Operator's recurrent program as per ORO.FC.231.</p> <p>Rationale:</p> <p>This will ensure that the instructors providing EBT are flying the line for this designated EBT operator which is essential as this is a recurrent training scheme not a qualification program.</p> <p>The whole EBT concept is based on more operational training made by highly qualified instructors. When standardisation is covered, initial training for an EBT instructor is necessary as well as recurrent training in an EBT assessment of competence.</p> <p>Moreover EBT programs cannot be generic, but linked to an operator environment. It is believed that only enrolled instructors can be at the right level of knowledge for both the operational environment and the ATO specific competency model, and with the relevant experience as specified in ARO.OPS.226 (c) (2) (iv).</p> <p>Air operations are evolving very quickly, as technology is in permanent evolution, and this is not expected to stop in the near future. It is believed that only regular practice of the line flying will allow instructors to maintain a strong link between line experience and training, fundamental pillar of the EBT concept.</p>
response	<p>Not accepted</p> <p>However, a new provision is introduced for those operators wishing to extend the validity of line evaluation of competence to 2 or 3 years, provided that one module per year is conducted by an instructor that is enrolled in the operator. This new provision is partially aligned with this comment.</p>
comment	<p>508 comment by: <i>SNPL FRANCE ALPA technical committee</i></p> <p>SNPL FRANCE ALPA believes that instructors must be trained for EBT and standardised as per AMC1 to ORO.FC.145 therefore SNPL proposes the following modification:</p>

	<p>ORO.FC.145 Provision of training</p> <p>(a) All the training required in this Subpart shall be conducted: ... (3) in addition to the above, for an approved EBT programme: (i) personnel providing assessment and training shall hold an Annex I (Part-FCL) instructor or examiner certificate; and (ii) have completed the operator’s EBT instructor training and standardisation.</p> <p>Successful completion of the operator’s EBT training and standardisation will qualify the instructor to perform practical assessment in competencies.</p> <p>Rationale: to align ORO.FC.145 with the AMC1</p>
response	<p>Not accepted</p> <p>Both AMC1 and AMC2 ORO.FC.146 deal with ‘instructor standardisation’.</p> <p>It is true that training is required during the initial standardisation. However, for simplicity reasons the wording is maintained.</p>
comment	<p>509 comment by: SNPL FRANCE ALPA technical committee</p> <p>SNPL FRANCE ALPA proposes the following amendment:</p> <p>ORO.FC.145 Provision of training</p> <p>(a) All the training required in this Subpart shall be conducted: ... (3) in addition to the above, for an approved EBT programme:</p> <p>(iii) be enrolled in the operators EBT program and have successfully completed the Operator's recurrent program as per ORO.FC.231.</p> <p>Rationale: This will ensure that the instructors providing EBT are flying the line for this designated EBT operator which is essential as this a recurrent training scheme not a qualification program.</p> <p>EBT whole concept is based on more operational training made by highly qualified instructors. When standardisation is covered, initial training for an EBT instructor is necessary.</p> <p>Moreover EBT programs cannot be generic, but linked to an operator environment. It is believed that only enrolled instructors can be at the right level of knowledge for both the operational environment and the ATO specific competency model, and with the relevant experience as specified in ARO.OPS.226 (c) (2) (iv). Air operations are evolving very quickly, as technology is in permanent evolution, and is not expected to stop in a near future. It is believed that only regular practice of the line will allow instructors to maintain a strong link between line experience and training, again one pillar of the EBT concept.</p>
response	<p>Not accepted</p> <p>However, a new provision is introduced for those operators wishing to extend the validity of line evaluation of competence to 2 or 3 years, provided that one module</p>



per year is conducted by an instructor that is enrolled in the operator. This new provision is partially aligned with this comment.

comment 510 comment by: SNPL FRANCE ALPA technical committee

SNPL FRANCE ALPA proposes the following change :

ORO.FC.231(a)(2)(i)

(i) assess and develop the competencies ~~required by~~ **expected from** flight crew members for safe, effective and efficient operations of aircraft;

Proposal: delete required by and replace it by “**expected from**”

Rationale : competencies are not strictly measurable, they are underlying needs for safe operations.

response Not accepted
According to ICAO Doc 9995, ‘The aim of this programme is to identify, develop and evaluate the competencies **required** to operate safely, effectively and efficiently in a commercial air transport environment whilst addressing the most relevant threats according to evidence collected in accidents, incidents, flight operations and training.’

comment 511 comment by: SNPL FRANCE ALPA technical committee

SNPL FRANCE ALPA proposes the following change :

ORO.FC.231(a)(2)(i)

(i) assess and develop the competencies ~~required by~~ **expected from** flight crew members for safe, ~~effective and efficient~~ operations of aircraft;

Proposal: suppress effective and efficient

Rationale: there is no definition or criteria for effective and efficient operations. In a licensing environment the regulation should not specify operational prescriptions which do vary from one operator to another.

response Not accepted
According to ICAO Doc 9995, ‘The aim of this programme is to identify, develop and evaluate the competencies **required** to operate safely, effectively and efficiently in a commercial air transport environment whilst addressing the most relevant threats according to evidence collected in accidents, incidents, flight operations and training.’

comment 554 comment by: EBT Foundation

Page No: 7

Paragraph No: (a) (3) (ii)



response	<p>Comment: Sub para (ii) refers to standardisation twice. The text could be adjusted</p> <p>Justification: Clarity</p> <p>Proposed text:</p> <p>replace para (ii) with (ii) have successfully completed the operator's EBT instructor standardisation</p> <p>Not accepted. There is no repetition in the provision. Please read the explanatory note of the NPA or the Appendix to the Opinion where EASA explains the reasoning behind most of the words chosen for this point.</p>
comment	<p>559 comment by: CAE</p> <p>Requiring the EBT instructor to hold only an EASA instructor certificate is a restriction of trade and potentially limits the reach and sourcing of instructors in ATOs. As EASA training can be provided by instructors not holding EASA certificates under FCL.900(c), CAE proposes that this equally applies to the EBT instructor. The important element is the EBT instructor training and standardisation.</p> <p>We believe that EBT instructor training should not be Operator-specific. As an EBT instructor, one should be adaptable to any operation or ATO by definition. Chapter 4 of ICAO Doc 9995 explains the implementation principles, methodology and competencies, all generic and not specific (for baseline EBT), and chapter 4.3 states:</p> <p>"In contrast to an enhanced EBT programme, which provides benefits in operation-specific training, the baseline EBT programme is a generation-specific, ready-made programme. It does not require detailed analysis or programme design by the Operator or the ATO. It only needs the necessary adaptation to aircraft type and operation, and the development of an assessment and grading system."</p> <p>Using Doc 9995 as the rationale, we propose the deletion of the words "the operator's" in ORO.FC.145(a)(3)(ii).</p> <p>Not accepted EBT is intended to address the operational risks of the operator. The instructor training should be operator-specific.</p>
comment	<p>604 comment by: Vereinigung Cockpit</p> <p>Vereinigung Cockpit believes that <u>Instructors</u> must be trained for EBT and standardised as per AMC1 to ORO.FC.145 therefore ECA proposes the following wording:</p> <p>ORO.FC.145 Provision of training</p> <p>(a) All the training required in this Subpart shall be conducted:</p> <p>...</p>

(3) in addition to the above, for an approved EBT program:
 (i) personnel providing assessment and training shall hold an Annex I (Part-FCL) instructor or examiner certificate; and
 (ii) have completed the operator's EBT instructor **training and** standardisation.
 Successful completion of the operator's EBT **training and** standardisation will qualify the instructor to perform practical assessment in competencies, **and**

Rationale: to align ORO.FC.145 with the AMC1

ORO.FC.145 Provision of training

(a) All the training required in this Subpart shall be conducted:

(...)

(3) in addition to the above, for an approved EBT programme:

(iii) be enrolled in the operators EBT program and have successfully completed the Operator's recurrent program as per ORO.FC.231.

Rationale:

This will ensure that the instructors providing EBT are flying the line for this designated EBT operator which is essential as this is a recurrent training scheme not a qualification program.

The whole EBT concept is based on more operational training made by highly qualified instructors. When standardisation is covered, initial training for an EBT instructor is necessary as well as recurrent training in an EBT assessment of competence.

Moreover EBT programs cannot be generic, but linked to an operator environment. It is believed that only enrolled instructors can be at the right level of knowledge for both the operational environment and the ATO specific competency model, and with the relevant experience as specified in ARO.OPS.226 (c) (2) (iv).

Air operations are evolving very quickly, as technology is in permanent evolution, and this is not expected to stop in the near future. It is believed that only regular practice of the line flying will allow instructors to maintain a strong link between line experience and training, fundamental pillar of the EBT concept.

response

Not accepted

Both AMC1 and AMC2 ORO.FC.146 deal with 'instructor standardisation'.

It is true that training is required during the initial standardisation. However, for simplicity reasons the wording is maintained.

comment

627

comment by: *European Cockpit Association*

ECA believes that instructors must be trained in, or hold, CRM-I in order to become an EBT instructor.

ECA therefore proposes the following wording:

ORO.FC.145 Provision of training

(a) All the training required in this Subpart shall be conducted:

...



(3) in addition to the above, for an approved EBT program:
 (i) personnel providing assessment and training shall hold an Annex I (Part-FCL) instructor or examiner certificate; **and CRM-I**; and
 (ii) have completed the operator's EBT instructor **training and** standardisation. **If the trainee is not a CRM-I, Operators EBT course shall include this training.**
 Successful completion of the operator's EBT **training and** standardisation will qualify the instructor to perform practical assessment in competencies, **and**

Rationale:

Without a deep understanding of HF and CRM, it is IMPOSIBLE for an Instructor (regardless of the type and/or experience) to be able to identify, train and assess competencies, from which at least the "Attitude" is based on CRM principles.

response

Noted

EPAS includes a safety promotion task (SPT.012) to ensure implementation issues are addressed.

comment

651

comment by: IATA

Annex III (Part-ORO) to Regulation (EU) No 965/2012 ORO.FC.145 Provision of training

(a) All the training required in this Subpart shall be conducted:

(1) in accordance with the training programmes and syllabi established by the operator in the operations manual;

(2) by appropriately qualified personnel. In the case of flight and flight simulation training and checking, the personnel providing the training and conducting the checks shall be qualified in accordance with Annex I (Part-FCL) to Regulation (EU) No 1178/2011;

(3) in addition to the above, for an approved EBT programme:

(i) personnel providing assessment and training shall hold an Annex I (Part-FCL) instructor or examiner certificate; and

(ii) have completed the operator's EBT instructor standardisation; [proposed text:] **and**

(iii) be enrolled in the operator EBT recurrent training programme.

[end of proposed text]

Successful completion of the operator's EBT standardisation will qualify the instructor to perform practical assessment in competencies.

Comment :

As EBT programme is depending of the operator context, and want to assess and train operational situations, this addition will guarantee that the instructors will know the operator lines context and that the SFI or SFE will have a recent expertise of lines operations.

response

Not accepted



However, the review group took into account the safety objective of this comment, and they decided to modify the requirement in point (a) of AMC2 ORO.FC.231(h)(3) to ensure during the EBT modules the trainee maintains a regular exposure to an instructor with valid line experience.

One of the purposes of a line check is to verify the ability of a pilot to undertake normal line operations in the real aircraft. The validity of the line evaluation of competence is extended on the condition that the pilot ability to undertake normal line operations is maintained.

Therefore as line checks are replaced by FFS evaluations, to have the credits to extend the validity of the line evaluation of competence, the operator is required to integrate into these modules as much as possible the 'experience' of a line check.

For that matter, it is important that the evaluation is well designed, but also that at least once a year, the person delivering this EBT evaluation, which is a 'mirror of the line check', is an instructor who has a valid line evaluation of competence with that particular operator in order to be able to provide the necessary relevance of line flying experience.

comment	652	comment by: IATA
	EBT Instructor standardisation will qualify the instructor to perform practical assessment in competencies. A more detailed description of the requirements for performing the assessment could be considered.	
response	Noted	

ORO.FC.231 Evidence-based training

p. 7-9

comment	28	comment by: FNAM
	<p>ISSUE – (a)(2)(ii)</p> <p>The proposed disposal lists required information for the operators' approved EBT programme. FNAM thanks for this clear list. Nevertheless, FNAM fears that some operators may not be able to present valuable and adapted data on a 3-year period. It may be the case of small operators performing business or general aviation activities. EBT principle should be encouraged to small operators in order to enhance flight safety level and improve the training efficiency. Flexible provisions should be provided for small operators in order to facilitate and organize resources and data pooling thanks to manufacturers or between operators to implement EBT. Therefore, dedicated AMC or GM should allow operators to benefit of data from other operators performing the same type of operation or operating the same type of aircraft: data base shared between few operators.</p> <p>PROPOSAL</p> <p>Allow flexibilities for small operators and encourage EBT implementations thanks to pooling resources and data with manufacturers or between operators</p>	



response	Not accepted However, the issue will be studied during Phase 3 of RMT.0599. See the latest EPAS.
comment	29 comment by: <i>FNAM</i> AGREEMENT The proposed disposal lists the different requirements for flight crew members. FNAM thanks for this clear list. The 2 required modules within the validity period of 12 months should not follow quickly and should at least be separated by 3 months. The training and the evaluation of the flight crew would be therefore improved and it would avoid to have all FSTD trainings in successive few days on a 12-month period.
response	Noted
comment	128 comment by: <i>FlightSafety International - Regional Director Regulatory Affairs</i> i. More clarity is required regarding the competencies expected of CBTA instructors. ORO.FC must include AMCs setting out EASA's endorsed competencies of the personnel in whose hands rest the task of delivering CBTA. Reference to or inclusion of material being generated by the ICAO/IATA CBTA-TF and PANS-TRG would be beneficial. Continued reliance upon the legacy instructor competencies listed in FCL.920 is ill-suited to this new paradigm in training.
response	Noted More guidance is provided. See the Opinion.
comment	138 comment by: <i>Olaf Birgels (DLH)</i> Reference: (c) TRAINING SYSTEM PERFORMANCE (1) The EBT system performance shall be measured and evaluated through a feedback system in order to: (i) validate and refine the operator's approved EBT programme; and (ii) ascertain that the operator's approved EBT programme develops pilot competencies. (2) The feedback system shall be included in the operator's management system. Question: <ul style="list-style-type: none">• What kind of operator management system?• Which feedback?<ul style="list-style-type: none">○ Pilot to instructor○ Instructor to pilot○ Pilot to trainings department
response	Partially accepted



	More guidance is provided in the Opinion.	
comment	170	comment by: <i>M.Held / Lufthansa Airlines</i>
	(c) Training System performance (2) The feedback System...	
	What kind of operator management system? Which feedback? Pilot to instructor - Instructor to pilot - Pilot to trainings department	
response	Partially accepted More guidance is provided in the Opinion.	
comment	198	comment by: <i>Lufthansa CityLine GmbH</i>
	(2) The feedback system shall be included in the operator's management system.	
	Question -What kind of operator management system? Which feedback? Pilot to instructor - Instructor to pilot - Pilot to trainings department	
	concordance assurance	
response	Partially accepted More guidance is provided in the Opinion.	
comment	246	comment by: <i>HEAD OF TRAINING PROGRAMS AZ FLEET</i>
	<ul style="list-style-type: none"> NPA (B) page 8 (3) (ii) validity period. Is it referring to the validity of the type rating or EBT period? 	
response	Noted. The validity period of the EBT module. The principle follows the concept already established in the ATQP (ORO.FC.A.145) and the OPC (ORO.FC.230) where the OPC has a validity period, while the FCL provides the same or different period.	
comment	255	comment by: <i>SWISS Intl. Air Lines</i>
	(c) (2): what kind of operator management system? Which feedback? Pilot to instructor / Instructor to pilot / Pilot to training department ??	
response	Partially accepted More guidance is provided in the Opinion.	

comment	<p>280 comment by: <i>Brussels Airlines</i></p> <p>ORO.FC.231</p> <p>Training Sytem Performance</p> <p>Can the feedback system be defined ? What kind of operator management system ? Feedback to training management, instructors and /or trainees ?</p>
response	<p>Partially accepted More guidance is provided in the Opinion.</p>
comment	<p>334 comment by: <i>UK CAA</i></p> <p>Page No: 7</p> <p>Paragraph No: ORO.FC.231 Evidence-based training</p> <p>Comment: We are concerned that there are no criteria for measuring concordance. We recommend that clear guidance/criteria on minimum standards to be achieved is provided. This will assist both the operator and the NAA in ensuring the correct metrics are being used.</p> <p>Justification: Clarity and standardisation.</p>
response	<p>Accepted</p>
comment	<p>371 comment by: <i>European Cockpit Association</i></p> <p>ECA proposes the following change:</p> <p>ORO.FC.231(a)(2)(i) (i) assess and develop the competencies required by expected from flight crew members for safe, effective and efficient operations of aircraft;</p> <p>Proposal: delete required by and replace it by “expected from”</p> <p>Rationale: competencies are not strictly measurable, they are underlying needs for safe operations.</p>
response	<p>Not accepted According to ICAO Doc 9995, ‘The aim of this programme is to identify, develop and evaluate the competencies required to operate safely, effectively and efficiently in a commercial air transport environment whilst addressing the most relevant threats according to evidence collected in accidents, incidents, flight operations and training.’</p>
comment	<p>372 comment by: <i>European Cockpit Association</i></p>



	<p>ECA proposes the following change:</p> <p>ORO.FC.231(a)(2)(i) (i) assess and develop the competencies required by expected from flight crew members for safe, effective and efficient operations of aircraft;</p> <p>Proposal: Delete effective and efficient</p> <p>Rational: There is no definition or criteria for <i>effective and efficient</i> operations. In a licensing environment the regulation should not specify operational prescriptions which do vary from one operator to another.</p>
response	<p>Not accepted</p> <p>According to ICAO Doc 9995, 'The aim of this programme is to identify, develop and evaluate the competencies required to operate safely, effectively and efficiently in a commercial air transport environment whilst addressing the most relevant threats according to evidence collected in accidents, incidents, flight operations and training.'</p>
comment	<p>373 comment by: <i>European Cockpit Association</i></p> <p>ECA proposes the following editorial change:</p> <p>ORO FC 231 (a)(2)(iii)(C) scenario-based training (C) scenario-based training phase, a-comprising line-orientated flight scenario(s) and in-seat instruction to develop competencies and address individual training needs; and</p> <p>Comment: Delete the « a » before comprising</p>
response	<p>Accepted</p>
comment	<p>374 comment by: <i>European Cockpit Association</i></p> <p>ECA proposes the following amendment:</p> <p>ORO.FC231(a)(3)(ii) C will not continue line operations if during a module the performance observed was below the minimum acceptable level assessed by a TRI/TRE. The flight crew member continues line operations when a module is completed When a module is completed, the flight crew member can continue line operations.</p> <p>Rational: Line operations are under the privileges of TRI/TRE for the reason it is required to hold a valid licence to train or check.</p>

response	<p>The minimum level of instructor for EBT is TRI. As the validation of a module is giving credits against ICAO annex 6 on one hand, and allowing less frequent line check on the other hand, the validation of one module can not be done by less than a trained, standardised TRI.</p> <p>Not accepted</p>
comment	<p>375 comment by: <i>European Cockpit Association</i></p> <p>ECA proposes the following changes:</p> <p>ORO.FC.231 (a)(4)</p> <p>(4) The operator shall establish an instructor competence and concordance assurance programme</p> <p>(iii) (i) Relevant metrics must be used to support this programme.</p> <p>(iv) (ii) All instructors must be subject to this programme.</p> <p>(v) (iii) Sufficient instructor competence in EBT is demonstrated.</p> <p>(iv) Sufficient instructor concordance must be demonstrated</p> <p>Reasoning:</p> <p>The numeration of (a)(4) seems to be continued from (a)(3) and the EBT instructor competence must be demonstrated before concordance can be assessed.</p>
response	<p>Accepted</p> <p>The numbering has been corrected.</p>
comment	<p>376 comment by: <i>European Cockpit Association</i></p> <p>ECA proposes the following changes:</p> <p>ORO.FC.231 (b)(1)</p> <p>(b) COMPETENCY FRAMEWORKS</p> <p>The operator shall use a competency framework for all aspects of assessment and training within an approved EBT programme. The competency framework shall :</p> <p>(1) include observable behaviours required for safe, effective and efficient operations the competencies descriptions and their associated performance criteria; and</p> <p>(2) be comprehensive, accurate, and usable</p> <p>Comment: The competency framework used by the operator should refer to the ICAO structure of competencies which are not limited to observable behaviours but include more global performance criteria.</p> <p>Rationale: Using a verbatim in line with ICAO PANS TRG make the text more consistent. In a licensing environment <i>effectivity or efficiency</i> does not seem a common criteria across the industry, therefore it should be removed.</p>
response	<p>Partially accepted</p>

A new provision 'a performance criterion and a scale for each competency' is introduced in ORO.FC.231(d). The proposed deletion is not accepted for harmonisation with Doc 9995.

comment

377

comment by: *European Cockpit Association*

ECA proposes the following changes:

ORO.FC.231(b)(3)

(b) COMPETENCY FRAMEWORKS

The operator shall use a competency framework for all aspects of assessment and training within an approved EBT programme. The competency framework shall :

...

(3) be approved by the competent authority.

Rationale:

Just like for quality processes and instructors standardisation, as EBT concept offers the possibility for operator to assess competencies with different frameworks, therefore it is the authority's responsibility to approve the competency framework used by the operator's programme.

Article 30 of ICAO convention put in place the need of mutual recognition of licences. Moving from a performance based to a competency based system should be done with an equivalent level of responsibility of ICAO states.

An adapted competency framework is like the DNA of an EBT programme. The complexity of the task is high enough to justify the authority commitment starting by its definition.

Licences validities are based on delivery and revalidation processes. As EBT will introduce a new way to revalidate licences and Class or Type rating, with the use of CBT, ICAO pans training (amendment 5 to be published) should be the base line for EASA implementation, and taking into account ICAO's work on CBT, which specify:

Chapter 1 ICAO Competency Framework for Aeroplane Pilots

1.1 INTRODUCTION

3. The ICAO competency framework for aeroplane pilots defined in Appendix 1 to this chapter shall be used by the ATO or the operator as the basis for the development of an adapted competency model, **approved by the Licensing Authority**, for pilot licences and ratings in accordance with PartI, Chapter 2.

response

Not accepted

ORO.FC.145 point (c) applies: 'In the case of CAT operations, training and checking programmes, including syllabi and use of individual flight simulation training devices (FSTDs), shall be approved by the competent authority'.

Therefore, the competency framework is already approved via the approval of the OPS Manual part D by the competent authority.

comment

378

comment by: *European Cockpit Association*

ECA proposes to add new subparagraphs:

(c)(3) and (4) to ORO.FC.231 as follows



	<p>ORO.FC.231 (c) TRAINING SYSTEM PERFORMANCE ... (3) The operator shall establish and maintain a training data monitoring programme, (4) The training data monitoring programme shall be non-punitive and contain adequate safeguards to protect the source(s) of the data.</p> <p>Comment: EBT is data driven, provision should be equivalent as per FDM</p> <p>Rationale: EBT is data driven, it is of utmost importance to raise data collection and protection at an adequate level. References to OPS are given in GM material (see page 82). This is not only relevant to protect systemic but also individual personal data. Therefore ECA suggests the following change and upgrade GM 2 ORO FC 231 (c) (see page 82) to an AMC, to maintain binding regulation on this very sensible subject.</p>
response	<p>Not accepted However, provisions to ensure data protection and a NON-punitive environment have been introduced.</p>
comment	<p>379 comment by: <i>European Cockpit Association</i></p> <p>ECA proposes the following change:</p> <p>ORO.FC.231(d) Grading system (1) (iii) : (iii) data integrity and security</p> <p>Comment: Add “and security” rationale: the confidentiality of the data must be ensured and in accordance with the GDPR regulation</p>
response	<p>Accepted</p>
comment	<p>401 comment by: <i>Lufthansa Cargo AG</i></p> <p>(4) The operator shall establish an instructor concordance assurance programme.</p> <p>Detailed Specification needed: Method, implementation (classroom, distance evaluation, etc.), concord dimensions, time intervals to demonstrate instructor concordance, minimum concordance value</p> <p>(c) TRAINING SYSTEM PERFORMANCE (1) The EBT system performance shall be measured and evaluated through a feedback system in order to:</p>

	<p>(i) validate and refine the operator's approved EBT programme; and (ii) ascertain that the operator's approved EBT programme develops pilot competencies.</p> <p>Detailed Specification needed: Measurement of EBT system performance by "before and after comparison"? How detailed? Which feedback (Instructor feedback, trainee feedback, etc.) ?</p>
response	Accepted Further guidance about concordance is introduced.
comment	<p>451 comment by: <i>European Cockpit Association</i></p> <p>ORO.FC.231 Evidence based Training (3)(ii)(c) will not continue line operations if during a module the performance observed was below the minimum level. The flight crew member continues line operation when a module is complete.</p> <p>Comment: (c) needs to be (iii) otherwise the sentence would read: The module is complete when: will not continue line operations</p>
response	Partially accepted The provision has been reworded to ensure clarity regarding the requirement.
comment	<p>452 comment by: <i>European Cockpit Association</i></p> <p>ORO.FC.231 (e) SUITABLE TRAINING DEVICES AND VOLUME TO COMPLETE THE OPERATORS APPROVED EBT PROGRAMME:</p> <p>(1) Each EBT module shall be conducted in an FSTD with a <u>qualification level</u> adequate to complete proficiency check/training</p> <p>Comment: Definition/Reference for qualification level of the FSTD is required</p> <p>(2) The operator shall provide <u>sufficient volume of hours</u> in a suitable training device for the pilot to complete the operator's approved EBT programme</p> <p>Comment: Sufficient volume of hours: ICAO doc 9995 states 48h over a three year period, since EBT being new, that basic assumption shall be followed by EASA by including this here (iso AMC): Reference: ICAO doc 9995, PART I, Chapter 3, 3.6.1 and ICAO doc 9995, PART II, Chapter 1, 1.1.1</p>
response	Not accepted



AMC1 ORO.FC.231(e) in the NPA and the proposed CS OPS.EBT.231.4 in the Appendix to the Opinion already define the qualification level and volume of hours to 48 hours (36 hours subject to authority approval) and FFS level C or D.

comment

495

comment by: *Vereinigung Cockpit***ORO.FC.231(a)(2)(i)**

(i) assess and develop the competencies ~~required by~~ **expected from** flight crew members for safe, effective and efficient operations of aircraft;

Proposal: delete required by and replace it by “**expected from**”

Rationale: competencies are not strictly measurable, they are underlying needs for safe operations.

ORO.FC.231(a)(2)(i)

(i) assess and develop the competencies ~~required by~~ **expected from** flight crew members for safe, ~~effective and efficient~~ operations of aircraft;

Proposal:

Delete effective and efficient

Rational:

There is no definition or criteria for *effective and efficient* operations. In a licensing environment the regulation should not specify operational prescriptions which do vary from one operator to another.

ORO FC 231 (a)(2)(iii)(C) scenario-based training

(C) scenario-based training phase, ~~a~~-comprising line-orientated flight scenario(s) and in-seat instruction to develop competencies and address individual training needs; and

Comment:

Delete the « a » before comprising

ORO.FC.231 Evidence based Training

(3)(ii)(c) will not continue line operations if during a module the performance observed was below the minimum level. The flight crew member continues line operation when a module is complete.

Comment: (c) needs to be (iii) otherwise the sentence would read :The module is complete when: will not continue line operations



ORO.FC.231

(e) SUITABLE TRAINING DEVICES AND VOLUME TO COMPLETE THE OPERATORS APPROVED EBT PROGRAMME

(1) Each EBT module shall be conducted in an FSTD with a qualification level adequate to complete proficiency check/training

Comment: Definition/Reference for qualification level of the FSTD required

(2) The operator shall provide sufficient volume of hours in a suitable training device for the pilot to complete the operator's approved EBT programme

Comment: Sufficient volume of hours: ICAO doc 9995 states 48h over a three year period, since EBT being new, that basic assumption shall be followed by EASA by including this here (iso AMC): Reference: ICAO doc 9995, PART I, Chapter 3, 3.6.1 and ICAO doc 9995, PART II, Chapter 1, 1.1.1

ORO.FC.231 (a)(4)

(4) The operator shall establish an instructor **competence and** concordance assurance programme

(iii) (i) Relevant metrics must be used to support this programme.

(iv) (ii) All instructors must be subject to this programme.

(v) (iii) Sufficient instructor competence in EBT is demonstrated.

(iv) Sufficient instructor concordance must be demonstrated

Reasoning:

The numeration of (a)(4) seems to be continued from (a)(3) and the EBT instructor competence must be demonstrated before concordance can be assessed.

ORO.FC.231 (b)(1)

(b) COMPETENCY FRAMEWORKS

The operator shall use a competency framework for all aspects of assessment and training within an approved EBT programme. The competency framework shall :

(1) include ~~observable behaviours required for safe, effective and efficient operations~~ **the competencies descriptions and their associated performance criteria;** and

(2) be comprehensive, accurate, and usable

Comment: The competency framework used by the operator should refer to the ICAO structure of competencies which are not limited to observable behaviours but include more global performance criteria.

Rationale: Using a verbatim in line with ICAO PANS TRG make the text more consistent. In a licensing environment effectivity or efficiency does not seem a common criteria across the industry, therefore **it** should be removed.

ORO.FC.231 (b)(3)*(b) COMPETENCY FRAMEWORKS**The operator shall use a competency framework for all aspects of assessment and training within an approved EBT programme. The competency framework shall :*

...

(3) be approved by the competent authority.**Rationale:***Just like for quality processes and instructors standardisation, as EBT concept offers the possibility for operator to assess competencies with different frameworks, therefore it is the authority's responsibility to approve the competency framework used by the operator's programme.**Article 30 of ICAO convention put in place the need of mutual recognition of licences. Moving from a performance based to a competency based system should be done with an equivalent level of responsibility of ICAO states.**An adapted competency framework is like the DNA of an EBT programme. The complexity of the task is high enough to justify the authority commitment starting by its definition.**Licences validities are based on delivery and revalidation processes. As EBT will introduce a new way to revalidate licences and Class or Type rating, with the use of CBT, ICAO pans training (amendment 5 to be published) should be the base line for EASA implementation, and taking into account ICAO's work on CBT, which specify:***Chapter 1 ICAO Competency Framework for Aeroplane Pilots****1.1 INTRODUCTION****3.** *The ICAO competency framework for aeroplane pilots defined in Appendix 1 to this chapter shall be used by the ATO or the operator as the basis for the development of an adapted competency model, **approved by the Licensing Authority**, for pilot licences and ratings in accordance with PartI, Chapter 2.***proposes to add new subparagraphs:
(c)(3) and (4) to ORO.FC.231 as follows****ORO.FC.231****(c) TRAINING SYSTEM PERFORMANCE**

...

(3) The operator shall establish and maintain a training data monitoring programme,**(4) The training data monitoring programme shall be non-punitive and contain adequate safeguards to protect the source(s) of the data.****Comment:**

EBT is data driven, provision should be equivalent as per FDM

Rationale:

EBT is data driven, it is of utmost importance to raise data collection and protection at an adequate level. References to OPS are given in GM material (see page 82). This is not only relevant to protect systemic but also individual personal data. Therefore ECA suggests the following change and upgrade GM 2 ORO FC 231 (c) (see page 82) to an AMC, to maintain binding regulation on this very sensible subject.

ORO.FC.231(d) Grading system (1) (iii) :

(iii) data integrity and security

Comment:

Add **“and security”**

rationale: the confidentiality of the data must be ensured and in accordance with the GDPR regulation

ORO.FC.231 Evidence based Training

(3)(ii)(c) will not continue line operations if during a module the performance observed was below the minimum level. The flight crew member continues line operation when a module is complete.

Comment:

(c) needs to be (iii) otherwise the sentence would read: The module is complete when: will not continue line operations

ORO.FC.231

(e) SUITABLE TRAINING DEVICES AND VOLUME TO COMPLETE THE OPERATORS APPROVED EBT PROGRAMME:

(1) Each EBT module shall be conducted in an FSTD with a qualification level adequate to complete proficiency check/training

Comment:

Definition/Reference for qualification level of the FSTD is required

(2) The operator shall provide sufficient volume of hours in a suitable training device for the pilot to complete the operator’s approved EBT programme

Comment:

Sufficient volume of hours: ICAO doc 9995 states 48h over a three year period, since EBT being new, that basic assumption shall be followed by EASA by including this here



	<p>(iso AMC): Reference: ICAO doc 9995, PART I, Chapter 3, 3.6.1 and ICAO doc 9995, PART II, Chapter 1, 1.1.1</p>
response	<p>Partially accepted</p> <p>According to ICAO Doc 9995, ‘The aim of this programme is to identify, develop and evaluate the competencies required to operate safely, effectively and efficiently in a commercial air transport environment whilst addressing the most relevant threats according to evidence collected in accidents, incidents, flight operations and training.’</p> <p>A new provision on competencies description and associated performance criteria has been introduced. The proposed deletion is not accepted for harmonisation with Doc 9995.</p> <p>The numbering has been corrected.</p> <p>Provisions to ensure data protection and a NON-punitive environment have been introduced.</p> <p><i>For the other comments</i></p> <p>The comment seems to be a repetition of other comments from other pilot representatives. Please find the reply to the original comments.</p>
comment	<p>512 comment by: SNPL FRANCE ALPA technical committee</p> <p>SNPL FRANCE ALPA proposes the following editorial change:</p> <p>ORO FC 231 (a)(2)(iii)(C) scenario-based training (C) scenario-based training phase, a-comprising line-orientated flight scenario(s) and in-seat instruction to develop competencies and address individual training needs; and</p> <p>Comment: suppress the « a » before comprising</p>
response	<p>Accepted</p>
comment	<p>513 comment by: SNPL FRANCE ALPA technical committee</p> <p>SNPL FRANCE ALPA proposes the following amendment:</p> <p>ORO.FC231(a)(3)(ii) C will not continue line operations if during a module the performance observed was below the minimum acceptable level assessed by a TRI/TRE. The flight crew member continues line operations when a module is completed When a module is completed, the flight crew member can continue line operations.</p> <p>Rationale : Line operation are under the privileges of TRI/TRE for the reason it is required to hold a valid licence to train or check. The minimum level of instructor for EBT is TRI. As the validation of a module is giving credits against ICAO annex 6 on one</p>

response	<p>hand, and allowing less frequent line check on the other hand, the validation of one module can not be done by less than a trained, standardised TRI.</p> <p>Not accepted As in traditional training, SFIs are allowed.</p>
comment	<p>514 comment by: SNPL FRANCE ALPA technical committee</p> <p>SNPL FRANCE ALPA proposes the following changes:</p> <p>ORO.FC.231 (a)(4) (4) The operator shall establish an instructor competence and concordance assurance programme (iii) (i) Relevant metrics must be used to support this programme. (iv) (ii) All instructors must be subject to this programme. (v) (iii) Sufficient instructor competence in EBT is demonstrated. (iv) Sufficient instructor concordance must be demonstrated</p> <p>Rationale: The numeration of (a)(4) seems to be continued from (a)(3) and the EBT instructor competence must be demonstrated before concordance can be assessed.</p>
response	<p>Accepted The numbering has been corrected.</p>
comment	<p>515 comment by: SNPL FRANCE ALPA technical committee</p> <p>SNPL FRANCE ALPA proposes the following changes :</p> <p>ORO.FC.231 (b)(1) (b) COMPETENCY FRAMEWORKS The operator shall use a competency framework for all aspects of assessment and training within an approved EBT programme. The competency framework shall : (1) include observable behaviours required for safe, effective and efficient operations the competencies descriptions and their associated performance criteria; and (2) be comprehensive, accurate, and usable</p> <p>Comment : The competency framework used by the operator should refer to the ICAO structure of competencies which are not limited to observable behaviours but include more global performance criteria.</p> <p>Rationale : Using a verbatim in line with ICAO PANS TRG make the text more consistent. In a licensing environment affectivity or efficiency does not seem a common criteria across the industry, therefore it should be removed.</p>
response	<p>Partially accepted A new provision on competencies description and associated performance criteria has been introduced. The proposed deletion is not accepted for harmonisation with Doc 9995.</p>

comment	<div data-bbox="375 190 1398 257" style="border: 1px solid black; height: 30px; margin-bottom: 10px;"></div> <p data-bbox="375 300 1398 331">516 comment by: SNPL FRANCE ALPA technical committee</p> <p data-bbox="375 358 1398 392">SNPL proposes the following changes:</p> <p data-bbox="375 425 1398 459">ORO.FC.231(b)(3)</p> <p data-bbox="375 465 1398 499">(b) COMPETENCY FRAMEWORKS</p> <p data-bbox="375 504 1398 571">The operator shall use a competency framework for all aspects of assessment and training within an approved EBT programme. The competency framework shall :</p> <p data-bbox="375 582 1398 604">...</p> <p data-bbox="375 609 1398 642">(3) be approved by the competent authority.</p> <p data-bbox="375 683 1398 817">Rationale : Just like for quality processes and instructors standardisation, as EBT concept offers the possibility for operator to assess competencies with different frameworks, therefore it is the authority's responsibility to approve the competency framework used by the operator's programme.</p> <p data-bbox="375 824 1398 929">Article 30 of ICAO convention put in place the need of mutual recognition of licences. Moving from a performance based to a competency based system should be done with an equivalent level of responsibility of ICAO states.</p> <p data-bbox="375 936 1398 1041">An adapted competency framework is like the DNA of an EBT programme. The complexity of the task is high enough to justify the authority commitment starting by its definition.</p> <p data-bbox="375 1048 1398 1176">Licences validities are based on delivery and revalidation processes. As EBT will introduce a new way to revalidate licences and Class or Type rating, with the use of CBT, ICAO pans training (amendment 5 to be published) should be the base line for EASA implementation, and taking into account ICAO's work on CBT, which specify :</p> <p data-bbox="375 1182 1398 1216">Chapter 1 ICAO Competency Framework for Aeroplane Pilots</p> <p data-bbox="375 1223 1398 1256">1.1 INTRODUCTION</p> <p data-bbox="375 1263 1398 1400">3. The ICAO competency framework for aeroplane pilots defined in Appendix 1 to this chapter shall be used by the ATO or the operator as the basis for the development of an adapted competency model, approved by the Licensing Authority, for pilot licences and ratings in accordance with PartI, Chapter 2.</p>
response	<p data-bbox="375 1422 1398 1456">Not accepted</p> <p data-bbox="375 1462 1398 1556">ORO.FC.145 (c) applies: 'In the case of CAT operations, training and checking programmes, including syllabi and use of individual flight simulation training devices (FSTDs), shall be approved by the competent authority'.</p> <p data-bbox="375 1563 1398 1635">Therefore the competency framework is already approved via the approval of the OPS Manual part D by the competent authority.</p>
comment	<p data-bbox="375 1691 1398 1722">517 comment by: SNPL FRANCE ALPA technical committee</p> <p data-bbox="375 1751 1398 1785">SNPL proposes to add new subparagraphs (c)(3) and (4) to ORO.FC.231 as follows :</p> <p data-bbox="375 1818 1398 1852">ORO.FC.231</p> <p data-bbox="375 1859 1398 1892">(c) TRAINING SYSTEM PERFORMANCE</p> <p data-bbox="375 1904 1398 1926">...</p> <p data-bbox="375 1930 1398 2002">(3) The operator shall establish and maintain a training data monitoring programme,</p>

(4) The training data monitoring programme shall be non-punitive and contain adequate safeguards to protect the source(s) of the data.

Comment : EBT is data driven, provision should be equivalent as per FDM

Rationale : EBT is data driven, it is of utmost importance to raise data collection and protection at an adequate level. References to OPS are given in GM material (see page 82). This is not only relevant to protect systemic but also individual personal data. Therefore SNPL suggests the following change and upgrade GM 2 ORO FC 231 (c) (see page 82) to an AMC, to maintain binding regulation on this very sensible subject.

response

Not accepted

However, provisions to ensure data protection and a NON-punitive environment have been introduced.

comment

518

comment by: *SNPL FRANCE ALPA technical committee*

SNPL FRANCE ALPA proposes the following change:

ORO.FC.231(d) Grading system (1) (iii) :
(iii) data integrity **and security**

Comment : add “and security”

Rationale: the confidentiality of the data must be ensured and in accordance with the GDPR regulation

response

Accepted

comment

555

comment by: *EBT Foundation*

Page No: 7

Paragraph No: ORO.FC.231 (a) Evidence-based Training (1)

Comment: The EBT program was developed and published by ICAO in 2013. There are no substantive changes in this proposal to what was developed. EBT is already in service in the mixed implementation format according to EASA GM published in 2015. The second sentence in (1) should be narrowed to encompass an implementation risk assessment. To ask every operator to perform an overall safety risk assessment based on a program of exposure to defined training topics already over a 3-year training program is contradictory. By publishing this proposed rule, the Agency has indicated that certain changes to licensing rules are acceptable, and therefore the Agency has satisfied itself that the EBT programme and philosophy maintains at least an equivalent level of safety. The operator should concentrate on the risks of change during implementation, confident that the EBT system has already been determined by the Agency and competent authorities to be acceptable.



response	<p>Justification: Scope</p> <p>Proposed text: The operator shall demonstrate its capability to support the implementation and perform a safety risk assessment demonstrating how identified hazards will be mitigated during the transition to EBT.</p> <p>Not accepted The operator must ensure an equivalent level of safety.</p>
comment	<p>556 comment by: <i>EBT Foundation</i></p> <p>Attachment #1</p> <p>Page No: 9</p> <p>Paragraph No: (d) GRADING SYSTEM sub para (2)</p> <p>Comment: A system of competencies with related behavioural indicators, plus descriptions of expected performance related to a scale is a criterion referenced system. In aviation safety we do not determine norms looking at the population of pilots. This process has been applied in education but is inappropriate where safety must be determined by standardised levels. Because they are not described simply as definitions of aircraft trajectory does not mean there are no criteria applied within a competency-based system. The responsibility for using a clearly defined system with measurable levels of performance is the responsibility of the operator.</p> <p>Justification: misleading terminology which will confuse authorities and operators</p> <p>Proposed text:</p> <p>Remove sub para 2</p> <p>Not accepted The comment was already addressed in the NPA. Please read the explanatory note to ORO.FC.231 point (d) and associated explanatory notes to AMC and GM to ORO.FC.231(d)(2).</p>
comment	<p>560 comment by: <i>CAE</i></p> <p>The NPA 2018-07(A) proposes the implementation of EBT in Option 1 as Voluntary. This proposal will now make a voluntary action mandatory in hard law. This is far too restrictive. EBT is supposed to be an open 'concept'. CAE strongly supports that the material in ORO.FC.231 be moved to AMC material which will additionally allow for alternative means of compliance and/or flexibility measures to be adopted as experience is gained with EBT implementation.</p> <p>The MPL regulation in Part-FCL should serve as a reminder of constraining a new concept with hard law regulation and no flexibility.</p>
response	<p>Not accepted The EBT regulation must provide legally certainty. This is not possible without implementing rules.</p>



comment	569	comment by: AUA EBT
	<p>Question -What kind of operator management system? Which feedback? Pilot to instructor - Instructor to pilot - Pilot to trainings department</p>	
response	<p>Partially accepted More guidance is provided in the Opinion.</p>	

comment	647	comment by: IATA
	<p>Concerning ORO.FC.231 Evidence-based training, proposition to clarify the wording of ORO.FC.231 Evidence-based training (a) EBT PROGRAMME (3) (C) and to replace (C) by the points (iii) and (iv) as per below</p> <p>ORO.FC.231 Evidence-based training (a) EBT PROGRAMME</p> <p>(3) The operator shall ensure that each flight crew member:</p> <p>(i) is enrolled in the EBT programme;</p> <p>(ii) completes a minimum of 2 modules within the validity period of 12 months, separated by a period of not less than 3 months. The module is completed when:</p> <p>(A) the content of the approved EBT programme is completed for that module; and</p> <p>(B) an acceptable level of performance in all observed competencies has been demonstrated; and</p> <p>(C) will not continue line operations if during a module the performance observed was below the minimum acceptable level. The flight crew member continues line operations when a module is completed.</p> <p>(iii) continues line operations when a module is completed.</p> <p>(iv) does not continue line operations if during a module the performance observed was below the minimum acceptable level.</p>	
response	<p>Partially accepted. ORO.FC.231 has been redrafted to improve clarity.</p>	

comment	654	comment by: IATA
	<p>(c)(1)and (2) Guidance welcomed on: What kind of operator management system? Which feedback? Pilot to instructor -</p>	

	<div style="border: 1px solid black; padding: 5px; width: fit-content; margin: 0 auto;"> Instructor to pilot - Pilot to trainings department </div>	
response	Partially accepted More guidance is provided in the Opinion.	
comment	655	comment by: IATA
response	Noted	
comment	656	comment by: Ryanair ATO
	<p>(e)(1) Each EBT module shall be conducted in an FSTD with a qualification level adequate to complete proficiency check/training.</p> <p><i>The train/check “slash” (/) here is ambiguous. Does it mean training and checking OR training or checking. If the latter, then there is scope for a device that can be used for training (As per the new EASA concept of FSTD DNA). If the former, it means that the device must be capable of being used for a check which implies an FFS.</i></p>	
response	Noted The text has been redrafted. See the EASA Opinion for more information.	
comment	657	comment by: IATA
	<div style="border: 1px solid black; padding: 5px;"> <p>(e)(1) Comment: Not clear what the FSTD qualification level should be and what is proficiency training.</p> </div>	
response	Noted The text has been redrafted. See the EASA Opinion for more information.	
comment	658	comment by: IATA
	<p>(f)(3) Consider the possibility to combine characteristics, without reducing the number of malfunction below 4 for each crew member every year.</p>	
response	Not accepted The operator has the option to choose a malfunction which combines characteristics. The proposal requires a minimum of seven malfunctions. The rulemaking group considered that four malfunctions is too little exposure.	

ORO.FC.231 Evidence-based training

p. 10

comment

254

comment by: *HEAD OF TRAINING PROGRAMS AZ FLEET*

- ORO.FC.231 (a)(2)(iii)(A) today, Alitalia and Alitalia CityLiner, in order to satisfy individual training needs, has created a “customized training space” in the day 2 of each module. In case of individual training needs emerged in day one, the trainer can choose from different set scenarios according to the core competence to be trained.

response

Noted

comment

380

comment by: *European Cockpit Association*

ECA proposes the following change:

ORO.FC.231(h)

(h) LINE EVALUATION OF COMPETENCE

(1) Each enrolled flight crew member shall periodically undertake a line evaluation of competence in an aircraft in flight to demonstrate the ~~safe, effective and efficient~~ conduct of normal operations as specified in the operations manual.

Comment:

Delete safe, effective and efficient

Rationale:

Normal operation as per FCOM should already ensure an acceptable level of safety, the definition of effectiveness and efficiency are not a relevant criteria, each operator having their own priorities.

response

Not accepted

According to ICAO Doc 9995, ‘The aim of this programme is to identify, develop and evaluate the competencies **required** to operate safely, effectively and efficiently in a commercial air transport environment whilst addressing the most relevant threats according to evidence collected in accidents, incidents, flight operations and training.’

comment

454

comment by: *European Cockpit Association***ORO.FC.231****(h) LINE EVALUATION COMPETENCE**

(4) Evaluation of competencies during line operations shall be conducted by a suitably qualified commander nominated by the operator and trained in EBT concepts and the assessment of competencies.

Comment:

Definition of suitable commander is missing. Since this is a licensing event, substitute suitable commander by TRE.



	<p>(i) GROUND TRAINING</p> <p>(2) The operator may with the approval of the competent authority, extend the period of training on the location and use of all emergency and safety equipment carried on the aircraft to 24 months</p> <p>Comment: Delete ORO.FC.231 (i) (2),</p> <p>Rationale: There is no correlation between EBT and Emergency Ground training. (also applicable for page 123)</p>
response	<p>Partially accepted</p> <p>Line evaluator is introduced.</p> <p>The provision about the emergency safety and equipment training is mirroring the existing provision in ORO.FC.A.245.</p>
comment	<p>473 comment by: AIRBUS</p> <p>Page 10 ORO.FC.231(h)(3):</p> <p><u>Comment:</u> Airbus considers that, even if an operator has an efficient feedback system for the monitoring of line operations, a validity period of 3 years for line evaluation is too long and should be limited to 2 years.</p> <p>Proposed text :</p> <p>(h) (3) to read either:</p> <ul style="list-style-type: none"> • The operator approved for EBT may, with the approval of the competent authority extend the validity period of the line evaluation competence to 2 years, or • The operator approved for EBT may, with the approval of the competent authority extend the validity period of the line evaluation competence to 2 years, subject to a feedback system for the monitoring of line operations
response	<p>Not accepted</p> <p>The provision was discussed and agreed with the Airbus representative in the review group to ensure the Airbus concerns are addressed. Please see the EASA Opinion for more information.</p>
comment	<p>496 comment by: Vereinigung Cockpit</p> <p>ORO.FC.231(h)</p> <p>(h) LINE EVALUATION OF COMPETENCE</p> <p>(1) Each enrolled flight crew member shall periodically undertake a line evaluation of competence in an aircraft in flight to demonstrate the safe, effective and efficient conduct of normal operations as specified in the operations manual.</p> <p>Comment: Delete safe, effective and efficient</p> <p>Rationale:</p>

Normal operation as per FCOM should already ensure an acceptable level of safety, the definition of effectiveness and efficiency are not a relevant criteria, each operator having their own priorities.

ORO.FC.231

(h) LINE EVALUATION COMPETENCE

(4) Evaluation of competencies during line operations shall be conducted by a suitably qualified commander nominated by the operator and trained in EBT concepts and the assessment of competencies.

Comment: Definition of suitable commander missing. Since this is a licensing event, substitute suitable commander by TRE.

(i) GROUND TRAINING

(2) The operator may with the approval of the competent authority, extend the period of training on the location and use of all emergency and safety equipment carried on the aircraft to 24 months

Comment: Delete ORO.FC.231 (i) (2),

Rationale: There is no correlation between EBT and Emergency Ground training. (also applicable for page 123)

response

Not accepted

According to ICAO Doc 9995, 'The aim of this programme is to identify, develop and evaluate the competencies **required** to operate safely, effectively and efficiently in a commercial air transport environment whilst addressing the most relevant threats according to evidence collected in accidents, incidents, flight operations and training.'

Not accepted

The provision is mirroring the existing provision in ORO.FC.A.245.

comment

519

comment by: SNPL FRANCE ALPA technical committee

SNPL FRANCE ALPA proposes the following change:

ORO.FC.231(h)

(h) LINE EVALUATION OF COMPETENCE

(1) Each enrolled flight crew member shall periodically undertake a line evaluation of competence in an aircraft in flight to demonstrate the ~~safe, effective and efficient~~ conduct of normal operations as specified in the operations manual.

Comment : delete safe, effective and efficient

Rationale : Normal operation as per FCOM should already ensure an acceptable level of safety, the definition of effectiveness and efficiency are not a relevant criteria, each operator having their own priorities.

response

Not accepted



According to ICAO Doc 9995, 'The aim of this programme is to identify, develop and evaluate the competencies **required** to operate safely, effectively and efficiently in a commercial air transport environment whilst addressing the most relevant threats according to evidence collected in accidents, incidents, flight operations and training.'

comment

684

comment by: Ryanair ATO

ORO.FC.231(h)(4) Page 10

(4) Evaluation of competencies during line operations shall be conducted by a suitably qualified commander nominated by the operator and trained in EBT concepts and the assessment of competencies.

AMC1 ORO.FC.231(h) Page 119

(b) Each flight crew member should be **assessed** according to the competency framework and grading system approved for their operator's approved EBT programme.

(d) The operator should inform the competent authority about the suitably qualified commander nominated to undertake line evaluations of competence. The commander should be trained following the applicable provisions contained in AMC1 ORO.FC.145 (a)(3)

(c) Flight Crew members should be the **assessed** in duties as pilot flying and pilot monitoring: they should be evaluated in each role.....

ORO.FC.145 (a)(3) Page 27

(i) personnel providing assessment and training shall hold an Annex I (Part-FCL) instructor or examiner certificate; and

The proposed IR in ORO.FC.231(h) refers only to the Line Evaluation of Competence. It does not use the word assessment or refer to a Line Assessment of Competencies. It is assumed that this language is carefully chosen to avoid the full requirements of ORO.FC.145 being applied to the 'suitably qualified commander'. Based on the totality of the proposed IR, AMC and GM, if the Evaluation is deemed to be an Assessment then the suitably qualified person would have to hold an Annex I (Part-FCL) instructor or examiner certificate.

It follows therefore, that there must be no use of the word 'Assessment' in the AMC. In paragraphs (b) and (c) on page 119 the word Assessment is used in reference to Line Evaluations. The word Assessment should be replaced by "Evaluation" in paragraphs (b) and (c) to AMC1 ORO.fc.231(h). This prevents any confusion between the terms and ensures that Line Evaluation of Competence can be carried out by suitably qualified commanders, who may not be a certificate holder, but will have received suitable training from the operator in EBT methodologies.

ORO.FC.145 (a)(3) requires all personnel providing Assessment and training shall hold an Instructor or Examiner certificate. This will therefore require all Line Training/Check Captains to hold a TRI certificate. This is not only impractical but unnecessary. Having to train a large number of Line training/Check Captains to be Type Rating Instructors will deter medium or large operators from undertaking EBT.



We appreciate this may not have been the intention of the RMG but while this ambiguity exists there is a possibility for competent authorities to interpret it in this way and insist on all line training/check captains being trained to be a TRI.

Note: At least one EASA NAA regards GM as having the same weight as AMC when evaluating an Operator's proposals. This is the background to the above commentary and proposal.

response Partially accepted
The comment includes several issues across the EBT proposal. Please refer to the EASA Opinion for more information regarding the amendments proposed by the commenter.

Appendix II to Part-ORO of Regulation (EU) No 965/2012

p. 10

comment 30 comment by: *FNAM*

ISSUE
'... to assessment and topics relevant to the type or variant of aircraft on which they operate'.
Precisions should be added. Indeed, pilot trainings should be adapted to aircraft generation but also to operators activities and operations characteristics.

PROPOSAL
Add precisions that trainings should be adapted also to operators activities and operations characteristics

response Noted

FCL.625 IR — Validity, revalidation and renew

p. 10-11

comment 335 comment by: *UK CAA*

Page No: 10 and 12

Paragraph No: FCL.625 IR – Validity, revalidation and renewal

Comment: Sub-paragraph (c)(2) states “complete a proficiency check in accordance with Appendix 9 or Appendix 10 to this Part, in the relevant aircraft category.”

The current requirements in FCL.625 IR sub-paragraph (d) state that if the IR has not been revalidated or renewed within the preceding 7 years, the holder will be required to pass again the IR theoretical knowledge examinations and skill test.

Appendix 10, sub-paragraph 5. (c)(1) indicates that the Competent Authority will authorise a nominated person where the operator has an approved procedure for such cases.



response	<p>Clarity is needed on who, how and what evidence will be available to assist operators, training organisations and Competent Authorities to establish when instrument privileges have expired and expired by more than 7 years. It is recommended that further consideration is given to Appendix 10 paragraph 5 to make it clear who will be nominated and what administrative actions need to be taken.</p> <p>Justification: Clarity.</p>
	<p>Accepted AMC1 ORO.FC.231(a)(5) and the related GM have been modified to ensure clarity.</p>
comment	<p>381 comment by: <i>European Cockpit Association</i></p> <p>ECA proposes the following change: Annex I (Part-FCL) to Regulation (EU) No 1178/2011 FCL.625 IR — Validity, revalidation and renewal</p> <p>(a) [...] (b) [...] (c) Renewal. If an IR has expired, in order to renew their privileges applicants shall: (1) go through refresher training at an ATO to reach the level of proficiency needed to pass the instrument element of the skill test in accordance with Appendix 9 to this Part; and (2) complete a proficiency check in accordance with Appendix 9 or Appendix 10 to this Part, in the relevant aircraft category.</p> <p>Comment: ECA is opposed to the possibility of renewal of type rating within an EBT programme. As EBT is a new way of training for recurrent training, it is not mature enough to deliver or renew a licence, class or type rating.</p> <p>Rationale: Renewal should remain under classical scheme to avoid EBT abuse by limiting to one single module per year.</p> <p>Example : in March, a pilot with an expired licence IR and type can revalidate by a single module. By October no OPC is required, the season is over. The following year the same pilot will have to just make another single module to revalidate all ratings and licence.</p> <p>This is exactly what the drafting group wanted to avoid. Therefore we propose to voluntarily restrict EBT to revalidation, leaving renewal under ORO 230 and appendix 9.</p>
response	<p>Not accepted</p> <p>Before the introduction of Regulation (EU) No 1178/2011, the renewals could be made at a type rating training organisation (TRTO). These organisations were not a school for the issue of licences. The TRTOs were normally at operator level. No safety concern was raised due to this fact.</p> <p>There is a strong regulatory oversight of operators; the same as for approved training organisations.</p>
comment	<p>520 comment by: <i>SNPL FRANCE ALPA technical committee</i></p>

SNPL FRANCE ALPA proposes the following change:

Annex I (Part-FCL) to Regulation (EU) No 1178/2011 FCL.625 IR — Validity, revalidation and renewal

(a) [...]

(b) [...]

(c) Renewal. If an IR has expired, in order to renew their privileges applicants shall:
 (1) go through refresher training at an ATO to reach the level of proficiency needed to pass the instrument element of the skill test in accordance with Appendix 9 to this Part; and
 (2) complete a proficiency check in accordance with Appendix 9 or Appendix 10 to this Part, in the relevant aircraft category.

Comment : SNPL is opposed to the possibility of renewal of type rating within an EBT programme. As EBT is a new way of training for recurrent training, it is not mature enough to deliver or renew a licence, class or type rating.

Rationale : Renewal should remain under classical scheme to avoid EBT abuse by limiting to one single module per year.

exemple : in march, a pilot with an expired licence IR and type can revalidate by a single module. By october no OPC is required, the season is over. The following year the same pilot will have to just make another single module to revalidate all ratings and licence.

This is exactly what the drafting group wanted to avoid. Therefore we propose to voluntarily restrict EBT to revalidation, leaving renewal under ORO 230 and appendix 9.

response

Not accepted

Before the introduction of Regulation (EU) No 1178/2011, the renewals could be made at a type rating training organisation (TRTO). These organisations were not a school for the issue of licences. The TRTOs were normally at operator level. No safety concern was raised due to this fact.

There is a strong regulatory oversight of operators; the same as for approved training organisations.

comment

609

comment by: *Vereinigung Cockpit*

Annex I (Part-FCL) to Regulation (EU) No 1178/2011 FCL.625 IR — Validity, revalidation and renewal

(a) [...]

(b) [...]

(c) Renewal. If an IR has expired, in order to renew their privileges applicants shall:

(1) go through refresher training at an ATO to reach the level of proficiency needed to pass the instrument element of the skill test in accordance with Appendix 9 to this Part; and

(2) complete a proficiency check in accordance with Appendix 9 or Appendix 10 to this Part, in the relevant aircraft category.

Comment:



ECA is opposed to the possibility of renewal of type rating within an EBT programme. As EBT is a new way of training for recurrent training, it is not mature enough to deliver or renew a licence, class or type rating.

Rationale:

Renewal should remain under classical scheme to avoid EBT abuse by limiting to one single module per year.

Example : in March, a pilot with an expired licence IR and type can revalidate by a single module. By October no OPC is required, the season is over. The following year the same pilot will have to just make another single module to revalidate all ratings and licence.

This is exactly what the drafting group wanted to avoid. **Therefore we propose to voluntarily restrict EBT to revalidation, leaving renewal under ORO 230 and appendix 9.**

response

Not accepted

Before the introduction of Regulation (EU) No 1178/2011, the renewals could be made at a type rating training organisation (TRTO). These organisations were not a school for the issue of licences. The TRTOs were normally at operator level. No safety concern was raised due to this fact.

There is a strong regulatory oversight of operators; the same as for approved training organisations.

FCL.740 — Validity and renewal of class and type rating

p. 11

comment

129

comment by: *FlightSafety International - Regional Director Regulatory Affairs*

i. FCL.740 Renewal of Class and Type ratings. This proposes that Refresher training could be conducted at approved AOCs. AMC2 FCL.740(b)(1) Validity and renewal of class and type ratings specifies that *if a class or type rating has lapsed, the applicant shall take refresher training. An AOC approved for such purpose can provide such training only for their own pilots when enrolled under an approved EBT programme. The maximum amount of time elapsed since the expiry of the validity period of the rating should be no more than one year. If more than 1 year has elapsed, the training should be performed in an ATO and AMC1 FCL.740(b)(1) applies.* But AOCs are not subject to the same regulatory oversight as an ATO, the proposal has untold safety implications and appears to be a commercially-driven incentive, presumably supported by an unstated risk analysis. It sets the conditions for a very un-level playing field amongst Refresher training providers and begs the question where AOCs will obtain the necessary FSTDs and the instructional competence to operate them effectively.

response

Not accepted

Before the introduction of Regulation (EU) No 1178/2011, the renewals could be made at a type rating training organisation (TRTO). These organisations were not a school for the issue of licences. The TRTOs were normally at operator level. No safety concern was raised due to this fact.

There is a strong regulatory oversight of operators; the same as for approved training organisations.



comment	<p data-bbox="367 235 1394 280">444 comment by: <i>France</i></p> <p data-bbox="367 291 1394 403">The rationale for amending FCL.740 to authorize AOC holder to conduct refresher training is not sufficiently explained in the NPA explanatory note. We understand that it is an additional incentive for AOC holders to apply for an EBT programme.</p> <p data-bbox="367 436 1394 548">DGAC FR supports the proposal but in the meantime considers that the intention should be clarified by introducing directly in the rule text the elements contained in AMC2 FCL.740 (b) (1) and in particular that:</p> <ul style="list-style-type: none"> <li data-bbox="367 548 1394 582">§ this possibility is limited to AOC holder having an approved EBT programme, <li data-bbox="367 582 1394 649">§ the refresher training can only be done for AOC's pilot when enrolled under the EBT programme, <li data-bbox="367 649 1394 728">§ in case of a rating expired for more than 1 year the applicant is required to take refresher training in an ATO. <p data-bbox="367 761 1394 795">Therefore DGAC FR proposes a rewording for FCL.740.</p> <p data-bbox="367 828 1394 862">FCL.740 — Validity and renewal of class and type ratings</p> <p data-bbox="367 896 1394 929">(a) [...]</p> <p data-bbox="367 974 1394 1008">(b) <i>Renewal. If a class or type rating has expired, the applicant shall:</i></p> <p data-bbox="367 1041 1394 1153">(1) <i>take refresher training at an ATO, or an AOC approved for such refresher, when necessary to reach the level of proficiency necessary to safely operate the relevant class or type of aircraft.</i></p> <p data-bbox="367 1187 1394 1332"><i>If the rating has lapsed for less than 1 year, the refresher training may also be conducted within an AOC having an approved EBT programme and approved for such refresher training. The refresher training can only be provided for their own pilots when enrolled in the AOC's approved EBT programme ; and</i></p> <p data-bbox="367 1366 1394 1433">(2) <i>pass a proficiency check in accordance with Appendix 9 or Appendix 10 to this Part.</i></p>
response	<p data-bbox="367 1451 1394 1489">Partially accepted.</p> <p data-bbox="367 1489 1394 1574">GM1 ORO.FC.231(a)(5) has been developed to promote clarity regarding the issue raised by this comment.</p>

comment	<p data-bbox="367 1626 1394 1671">456 comment by: <i>European Cockpit Association</i></p> <p data-bbox="367 1680 1394 1713">Annex I (Part FCL)</p> <p data-bbox="367 1713 1394 1747"><i>FCL.740 – Validity and renewal of class and type ratings</i></p> <p data-bbox="367 1747 1394 1825"><i>(b)(2) pass a proficiency check in accordance with Appendix 9 or Appendix 10 to this part.</i></p> <p data-bbox="367 1825 1394 1859">Comment:</p> <p data-bbox="367 1859 1394 1892">Delete Appendix 10</p> <p data-bbox="367 1892 1394 1971">EBT has not been designed for renewal of an expired TR, which, depending on the time since expiry could also be a fully new TR.</p>
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response	<p>Not accepted</p> <p>Before the introduction of Regulation (EU) No 1178/2011, the renewals could be made at a type rating training organisation (TRTO). These organisations were not a school for the issue of licences. The TRTOs were normally at operator level. No safety concern was raised due to this fact.</p> <p>There is a strong regulatory oversight of operators; the same as for approved training organisations.</p>
comment	<p>497 comment by: <i>Vereinigung Cockpit</i></p> <p>Annex I (Part FCL)</p> <p>FCL.740 – Validity and renewal of class and type ratings</p> <p>(b)(2) pass a proficiency check in accordance with Appendix 9 or <u>Appendix 10</u> to this part.</p> <p>Comment: <i>Delete Appendix 10, EBT has not been designed for renewal of an expired TR, which, depending on the time since expiry could also be a fully new TR</i></p>
response	<p>Not accepted</p> <p>Before the introduction of Regulation (EU) No 1178/2011, the renewals could be made at a type rating training organisation (TRTO). These organisations were not a school for the issue of licences. The TRTOs were normally at operator level. No safety concern was raised due to this fact.</p> <p>There is a strong regulatory oversight of operators; the same as for approved training organisations.</p>

FCL.740.A — Revalidation of class and type ratings — aeropl	p. 11
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comment	<p>281 comment by: <i>Brussels Airlines</i></p> <p>FCL.625.A -Renewal</p> <p>Can the (minimum) refresher training be determined ? In function of the expiry time ? Considering the EBT modules, a minimum of to be trained ? (Any directives concerning malfunction clustering or equivalent approaches to be performed during the refresher training ?)</p>
response	<p>Noted.</p> <p>The NPA provided already guidance on this issue. The Opinion has provided further guidance on this issue in AMC1 ORO.FC.231(a)(5) and GM1 ORO.FC.231(a)(5).</p>
comment	<p>445 comment by: <i>France</i></p> <p>DGAC FR believes that the wording used in FCL.740.A is not properly addressing the revalidation performed within an EBT system. As a matter of fact, in such case the period of 3 months mentioned in the text should no longer be applicable.</p>



When enrolled in the operator EBT programme, it should be possible to perform the administrative action of licence revalidation as soon as the pilot has completed the two modules required by ORO.FC.231 (3) (ii).

Therefore DGAC FR proposes a rewording for FCL.740.A.

FCL.740.A — Revalidation of class and type ratings — aeroplanes

(a) Revalidation of multi-engine class ratings and type ratings. For revalidation of multi-engine class ratings and type ratings, the applicant shall:

(1) pass a proficiency check in accordance with Appendix 9 ~~or Appendix 10~~ to this Part in the relevant

class or type of aeroplane or an FSTD representing that class or type, within the 3 months immediately preceding the expiry date of the rating;

or

pass a proficiency check in accordance with Appendix 10 to this Part in the relevant class or type of aeroplane or an FSTD representing that class or type within the validity period of the rating;

response

Not accepted

However, further guidance on this issue is provided in AMC1 ORO.FC.231(a)(5) and GM1 ORO.FC.231(a)(5).

FCL.905.TRI TRI — Privileges and conditio

p. 11

comment

2

comment by: *Michel Lacombe AF Training department and AF ATO*

FCL.905.TRI TRI — Privileges and conditions

(a) The privileges of a TRI are to instruct for:

(a) (1) the revalidation and renewal of an EIR or an IR, provided the TRI holds a valid IR;

[...]

(f) (6) in the case of the TRI for powered-lift aircraft:

(1) (i) the issue, revalidation and renewal of powered-lift type ratings; (2) (ii) MCC training.

(b) After successful completion of the operator's EBT instructor standardisation in accordance with Part ORO, the TRI **"enrolled in an operator EBT recurrent programme"** has additionally the privilege to conduct practical assessment in competencies.

It should be considered important that the instructors have the same experience that the pilots he is going to assess and train.

response

Not accepted

Before the introduction of Regulation (EU) No 1178/2011, the renewals could be made at a type rating training organisation (TRTO). These organisations were not a



school for the issue of licences. The TRTOs were normally at operator level. No safety concern was raised due to this fact.
There is a strong regulatory oversight of operators; the same as for approved training organisations.

comment

31

comment by: FNAM

ISSUE

A Negative social impact may affect pilots but also instructors and examiners. Since some licenses would be based on EBT and some licenses based on LPC, EASA and NAA should ensure that no discrimination would be able between these two licenses. In the same way, pilots, instructors and examiners should not be better considered by an operators because he is / was EBT trained. Therefore, EBT training should not be mentioned on the license. The wording 'additionally the privilege' should not be interpreted such as privileges transposed on the license.

PROPOSAL

Ensure no discrimination are possible between instructors and examiners EBT trained and pilot LPC trained; and
Do not mention EBT privilege on the license

response

Not accepted

Point (b) of FCL.905 TRI has been introduced for legal consistency. This point does not discriminate against NON-EBT instructors.

comment

32

comment by: FNAM

ISSUE

EASA's proposed disposals should ensure that instructors have the same experience than trained and assessed pilots. It is not acceptable that instructors are not used to specific operational situations representing the operator lines context.

PROPOSAL

Modify such as :

'(a) The privileges of a TRI are to instruct for:

(a) (1) the revalidation and renewal of an EIR or an IR, provided the TRI holds a valid IR;

[...]

(f) (6) in the case of the TRI for powered-lift aircraft: (1) (i) the issue, revalidation and renewal of powered-lift type ratings; (2) (ii) MCC training.

(b) After successful completion of the operator's EBT instructor standardisation in accordance with Part ORO, the TRI "**enrolled in an operator EBT recurrent programme**" has additionally the privilege to conduct practical assessment in competencies.'

response

Not accepted

Before the introduction of Regulation (EU) No 1178/2011, the renewals could be made at a type rating training organisation (TRTO). These organisations were not a school for the issue of licences. The TRTOs were normally at operator level. No safety concern was raised due to this fact.

There is a strong regulatory oversight of operators; the same as for approved training organisations.



comment	<p>382 comment by: <i>European Cockpit Association</i></p> <p>ECA proposes the following change:</p> <p>FCL 905 TRI (b) After successful completion of the operator’s EBT instructor training and standardisation program in accordance with Part ORO, the TRI has additionally the privilege to conduct practical assessment in competencies.</p> <p>Rationale: to make it consistent with the comment on ORO.FC.145 Provision of training</p>
response	<p>Not accepted</p> <p>Both AMC1 and AMC2 ORO.FC.146 deal with ‘instructor standardisation’.</p> <p>It is true that training is required during the initial standardisation. However, for simplicity reasons the wording is maintained.</p>
comment	<p>446 comment by: <i>France</i></p> <p>DGAC FR understands the necessity to add a new provision in FCL.TRI.905 to identify the EBT privilege as an additional privilege. Nevertheless, DGAC FR considers that it is not necessary to endorse it on the Part FCL licence held by the TRI. It should be explicitly mentioned in the text as current FCL.015 (b) states that all extension of privileges has to be endorsed on a certificate.</p> <p><i>FCL.015 Application and issue, revalidation and renewal of licences, ratings and certificates</i> [...] <i>(b) Any limitation or extension of the privileges granted by a licence, rating or certificate shall be endorsed in the licence or certificate by the competent authority.</i></p> <p>DGAC FR proposes a rewording for FCL.905.TRI. For consistencies a similar wording should be used in FCL.905.SFI (b).</p> <p><i>FCL.905.TRI TRI — Privileges and conditions</i></p> <p><i>(a) The privileges of a TRI are to instruct for:</i></p> <p><i>(1) the revalidation and renewal of an EIR or an IR, provided the TRI holds a valid IR;</i> [...]</p> <p><i>(6) in the case of the TRI for powered-lift aircraft:</i> <i>(i) the issue, revalidation and renewal of powered-lift type ratings;</i> <i>(ii) MCC training.</i></p> <p><i>(b) After successful completion of the operator’s EBT instructor standardisation in accordance with Part ORO, the TRI has additionally the privilege to conduct practical assessment in competencies. Such privilege is not endorsed on the TRI certificate.</i></p>
response	<p>Accepted</p> <p>FCL.905.TRI has been modified accordingly.</p>

comment	<p>521 comment by: SNPL FRANCE ALPA technical committee</p> <p>SNPL FRANCE ALPA proposes the following change :</p> <p>FCL 905 TRI (b) After successful completion of the operator’s EBT instructor training and standardisation program in accordance with Part ORO, the TRI has additionally the privilege to conduct practical assessment in competencies.</p> <p>Rationale: to make it consistent with the comment on ORO.FC.145 Provision of training</p>
response	Not accepted
comment	<p>610 comment by: Vereinigung Cockpit</p> <p>FCL 905 TRI (b) After successful completion of the operator’s EBT instructor training and standardisation program in accordance with Part ORO, the TRI has additionally the privilege to conduct practical assessment in competencies.</p> <p>Rationale: to make it consistent with the comment on ORO.FC.145 Provision of training</p>
response	Not accepted
comment	<p>659 comment by: IATA</p> <div style="border: 1px solid black; padding: 5px;"> <p>FCL.905.TRI TRI — Privileges and conditions (a) The privileges of a TRI are to instruct for: (a) (1) the revalidation and renewal of an EIR or an IR, provided the TRI holds a valid IR; [...] (f) (6) in the case of the TRI for powered-lift aircraft: (1) (i) the issue, revalidation and renewal of powered-lift type ratings; (2) (ii) MCC training. (b) After successful completion of the operator’s EBT instructor standardisation in accordance with Part ORO, the TRI “enrolled in an operator EBT recurrent programme” has additionally the privilege to conduct practical assessment in competencies.</p> <p>It should considered important that the instructors have the same experience that the pilots he is going to assess and train.</p> </div>
response	Not accepted

However, the review group took into account the safety objective of this comment, and they decided to modify the requirement in point (a) of AMC2 ORO.FC.231(h)(3) to ensure during the EBT modules the trainee maintains a regular exposure to an instructor with valid line experience.

One of the purposes of a line check is to verify the ability of a pilot to undertake normal line operations in the real aircraft. The validity of the line evaluation of competence is extended on the condition that the pilot ability to undertake normal line operations is maintained.

Therefore as line checks are replaced by FFS evaluations, to have the credits to extend the validity of the line evaluation of competence, the operator is required to integrate into these modules as much as possible the 'experience' of a line check.

For that matter, it is important that the evaluation is well designed, but also that at least once a year, the person delivering this EBT evaluation, which is a 'mirror of the line check', is an instructor who has a valid line evaluation of competence with that particular operator in order to be able to provide the necessary relevance of line flying experience.

FCL.905.SFI SFI — Privileges and conditio

p. 11-12

comment

3

comment by: *Michel Lacombe AF Training department and AF ATO*

(b) After successful completion of the operator's EBT instructor standardisation in accordance with Part ORO, the SFI "**enrolled in an operator EBT System**" has additionally the privilege to conduct practical assessment in competencies.

It should be considered important that the SFI has a recent experience in lines operations and in the operator programme.

response

Not accepted

However, the review group took into account the safety objective of this comment, and they decided to modify the requirement in point (a) of AMC2 ORO.FC.231(h)(3) to ensure during the EBT modules the trainee maintains a regular exposure to an instructor with valid line experience.

One of the purposes of a line check is to verify the ability of a pilot to undertake normal line operations in the real aircraft. The validity of the line evaluation of competence is extended on the condition that the pilot ability to undertake normal line operations is maintained.



Therefore as line checks are replaced by FFS evaluations, to have the credits to extend the validity of the line evaluation of competence, the operator is required to integrate into these modules as much as possible the 'experience' of a line check.

For that matter, it is important that the evaluation is well designed, but also that at least once a year, the person delivering this EBT evaluation, which is a 'mirror of the line check', is an instructor who has a valid line evaluation of competence with that particular operator in order to be able to provide the necessary relevance of line flying experience.

comment

6

comment by: *Michel Lacombe AF Training department and AF ATO*

In NPA part A we can read: Although the amount of training in EBT remains unchanged, the role of the trainer will be now performed under the privileges of type rating instructor (TRI) licence, instead of type rating examiner (TRE) licence.

Why in NPA (part B) we do not use the same wording and by this lack of precision allow all type of instructors to be acceptable for EBT, even if they have not any experience of line operations and of the operator's context (SFI, CRI) ?

Doc 9995

EBT instructor. A person who has undergone a screening and selection process, successfully completed an approved course in delivering competency-based training, and is subsequently authorized to conduct recurrent assessment and training within an approved EBT programme.

Part OPS

AMC1ORO.FC.230 Recurrent training and checking

Personnel providing training and checking

Training and checking should be provided by the following personnel:

- (1) ground and refresher training by suitably qualified personnel;
- (2) flight training by a flight instructor (FI), type rating instructor (TRI) or class rating instructor (CRI) or, in the case of the FSTD content, a synthetic flight instructor (SFI), providing that the FI, TRI, CRI or SFI satisfies the operator's experience and knowledge requirements sufficient to instruct on the items specified in paragraphs (a)(1)(i)(A) and (B);

For a tasks based system that is considered ok.

If we want to train unexpected events on line , how instructors with no experience (or very old experience) on line operations will be able to train and assess. Pilots losing their licence could be used as SFI only for the first two years as being EBT enrolled, after 2 years as SFI they will be restricted to the TR training and no more on the recurrent.

response

Not accepted

However, the review group took into account the safety objective of this comment, and they decided to modify the requirement in point (a) of AMC2 ORO.FC.231(h)(3)



to ensure during the EBT modules the trainee maintains a regular exposure to an instructor with valid line experience.

One of the purposes of a line check is to verify the ability of a pilot to undertake normal line operations in the real aircraft. The validity of the line evaluation of competence is extended on the condition that the pilot ability to undertake normal line operations is maintained.

Therefore as line checks are replaced by FFS evaluations, to have the credits to extend the validity of the line evaluation of competence, the operator is required to integrate into these modules as much as possible the 'experience' of a line check.

For that matter, it is important that the evaluation is well designed, but also that at least once a year, the person delivering this EBT evaluation, which is a 'mirror of the line check', is an instructor who has a valid line evaluation of competence with that particular operator in order to be able to provide the necessary relevance of line flying experience.

comment

7

comment by: *Michel Lacombe AF Training department and AF ATO*

(b) After successful completion of the operator's EBT instructor standardisation in accordance with Part ORO, the SFI has additionally the privilege to conduct practical assessment in competencies.

In order to allow SFI with recent experience on line and on the operator domain it should be written:

(b) After successful completion of the operator's EBT instructor standardisation in accordance with Part ORO, the SFI, enrolled in an operator EBT recurrent programme, has additionally the privilege to conduct practical assessment in competencies.

response

Not accepted

However, the review group took into account the safety objective of this comment, and they decided to modify the requirement in point (a) of AMC2 ORO.FC.231(h)(3) to ensure during the EBT modules the trainee maintains a regular exposure to an instructor with valid line experience.

One of the purposes of a line check is to verify the ability of a pilot to undertake normal line operations in the real aircraft. The validity of the line evaluation of competence is extended on the condition that the pilot ability to undertake normal line operations is maintained.

Therefore as line checks are replaced by FFS evaluations, to have the credits to extend the validity of the line evaluation of competence, the operator is required to integrate into these modules as much as possible the 'experience' of a line check.

For that matter, it is important that the evaluation is well designed, but also that at least once a year, the person delivering this EBT evaluation, which is a 'mirror of the line check', is an instructor who has a valid line evaluation of competence with that



particular operator in order to be able to provide the necessary relevance of line flying experience.

comment

33

comment by: FNAM

ISSUE

EASA's proposed disposals should clearly differentiate each type of instructors and examiners (TRI, TRE, SFI, SFE, CRI, CRE, etc.) for EBT since they don't benefit of equal trainings and activities. Currently, they don't have the same responsibilities; it is therefore necessary to present adapted disposals for trainings and requirements for each type of instructors and examiners. For example, compared to TRI and TRE, SFI and SFE should demonstrate additional conditions in order to ensure their competences to provide EBT trainings or validate EBT licenses.

Moreover, in NPA 2018-07 (A) we can read: 'Although the amount of training in EBT remains unchanged, the role of the trainer will be now performed under the privileges of type rating instructor (TRI) license, instead of type rating examiner (TRE) license.'

Why in NPA 2018-07 (B) the same wording is not used? This lack of precision allows all types of instructors to be acceptable for EBT, even if they have no experience of line operations and of the operator's context (SFI, CRI).

Additionally, ICAO Doc 9995 defines EBT instructors such as: 'A person who has undergone a screening and selection process, successfully completed an approved course in delivering competency-based training, and is subsequently authorized to conduct recurrent assessment and training within an approved EBT programme.'

Current AMC1 ORO.FC.230 disposals require that instructors demonstrate sufficient experience and knowledge to instruct:

'Part OPS**AMC1 ORO.FC.230 Recurrent training and checking**

Personnel providing training and checking

Training and checking should be provided by the following personnel:

- (1) ground and refresher training by suitably qualified personnel;
- (2) flight training by a flight instructor (FI), type rating instructor (TRI) or class rating instructor (CRI) or, in the case of the FSTD content, a synthetic flight instructor (SFI), providing that the FI, TRI, CRI or SFI satisfies the operator's experience and knowledge requirements sufficient to instruct on the items specified in paragraphs (a)(1)(i)(A) and (B);'

FNAM suggests that instructors should demonstrate that they benefit of complete recent experiences of instructors and examiners before providing trainings or validating EBT licenses. Indeed, if trainings are based unexpected events on line, how instructors with no experience (or very old experience) on line operations will be able to train and assess properly. Pilots losing their license could therefore be used as SFI only for the first two years as being EBT enrolled, after 2 years as SFI they will be restricted to the TR training and no more on the recurrent. Instructors without proper competences may have significant impacts on flight safety since the EASA's proposed disposals would allow license validation solely based on declarations and would allow EBT trainings by instructors and examiners with inhomogeneous competences.

PROPOSAL

Ensure that SFI and SFE can demonstrate complete recent experiences of instructors and examiners before providing trainings or validating licenses; and



response	<p>Modify such as : ‘(b) After successful completion of the operator’s EBT instructor standardisation in accordance with Part ORO, the SFI, enrolled in an operator EBT recurrent programme, has additionally the privilege to conduct practical assessment in competencies.’</p> <p>Not accepted</p> <p>However, the review group took into account the safety objective of this comment, and they decided to modify the requirement in point (a) of AMC2 ORO.FC.231(h)(3) to ensure during the EBT modules the trainee maintains a regular exposure to an instructor with valid line experience.</p> <p>One of the purposes of a line check is to verify the ability of a pilot to undertake normal line operations in the real aircraft. The validity of the line evaluation of competence is extended on the condition that the pilot ability to undertake normal line operations is maintained.</p> <p>Therefore as line checks are replaced by FFS evaluations, to have the credits to extend the validity of the line evaluation of competence, the operator is required to integrate into these modules as much as possible the ‘experience’ of a line check.</p> <p>For that matter, it is important that the evaluation is well designed, but also that at least once a year, the person delivering this EBT evaluation, which is a ‘mirror of the line check’, is an instructor who has a valid line evaluation of competence with that particular operator in order to be able to provide the necessary relevance of line flying experience.</p>
comment	<p>34 comment by: <i>FNAM</i></p> <p>ISSUE</p> <p>EASA’s proposed EBT disposals describe requirements for all instructors and examiners without precisising if it should be TRI, TRE, SFI and SFE only. All types of instructor and examiner should therefore be able to follow dedicated training to be EBT competent. FNAM wonders why only TRI and SFI requirements are completed in these EASA’s proposed disposals in Part-FCL. Why FI, CRI, IRI, MCCI or STI are not modified to include EBT privileges?</p> <p>FNAM suggests therefore to harmonize the proposed regulation by; either precisising in EBT disposals the exact types of instructors and examiners allowed to perform EBT training or validate EBT programme and training; or adding EBT disposals for each type of instructor in Part-FCL.</p> <p>PROPOSAL</p> <p>Precise in EBT disposals the exact types of instructors and examiners allowed to perform EBT training or validate EBT programme and training; or Add EBT disposals for each type of instructor in Part-FCL</p>
response	<p>Noted</p>
comment	<p>383 comment by: <i>European Cockpit Association</i></p> <p>ECA proposes the following change:</p>



FCL 905 SFI

~~(b) After successful completion of the operator's EBT instructor standardisation in accordance with Part ORO, the SFI has additionally the privilege to conduct practical assessment in competencies.~~

Comment:

ECA opposes this privilege extension to SFI and therefore **proposes subparagraph (b) deletion**

Rationale:

No assessment privilege can be given to SFI in the context of EBT. In this NPA EBT is only considered for recurrent training for pilots already type qualified and it is also used to validate the operational proficiency check.

SFI do not have any requirement to have line experience (1500 hours in a multi-pilot airplane) even less to have recent experience of line flying in the airline so they do not possess the competence to assess a pilot during a LOE or SBT. **This assessment can only be done by a TRE-EBT or a TRI-EBT.**

The following comes from the definition of competency given on page 16 and shows that to be able to observe a competency the instructor must have a practical knowledge of the line flying activity:

A competency is manifested and observed through behaviours that mobilise the relevant knowledge, skills and attitudes to carry out activities or tasks under specified conditions. Trainees successfully demonstrate competency by meeting the associated competency standard.

The definition proposed in the NPA is based on:

- Amendment 175 to ICAO Annex 1 'Personal licensing'; and
- Doc 9995.

The Doc 9995 references used were:

'7.8.5.1 To be competent in any job, a person requires a certain amount of knowledge, an adequate level of skills, and a particular set of attitudes'.

'7.8.5.4 To be competent, a pilot requires capabilities across a range of knowledge, skills and attitudes (KSA)'.

response

Not accepted

Traditional recurrent training allows SFIs to perform such training. To ensure level playing field, it is necessary to maintain the approach regarding SFIs. However, EBT has proposed additional requirements for SFIs — they need to attend the EBT instructor course.

In addition, when the validity of the line evaluation of competence (old line check) is extended, an instructor enrolled in the airline (with a valid line evaluation of competence) is necessary to deliver the module once a year.

comment

448

comment by: *France*

DGAC FR believes that to be an EBT instructor an SFI shall be fully enrolled himself/herself in an EBT programme (it includes all elements of ORO.FC.231 and in particular the fact that the SFI has undertaken a line evaluation and undergone ground training). Only instructor being involved in operations within the operator should be



	<p>allowed to provide EBT modules. SFI having no such experience might not be relevant when providing instruction in an EBT context.</p> <p>DGAC FR proposes a rewording for FCL.905.SFI in order to add this prerequisite.</p> <p>FCL.905.SFI SFI — Privileges and conditions <i>(a) The privileges of an SFI are to carry out synthetic flight instruction, within the relevant aircraft category, for:</i> [...] <i>(b) After successful completion of the operator’s EBT instructor standardisation in accordance with Part ORO, and if enrolled in the operator’s approved EBT programme the SFI has additionally the privilege to conduct practical assessment in competencies.</i></p>
response	<p>Not accepted</p> <p>However, the review group took into account the safety objective of this comment, and they decided to modify the requirement in point (a) of AMC2 ORO.FC.231(h)(3) to ensure during the EBT modules the trainee maintains a regular exposure to an instructor with valid line experience.</p> <p>One of the purposes of a line check is to verify the ability of a pilot to undertake normal line operations in the real aircraft. The validity of the line evaluation of competence is extended on the condition that the pilot ability to undertake normal line operations is maintained.</p> <p>Therefore as line checks are replaced by FFS evaluations, to have the credits to extend the validity of the line evaluation of competence, the operator is required to integrate into these modules as much as possible the ‘experience’ of a line check.</p> <p>For that matter, it is important that the evaluation is well designed, but also that at least once a year, the person delivering this EBT evaluation, which is a ‘mirror of the line check’, is an instructor who has a valid line evaluation of competence with that particular operator in order to be able to provide the necessary relevance of line flying experience.</p>
comment	<p>522 comment by: SNPL FRANCE ALPA technical committee</p> <p>SNPL FRANCE ALPA proposes the following deletion:</p> <p>FCL 905 SFI SFI (b) After successful completion of the operator’s EBT instructor standardisation in accordance with Part ORO, the SFI has additionally the privilege to conduct practical assessment in competencies.</p> <p>Comment: <u>SNPL STRONGLY OPPOSES</u> this privilege extension to SFI and therefore proposes subparagraph (b) deletion.</p> <p>Rationale: no assessment privilege can be given to SFI in the context of EBT. In this NPA EBT is only considered for recurrent training for pilots already type qualified and</p>

it is also used to validate the operational proficiency check. SFI do not have any requirement to have line experience (1500 hours in a multi-pilot airplane) even less to have recent experience of line flying in the airline so they do not possess the competence to assess a pilot during a LOE or SBT. This assessment can only be done by a TRE-EBT or a TRI-EBT.

The following comes from the definition of competency given on page 16 and shows that to be able to observe a competency the instructor must have a practical knowledge of the line flying activity:

A competency is manifested and observed through behaviours that mobilise the relevant knowledge, skills and attitudes to carry out activities or tasks under specified conditions. Trainees successfully demonstrate competency by meeting the associated competency standard.

The definition proposed in the NPA is created based on:

- Amendment 175 to ICAO Annex 1 ‘Personal licensing’; and
- Doc 9995.

The Doc 9995 references used were:

‘7.8.5.1 To be competent in any job, a person requires a certain amount of knowledge, an adequate level of skills, and a particular set of attitudes’.

‘7.8.5.4 To be competent, a pilot requires capabilities across a range of knowledge, skills and attitudes (KSA)’.

response

Not accepted

Traditional recurrent training allows SFIs to perform such training. To ensure level playing field, it is necessary to maintain the approach regarding SFIs. However, EBT has proposed additional requirements for SFIs — they need to attend the EBT instructor course.

In addition, when the validity of the line evaluation of competence (old line check) is extended, an instructor enrolled in the airline (with a valid line evaluation of competence) is necessary to deliver the module once a year.

comment

561

comment by: CAE

FCL.905.SFI SFI - Priveleges and conditions - there is a mistake in that the addition of "the successful completion of the operator's EBT instructor standardisation in accordance with Part-ORO", has not been copied to the SFI(A) requirement. It is in the TRI(A) and SFI(H). We assume this is an omission error?

response

Accepted

FCL.905.SFI has been modified accordingly.

comment

611

comment by: Vereinigung Cockpit

FCL 905 SFI

~~(b) After successful completion of the operator's EBT instructor standardisation in accordance with Part ORO, the SFI has additionally the privilege to conduct practical assessment in competencies.~~

Comment:



Vereinigung Cockpit *oposes this privilege extension to SFI and therefore **proposes subparagraph (b) deletion***

Rationale:

No assessment privilege can be given to SFI in the context of EBT. In this NPA EBT is only considered for recurrent training for pilots already type qualified and it is also used to validate the operational proficiency check.

*SFI do not have any requirement to have line experience (1500 hours in a multi-pilot airplane) even less to have recent experience of line flying in the airline so they do not possess the competence to assess a pilot during a LOE or SBT. **This assessment can only be done by a TRE-EBT or a TRI-EBT.***

The following comes from the definition of competency given on page 16 and shows that to be able to observe a competency the instructor must have a practical knowledge of the line flying activity:

A competency is manifested and observed through behaviours that mobilise the relevant knowledge, skills and attitudes to carry out activities or tasks under specified conditions. Trainees successfully demonstrate competency by meeting the associated competency standard.

The definition proposed in the NPA is based on:

- Amendment 175 to ICAO Annex 1 ‘Personal licensing’; and
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The Doc 9995 references used were:

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‘7.8.5.4 To be competent, a pilot requires capabilities across a range of knowledge, skills and attitudes (KSA)’.

response

Not Not accepted

Traditional recurrent training allows SFIs to perform such training. To ensure level playing field, it is necessary to maintain the approach regarding SFIs. However, EBT has proposed additional requirements for SFIs — they need to attend the EBT instructor course.

In addition, when the validity of the line evaluation of competence (old line check) is extended, an instructor enrolled in the airline (with a valid line evaluation of competence) is necessary to deliver the module once a year.

comment

660

comment by: IATA

(b) After successful completion of the operator’s EBT instructor standardisation in accordance with Part ORO, the SFI “**enrolled in an operator EBT System**” has additionally the privilege to conduct practical assessment in competencies.

It should be considered important that the SFI has a recent experience in lines operations and in the operator programme.



response

Not accepted

Traditional recurrent training allows SFIs to perform such training. To ensure level playing field, it is necessary to maintain the approach regarding SFIs. However, EBT has proposed additional requirements for SFIs — they need to attend the EBT instructor course.

In addition, when the validity of the line evaluation of competence (old line check) is extended, an instructor enrolled in the airline (with a valid line evaluation of competence) is necessary to deliver the module once a year.

comment

661

comment by: IATA

In NPA part A we can read: Although the amount of training in EBT remains unchanged, the role of the trainer will be now performed under the privileges of type rating instructor (TRI) licence, instead of type rating examiner (TRE) licence.

Why in NPA (part B) we do not use the same wording and this lack of precision allows all type of instructors to be acceptable for EBT, even if they do not have any experience of line operations and of the operator's context (SFI, CRI)?

Doc 9995

EBT instructor. A person who has undergone a screening and selection process, successfully completed an approved course in delivering competency-based training, and is subsequently authorized to conduct recurrent assessment and training within an approved EBT programme.

Part OPS

AMC1ORO.FC.230 Recurrent training and checking

Personnel providing training and checking

Training and checking should be provided by the following personnel:

- (1) ground and refresher training by suitably qualified personnel;
- (2) flight training by a flight instructor (FI), type rating instructor (TRI) or class rating instructor (CRI) or, in the case of the FSTD content, a synthetic flight instructor (SFI), providing that the FI, TRI, CRI or SFI satisfies the operator's experience and knowledge requirements sufficient to instruct on the items specified in paragraphs (a)(1)(i)(A) and (B);

For a tasks based system that is considered ok.

If we want to train unexpected events on line, how instructors with no experience (or very old experience) on line operations will be able to train and assess. Pilots losing their licence could be used as SFI only for the first two years as being EBT enrolled, after 2 years as SFI they will be restricted to the TR training and no more on the recurrent.

response

Not accepted



However, the review group took into account the safety objective of this comment, and they decided to modify the requirement in point (a) of AMC2 ORO.FC.231(h)(3) to ensure during the EBT modules the trainee maintains a regular exposure to an instructor with valid line experience.

One of the purposes of a line check is to verify the ability of a pilot to undertake normal line operations in the real aircraft. The validity of the line evaluation of competence is extended on the condition that the pilot ability to undertake normal line operations is maintained.

Therefore as line checks are replaced by FFS evaluations, to have the credits to extend the validity of the line evaluation of competence, the operator is required to integrate into these modules as much as possible the 'experience' of a line check.

For that matter, it is important that the evaluation is well designed, but also that at least once a year, the person delivering this EBT evaluation, which is a 'mirror of the line check', is an instructor who has a valid line evaluation of competence with that particular operator in order to be able to provide the necessary relevance of line flying experience.

comment 662

comment by: IATA

(b) After successful completion of the operator's EBT instructor standardisation in accordance with Part ORO, the SFI has additionally the privilege to conduct practical assessment in competencies.

In order to allow SFI with recent experience on line and on the operator domain it should be written:

(b) After successful completion of the operator's EBT instructor standardisation in accordance with Part ORO, the SFI, enrolled in an operator EBT recurrent programme, has additionally the privilege to conduct practical assessment in competencies.

response Not accepted

However, the review group took into account the safety objective of this comment, and they decided to modify the requirement in point (a) of AMC2 ORO.FC.231(h)(3) to ensure during the EBT modules the trainee maintains a regular exposure to an instructor with valid line experience.

One of the purposes of a line check is to verify the ability of a pilot to undertake normal line operations in the real aircraft. The validity of the line evaluation of



competence is extended on the condition that the pilot ability to undertake normal line operations is maintained.

Therefore as line checks are replaced by FFS evaluations, to have the credits to extend the validity of the line evaluation of competence, the operator is required to integrate into these modules as much as possible the 'experience' of a line check.

For that matter, it is important that the evaluation is well designed, but also that at least once a year, the person delivering this EBT evaluation, which is a 'mirror of the line check', is an instructor who has a valid line evaluation of competence with that particular operator in order to be able to provide the necessary relevance of line flying experience.

Appendix 10 — Proficiency check type ratings, and proficiency check for IRs when combined with type rating — Practical assessment in competen

p. 12-13

comment 35

comment by: *FNAM*

ISSUE – 2(a)(2)

The EASA's proposed disposals describe requirements for the approved EBT programme, in particular the nominated person for crew training. It is required that examiners should be competent on each of the type of ratings. Due to the large scope of rating and the heavy competencies needed for one rating, the requirement of competences on each type of rating would be a serious burden for all operators. They would not be able to provide sufficiently trained examiners according to this EASA's proposed disposal, and would therefore not implement EBT. FNAM suggests to replace 'each of' by 'the dedicated' in order to ensure efficient EBT implementations. It would be even a safer measure because examiners would be focused and therefore more competent on this rating.

PROPOSAL

Replace 'each of' by 'the dedicated'

response

Not accepted.

An explanatory note explains the intended meaning of paragraph A. 2. (a)(2).

comment

336

comment by: *UK CAA*

Page No: 12

Paragraph No: Appendix 10

Comment: We believe there is an issue in identifying credits in association with Appendix 8 of Annex 1 in the current regulation, which lays out the cross crediting of the IR part of a Class or Type Rating Proficiency Check. For pilots who have maintained a type rating and instrument privileges in accordance with Appendix 10, it is unclear what credit will they be able to use towards the revalidation of instrument privileges in other classes or types of aircraft.



response	<p>The CAA would appreciate understanding EASA’s thinking on cross crediting where EBT has been used to maintain the multi-pilot type rating and instrument privileges.</p> <p>Justification: Clarity</p> <p>Accepted Appendix 10 has been modified to ensure clarity regarding the revalidation/renewal of instrument rating.</p>
comment	<p>384 comment by: <i>European Cockpit Association</i></p> <p>ECA proposes to delete the provision for renewal in Appendix 10:</p> <p>Appendix 10 — Proficiency check type ratings, and proficiency check for IRs when combined with type rating — Practical assessment in competencies A — General ... 5. The revalidation or renewal in accordance with Appendix 10 shall comprise:</p> <p>Comment: ECA is opposed to the possibility of renewal of type rating within an EBT programme. As EBT is a new way of training for recurrent training, it is not entitled to deliver or renew a licence, class or type rating.</p> <p>Rationale: To be enrolled in an EBT programme, a pilot must have a valid licence and the appropriate type rating. In case of any disruption in the EBT, the pilot should renew its licence and possibly class or type rating under Appendix 9 with a proficiency check. This organisation is in line with the existing system which has proven to be safe, and simplify the EBT rules: a pilot is enrolled with valid type rating and stays in as long as his type rating is valid or when the operator “is no longer responsible for the administrative action for the flight crew’s licence revalidation” as per AMC1 ORO.FC23(a)(3)(i) (b).. This also implies the licence to remain under the scope of national authorities fulfilling ICAO rules, and easing article 30 of ICAO convention.</p>
response	<p>Not accepted Before the introduction of Regulation (EU) No 1178/2011, the renewals could be made at a type rating training organisation (TRTO). These organisations were not a school for the issue of licences. The TRTOs were normally at operator level. No safety concern was raised due to this fact. There is a strong regulatory oversight of operators; the same as for approved training organisations.</p>
comment	<p>385 comment by: <i>European Cockpit Association</i></p> <p>ECA proposes to add a new wording for paragraph A 5 (c) of Appendix 10:</p> <p>Appendix 10 — Proficiency check type ratings, and proficiency check for IRs when combined with type rating — Practical assessment in competencies A — General</p>

	<p>...</p> <p>5. The revalidation or renewal in accordance with Appendix 10 shall comprise:</p> <p>...</p> <p>(c) the administrative action of licence revalidation</p> <p>(1) The nominated person for crew training (or the deputy(ies)) The TRE EBT who has performed the full module, after review of the relevant module assessment shall endorse the applicant's licence or certificate with the new expiry date of the rating, if specifically authorised for that purpose by the competent authority responsible for the applicant's licence.</p> <p>Delegation of the TRE EBT's nominated person's for crew training (or the deputy(ies)) signature in order for the applicant's licence to be signed, may be possible only if the operator has an approved procedure for such case-</p> <p>Rationale:</p> <p>This will keep the TRE's responsibility when endorsing a licence and will continue to ensure the authority's involvement in the validity of the licences revalidation process. There is no need to suppress the TRE in the licence revalidation process under Appendix 10, we must keep the current FCL 1030 procedure.</p> <p>This will be a much more legally robust means to ensure the international validity of a licence by the same mutual recognition scheme that is in practice today.</p>
response	<p>Not accepted</p> <p>The examiner is the person revalidating licences and doing the administrative action of licence revalidation including compliance with FCL.1030. In addition, the examiner must be the nominated person for crew training or the deputy(ies). This concept does not prevent the operator from allowing instructors to conduct the EBT modules, which should provide the necessary data for the examiner to revalidate licences.</p>
comment	<p>386 comment by: <i>European Cockpit Association</i></p> <p>ECA proposes to delete paragraph A5(c)(2) in Appendix 10:</p> <p>Appendix 10 — Proficiency check type ratings, and proficiency check for IRs when combined with type rating — Practical assessment in competencies</p> <p>A — General</p> <p>5. The revalidation or renewal in accordance with Appendix 10 shall comprise:</p> <p>(c) the administrative action of licence revalidation.</p> <p>(2) The nominated person for crew training (or the deputy(ies)) shall ensure that the requirements in FCL.1030 'Conduct of skill tests, proficiency checks and assessments of competence' are met.</p> <p>Comment:</p> <p>(c) (2) should be cancelled as already in force in Appendix 10 paragraph A 3.</p> <p>This comment to be read in conjunction with ECA's comment on paragraph A 5 (c) of Appendix 10 — Proficiency check type ratings, and proficiency check for IRs when combined with type rating — Practical assessment in competencies, A — General</p>

response Accepted
Paragraph (c)(2) has been deleted.

comment 449 comment by: France

DGAC FR believes that requiring the “*nominated person for crew training to be a current examiner in **each of the type rating** for which appendix 10 is applicable*” will not match all operators’ situations (especially operators having several types in their fleet). Therefore, DGAC FR welcomes the fact that the nominated person for crew training could delegate to others persons (in particular the administrative action of licence revalidation). Nevertheless the persons to whom delegation is given should not be identified as formal “*deputies*” in the sense that their designation (or any changes related to them) should not need to be beforehand approved by the competent authority. In the meantime, DGAC FR stresses that the persons to whom delegation is given have to be operator’s examiner current on the relevant type rating. To summarize there is a need to give flexibility to operators regarding the choice of examiners belonging to their organization to whom delegation is given.

DGAC FR proposes a rewording for Appendix 10.

Appendix 10 — Proficiency check type ratings, and proficiency check for IRs when combined with type rating — Practical assessment in competencies

A — General

1. *The practical assessment in competencies within an approved EBT programme is equivalent to a proficiency check.*

2. *Appendix 10 only applies to:*

(a) an operator with an approved EBT programme that has:

(1) an experience of at least 2 years conducting an EBT programme which may include mixed

EBT;

and

*(2) a nominated person for crew training ~~(or the deputy(ies))~~ who is a current examiner ~~in each of~~ on the **relevant** type ratings for which Appendix 10 is applicable, **or an examiner to whom the nominated person may have given a delegation;***

or

(b) an ATO on behalf of the operator that complies with paragraph (2)(a) above, under ORO.GEN.205

‘Contracted activities’.

3. *The nominated person for crew training must verify that the applicant complies with all the qualification, training and experience requirements in this Part for the revalidation of the rating for which the proficiency check is taken.*



4. Applicants using Appendix 10 shall:

(a) be enrolled flight crew members in the operator's approved EBT programme; and

(b) within the period of validity, complete the operator's approved EBT programme.

5. The revalidation or renewal in accordance with Appendix 10 shall comprise:

(a) continuous practical assessment in competencies within an approved EBT programme;

(b) demonstration of an acceptable level of performance in all competencies; and

(c) the administrative action of licence revalidation.

(1) The nominated person for crew training *and examiners to whom the nominated person might have given a delegation (or the deputy(ies))* shall endorse the applicant's licence or certificate with the new expiry date of the rating, if specifically authorised for that purpose by the competent authority responsible for the applicant's licence. Delegation *of the nominated person's* for crew training *(or the deputy(ies))* signature in order for the applicant's licence to be signed, may be possible only if the operator has an approved procedure for such case.

(2) The nominated person for crew training (or the deputy(ies)) shall ensure that the requirements in FCL.1030 'Conduct of skill tests, proficiency checks and assessments of competence' are met.

response

Partially accepted

The Appendix 10 proposed text has been modified.

comment

464

comment by: France

DGAC believes that an operator's prior ATQP experience should also be considered as relevant as mixed EBT experience to apply ORO.FC.231 and appendix 10. In other words an operator already approved for ATQP shall be exempted from the requirement of at least 2 years conducting an EBT programme which may include mixed EBT.

DGAC FR proposes to amend AMC1 ORO.FC.231 (a) (1) and appendix 10 accordingly.

Appendix 10 — Proficiency check type ratings, and proficiency check for IRs when combined with type rating — Practical assessment in competencies

A — General

1. The practical assessment in competencies within an approved EBT programme is equivalent to a proficiency check.

2. Appendix 10 only applies to:

(a) an operator with an approved EBT programme that has:

(1) an experience of at least 2 years conducting an EBT programme which may include mixed EBT *or ATQP programme with an appropriate pilot competency scheme*; and



	<p>AMC1 ORO.FC.231(a)(1) Evidence-based training (a) MINIMUM EXPERIENCE TO SUBSTITUTE ORO.FC.230 The operator should have a minimum experience of 2 years of a mixed EBT programme (mixed EBT implementation) or ATQP programme with an appropriate pilot competency scheme.</p>
response	<p>Not accepted EASA published ED Decision 2015/027/R in December 2015 to provide guidance on EBT mixed implementation under ATQP programmes. Therefore, to ensure level playing field, the ATQP operators should demonstrate an experience of 2 years in EBT mixed.</p>
comment	<p>523 comment by: <i>SNPL FRANCE ALPA technical committee</i></p> <p>SNPL FRANCE ALPA proposes to delete the provision for renewal in appendix 10:</p> <p>Appendix 10 — Proficiency check type ratings, and proficiency check for IRs when combined with type rating — Practical assessment in competencies A — General ... 5. The revalidation or renewal in accordance with Appendix 10 shall comprise:</p> <p>Comment : SNPL is opposed to the possibility of renewal of type rating within an EBT programme. As EBT is a new way of training for recurrent training, it is not entitled to deliver or renew a licence, class or type rating.</p> <p>Rationale : To be enrolled in an EBT programme, a pilot must have a valid licence and the appropriate type rating. In case of any disruption in the EBT, the pilot should renew its licence and possibly class or type rating under appendix 9 with a proficiency check. This organisation is in line with the existing system which has proven to be safe, and simplify the EBT rules : a pilot is enrolled with valid type rating and stays in as long as his type rating is valid or when the operator “is no longer responsible for the administrative action for the flight crew’s licence revalidation” as per AMC1 ORO.FC23(a)(3)(i) (b).. This also implies the licence to remain under the scope of national authorities fulfilling ICAO rules, and easing article 30 of ICAO convention.</p>
response	<p>Not accepted Before the introduction of Regulation (EU) No 1178/2011, the renewals could be made at a type rating training organisation (TRTO). These organisations were not a school for the issue of licences. The TRTOs were normally at operator level. No safety concern was raised due to this fact. There is a strong regulatory oversight of operators; the same as for approved training organisations.</p>
comment	<p>524 comment by: <i>SNPL FRANCE ALPA technical committee</i></p> <p>SNPL FRANCE ALPA proposes to add a new wording for paragraph A 5 (c) of Appendix 10 :</p>

Appendix 10 — Proficiency check type ratings, and proficiency check for IRs when combined with type rating — Practical assessment in competencies

A — General

...

5. The revalidation or renewal in accordance with Appendix 10 shall comprise:

...

(c) the administrative action of licence revalidation

(1) ~~The nominated person for crew training (or the deputy(ies))~~ **The TRE EBT who has performed the full module, after review of the relevant module assessment shall endorse the applicant's licence or certificate with the new expiry date of the rating, if specifically authorised for that purpose by the competent authority responsible for the applicant's licence.**

Delegation of the ~~TRE EBT's~~ **nominated person's for crew training (or the deputy(ies))** signature in order for the applicant's licence to be signed, may be possible only if the operator has an approved procedure for such case.

Rationale : this will keep the TRE's responsibility when endorsing a licence and will continue to ensure the authority's involvement in the validity of the licences revalidation process. There is no need to suppress the TRE in the licence revalidation process under appendix 10, we must keep the current FCL 1030 procedure.

This will be a much more legally robust mean to ensure the international validity of a licence by the same mutual recognition scheme that is in practice today.

response

Not accepted

The examiner is the person revalidating licences and doing the administrative action of licence revalidation including compliance with FCL.1030. In addition, the examiner must be the nominated person for crew training or the deputy(ies). This concept does not prevent the operator from allowing instructors to conduct the EBT modules, which should provide the necessary data for the examiner to revalidate licences.

comment

525

comment by: *SNPL FRANCE ALPA technical committee*

SNPL FRANCE ALPA proposes to delete paragraph A5(c)(2) in appendix 10 :

Appendix 10 — Proficiency check type ratings, and proficiency check for IRs when combined with type rating — Practical assessment in competencies

A — General

5. The revalidation or renewal in accordance with Appendix 10 shall comprise:

(c) the administrative action of licence revalidation.

~~(2) The nominated person for crew training (or the deputy(ies)) shall ensure that the requirements in FCL.1030 'Conduct of skill tests, proficiency checks and assessments of competence' are met.~~

Comment : (c) (2) should be cancelled as already in force in ~~appendix 10~~ **paragraph A 3.**

response

Accepted

Paragraph (c)(2) has been deleted.



comment	<p data-bbox="368 235 432 271">557</p> <p data-bbox="1027 235 1394 271" style="text-align: right;">comment by: <i>EBT Foundation</i></p> <p data-bbox="368 293 488 329">Page: 13</p> <p data-bbox="368 360 1299 396">Paragraph No: B - CONDUCT OF PRACTICAL ASSESSMENT IN COMPETENCIES</p> <p data-bbox="368 427 1394 508">Comment: There are many references in this and preceding sections to "assessments in competencies". The term is grammatically incorrect/</p> <p data-bbox="368 539 660 575">Justification: grammar</p> <p data-bbox="368 607 564 642">Proposed text:</p> <p data-bbox="368 674 1394 754">Change all references where the phrase "assessment in competencies" is used to competency-based assessments, or assessments of competency</p>
response	<p data-bbox="368 770 496 806">Accepted</p> <p data-bbox="368 806 1299 842">The wording has been deleted from the proposed text of the EASA Opinion.</p>
comment	<p data-bbox="368 904 432 940">562</p> <p data-bbox="1166 904 1394 940" style="text-align: right;">comment by: <i>CAE</i></p> <p data-bbox="368 972 1394 1178">The introduction of a new Appendix 10 specifically for EBT appears to be extremely restrictive and burdensome, especially for ATOs working on behalf of an operator. The language used in the FCL regulation is operator-centric and does not take into consideration any other potential EBT training and assessment for AOC holders operating in the non-Airline environment. We suggest the removal of all references to the specific operated-approved EBT programme.</p>
response	<p data-bbox="368 1218 549 1254">Not accepted.</p> <p data-bbox="368 1254 1394 1424">The current proposal provides provisions for the operator's recurrent training where the specific operational risks of the operator should be addressed. EBT is an operator-specific programme and therefore is operator-centric, this concept has been transposed from ICAO Doc 9995 'Manual of EBT'.</p>
comment	<p data-bbox="368 1464 432 1500">612</p> <p data-bbox="975 1464 1394 1500" style="text-align: right;">comment by: <i>Vereinigung Cockpit</i></p> <p data-bbox="368 1532 1394 1644">Appendix 10 — Proficiency check type ratings, and proficiency check for IRs when combined with type rating — Practical assessment in competencies A — General</p> <p data-bbox="368 1644 405 1680">...</p> <p data-bbox="368 1680 1315 1715">5. The revalidation or renewal in accordance with Appendix 10 shall comprise:</p> <p data-bbox="368 1747 517 1783">Comment:</p> <p data-bbox="368 1783 1394 1895"><i>ECA is opposed to the possibility of renewal of type rating within an EBT programme. As EBT is a new way of training for recurrent training, it is not entitled to deliver or renew a licence, class or type rating.</i></p> <p data-bbox="368 1926 517 1962">Rationale:</p>

To be enrolled in an EBT programme, a pilot must have a valid licence and the appropriate type rating. In case of any disruption in the EBT, the pilot should renew its licence and possibly class or type rating under Appendix 9 with a proficiency check. This organisation is in line with the existing system which has proven to be safe, and simplify the EBT rules: a pilot is enrolled with valid type rating and stays in as long as his type rating is valid or when the operator “is no longer responsible for the administrative action for the flight crew’s licence revalidation” as per AMC1 ORO.FC23(a)(3)(i) (b).. This also implies the licence to remain under the scope of national authorities fulfilling ICAO rules, and easing article 30 of ICAO convention

...

(c) the administrative action of licence revalidation

~~(1) The nominated person for crew training (or the deputy(ies)) The TRE EBT who has performed the full module, after review of the relevant module assessment shall endorse the applicant’s licence or certificate with the new expiry date of the rating, if specifically authorised for that purpose by the competent authority responsible for the applicant’s licence.~~

~~Delegation of the TRE EBT’s nominated person’s for crew training (or the deputy(ies)) signature in order for the applicant’s licence to be signed, may be possible only if the operator has an approved procedure for such case.~~

Rationale:

This will keep the TRE’s responsibility when endorsing a licence and will continue to ensure the authority’s involvement in the validity of the licences revalidation process. There is no need to suppress the TRE in the licence revalidation process under Appendix 10, we must keep the current FCL 1030 procedure.

This will be a much more legally robust means to ensure the international validity of a licence by the same mutual recognition scheme that is in practice today.

(c) the administrative action of licence revalidation.

~~(2) The nominated person for crew training (or the deputy(ies)) shall ensure that the requirements in FCL.1030 ‘Conduct of skill tests, proficiency checks and assessments of competence’ are met.~~

Comment:

(c) (2) should be cancelled as already in force in ~~Appendix 10~~ **paragraph A 3.**

*This comment to be read in conjunction with ECA’s comment on paragraph A 5 (c) of Appendix 10 — **Proficiency check type ratings, and proficiency check for IRs when combined with type rating — Practical assessment in competencies, A — General***

response Partially accepted

Before the introduction of Regulation (EU) No 1178/2011, the renewals could be made at a type rating training organisation (TRTO). These organisations were not a school for the issue of licences. The TRTOs were normally at operator level. No safety concern was raised due to this fact.



There is a strong regulatory oversight of operators; the same as for approved training organisations.

The examiner is the person revalidating licences and doing the administrative action of licence revalidation including compliance with FCL.1030. In addition, the examiner must be the nominated person for crew training or the deputy(ies). This concept does not prevent the operator from allowing instructors to conduct the EBT modules, which should provide the necessary data for the examiner to revalidate licences. Point (c)(2) has been deleted.

ARA.FCL.200 Procedure for issue, revalidation or renewal of a licence, rating or certificate

p. 13-25

comment

450

comment by: *France*

DGAC FR believes that there is no need to distinguish licence endorsement procedures for EBT in authority procedures mentioned in ARA.FCL.200. Existing procedures for non EBT examiners could be amended to include the EBT case. Non EBT examiners may already today be authorized by the competent authority to endorse and sign the licence. This possibility needs only be extended to EBT examiner.

DGAC FR proposes a slight rewording of the new paragraph ARA.FCL.200 (c) (2).

ARA.FCL.200 Procedure for issue, revalidation or renewal of a licence, rating or certificate

(a) Issue of licences and ratings.

The competent authority shall issue a pilot licence and associated ratings, using the form as established in Appendix I to this Part.

(b) Issue of instructor and examiner certificates.

The competent authority shall issue an instructor or examiner certificate as:

(1) an endorsement of the relevant privileges in the pilot licence as established in Appendix I to this

Part; or

(2) a separate document, in a form and manner specified by the competent authority.

(c) Endorsement of licence by examiners.

~~*(1) before specifically authorising certain examiners to revalidate or renew ratings or certificates, including possible licence endorsement the competent authority shall develop appropriate procedures.*~~

~~*(2) These appropriate procedures may include endorsement of licence under an approved EBT programme in accordance with Appendix 10. In such case, signature delegation to endorsement of licence may be allowed.*~~



response

Not accepted

The proposal in the comment does not include the signature delegation.

Definitions for terms used in Annexes II to VI

p. 14-17

comment

139

comment by: *British Airways*

(42a) Should be 'session or combination of sessions' as the EBT programme may only be 36 hours in 3 years, which means some modules may only be one session.

(47a) Should be 'programme' singular

(47c) This is a very strange definition. Equivalency of approaches is a process, not a list. This definition does not fit well with the IR of ORO.FC.231(g). The IR, AMC and GM don't mention creating a list. The word 'equivalency' is directly related to the phrase 'demonstrated proficiency in the conduct of one approach with one characteristic is considered equivalent to demonstrated proficiency in the management of other approaches in the operational network with the same characteristics'. Therefore equivalency of approaches is NOT all the approaches. Suggest amend to '...a process to select approaches that place an addition demand on a proficient crew to be used in the EBT programme.

(47d) Again this is a very strange definition. Equivalency of malfunctions is a process, not a list. The word 'equivalency' is directly related to the phrase 'demonstrated proficiency in the management of one malfunction is considered equivalent to demonstrated proficiency in the management of other malfunctions with the same characteristics'. Therefore equivalency of malfunctions is NOT all the malfunctions. Suggest amend to '...a process to select malfunctions that place a significant demand on a proficient crew to be used in the EBT programme.

(47f) Should be either 'the range of the competency framework', or better would be 'the range of competencies'

(69a) Repitition of 'scenario-based training phase'. Second sentence should be '...scripted scenarios where the...'

(76a) Why has the sentence 'These exercises or events should place a significant demand on a proficient crew' been added? This is not in Doc 9995 and there is no Explanatory Note. The important point is the manoeuvres require practise to maintain skill, and they may or may not be demanding. MT also includes some approaches which place an 'additional' demand on a proficient crew. The additional sentence should be deleted.

response

Partially accepted

Some of the definitions have been amended as suggested.

comment

387

comment by: *European Cockpit Association*

ECA proposes the following comment:



2.2. Draft regulation, AMC & GM (draft EASA opinion and draft EASA decision) and rationale in detail
Definitions for terms used in Annexes II to VIII

(47e) 'evaluation phase (EVAL)' means one of the phases of an EBT module. The evaluation phase is a line-orientated flight scenario, representative of the operator's environment during which there are one or more occurrences to evaluate key elements of the defined competency framework. The root cause rather than the symptoms in any deficiency should be identified, in order to determine training needs.

Comment:

ECA fully supports this definition of evaluation phase which suppose EBT instructor to have line-oriented recent experience and are fully aware of the operator environment. To be consistent with this principle EBT instructor should be at least TRI, and enrolled in the operator EBT program.

response

Noted

ORO.FC.231 and ORO.FC.146 and the associated AMC & GM ensure that EBT instructors are at least FCL instructors.

comment

457

comment by: *European Cockpit Association*

2.2 Annex I (Definitions)

(69a) 'in-seat instruction (ISI)' means part of the scenario-based training phase. ISI contains predetermined scripted scenarios within the scenario-based training phase where the instructors can:

Comment:

Include MT, since ISI can also be part of the maneuvers phase, e.g. UPRT, the recovery part is more a maneuver than a scenario (even if stated otherwise in the document)

response

Accepted

comment

474

comment by: *AIRBUS*

Page 14 Definitions for terms used in Annexes II to VIII , item (69a):

The definition of "in seat instruction (ISI)" is too restrictive by focusing only on scenario-based training. Airbus considers that it is even more pertinent to consider ISI in maneuver training, as this is typically the case for UPRT training. Thus this should also be reflected in ORO.FC.231(a)(2).

response

Accepted

comment

498

comment by: *Vereinigung Cockpit*

2.2. Draft regulation, AMC & GM (draft EASA opinion and draft EASA decision) and rationale in detail



Definitions for terms used in Annexes II to VIII

(47e) 'evaluation phase (EVAL)' means one of the phases of an EBT module. The evaluation phase is a line-orientated flight scenario, representative of the operator's environment during which there are one or more occurrences to evaluate key elements of the defined competency framework. The root cause rather than the symptoms in any deficiency should be identified, in order to determine training needs.

Comment:

ECA fully supports this definition of evaluation phase which suppose EBT instructor to have line-oriented recent experience and are fully aware of the operator environment. To be consistent with this principle EBT instructor should be at least TRI, and enrolled in the operator EBT program.

2.2 Annex I (Definitions)

(69a) 'in-seat instruction (ISI)' means part of the scenario-based training phase. ISI contains predetermined scripted scenarios within the scenario-based training phase where the instructors can:

Comment: Include MT, since ISI can also be part of the maneuvers phase, e.g. UPRT, the recovery part is more a maneuver than a scenario (even if stated otherwise in the document)

response

Partially accepted

On the comment about the 'evaluation phase', ORO.FC.231 and ORO.FC.146 and the associated AMC & GM ensure that EBT instructors are at least FCL instructors. The comment about the 'in-seat instruction' is accepted.

comment

526

comment by: SNPL FRANCE ALPA technical committee

SNPL proposes the following comment:

2.2. Draft regulation, AMC & GM (draft EASA opinion and draft EASA decision) and rationale in detail
Definitions for terms used in Annexes II to VIII

(47e) 'evaluation phase (EVAL)' means one of the phases of an EBT module. The evaluation phase is a line-orientated flight scenario, representative of the operator's environment during which there are one or more occurrences to evaluate key elements of the defined competency framework. The root cause rather than the symptoms in any deficiency should be identified, in order to determine training needs.

comment : SNPL fully supports this definition of evaluation phase which suppose EBT instructor to have line-oriented recent experience and are fully aware of the operator environment. To be consistent with this principle EBT instructor should be at least TRI, and enrolled in the operator EBT program.



response Noted.
ORO.FC.231 and ORO.FC.146 and the associated MAC &GM ensure that EBT instructors are at least FCL instructors.

GM2 Annex I Definitions

p. 17

comment 397 comment by: *European Powered Flying Union*

GM2 Annex I Definitions
page 17/222

Please change the title and write directly "Abbreviations".

Rationale:

There is nor a definition neither an acronym published in the segment of text.

response Not accepted.

GM1X Annex I Definitions

p. 18

comment 19 comment by: *Michel Lacombe AF Training department and AF ATO*

Définition conduct to false interpretation when reading GM1 FCL.1025 (b)(1)

'Practical assessment (or practical assessment in competencies)' is the primary method for assessing performance and should serve to verify the integrated performance of competencies. It takes place in either a simulated or an operational environment. A practical assessment in competencies is equivalent to a proficiency check and is performed under the instructor privilege in the context of proficiency check in accordance with Appendix 10 to Part-FCL. More information can be found in ICAO Doc 9868 'PANS-TRG'.

It could be indicated :

'Practical assessment (or practical assessment in competencies)' is the primary method for assessing performance and should serve to verify the integrated performance of competencies. It takes place in either a simulated or an operational environment. In the EBT context, when performed under the instructor privilege in the context of proficiency check in accordance with Appendix 10 to Part-FCL, two practical assessments in competencies are needed to be equivalent to a proficiency check. More information can be found in ICAO Doc 9868 'PANS-TRG'.

response Partially accepted
Some improvements to the definition have been made, but not the ones proposed in this comment.

comment 36 comment by: *FNAM*



	<p>AGREEMENT FNAM thanks EASA for transposing ICAO definitions.</p>
response	Noted
comment	<p>140 comment by: <i>British Airways</i></p> <p>Facilitation technique, last line, amend 'solutions and resulting' to 'solutions, resulting'</p> <p>Behavior is 'capable of being measured' but Observable behavior 'may or may not be measurable'. This is inconsistent. Both definitions should be 'may or may not be measurable'</p> <p>'Practical assessment in competencies' is the phrase chosen to be equivalent to a proficiency check. However, this is not good English. In Part-FCL there is already the concept of 'Assessment of competence'. The word 'of' is a much better and more natural word to use than 'in'. Suggest 'Practical assessment of competencies' is used throughout the NPA. The correct plural phrase is then 'Practical assessments of competencies'</p> <p>It is critical that everyone agrees what 'Practical assessment of competencies' means in the context of EBT. The current definition and Explanatory Note do not make it clear. When is a 'Practical assessment of competencies' carried out in an EBT module. Is it during the Eval? Is it at the end of the module? Or is it both? Or is it continuously throughout the module? There is no clarity.</p> <p>The Explanatory Note, at the bottom of page 19, suggests the 'Practical assessment of competencies' is the summative assessment that happens at the end of the module. Is this correct?</p> <p>This is critical because the 'Practical assessment of competencies' is equivalent to the proficiency check, and is fundamental to understanding the requirements of Appendix 10.</p>
response	<p>Partially accepted</p> <p>Some of the comments suggested have been transposed to the EASA Opinion.</p>
comment	<p>663 comment by: <i>IATA</i></p> <p>Definition potentially open to false interpretation when reading GM1 FCL.1025 (b)(1)</p> <p>'Practical assessment (or practical assessment in competencies)' is the primary method for assessing performance and should serve to verify the integrated performance of competencies. It takes place in either a simulated or an operational environment. A practical assessment in competencies is equivalent to a proficiency check and is performed under the instructor privilege in the context</p>

of proficiency check in accordance with Appendix 10 to Part-FCL. More information can be found in ICAO Doc 9868 'PANS-TRG'.

It could be indicated :

'Practical assessment (or practical assessment in competencies)' is the primary method for assessing performance and should serve to verify the integrated performance of competencies. It takes place in either a simulated or an operational environment. In the EBT context, when performed under the instructor privilege in the context of proficiency check in accordance with Appendix 10 to Part-FCL, two practical assessments in competencies are needed to be equivalent to a proficiency check. More information can be found in ICAO Doc 9868 'PANS-TRG'.

response Partially accepted
Some improvements to the definition have been made, but not the ones proposed in this comment.

GM1X Annex I Definitions

p. 19-21

comment

337

comment by: UK CAA

Page No: 19

Paragraph No: Practical Assessment

Comment: In the discussion point regarding the "Evaluation phase (EVAL)" as defined on Page 18, The following statement is made on page 19:

*The RMG decided to embrace the new philosophy of the draft ICAO Doc 9868 'PANS-TRG' to be soon published. The new paragraph 4.4.1.2.2 is **moving the summative assessment that otherwise would be made in the evaluation phase to the end of the module** as provided in ORO.FC.231(a) 'will not continue line operations if during a module the performance observed was below the minimum acceptable level*

It is not clear if the evaluation phase is intended to be in the first assessment or at the end of the module

Justification: Clarification needed.

response

Accepted

The explanatory note has been redrafted to provide a better explanation.



comment	398	comment by: <i>European Powered Flying Union</i>
	CRT line for pages 19 to 21: Should this line be deleted?	
response	Noted	
comment	570	comment by: <i>AUA EBT</i>
	Question- It is not clear if you promote a Formative or Summative assessment?	
response	Accepted The explanatory note has been redrafted to provide a better explanation.	

ARO.OPS.226 Approval and oversight of evidence-based training programmes

p. 21-23

comment	37	comment by: <i>FNAM</i>
	<p>ISSUE</p> <p>‘Comment on whether this rule should be developed are welcome by the stakeholders.’</p> <p>The proposed disposal requires that ‘the competent authority shall ensure the resolution of significant findings in the areas that will support the application of the EBT programme.’</p> <p>FNAM insists on the need to have a proportionate approach depending on the size of operators and their activities. EBT principle should be encouraged to small operators in order to enhance flight safety level and improve the global European training efficiency. Flexible provisions should be provided for small operators in order to facilitate and organize resources and data pooling thanks to manufacturers or between operators to implement EBT.</p> <p>PROPOSAL</p> <p>Allow flexibilities for small operators and encourage EBT implementations thanks to pooling resources and data with manufacturers or between operators</p>	
response	Not accepted However, the issue will be considered during Phase 3 RMT.0599. See the latest EPAS.	
comment	141	comment by: <i>British Airways</i>
	(c)(2)(i) Which programme is being referred to here? Suggest change to: ‘the maturity, capability and suitability of the operator’s management system’	
response	Accepted	
comment	358	comment by: <i>Czech Technical University</i>
	ARO.OPS.226 point (c)(1) We suggest a development of GM. Even slight variation in internal policies may cause difficulties for airlines holding several AOCs in different member states and attempting to implement a common EBT programme.	
response	Partially accepted The text has been modified to ensure clarity. See the EASA Opinion.	



comment	475	comment by: AIRBUS
	Page 21 ARO.OPS.226 (c) (1) and (c) (2) (iv):	
	This sentence: “ensure the resolution of significant findings in the areas that will support the application of the EBT programme” is considered by Airbus as too vague and prawn to many different interpretations and use by different NAA’s;	
	Similarly, the statement in (c)(2)(iv) is also felt unclear.	
response	Accepted The text has been modified to ensure clarity. See the EASA Opinion.	

AMC1 ARO.OPS.226(a) Approval and oversight of evidence-based training programmes

p. 23-24

comment	142	comment by: British Airways
	(a) Should be '...undertake EBT training as part...'	
	(a)(10) Should be 'recognise facilitated trainee learning...'	
response	Accepted	
comment	388	comment by: European Cockpit Association
	ECA proposes the following addition:	
	AMC1 ARO.OPS.226(a) Approval and oversight of evidence-based training programmes QUALIFICATION AND TRAINING — INSPECTORS — EVIDENCED-BASED TRAINING (a) ... (12) should be qualified to perform practical assessment in competencies (see ORO.FC.145 (a)(3)(ii))	
	Comment: Add a new subparagraph (12)	
	Rationale: It is important for the inspectors to also be trained in EBT assessment of competence in the same way as any EBT instructor to be able to perform efficient supervision. This is also supported by paragraph (7) of this AMC: <i>recognise trainee performance to determine competency-based training needs and recognise strengths, which requires both pilot competencies and EBT knowledge.</i>	
response	Not accepted	



comment	527	comment by: SNPL FRANCE ALPA technical committee
	<p>SNPL FRANCE ALPA proposes the following addition:</p> <p>AMC1 ARO.OPS.226(a) Approval and oversight of evidence-based training programmes QUALIFICATION AND TRAINING — INSPECTORS — EVIDENCED-BASED TRAINING (a) ... (12) should be qualified to perform practical assessment in competencies (see ORO.FC.145 (a)(3)(ii))</p> <p>Comment: add a new subparagraph (12)</p> <p>Rationale: It is important for the inspectors to also be trained in EBT assessment of competence in the same way as any EBT instructor to be able to perform efficient supervision. This is also supported by paragraph (7) of this AMC: <i>recognise trainee performance to determine competency-based training needs and recognise strengths, which requires both pilot competencies and EBT knowledge.</i></p>	
response	Not accepted	

comment	613	comment by: Vereinigung Cockpit
	<p>AMC1 ARO.OPS.226(a) Approval and oversight of evidence-based training programmes QUALIFICATION AND TRAINING — INSPECTORS — EVIDENCED-BASED TRAINING (a) ... (12) should be qualified to perform practical assessment in competencies (see ORO.FC.145 (a)(3)(ii))</p> <p>Comment: <i>Add a new subparagraph (12)</i></p> <p>Rationale: <i>It is important for the inspectors to also be trained in EBT assessment of competence in the same way as any EBT instructor to be able to perform efficient supervision. This is also supported by paragraph (7) of this AMC: recognise trainee performance to determine competency-based training needs and recognise strengths, which requires both pilot competencies and EBT knowledge.</i></p>	
response	Not accepted	

AMC1 ARO.OPS.226(d) Approval and oversight of evidence-based training programmes

p. 25-27

comment	4	comment by: Michel Lacombe AF Training department and AF ATO
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response	<p>AMC1 ARO.OPS.226(d) To facilitate the EBT implementation, the list should be supported by a Check-List as the one developed for the Mixed-EBT Implementation.</p> <p>Accepted</p> <p>A safety promotion task (SPT.012) has been planned in the latest EPAS to evaluate the feasibility of such checklist.</p>
comment	<p>5 comment by: <i>Michel Lacombe AF Training department and AF ATO</i></p> <p>AMC 1 ORO.OPS.226 (d) point (c)(10) “Continuing standardisation of EBT instructors”.</p> <p>To standardize à GM to explain how to verify CONCORDANCE and how to prevent DECAY IN CONCORDANCE should be appreciated.</p>
response	<p>Accepted</p> <p>The new AMC1 ORO.FC.231(a)(4) and GM1 ORO.FC.231(a)(4) have been developed in the AMC & GM to Part-ORO to clarify this point. The authority would need to read the information in the AMC & GM to Part-ORO to avoid duplication of the provision.</p>
comment	<p>38 comment by: <i>FNAM</i></p> <p>AGREEMENT – (c)(4)</p> <p>FNAM thanks EASA to ensure that competent authorities would guide operators to improve their EBT programme.</p>
response	<p>Noted</p>
comment	<p>39 comment by: <i>FNAM</i></p> <p>AGREEMENT</p> <p>FNAM agrees for the development of a clear checklist by EASA to support mixed EBT implementation.</p>
response	<p>Noted</p>
comment	<p>40 comment by: <i>FNAM</i></p> <p>ISSUE - (c)(10) “Continuing standardisation of EBT instructors”</p> <p>Efficient interpretations and implementations could be supported by a GM for concordance topic. Thus, FNAM suggests to standardize a GM to explain how to verify CONCORDANCE and how to prevent DECAY IN CONCORDANCE.</p> <p>PROPOSAL</p> <p>Explain in GM how to verify CONCORDANCE and how to prevent DECAY IN CONCORDANCE</p>
response	<p>Accepted</p> <p>The new AMC1 ORO.FC.231(a)(4) and GM1 ORO.FC.231(a)(4) have been developed in the AMC & GM to Part-ORO to clarify this point. The authority would need to read the information in the AMC & GM to Part-ORO to avoid duplication of the provision.</p>
comment	<p>143 comment by: <i>British Airways</i></p>

response	<p>(11) is not necessary as it's already covered by (5)</p> <p>Not accepted</p>
comment	<p>243 comment by: <i>Transport Malta - Civil Aviation Directorate</i></p> <p>AMC1 ARO.OPS.226(d) point (b) stipulates that</p> <p>“(b) Each organisation to which an EBT approval has been issued should have an inspector assigned to it who is trained and qualified for EBT (see AMC1 ARO.OPS.226(a)).”</p> <p>Comment –</p> <p>This statement would seem to go against the spirit of AMC2 ARO.GEN.305(b) which states –</p> <p>Each organisation to which a certificate has been issued should have an inspector specifically assigned to it. Several inspectors should be required for the larger companies with widespread or varied types of operation. This does not prevent a single inspector being assigned to several companies. Where more than one inspector is assigned to an organisation, one of them should be nominated as having overall responsibility for supervision of, and liaison with, the organisation’s management, and be responsible for reporting on compliance with the requirements for its operations as a whole.</p> <p>AMC2 ARO.GEN.305(b) provides flexibility to CA’s in assigning inspectors to oversee specific operators given size and complexity, however this does not prevent having inspectors not having all competencies i.a.w. operators’ scope of approval (e.g. LVO). As such the proposed text seems to be limiting this fact.</p> <p>We would like to have this point either revised i.a.w. AMC2 ARO.GEN.305(b) or removed all together.</p>
response	<p>Accepted</p> <p>The text has been modified to ensure the competent authority has the necessary flexibility.</p>
comment	<p>359 comment by: <i>Czech Technical University</i></p> <p>AMC1 ARO.OPS.226(d) point (c)(3) wording ‘relevance of the operator’s approved EBT programme’</p> <p>Terms ‘relevance’ and ‘effectiveness’ are clear and do not require further explanation.</p>
response	<p>Noted</p>
comment	<p>360 comment by: <i>Czech Technical University</i></p>

response	<p>AMC1 OARO.OPS.226(d) point (c)(10) wording ‘Continuing standardisation of EBT instructors’</p> <p>Verification of concordance by an authority may be limited to inspecting outputs from the instructor concordance assurance programme.</p> <p>Authority oversight of the instructor concordance assurance programme (and relevant metrics) is required by AMC1 ARO.OPS.226(d) point (c)(11).</p> <p>Decay prevention should be addressed by the operator.</p>
comment	<p>389 comment by: <i>European Cockpit Association</i></p> <p>ECA proposes the deletion of the <i>renewal</i> provision in the following AMC: AMC1 ARO.OPS.226(d) Approval and oversight of evidence-based training programmes (9) administration of programme enrolment and compliance with the requirements of Annex I (Part-FCL) for licence revalidation and renewal;</p> <p>Comment: ECA is opposed to the possibility of renewal of type rating within an EBT programme. As EBT is a new way of training for recurrent training, it is not entitled to deliver or renew a licence, class or type rating.</p> <p>Rationale: To be enrolled in an EBT programme, a pilot must have a valid licence and the appropriate type rating. In case of any disruption in the EBT, the pilot should renew its licence and possibly class or type rating under appendix 9 with a proficiency check. This organisation is in line with the existing system which has proven to be safe, and simplify the EBT rules: a pilot is enrolled with valid type rating and stays in as long as his type rating is valid or when the operator “is no longer responsible for the administrative action for the flight crew’s licence revalidation” as per AMC1 ORO.FC23(a)(3)(i) (b).. This also implies the licence to remain under the scope of national authorities fulfilling ICAO rules, and easing article 30 of ICAO convention.</p>
response	<p>Not accepted</p> <p>Before the introduction of Regulation (EU) No 1178/2011, the renewals could be made at a type rating training organisation (TRTO). These organisations were not a school for the issue of licences. The TRTOs were normally at operator level. No safety concern was raised due to this fact.</p> <p>There is a strong regulatory oversight of operators; the same as for approved training organisations.</p>
comment	<p>528 comment by: <i>SNPL FRANCE ALPA technical committee</i></p> <p>SNPL FRANCE ALPA proposes the deletion of renewal provision in the following AMC :</p>

AMC1 ARO.OPS.226(d) Approval and oversight of evidence-based training programmes

(9) administration of programme enrolment and compliance with the requirements of Annex I (Part-FCL) for licence revalidation ~~and renewal~~;

Comment : SNPL is opposed to the possibility of renewal of type rating within an EBT programme. As EBT is a new way of training for recurrent training, it is not entitled to deliver or renew a licence, class or type rating.

Rationale : To be enrolled in an EBT programme, a pilot must have a valid licence and the appropriate type rating. In case of any disruption in the EBT, the pilot should renew its licence and possibly class or type rating under appendix 9 with a proficiency check. This organisation is in line with the existing system which has proven to be safe, and simplify the EBT rules : a pilot is enrolled with valid type rating and stays in as long as his type rating is valid or when the operator “is no longer responsible for the administrative action for the flight crew’s licence revalidation” as per AMC1 ORO.FC23(a)(3)(i) (b).. This also implies the licence to remain under the scope of national authorities fulfilling ICAO rules, and easing article 30 of ICAO convention.

response

Not accepted

Before the introduction of Regulation (EU) No 1178/2011, the renewals could be made at a type rating training organisation (TRTO). These organisations were not a school for the issue of licences. The TRTOs were normally at operator level. No safety concern was raised due to this fact.

There is a strong regulatory oversight of operators; the same as for approved training organisations.

comment

614

comment by: *Vereinigung Cockpit***AMC1 ARO.OPS.226(d) Approval and oversight of evidence-based training programmes**

(9) administration of programme enrolment and compliance with the requirements of Annex I (Part-FCL) for licence revalidation ~~and renewal~~;

Comment:

ECA is opposed to the possibility of renewal of type rating within an EBT programme. As EBT is a new way of training for recurrent training, it is not entitled to deliver or renew a licence, class or type rating.

Rationale:

To be enrolled in an EBT programme, a pilot must have a valid licence and the appropriate type rating. In case of any disruption in the EBT, the pilot should renew its licence and possibly class or type rating under appendix 9 with a proficiency check. This organisation is in line with the existing system which has proven to be safe, and simplify the EBT rules: a pilot is enrolled with valid type rating and stays in as long as his type rating is valid or when the operator “is no longer responsible for the administrative action for the flight crew’s licence revalidation” as per AMC1 ORO.FC23(a)(3)(i) (b).. This also implies the licence to remain under the scope of national authorities fulfilling ICAO rules, and easing article 30 of ICAO convention.



response Not accepted
 Before the introduction of Regulation (EU) No 1178/2011, the renewals could be made at a type rating training organisation (TRTO). These organisations were not a school for the issue of licences. The TRTOs were normally at operator level. No safety concern was raised due to this fact.
 There is a strong regulatory oversight of operators; the same as for approved training organisations.

comment 664 comment by: IATA

AMC1 ARO.OPS.226(d) To facilitate the EBT implementation, the oversight should be supported by a Check-List as the one developed for the Mixed-EBT Implementation.

response Accepted.
 A safety promotion task (SPT.012) has been planned in the latest EPAS to evaluate the feasibility of such checklist.

comment 665 comment by: IATA

AMC 1 ORO.OPS.226 (d) point (c)(10) "Continuing standardisation of EBT instructors".
 To standardize, a GM to explain how to verify CONCORDANCE and how to prevent DECAY IN CONCORDANCE should be considered.

response Accepted
 The new AMC1 ORO.FC.231(a)(4) and GM1 ORO.FC.231(a)(4) have been developed in the AMC & GM to Part-ORO to clarify this point. The authority would need to read the information in the AMC & GM to Part-ORO to avoid duplication of the provision.

GM1 to AMC1 ARO.OPS.226(d) Approval and oversight of evidence-based training programmes

p. 27

comment 41 comment by: F NAM

AGREEMENT – (b)
 F NAM thanks EASA for guiding competent authorities in their approval and oversight. In particular for insisting on 'the analysis of the pilot competencies across domains should also take into account the operator's experience in the approved EBT programme and the level of difficulty contained within the scenario elements of the programme, which may result in variations of the grading results.'
 Indeed, since EBT programme may be built differently depending on the fleet, the risk activities of operators, training results may vary.



response	Noted	
comment	144	comment by: <i>British Airways</i>
	(a) There should be a comma after 'role'	
	(a) It should be just 'pilot competencies' not 'pilot core competencies'	
response	Accepted	
comment	361	comment by: <i>Czech Technical University</i>
	GM1 to AMC1 ARO.OPS.226(d) point (b)	
	We suggest to include a part of the explanatory note in the GM. Please consider rewording for better clarity as follows:	
	<i>(b) The analysis of the pilot competencies across the domains should also take into account the operator's experience in the approved EBT programme and the level of difficulty contained within the scenario elements of the programme, which may result in variations of the grading results <u>and those variations are acceptable.</u></i>	
response	Accepted	

ORO.FC.145 Provision of training

p. 27-30

comment	8	comment by: <i>Michel Lacombe AF Training department and AF ATO</i>
	ORO FC 145 Provision of training	
	(3) in addition to the above, for an approved EBT programme:	
	(ii) have completed the operator's EBT instructor standardisation.	
	(i) personnel providing assessment and training shall hold an Annex I (Part-FCL) instructor or examiner certificate; and	
	(ii) have completed the operator's EBT instructor standardisation.	
	Successful completion of the operator's EBT standardisation will qualify the instructor to perform practical assessment in competencies.	
	To be sure that the instructor have experience of what they train, operator context and line experience it should be indicated:	
	ORO FC 145 Provision of training	
	(3) in addition to the above, for an approved EBT programme:	
	(ii) have completed the operator's EBT instructor standardisation.	
	(i) personnel providing assessment and training shall hold an Annex I (Part-FCL) instructor or examiner certificate; and	
	(ii) have completed the operator's EBT instructor standardisation.	
	Successful completion of the operator's EBT standardisation will qualify the instructor to perform practical assessment in competencies.	



response	<p>(iii) be enrolled in the operator recurrent EBT programme.</p> <p>Not accepted</p> <p>However, the review group took into account the safety objective of this comment, and they decided to modify the requirement in point (a) of AMC2 ORO.FC.231(h)(3) to ensure during the EBT modules the trainee maintains a regular exposure to an instructor with valid line experience.</p>
comment	<p>9 <i>comment by: Michel Lacombe AF Training department and AF ATO</i></p> <p>AMC1 ORO FC 145 (a)(3) EBT INSTRUCTOR TRAINING</p> <p>(b) The EBT instructor training course should be delivered by a pilot who has already demonstrated proficiency to train the elements specified in point (b) below.</p> <p>If the pilot has already demonstrated proficiency to train he should be “in the instructor course”. And although if we do not want any kind of decay, to train instructors the minimum should be able to share their knowledge about training so it should be indicated :</p> <p>AMC1 ORO FC 145 (a)(3) EBT INSTRUCTOR TRAINING</p> <p>(b) The EBT instructor training course should be delivered by a pilot (having completed the instructor training course or holding or having held the instructor certificate) who has already demonstrated proficiency to train the elements specified in point (c) below.</p>
response	<p>Partially accepted. Agreed with the typo.</p> <p>The opinion of the majority in the review group was that it is not necessary for a person delivering the EBT instructor training course to have already completed the training course, or to hold or have held an instructor certificate. What is important is the teaching skills and proficiency of the person, not the fact that they are or have previously been an EBT instructor themselves. EBT instructor courses are already being delivered by training specialists who are not pilots, but who are very competent at delivering the learning objectives of an EBT instructor course. It was felt that specialists like these should not be excluded from delivering an EBT instructor course. It was also felt that this is a question of quality — it is for the operator to ensure quality of the persons delivering the training, not assumptions made on their background.</p>
comment	<p>10 <i>comment by: Michel Lacombe AF Training department and AF ATO</i></p> <p>EBT INSTRUCTOR — INITIAL STANDARDISATION</p> <p>(1) EBT instructor training; and (2) EBT assessment of competence.</p>

	<p>EBT INSTRUCTOR TRAINING</p> <p>(a) Before delivering the operator’s approved EBT programme, the instructor should successfully complete an EBT instructor initial standardisation composed of:</p> <p>(b) The EBT instructor training course should be delivered by a pilot who has already demonstrated proficiency to train the elements specified in point (b) below.</p> <p>(c) The EBT instructor training course should comprise theoretical and practical training. At the completion of EBT instructor training, the instructor should:</p> <p>There is an error of adressed in paragraph (b) It should be written:</p> <p>EBT INSTRUCTOR — INITIAL STANDARDISATION</p> <p>(1) EBT instructor training; and</p> <p>(2) EBT assessment of competence.</p> <p>EBT INSTRUCTOR TRAINING</p> <p>(a) Before delivering the operator’s approved EBT programme, the instructor should successfully complete an EBT instructor initial standardisation composed of:</p> <p>(b) The EBT instructor training course should be delivered by a pilot who has already demonstrated proficiency to train the elements specified in point (c) below.</p> <p>(c) The EBT instructor training course should comprise theoretical and practical training. At the completion of EBT instructor training, the instructor should:</p>
response	Accepted

comment	<p>42 comment by: <i>FNAM</i></p> <p>ISSUE</p> <p>The proposed disposals describes personal providing assessments and trainings requirements. FNAM thanks for precisig TRI, FI and CRI training role. Nevertheless, no precision is providing for assessment requirement and definition. EBT programme depends on the operator context and specificities. EBT instructors should assess, train and be trained on specific operational situations representing the operator lines context. All instructors (including SFI and SFE) should therefore be trained and have a recent expertise of specific operator lines operations.</p> <p>In the whole regulation and rationale, it is not clear if this privilege is allowed only for instructors or for examiner and instructors. Despite examiners role and nature, FNAM fears that only instructors would be able to assess EBT competencies. Thus, FNAM suggests to mention examiners each time instructors are mentioned in order to allow examiners to assess EBT competencies. This would better fit to operational reality.</p> <p>The EASA’s proposed disposals propose that examiners would have to assess and validate license solely on the basis of instructors’ declarations. FNAM wonders what is EASA’s level of apprehension of this issue and its associated risk.</p> <p>PROPOSAL</p> <p>Define clearly the concept of assessment for examiners and instructors; and</p> <p>Ensure examiners responsibilities correspond to examiners assessment means; and</p> <p>Ensure instructors and examiners recent experience in operators line specific operations by adding in ORO.FC.145:</p> <p>‘(3) in addition to the above, for an approved EBT programme:</p> <p>(ii) have completed the operator’s EBT instructor standardisation.</p>
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response	<p>(i) personnel providing assessment and training shall hold an Annex I (Part-FCL) instructor or examiner certificate; and (ii) have completed the operator’s EBT instructor standardization; and (iii) be enrolled in the operator recurrent EBT programme.’</p> <p>Not accepted</p> <p>However, the review group took into account the safety objective of this comment, and they decided to modify the requirement in point (a) of AMC2 ORO.FC.231(h)(3) to ensure during the EBT modules the trainee maintains a regular exposure to an instructor with valid line experience.</p>
comment	<p>43 comment by: <i>FNAM</i></p> <p>ISSUE FNAM wonders what does ‘assessment in competencies’ means exactly. Is it the final validation of the training or is it a declaration which ensures EBT module is validated? FNAM proposes to define clearly in GM the concept of ‘practical assessment in competencies’. It would help also to clarify the different roles between examiners and instructors. In these EASA’s proposed disposals, it is not clear in ORO.FC.231 and in ORO.FC145 what assessment is for instructors and examiners. This may lead to divergent interpretations and therefore to inefficient implementations.</p> <p>PROPOSAL Define clearly the concept of assessment for examiners and instructors</p>
response	<p>Partially accepted. The wording ‘assessment in competencies’ has been deleted.</p>
comment	<p>145 comment by: <i>British Airways</i></p> <p>(a)(3) This is not well written. (i) should start 'by personnel...' and (ii) should start 'who have completed...'</p> <p>Also, is the last paragraph 'Successful completion...' part of (a)(3)(ii)? It's not clear. Should this be a second sentence to (a)(3)(ii)?</p> <p>(a)(3)(ii) Which 'standardisation'? Is it Initial standardisation? Or is it Recurrent standardisation? The AMC is divided into Initial standardisation and Recurrent standardisation, but these terms are not in the IR. Suggest the two are combined under one AMC called EBT Instructor Standardisation, which is the term used in the IR.</p>
response	<p>Accepted Please be advised that the wording is not exactly as proposed; however, it reflects the proposal.</p>
comment	<p>248 comment by: <i>HEAD OF TRAINING PROGRAMS AZ FLEET</i></p> <ul style="list-style-type: none"> FCL940.TRI (a) (i) conduct one of the following parts of a complete type rating training course? For an operator it could be difficult to adhere to this



	<p>requirement. It's advisable to allow revalidation also by the completion EBT training session.</p>
response	<p>Not accepted In EBT, point (a)(iii) applies as all EBT instructors must have an assessment of competence every 3 years.</p>
comment	<p>492 comment by: RV</p> <p>Comments: Do instructors need a facilitation qualification by making them CRM trainers and facilitators, or is just enough only of being part of an EBT instructor course? Same as above. What is the training regarding CRM to be qualified as CRM EBT instructor for facilitation techniques during the SIM session and during the facilitated debriefing, some equivalent to CRM trainer in AMC3 ORO.FC 115?</p> <p>Proposal: Some clarification should be addressed to explain how an instructor or examiner integrates CRM as a facilitator just for being part of an EBT training programme, as some alleviation includes this requisite to reduce the CRM ground part requirements under EASA EBT programme.</p>
response	<p>Noted EPAS includes a safety promotion task (SPT.012) to ensure implementation issues are addressed.</p>
comment	<p>494 comment by: RV</p> <p>Comments: Just only doing a standard generic EBT training course a TRI/SFI obtains the privileges of an actual TRE/SFE to assess competencies? Sounds weird that now a TRE/SFE needs special training to obtain this privileges, plus retraining each three years in a refresh course, and all disappears all of a sudden under EBT.</p> <p>Proposal: More detailed description of the requirements for the TRI/SFI to acquire the privileges to act as an TRE/SFE, even under the paradigm that an EBT system is a shift from checking to training.</p>
response	<p>Noted EPAS includes a safety promotion task (SPT.012) to ensure implementation issues are addressed. SPT.012 will therefore evaluate the issue and provide when necessary the required documentation.</p>
comment	<p>563 comment by: CAE</p> <p>Same comment as for #559. The proposal is exclusionary in nature and imposes limitations on Operators and 'foreign' NAAs. Requiring the EBT instructor to hold only an EASA instructor certificate is a restriction of trade and potentially limits the reach and sourcing of instructors in ATOs. As EASA training can be provided by</p>

	instructors not holding EASA certificates under FCL.900(c), CAE proposes that this equally applies to the EBT instructor.
response	<p>Not accepted.</p> <p>EBT is intended to address the operational risks of the operator. The instructor training may be operator-specific. In this context, the basic principles of the European single market prevail. Please refer to the explanatory note where this issue is explained. FCL.900(c) is still valid in the EBT proposal.</p> <p>Explanatory note: <i>'To ensure alignment between Part-ORO of the Air OPS Regulation and Part-FCL of the Aircrew Regulation, the requirement of FCL.900 point (c) must be reproduced in Part-ORO. Therefore, only holders of European instructors' certificates (with a European pilot licence or with a pilot licence issued by a third country but subject to FCL.900 (c)) are allowed to provide training to European licence holders.'</i></p>
comment	<p>564 comment by: CAE</p> <p>Only allowing the EBT instructor to revalidate the EBT instructor certificate under an ATO belonging to an airline creates a barrier for independent ATOs, and shows that not enough work has gone into clarifying the AOC-ATO relationship. It will also create additional burden for Operators sub-contracting training activities under ORO.GEN.205.</p>
response	<p>Not accepted</p> <p>The approach taken in the EASA Opinion follows the general principle where the checkers should have at least the same qualification as the person they are assessing. EBT trainers should therefore revalidate the EBT instructor certificate.</p>
comment	<p>565 comment by: CAE</p> <p>EBT instructor training should not be Operator-specific. As an EBT instructor, one should be adaptable to any operation or ATO by definition. Chapter 4 of ICAO Doc 9995 explains the implementation principles, methodology and competencies, all generic and not specific (for baseline EBT), and chapter 4.3 states:</p> <p>"In contrast to an enhanced EBT programme, which provides benefits in operation-specific training, the baseline EBT programme is a generation-specific, ready-made programme. It does not require detailed analysis or programme design by the Operator or the ATO. It only needs the necessary adaptation to aircraft type and operation, and the development of an assessment and grading system."</p> <p>Using Doc 9995 as the rationale, we propose the deletion of the words "the operator's" in ORO.FC.145(a)(3)(ii).</p>
response	<p>Not accepted</p> <p>EBT is intended to address the operational risks of the operator. The instructor training should be operator-specific.</p>



comment

684 ❖

comment by: Ryanair ATO

ORO.FC.231(h)(4) Page 10

(4) Evaluation of competencies during line operations shall be conducted by a suitably qualified commander nominated by the operator and trained in EBT concepts and the assessment of competencies.

AMC1 ORO.FC.231(h) Page 119

(b) Each flight crew member should be **assessed** according to the competency framework and grading system approved for their operator's approved EBT programme.

(d) The operator should inform the competent authority about the suitably qualified commander nominated to undertake line evaluations of competence. The commander should be trained following the applicable provisions contained in AMC1 ORO.FC.145 (a)(3)

(c) Flight Crew members should be the **assessed** in duties as pilot flying and pilot monitoring; they should be evaluated in each role.....

ORO.FC.145 (a)(3) Page 27

(i) personnel providing assessment and training shall hold an Annex I (Part-FCL) instructor or examiner certificate; and

The proposed IR in ORO.FC.231(h) refers only to the Line Evaluation of Competence. It does not use the word assessment or refer to a Line Assessment of Competencies. It is assumed that this language is carefully chosen to avoid the full requirements of ORO.FC.145 being applied to the 'suitably qualified commander'. Based on the totality of the proposed IR, AMC and GM, if the Evaluation is deemed to be an Assessment then the suitably qualified person would have to hold an Annex I (Part-FCL) instructor or examiner certificate.

It follows therefore, that there must be no use of the word 'Assessment' in the AMC. In paragraphs (b) and (c) on page 119 the word Assessment is used in reference to Line Evaluations. The word Assessment should be replaced by "Evaluation" in paragraphs (b) and (c) to AMC1 ORO.fc.231(h). This prevents any confusion between the terms and ensures that Line Evaluation of Competence can be carried out by suitably qualified commanders, who may not be a certificate holder, but will have received suitable training from the operator in EBT methodologies.

ORO.FC.145 (a)(3) requires all personnel providing Assessment and training shall hold an Instructor or Examiner certificate. This will therefore require all Line Training/Check Captains to hold a TRI certificate. This is not only impractical but unnecessary. Having to train a large number of Line training/Check Captains to be Type Rating Instructors will deter medium or large operators from undertaking EBT.

We appreciate this may not have been the intention of the RMG but while this ambiguity exists there is a possibility for competent authorities to interpret it in this way and insist on all line training/check captains being trained to be a TRI.



Note: At least one EASA NAA regards GM as having the same weight as AMC when evaluating an Operator's proposals. This is the background to the above commentary and proposal.

response Partially accepted
The comment includes several issues across the EBT proposal. Please refer to the EASA Opinion for more information regarding the amendments proposed by the commenter.

AMC1 ORO.FC.145(a)(3) Provision of training

p. 30-31

comment 44 comment by: FNAM

ISSUE - assessment of competencies

FNAM thanks EASA for providing additional information and guidance on the practical assessment in competencies. Nevertheless, it seems that these privileges are allowed only for instructors and not for examiners. Despite examiners role and nature, FNAM fears that, through this AMC, only instructors would be able to assess EBT competencies during a module. Thus, FNAM suggests to mention examiners each time instructors are mentioned in order to allow examiners to assess EBT competencies. This would better fit to operational reality.

PROPOSAL

Define clearly the concept of assessment for examiners and instructors; and
Mention examiners each time instructors are mentioned

response Not accepted

comment 45 comment by: FNAM

ISSUE – (b)

These EASA's proposed disposals introduce the EBT instructor training. FNAM suggests that the training of the instructor should be delivered by a dedicated competent and trained person. Dedicated instructors or examiners should be responsible of the EBT training for instructors and examiners. Nevertheless, this EASA's proposed disposal offers the possibility that EBT instructor trainings could be delivered 'by a pilot'. This proposed requirement may have a significant impact on safety since the EBT instructor trainings may not be efficiently performed by a pilot not aware of instructors and examiners responsibilities. FNAM suggests therefore to replace 'by a pilot' with 'by a nominated instructors or examiners'.

PROPOSAL

Modify such as : '(b) The EBT instructor training course should be delivered by a pilot (having completed the instructor training course or holding or having held the instructor certificate) who has already demonstrated proficiency to train the elements specified in point (c) below.'

response Partially accepted
The provision has been modified. However, other considerations and comments have been considered and therefore the comment is only partially accepted.



comment	46	comment by: <i>FNAM</i>
	<p>EDITORIAL ISSUE – (b) Reference to point (b) in point (b) in this AMC is non-consistent: ‘(b) The EBT instructor training course should be delivered by a pilot who has already demonstrated proficiency to train the elements specified in point (b) below.’</p> <p>PROPOSAL Modify such as : ‘(b) The EBT instructor training course should be delivered by a pilot who has already demonstrated proficiency to train the elements specified in point (c) below.’</p>	
response	Accepted	

comment	47	comment by: <i>FNAM</i>
	<p>ISSUE – EBT ASSESSMENT COMPETENCE These EASA’s proposed disposals describe the EBT instructor initial training. Since the EBT implementation would be on a long period of time, instructors and examiners already in service would be trained. Therefore, the EBT programme for instructors and examiners trainings should take into account the current and already performed FCL training. FNAM suggests to avoid any redundancies between these two programmes. EBT initial training programme should also take into account the case when instructors and examiners are moving to another operator. Since EBT training is provided by the operator, unnecessary may persist when instructors and examiners are moving to another operators. In order to avoid these unnecessary burden, FNAM suggests that the EBT initial training programme takes into account the previous EBT training and competences of instructors and examiners. Plus, there would be also brand new instructors and examiners for which entire trainings should be provided. For this case, FNAM suggests that the classic FCL training should be followed and that EBT training should be an option without redundant items. Therefore, in order to fit to all these cases of instructors and examiners, FNAM suggests that these EASA’s proposed disposals on EBT instructors initial training precise that EBT programme is only an option to FCL training programme without any redundant items. Plus, the EBT training programme should be adapted to examiners and instructors current EBT competences.</p> <p>PROPOSAL Precise that EBT programme is only an option to FCL programme without any redundant items with it; and Adapt the EBT initial training programme to examiners and instructors EBT competences</p>	
response	<p>Noted EPAS includes a new safety promotion task (SPT.012) to provide guidance on the implementation of EBT.</p>	

comment	48	comment by: <i>FNAM</i>
	<p>ISSUE – (e)</p>	



	<p>The EASA's proposed disposals describe the features of EBT programme. In particular, the content of the programme such as the evaluation phase and the scenario-based training phase.</p> <p>FNAM wonders why manoeuvres training phase is including with the evaluation phase. Indeed, ICAO guidance chapter 7 of Doc 9995 describes 3 distinct phases for the structure of a module:</p> <ul style="list-style-type: none"> • Evaluation phase; • Manoeuvres training phase; • Scenario-based training phase. <p>FNAM suggests to provide 3 separate assessments during one EBT module and to separate the evaluation phase and the Manoeuvres training phase. This structure is more understandable and fit more with EBT purpose: evaluate competences before providing concrete training.</p> <p>PROPOSAL</p> <p>Provide 3 separate assessments during one EBT module by separating the evaluation phase and the Manoeuvres training phase</p>
response	Accepted
comment	<p>137 comment by: <i>European Human Factors Advisory Group</i></p> <p>Ref</p> <p>AMC1 ORO.FC.145 (a)(3) (b) EBT Instructor Training</p> <p>The EBT instructor Course should be delivered by a pilot</p> <p>There is no need for the classroom/groundschool Course to be delivered by a pilot. EBT is a competency based system and therefore if the person delivering EBT instructor training is competent to ensure the instructors meet the required proficiency then it is an unnecessary restriction to state that it must be a pilot.</p> <p>LMQ and other organisations have several non-pilot trainers who have been training EBT Instructors for almost 5 years with exceptional results. It would be a significant loss to the industry to preclude them from future training.</p>
response	<p>Partially accepted</p> <p>The provision has been amended to specify training delivery by at least one pilot who is or has been an EBT instructor to allow other experts to contribute to the course.</p>
comment	<p>146 comment by: <i>British Airways</i></p> <p>(b) Delete 'already'</p> <p>(b) This sentence refers to 'elements' but later in (d) they are referred to as 'topics'. Which is it? Or are they 'learning objectives' which a term used in the GM?</p> <p>(b) The end of the sentence should simply be '...specified in (c).'</p>



response	<p>(c)(5) What are 'objective observations'? Should be just 'observations'.</p> <p>(d) Suggest amend to '...given credits for parts of (c) if the instructor has previously demonstrated competency in those...'</p> <p>Partially accepted</p>			
comment	<p>308 comment by: <i>easyJet Airlines Europe</i></p> <table border="1" data-bbox="391 548 1380 784"> <tr> <td data-bbox="391 548 630 784"> <p>AMC1 ORO.FC.145(a)(3)</p> </td> <td data-bbox="630 548 933 784"> <p>The assessment of competence has a validity period of 3 years.</p> </td> <td data-bbox="933 548 1380 784"> <p>This requirement is more restrictive – compared with actual rules – however it is derived from Doc.9995 ∞6.3.5. Not a limitation for EZY (TRI AoC conducted every 3 years).</p> </td> </tr> </table> <p>response Noted</p>	<p>AMC1 ORO.FC.145(a)(3)</p>	<p>The assessment of competence has a validity period of 3 years.</p>	<p>This requirement is more restrictive – compared with actual rules – however it is derived from Doc.9995 ∞6.3.5. Not a limitation for EZY (TRI AoC conducted every 3 years).</p>
<p>AMC1 ORO.FC.145(a)(3)</p>	<p>The assessment of competence has a validity period of 3 years.</p>	<p>This requirement is more restrictive – compared with actual rules – however it is derived from Doc.9995 ∞6.3.5. Not a limitation for EZY (TRI AoC conducted every 3 years).</p>		
comment	<p>322 comment by: <i>CAA-NL</i></p> <p>AMC1. ORO.FC.145(a)(3)</p> <p>There is a typo in item (b), it should refer to 'elements specified in point (b) below.'</p>			
response	<p>Accepted</p>			
comment	<p>390 comment by: <i>European Cockpit Association</i></p> <p>ECA proposes the following change:</p> <p>AMC1 ORO.FC.145(a)(3)</p> <p>(b) The EBT instructor training course should be delivered by a pilot an Instructor who has already demonstrated proficiency to train the elements specified in point (c)</p> <p>Comment:</p> <p>ECA cannot support that FCL training is provided by <u>pilots not being FCL instructors themselves</u>.</p> <p>This would not only create a legal loophole as those EBT instructors could potentially be trained by persons not proficient, but also not entitled to deliver FCL assessment.</p>			
response	<p>Not accepted</p> <p>The opinion of the majority in the review group was that it is not necessary for a person delivering the EBT instructor training course to have already completed the training course, or to hold or have held an instructor certificate. What is important is the teaching skills and proficiency of the person, not the fact that they are or have previously been an EBT instructor themselves. EBT instructor courses are already</p>			



being delivered by training specialists who are not pilots, but who are very competent at delivering the learning objectives of an EBT instructor course. It was felt that specialists like these should not be excluded from delivering an EBT instructor course. It was also felt that this is a question of quality — it is for the operator to ensure quality of the persons delivering the training, not assumptions made on their background.

comment

391

comment by: *European Cockpit Association*

ECA proposes the following change:

AMC1 ORO.FC.145(a)(3) Provision of training

EBT INSTRUCTOR — INITIAL STANDARDISATION

(a) Before delivering the operator's approved EBT programme, the instructor should successfully complete an EBT instructor initial standardisation composed of:

- (1) EBT instructor training; and
- (2) EBT assessment of competence.

EBT INSTRUCTOR TRAINING

(b) The EBT instructor training course should be delivered by a pilot who has already demonstrated proficiency to train the elements specified in point ~~(b)~~ (c) below.

Comment:

the correct reference in (b) seems to be (c).

(c) The EBT instructor training course should comprise **additional** theoretical and practical training. **The EBT instructor training course should be a minimum of 21 hours (3 days) (EBT instructor training plus assessment of competence). Such duration may be reduced if the applicant instructor has previous experience in EBT instruction in accordance with ORO.FC.231.** At the completion of EBT instructor training, the instructor should: ...

Comment:

In (c) ECA proposes to **add the recommended duration of the course that is currently part of GM1 to ORO.FC.145** because as it is a minimum it should be part of the AMC.

Comment:

Furthermore - equally important to the initial training and standardization is how the TRI/TRE maintains the EBT qualification.

response

Partially accepted

The editorial has been accepted. The minimum duration remains at GM level.

comment

392

comment by: *European Cockpit Association*

ECA proposes the following change:

AMC1 ORO.FC.145(a)(3) Provision of training

EBT INSTRUCTOR — INITIAL STANDARDISATION

...



	<p>(g) The EBT assessment of competence should be conducted by a person nominated by the operator, who:</p> <p>(1) is a TRE qualified in accordance with Annex I (Part-FCL) to Regulation (EU) No 1178/2011 to conduct an assessment of competence; and</p> <p>(2) has completed the EBT instructor initial standardisation.</p> <p>Rationale: This EBT assessment of competence of an instructor must be done by a TRE who is also EBT qualified.</p>
response	<p>Not accepted</p> <p>Only examiners can perform an assessment of competence; this is already included in point (g)(1).</p>
comment	<p>453 comment by: <i>France</i></p> <p>DGAC FR strongly disagrees with (b) of AMC1 ORO.FC.145 (a) (3) where it is stated that the EBT instructor training could be delivered by a pilot being not instructor. The following statement of the explanatory note is not supported:</p> <p><i>Extract of the explanatory note:</i> " Point (b) provides the prerequisite for the pilot who delivers the EBT instructor training (ground course). The only prerequisite is that this pilot has completed the EBT instructor training. This pilot does not need to be a qualified instructor under Part-FCL of the Aircrew Regulation."</p> <p>Looking at the competencies listed in AMC1 ORO.FC.145 (a) (3) paragraph (c) it seems pretty obvious that only qualified Part FCL instructor could demonstrate this proficiency. Therefore DGAC FR believes that EBT instructor training must be delivered by a qualified Part FCL instructor holding EBT privilege. Furthermore authorizing non instructor to act in instructor training program is deviating from Part FCL that requires for example that only a TRI having a sufficient experience as instructor is authorized to act in TRI training courses (FCL.905.TRI (b)). Nevertheless DGAC FR recognizes the need to accommodate the possibility for a specialist to speak in a course. Such specialist may be a non-pilot and therefore it is no relevant to limit it to pilots only. In addition there intervention has to be limited and only possible for the theoretical part of the training.</p> <p>Regarding the EBT assessment DGAC supports that it is conducted by an EBT training instructor (holding a qualified Part FCL instructor) being also a qualified examiner in accordance with Part FCL. DGAC FR supports the choice proposed by the Agency to discard the option of non-current examiner and only authorize current examiners to conduct the EBT assessment of competence. DGAC FR suggests slight modifications to further clarify the wording in (g) and (h) (b) of AMC1 ORO.FC.145 (a) (3).</p> <p>AMC1 ORO.FC.145(a)(3) Provision of training</p> <p>EBT INSTRUCTOR — INITIAL STANDARDISATION</p>



(a) Before delivering the operator's approved EBT programme, the instructor should successfully complete an EBT instructor initial standardisation composed of:
 (1) EBT instructor training; and
 (2) EBT assessment of competence.

EBT INSTRUCTOR TRAINING

(b) The EBT instructor training course should be delivered by ~~a pilot~~ **an instructor qualified in accordance with Part FCL and enrolled in EBT program** who has already demonstrated proficiency to train the elements specified in point (c) ~~(b)~~ below. **A person not being an instructor might be authorized to deliver a limited part of the theoretical training.**

(c) The EBT instructor training course should comprise theoretical and practical training. At the completion of EBT instructor training, the instructor should:

[...]

EBT ASSESSMENT OF COMPETENCE

[...]

(g) The EBT assessment of competence should be conducted by a person nominated by the operator,

who:

(1) is **an examiner** qualified in accordance with Annex I (Part-FCL) to Regulation (EU) No 1178/2011 **and holding the privilege** to conduct an assessment of competence **in accordance with FCL.935 of Annex I (Part FCL) to Regulation (EU) No 1178/2011;**
 and

(2) has completed the EBT instructor initial **standardization and passed an EBT assessment of competence.**

(h) The EBT assessment of competence may be combined with the assessment of competence required in **FCL.935 of Annex I (Part-FCL) to Regulation (EU) No 1178/2011.**

response

Partially accepted.

The EASA Opinion offers more flexibility for those persons delivering the EBT instructor course. This is an improvement compared to the proposal in the NPA. However, the authority involvement is not required.

The text of the EBT assessment of competence has been modified to address the concerns raised by DGAC France; however, the wording proposed in the EASA Opinion is different from that proposed by DGAC France.

comment

529

comment by: SNPL FRANCE ALPA technical committee

SNPL proposes the following change :

AMC1 ORO.FC.145(a)(3)

(b) The EBT instructor training course should be delivered by ~~a pilot~~ **an instructor** who has already demonstrated proficiency to train the elements specified in point (c)



	<p>Rationale : SNPL cannot support that FCL training is provided by pilots not being FCL instructors themselves. This would not only create a legal loophole as those EBT instructors could potentially be trained by persons not proficient, but also not entitled in delivering FCL assessment.</p>
response	<p>Partially accepted</p> <p>The opinion of the majority in the review group was that it is not necessary for a person delivering the EBT instructor training course to have already completed the training course, or to hold or have held an instructor certificate. What is important is the teaching skills and proficiency of the person, not the fact that they are or have previously been an EBT instructor themselves. EBT instructor courses are already being delivered by training specialists who are not pilots, but who are very competent at delivering the learning objectives of an EBT instructor course. It was felt that specialists like these should not be excluded from delivering an EBT instructor course. It was also felt that this is a question of quality — it is for the operator to ensure quality of the persons delivering the training, not assumptions made on their background.</p> <p>The comment has been partially accepted as the EASA Opinion reflects partially the proposal of this comment, allowing also former EBT instructors.</p>
comment	<p>530 comment by: SNPL FRANCE ALPA technical committee</p> <p>SNPL FRANCE ALPA proposes the following change</p> <p>AMC1 ORO.FC.145(a)(3) Provision of training EBT INSTRUCTOR — INITIAL STANDARDISATION (a) Before delivering the operator’s approved EBT programme, the instructor should successfully complete an EBT instructor initial standardisation composed of: (1) EBT instructor training; and (2) EBT assessment of competence. EBT INSTRUCTOR TRAINING (b) The EBT instructor training course should be delivered by a pilot who has already demonstrated proficiency to train the elements specified in point (b) (c) below.</p> <p>Comment: the correct reference in (b) seems to be (c).</p> <p>(c) The EBT instructor training course should comprise additional theoretical and practical training. The EBT instructor training course should be a minimum of 21 hours (3 days) (EBT instructor training plus assessment of competence). Such duration may be reduced if the applicant instructor has previous experience in EBT instruction in accordance with ORO.FC.231. At the completion of EBT instructor training, the instructor should: ...</p> <p>Comment : In (c) SNPL proposes to add the recommended duration of the course that is currently part of GM1 to ORO.FC.145 because as it is a minimum it should be part of the AMC.</p>
response	<p>Not accepted</p>

The minimum duration remains at GM level.

comment	<p>531 comment by: <i>SNPL FRANCE ALPA technical committee</i></p> <p>SNPL FRANCE ALPA proposes the following change:</p> <p>AMC1 ORO.FC.145(a)(3) Provision of training EBT INSTRUCTOR — INITIAL STANDARDISATION</p> <p>...</p> <p>(g) The EBT assessment of competence should be conducted by a person nominated by the operator, who:</p> <p>(1) is a TRE qualified in accordance with Annex I (Part-FCL) to Regulation (EU) No 1178/2011 to conduct an assessment of competence; and</p> <p>(2) has completed the EBT instructor initial standardisation.</p> <p>Rationale: this EBT assessment of competence of an instructor must be done by a TRE who is also EBT qualified.</p>
response	Not accepted

comment	<p>558 comment by: <i>EBT Foundation</i></p> <p>Page No: 30</p> <p>Paragraph No: (b)</p> <p>Comment: The EBT instructor training course according to this provision can only be delivered by a pilot. This is restrictive and imposes an economic burden on those organisations already providing training according to the learning objectives in (c). Demonstrated capability and the facilitation of learning objectives is the key element in the provision of successful instructor training. Classroom training is by definition theoretical, and in accord with many other forms of training for pilots and instructors, specialist trainers can be as effective as pilots. The provision does not take account of a variety of methods of training delivery, including distance learning and is very restrictive. The operator has a responsibility to ensure that all training is delivered to achieve objectives, and this is subject to normal oversight and part of the mixed implementation approval process as defined in the checklist v2.0.</p> <p>Justification: remove unnecessarily restrictive provisions, remove economic burden</p> <p>Proposed text: The EBT instructor training course should be delivered in order to achieve the learning objectives in para (c) below, and if necessary introduce text to say, "by persons nominated by the operator approved for EBT."</p>
response	<p>Not accepted.</p> <p>The review group provided an negative opinion on this comment as there was general consensus that pilots who are or have been an EBT instructor are the best qualified to conduct such training. However, the EASA Opinion allows more flexibility and external experts may be invited to additionally conduct the EBT instructor course.</p>



comment	<p>605 comment by: IATA</p> <p>Concerning ORO.FC.145 Provision of training, proposition to amend the wording of AMC1 ORO.FC.145 (a)(3) as per below:</p> <div style="border: 1px solid black; padding: 5px; margin: 10px 0;"> <p>(b) The EBT instructor training course should be delivered by a pilot holding or having held a TRI certificate, who has already demonstrated proficiency to train the elements specified in point (c) below.</p> </div>
response	<p>Partially accepted</p> <p>The opinion of the majority in the review group was that it is not necessary for a person delivering the EBT instructor training course to have already completed the training course, or to hold or have held an instructor certificate. What is important is the teaching skills and proficiency of the person, not the fact that they are or have previously been an EBT instructor themselves. EBT instructor courses are already being delivered by training specialists who are not pilots, but who are very competent at delivering the learning objectives of an EBT instructor course. It was felt that specialists like these should not be excluded from delivering an EBT instructor course. It was also felt that this is a question of quality — it is for the operator to ensure quality of the persons delivering the training, not assumptions made on their background.</p> <p>The comment has been partially accepted as the EASA Opinion reflects partially the proposal of this comment, allowing also former EBT instructors.</p>
comment	<p>615 comment by: Vereinigung Cockpit</p> <p>AMC1 ORO.FC.145(a)(3)</p> <p>(b) The EBT instructor training course should be delivered by a pilot an Instructor who has already demonstrated proficiency to train the elements specified in point (c)</p> <p>Comment: <i>ECA cannot support that FCL training is provided by <u>pilots not being FCL instructors themselves</u>.</i> <i>This would not only create a legal loophole as those EBT instructors could potentially be trained by persons not proficient, but also not entitled to deliver FCL assessment.</i></p> <p>AMC1 ORO.FC.145(a)(3) Provision of training EBT INSTRUCTOR — INITIAL STANDARDISATION</p> <p>(a) Before delivering the operator’s approved EBT programme, the instructor should successfully complete an EBT instructor initial standardisation composed of:</p> <ol style="list-style-type: none"> (1) EBT instructor training; and (2) EBT assessment of competence.

EBT INSTRUCTOR TRAINING

(b) The EBT instructor training course should be delivered by a pilot who has already demonstrated proficiency to train the elements specified in point ~~(b)~~ (c) below.

Comment:

the correct reference in (b) seems to be (c).

*(c) The EBT instructor training course should comprise **additional** theoretical and practical training. **The EBT instructor training course should be a minimum of 21 hours (3 days) (EBT instructor training plus assessment of competence). Such duration may be reduced if the applicant instructor has previous experience in EBT instruction in accordance with ORO.FC.231. At the completion of EBT instructor training, the instructor should: ...***

Comment:

*In (c) Vereinigung cockpit proposes to **add the recommended duration of the course that is currently part of GM1 to ORO.FC.145** because as it is a minimum it should be part of the AMC.*

Comment:

Furthermore - equally important to the initial training and standardization is how the TRI/TRE maintains the EBT qualification.

AMC1 ORO.FC.145(a)(3) Provision of training

EBT INSTRUCTOR — INITIAL STANDARDISATION

...

(g) The EBT assessment of competence should be conducted by a person nominated by the operator, who:

- (1) is a **TRE** qualified in accordance with Annex I (Part-FCL) to Regulation (EU) No 1178/2011 to conduct an assessment of competence; and
- (2) has completed the EBT instructor initial standardisation.

-

Rationale:

This EBT assessment of competence of an instructor must be done by a TRE who is also EBT qualified.

response

Partially accepted.

The opinion of the majority in the review group was that it is not necessary for a person delivering the EBT instructor training course to have already completed the training course, or to hold or have held an instructor certificate. What is important is the teaching skills and proficiency of the person, not the fact that they are or have previously been an EBT instructor themselves. EBT instructor courses are already being delivered by training specialists who are not pilots, but who are very competent at delivering the learning objectives of an EBT instructor course. It was felt that specialists like these should not be excluded from delivering an EBT instructor course. It was also felt that this is a question of quality — it is for the



operator to ensure quality of the persons delivering the training, not assumptions made on their background.
The comment has been partially accepted as the EASA Opinion reflects partially the proposal of this comment, allowing also former EBT instructors.

comment

645

comment by: IATA

Concerning ORO.FC.145 (a)(3) Provision of training / EBT Instructor Initial Standardization.

The **AMC1 ORO.FC.145 (a)(3)** mentions possible credits if the instructor has already demonstrated competency in certain areas of training and the **GM1 ORO.FC.145(a)(3)** indicates recommendations about the duration of the EBT instructor training.

The first comment is that IATA proposes a competency based approach to Instructor Evaluator training which should provide inspiration to the rulemaking group in order to promote a competency based approach to instructor training and to avoid outdated prescriptive hours requirements. Please note that ICAO has proposed same competency set for Instructor Evaluator in amendment of the Pans TRG (State Letter 2018-077e).

The second comment is that many operators will integrate the EBT instructor standardization training or at least several components into the TRI instructor course (FCL.930.TRI TRI training course). This is recommended because the operators will make sure that their training policy and procedures are consistent across all their training spectrum: conversion course, recurrent training, command course etc.

Therefore, the request is that the **AMC1 ORO.FC.145 (a)(3)** makes a direct reference to **FCL.930.TRI TRI** training course in order to avoid unnecessary duplication of instructor training based on prescriptive amount of hours.

response

Accepted.

The EASA Opinion reflects the new State Letter 2018-077e and the information has been transposed into GM. EASA also planned a safety promotion task (SPT.012) to facilitate the implementation of EBT. In this context, SPT.012 will evaluate and address when appropriate the concerns of comment number two.

comment

666

comment by: IATA

AMC1 ORO FC 145 (a)(3)
EBT INSTRUCTOR TRAINING

(b) The EBT instructor training course should be delivered by a pilot who has already demonstrated proficiency to train the elements specified in point (b) below.

If the pilot has already demonstrated proficiency to train he should be “in the instructor course”. And although if we do not want any kind of decay, to train instructors the minimum should be able to share their knowledge about training so it should be indicated :



AMC1 ORO FC 145 (a)(3)**EBT INSTRUCTOR TRAINING**

(b) The EBT instructor training course should be delivered by a pilot (having completed the instructor training course or holding or having held the instructor certificate) who has already demonstrated proficiency to train the elements specified in point (c) below.

response

Partially accepted

Agreed with the typo.

The opinion of the majority in the review group was that it is not necessary for a person delivering the EBT instructor training course to have already completed the training course, or to hold or have held an instructor certificate. What is important is the teaching skills and proficiency of the person, not the fact that they are or have previously been an EBT instructor themselves. EBT instructor courses are already being delivered by training specialists who are not pilots, but who are very competent at delivering the learning objectives of an EBT instructor course. It was felt that specialists like these should not be excluded from delivering an EBT instructor course. It was also felt that this is a question of quality — it is for the operator to ensure quality of the persons delivering the training, not assumptions made on their background.

comment

667

comment by: IATA

(b) The EBT instructor training course should be delivered by a pilot who has already demonstrated proficiency to train the elements specified in point (b) below.

There is a typo in paragraph (b) It should be written:

(b) The EBT instructor training course should be delivered by a pilot who has already demonstrated proficiency to train the elements specified in point (c) below.

response

Accepted

comment

687

comment by: Ryanair ATO

(b) The EBT instructor training course should be delivered by a pilot who has already demonstrated proficiency to train the elements specified in **point (b)** below.



Delivered by a “pilot”, this should be “instructor” or “suitably qualified person”. Provision should be made for the EBT Instructor training course to be delivered by an SFI/SFE or some elements by a CRMT.

*I think this is a typo and should refer to **point (c)**?*

response Accepted

comment 688

comment by: Ryanair ATO

EBT ASSESSMENT OF COMPETENCE

(e) Prior to conducting assessment and training within an EBT programme, the EBT instructor should complete an EBT assessment of competence where the EBT instructor delivers:

- (1) an evaluation phase and a manoeuvres training phase; or
- (2) a scenario-based training phase.

How is this achieved for initial instructor training? Notes in GM state recommended hours for training but the AMC states that the AoC must take place on an EBT session. Without an approved EBT program (and associated EBT qualified instructors) there can be no EBT sessions in which to assess candidates. Some GM on how this can be achieved during the rollout of EBT would be useful for both Operators and Authorities. Below is the relevant explanatory text provided by EASA in ED Decision 2015-027-R during the launch of Mixed Implementation of EBT.

- *ICAO Doc 9995 refers to the assessment of instructor during a practical training session. This is a session conducted in an FSTD as part of an EBT programme, or an equivalent FSTD session (which may involve pilot role-playing) to facilitate standardisation of the examiner or instructor.*

This text should be transferred to GM in the new proposals and would enhance the introduction of EBT to Operators.

If the instructor has been qualified to train under Mixed Implementation EBT will they be qualified for Baseline EBT?

response Noted.

If during mixed implementation the instructor was trained following the provision of the new ORO.FC.146, then the EBT instructor is fully qualified for full EBT (EBT baseline).

comment 696

comment by: EBT Foundation

Page No: 30

Paragraph No: AMC1 ORO.FC.145(a) (3) sub para (a) (2)

Comment:

The EBT Assessment of Competence when undertaken for the first time may not be aligned with the assessment of competence required under Annex 1 (Part-FCL) to



(EU) No 1178/2011. The term is confusing because 1 is a licensing requirement and the other belongs to the AOC holder.

From in service experience with many operators it is clear that the focus of standardisation activity in the delivery of EBT is not related to the type qualification of the supervisor. What is of paramount importance is to limit the number of instructors providing standardisation and ultimately assessments during the initial approval of EBT, in order to preserve the very best practice and standardisation.

In order to distinguish between an assessment of competency under Annex 1 (Part-FCL) to (EU) No 1178/2011 and an initial qualification of an EBT instructor for an AOC holder, a different term may be useful.

In order to maximise the benefit of expertise it is desirable to remove any type specific requirement from the supervisor and enable examiners who have held certificates to provide the necessary supervision during the initial qualification only.

Justification: maximise programme effectiveness and instructor delivery standards

Proposed text:

EBT INSTRUCTOR — INITIAL STANDARDISATION

Before delivering the operator's approved EBT programme, the instructor should successfully complete an EBT instructor initial ~~standardisation~~ qualification comprising of:

- (1) EBT instructor training; and
- (2) EBT standardisation

~~EBT ASSESSMENT OF COMPETENCE~~ **STANDARDISATION**

(e) Prior to conducting assessment and training within an EBT programme, the EBT instructor should complete an EBT ~~assessment of competence~~ **standardisation** where the EBT instructor delivers:

- (1) an evaluation phase and a manoeuvres training phase; or
- (2) a scenario-based training phase.

(f) The ~~assessment of competence~~ **standardisation** has a validity period of 3 years. When the ~~assessment of competence~~ **standardisation** is conducted within the 12 months preceding the expiry date, the next ~~assessment of competence~~ **standardisation** should be completed within 36 calendar months of the original expiry date of the previous assessment.

(g) The EBT ~~assessment of competence~~ **standardisations** should be conducted by a person nominated by the operator, who:

- (1) ~~is qualified in accordance with~~ is or has previously held a qualification in accordance with Annex I (Part-FCL) to Regulation (EU) No 1178/2011 to conduct an assessment of competence; and
- (2) has completed the EBT instructor initial standardisation.

The EBT **standardisation** may be combined with the assessment of competence required in Annex I (Part-FCL) to Regulation (EU) No 1178/2011.



response Not accepted.
Please refer to the explanatory note in the Appendix to the Opinion.

AMC2 ORO.FC.145(a)(3) Provision of training

p. 31-34

comment 49 comment by: *FNAM*

ISSUE

FNAM agrees with these AMC proposals which describe the recurrent standardization of an EBT instructor. Nevertheless, this AMC should also precise the provider of the recurrent standardization: is it an ATO or the operator?

This precision would ensure a correct implementation of the EBT *via* an proper instructor and examiner training. According to the rationale of ORO.FC.145, FNAM agrees with the RMG that it must be an operator task.

PROPOSAL

Clarify that the recurrent standardization is under operator responsibility

response Noted.
ORO.FC.145 is an operator requirement. This requirement is not transposed to Part-ORA where ATO provisions are covered.

comment 50 comment by: *FNAM*

AGREEMENT

FNAM thanks EASA for including details of the initial standardization course in GM.

response Noted

comment 51 comment by: *FNAM*

ISSUE

‘This provision is introduced to ensure an examiner will perform the EBT assessment of competence’

This rationale is non-consistent with the proposed disposals AMC1 ORO.FC.145(a)(3) and ORO.FC.145. Indeed, it was previously suggested that only instructors were able to assess competences. The clarification of assessment would help to understand the different roles of examiners and instructors.

FNAM fears that these disposals would therefore be differently interpreted and implemented. The level-playing-field objective and flight safety may be impacted. Thus, FNAM proposes to harmonize and clarify in the whole regulation the responsibilities of examiners and instructors.

PROPOSAL

Define clearly the concept of assessment for examiners and instructors

response Noted

comment 52 comment by: *FNAM*

ISSUE

These EASA’s proposed disposals describe the EBT instructor recurrent training.



Since the EBT implementation would be on a long period of time, instructors and examiners already in service would be trained. Therefore, the EBT programme for instructors and examiners trainings should take into account the current and already performed FCL training. FNAM suggests to avoid any redundancies between these two programmes.

EBT recurrent training programme should also take into account the case when instructors and examiners are moving to another operator. Since EBT training is provided by the operator, unnecessary may persist when instructors and examiners are moving to another operators. In order to avoid these unnecessary burden, FNAM suggests that the EBT recurrent training programme takes into account the previous EBT training and competences of instructors and examiners.

Plus, there would be also brand new instructors and examiners for which entire trainings should be provided. For this case, FNAM suggests that the classic FCL training should be followed and that EBT training should be an option without redundant items.

Therefore, in order to fit to all these cases of instructors and examiners, FNAM suggests that these EASA's proposed disposals on EBT instructors recurrent training precise that EBT programme is only an option to FCL training programme without any redundant items. Plus, the EBT training programme should be adapted to examiners and instructors current EBT competences.

PROPOSAL

Precise that EBT programme is only an option to FCL programme without any redundant items with it; and

Adapt the EBT recurrent training programme to examiners and instructors EBT competences

response

Noted.

EPAS includes a new safety promotion task (SPT.012) to provide guidance on the implementation of EBT.

comment

53

comment by: FNAM

ISSUE

The implementation of EBT and mixed EBT principles may take a long time and be difficult for most of operators. All the philosophy of trainings would be changed. FNAM suggests to allow flexibilities for EBT assessment of competence of instructors. Indeed, operators would have to train initially all their instructors before implementing EBT. All assessment of competences of instructors would therefore be performed in the same period for all instructors every 3 years. In order to avoid this burden, FNAM suggests to allow flexibility for the frequency of assessment of competences of instructors. For example, this frequency may be extend exceptionally to 5 years within some conditions.

PROPOSAL

Allow flexibility for the frequency of assessment of competences of instructors

response

Not accepted

There is a provision to allow a flexibility of 1 year to perform the assessment of competence.

comment

54

comment by: FNAM



	<p>ISSUE – (c) This proposed EASA 's disposals introduce the possibility to make an assessment of competences if no complete EBT module has been conducted within the last 12 months preceding the expiry date. FNAM wonders if this disposal is relevant. Refresher course may be more useful than an assessment of competences (and such a refresher course could be Computer Based training, as the main focus point would be on Competency based training, learning from positive performance, building resilience and data-driven training).</p> <p>PROPOSAL Authorize refresher EBT training in (c)</p>
response	<p>Not accepted FCL requires an assessment of competence every 3 years. For consistency reasons between OPS and FCL and following ICAO Doc 9995 6.3.5, the provision is maintained.</p>
comment	<p>127 comment by: <i>FlightSafety International - Regional Director Regulatory Affairs</i></p> <p>i. AMC2.ORO.FC.145(a)(3) Provision of training - EBT Instructor - Recurrent Standardisation. Inter-Rater Reliability (Concordance) training is essential but industry lacks an EBT equivalent of the nine JARTEL 'NoTechs' training videos. EASA must progress this requirement. SPT.012 mentions reference material such as flight recordings, scripted videos and/or case studies but if all operators use material of varying quality the essential standardization of concordance will not be achieved. If EASA can establish a library of concordance materials for use across the industry it will provide a strong basis for the development and measurement of concordance amongst the training cadre. EASA should try to obviate the difficulty of variable standards of IRR training and assessment.</p>
response	<p>Noted</p>
comment	<p>147 comment by: <i>British Airways</i></p> <p>(a)(1) Should be just 'refresher training; and'</p> <p>(a)(2) What is 'concordance training'? In ORO.FC.231 this is referred to as 'concordance assurance'. It is really verification, not training. Suggest this whole sub para (a) simply says 'The EBT instructor should receive annual refresher training.' with suitable GM.</p> <p>(b) The AMC wording and the Explanatory Note are different. The Explanatory Note says the EBT instructor should complete 'one full simulator of EBT every 12 months' but the AMC is 'a complete EBT module within the last 12 months preceding the expiry date'. Which is it? Also, the Explanatory Note says this means the combination of Eval plus MT/MV and SBT, which is not 'one full simulator'. Suggest the AMC requirement is simply '...an EBT module every 12 calendar months.' (no need for 'complete')</p> <p>(d) This repeats AMC1 and should be deleted.</p>



response	Partially accepted The first comment is not accepted; the second is accepted and the third is partially accepted.
comment	<p>455 comment by: <i>France</i></p> <p>The explanatory note (page 33/222) states that the EBT instructor refresher training may be credited (if accepted by the competent authority) for the refresher training required for TRI revalidation (FCL.940.TRI (a) (1) (ii)): <i>“Point (a) of AMC2 ORO.FC.145 (a)(3) provides the requirement for EBT refresher training. This training may satisfy the requirement of FCL.940.TRI (a)(1)(ii) concerning instructor refresher training, if accepted by the competent authority.”</i></p> <p>DGAC FR supports this flexibility. Nevertheless we believe that such provision in order to be properly applied needs an amendment to FCL.940.TRI (a) (1) (ii).</p> <p><i>FCL.940.TRI TRI — Revalidation and renewal</i> <i>(a) Revalidation</i> <i>(1) Aeroplanes. For revalidation of a TRI(A) certificate, the applicant shall, within the last 12 months preceding the expiry date of the certificate, fulfil one of the following 3 requirements:</i></p> <p><i>(i) conduct one of the following parts of a complete type rating training course: simulator session of at least 3 hours or one air exercise of at least 1 hour comprising a minimum of 2 take-offs and landings;</i> <i>(ii) receive instructor refresher training as a TRI at an ATO ,or, if agreed by the competent authority, receive an EBT instructor refresher training within an operator having an approved EBT programme;</i> <i>(iii) pass the assessment of competence in accordance with FCL.935.’</i></p>
response	Not accepted EPAS includes a new safety promotion task (SPT.012) to provide guidance on the implementation of EBT. The issue highlighted by DGAC France will be evaluated in the context of the activities of this task.
comment	<p>476 comment by: <i>AIRBUS</i></p> <p>Page 31 & 33 AMC2 ORO.FC.145 (a)(3):</p> <p>Airbus recognizes the need for an annual EBT standardization of instructors but considers as indicated by EASA in the explanation on page 33 regarding intention of the RMG that the assessment of competence for EBT should be combined with the assessment of competence to revalidate instructor certificate; it should not be “on top”.</p> <p>Airbus recommends that this clarification be indicated into a GM to ORO.FC.145 (a) (3) to avoid any future misunderstanding.</p>



response	<p>Accepted.</p> <p>A reference in AMC1 ORO.FC.146 has been included: '(h) The EBT assessment of competence may be combined with the assessment of competence required in Annex I (Part-FCL) to Regulation (EU) No 1178/2011.'</p>
comment	<p>646 comment by: IATA</p> <p>Concerning ORO.FC.145 Provision of training, proposition to remove point (b) and (c) from AMC2 ORO.FC.145(a)(3) Provision of training EBT INSTRUCTOR RECURRENT STANDARDISATION</p> <p>ORO.FC.145 Provision of training <i>AMC2 ORO.FC.145(a)(3) Provision of training EBT INSTRUCTOR — RECURRENT STANDARDISATION</i></p> <p><i>(a) The EBT instructor should receive an annual recurrent standardization. The recurrent standardization should include:</i></p> <p><i>(1) refresher EBT training; and</i></p> <p><i>(2) Concordance training.</i></p> <p><i>(b) The EBT instructor should conduct a complete EBT module within the last 12 months preceding the expiry date.</i></p> <p><i>(c) If the requirement of point (b) has not been fulfilled, before conducting training within an EBT programme, the EBT instructor should undergo an EBT assessment of competence.</i></p> <p><i>(d) The EBT instructor should undergo an EBT assessment of competence every 3 years.</i></p> <p>Rationale: The AMC 2 ORO.FC.145 (a) (3) impose through the points (b) and (c) a recent experience requirement and an expiration date for EBT standardization. Those requirements are not aligned with the rule requirement of ORO.FC.145 Provision of training which are related to standardization only. As the EBT instructor has to undergo an EBT assessment of competence every 3 years, the lack of recent experience will be mitigated anyway.</p>
response	<p>Not accepted</p>
comment	<p>668 comment by: IATA</p> <p>The EBT instructor should conduct a complete EBT module within the last 12 months preceding the expiry date.</p> <p>Proposed text: The EBT instructor should conduct at least one evaluation, one manoeuvres training and one scenario-based training within the last 12 months preceding the expiry date of... ?.</p>

	<p>Comment : There are more than one EBT programme modules in one year and this wording will provide more flexibility in case, for unforeseen circumstances, the instructor cannot conduct all the phases in one module/programme. It should be specified the 'expiry date' of what.</p>
response	<p>Partially accepted The proposal has been modified to provide greater flexibility. EPAS includes a new safety promotion task (SPT.012) to provide guidance on the implementation of EBT. The issue highlighted by IATA will be evaluated in the context of the activities of this task.</p>
comment	<p>686 comment by: Ryanair ATO</p> <p>AMC1 ORO.FC.145(a)(3) Provision of training (Page 31) (d) An instructor may be given credits on the topics of point (c) if the instructor has previously demonstrated competencies in those topics.</p> <p>GM1 ORO.FC.145(a)(3) Provision of training (Page 34) (e) The EBT instructor training course may be a minimum of 14 hours (EBT instructor training) and the recommended length is between 21 to 24 hours (EBT instructor training plus assessment of competence).</p> <p><i>Note: At least one EASA NAA regards GM as having the same weight as AMC when evaluating an Operator's proposals. This is the background to this commentary and proposal.</i></p> <p><i>One of the cornerstones of EBT is the idea of training to competency. In that context, the stipulation of a minimum hours requirement in this GM seems to be counter intuitive. We appreciate this is "only" GM and we definitely believe it should NOT be included in AMC. Instead, each course should be assessed by the Competent Authority based on the Operator's experience base, instructor experience base and proposed training course. If the EBT instructor training is integrated with the teaching and learning and SFI/TRI course then hours may be difficult to attribute to EBT elements.</i></p> <p><i>This is reflected in the explanatory notes and AMC but not in the text of the GM which is too prescriptive.</i></p> <p><i>The AMC allows credit to be granted for previous experience. This is non-prescriptive text and allows an Operator and Authority to agree to a suitable course of training based on circumstances particular to the Operator, and known to the CA.</i></p> <p><i>The suggestion in the explanatory notes on page 35 about moving hours from GM to AMC should not be acted on.</i></p>
response	Noted

comment	<p data-bbox="379 241 432 273">689</p> <p data-bbox="1066 241 1385 273">comment by: <i>Ryanair ATO</i></p> <p data-bbox="379 300 1390 365">The EBT instructor should conduct a complete EBT module within the last 12 months preceding the expiry date.</p> <p data-bbox="379 407 711 439">Explanatory Note (Page 33)</p> <p data-bbox="379 443 1390 580">Following the concept above, the revalidation for EBT instructor will be based on the completion of one full simulator of EBT every 12 months; that means the combination of evaluation plus manoeuvres training/validation (mixed EBT) and a scenario-based training, plus an assessment of competence every 3 years.</p> <p data-bbox="379 620 1177 651"><i>How is this achieved on a practical level in mixed implementation?</i></p> <p data-bbox="379 694 1390 831"><i>Not all instructors are examiners and would not be able to conduct the evaluation phase in mixed implementation. "A complete EBT module" should not require an instructor to complete all 3 areas with one crew, from a crew scheduling perspective this is not practical.</i></p> <p data-bbox="379 873 687 904"><i>Recommend text in AMC:</i></p> <p data-bbox="379 909 1390 1010"><i>The EBT Instructor should complete 3 EBT simulator training sessions in the last 12 months preceding the expiry date. These simulator sessions can be either evaluation, manoeuvre training or scenario based training sessions.</i></p> <p data-bbox="379 1052 1390 1153"><i>The explanatory note requires rewording of "a complete EBT module" at the bottom of page 33. Inclusion of the explanatory notes in AMC or GM is vital as this definition of a complete EBT module is not currently in the AMC.</i></p>
response	<p data-bbox="379 1216 598 1247">Partially accepted</p> <p data-bbox="379 1252 1390 1388">The proposal has been modified to provide greater flexibility. EPAS includes a new safety promotion task (SPT.012) to provide guidance on the implementation of EBT. The issue highlighted by IATA will be evaluated in the context of the activities of this task.</p>
comment	<p data-bbox="379 1451 432 1482">697</p> <p data-bbox="1027 1451 1385 1482">comment by: <i>EBT Foundation</i></p> <p data-bbox="379 1512 528 1543">Page No: 31</p> <p data-bbox="379 1585 863 1617">Paragraph No: AMC2 ORO.FC.145(a) (3)</p> <p data-bbox="379 1659 512 1691">Comment:</p> <p data-bbox="379 1733 1390 1798">Based on suggested changes to AMC1 ORO.FC.145(a) (3), the term "standardisation" in this AMC should be replaced with "refresher training"</p> <p data-bbox="379 1841 799 1872">Justification: alignment and clarity</p> <p data-bbox="379 1915 922 1980">Proposed text: AMC2 ORO.FC.145(a)(3) Provision of training</p>

EBT INSTRUCTOR — ~~RECURRENT STANDARDISATION~~ REFRESHER TRAINING

(a) The EBT instructor should receive an annual recurrent ~~standardization~~ refresher training. The ~~recurrent standardisation~~ refresher training should include:

(1) ~~refresher EBT training~~ Reviews of lessons learned and best practice in EBT; and
 (2) concordance (inter-rater reliability) training.

(b) The EBT instructor should conduct a complete EBT module within the last 12 months preceding the expiry date.

(c) If the requirement of point (b) has not been fulfilled, before conducting training within an EBT programme, the EBT instructor should undergo an EBT ~~assessment of competence~~ **standardisation**

(d) The EBT instructor should undergo an EBT **standardisation** ~~assessment of competence~~ every 3 years.

response Not accepted

GM1 ORO.FC.145(a)(3) Provision of training

p. 34-35

comment

11

comment by: *Michel Lacombe AF Training department and AF ATO*

GM1 ORO FC 145 (a)(3) Provision of training

(e) The EBT instructor training course may be a minimum of 14 hours (EBT instructor training) and the recommended length is between 21 to 24 hours (EBT instructor training plus assessment of competence).

For TRI or SFI in FCL training quantities are in the IR

FCL.930.TRI TRI — Training course

(a) The TRI training course shall include, at least: (1) 25 hours of teaching and learning;

(2) 10 hours of technical training, including revision of technical knowledge, the preparation of lesson plans and the development of classroom/ simulator instructional skills;

(3) 5 hours of flight instruction on the appropriate aircraft or a simulator representing that aircraft for single-pilot aircraft and 10 hours for multi-pilot aircraft or a simulator representing that aircraft.

Here these indications (different from ICAO DOC EBT 9995) are at a GM level. Is it consistent?

It could have been at least recommended to integrate this training part in the generic instructor training course and indicated at the AMC level as :

AMC1 ORI FC 145(a)(3) Provision of training

(10) facilitate trainee learning, focusing on specific competency-based training needs; and

(11) conduct a debrief using facilitation techniques.



	<p>(d) The EBT instructor training course should be included in the instructor course and may be, for the EBT subjects, of a minimum duration of 14 hours (EBT instructor training) and the recommended length is between 21 to 24 hours (EBT instructor training plus assessment of competence).</p> <p>An instructor may be given credits on the topics of point (c) if the instructor has previously demonstrated competencies in those topics.</p>
response	<p>Not accepted.</p> <p>The minimum duration of the EBT instructor course is maintained at GM level.</p>
comment	<p>55 comment by: <i>FNAM</i></p> <p>ISSUE – EBT ASSESSMENT COMPETENCE</p> <p>These EASA’s proposed disposals describe the EBT instructor initial training. Since the EBT implementation would be on a long period of time, instructors and examiners already in service would be trained. Therefore, the EBT programme for instructors and examiners trainings should take into account the current and already performed FCL training. FNAM suggests to avoid any redundancies between these two programmes.</p> <p>EBT initial training programme should also take into account the case when instructors and examiners are moving to another operator. Since EBT training is provided by the operator, unnecessary may persist when instructors and examiners are moving to another operators. In order to avoid these unnecessary burden, FNAM suggests that the EBT initial training programme takes into account the previous EBT training and competences of instructors and examiners.</p> <p>Plus, there would be also brand new instructors and examiners for which entire trainings should be provided. For this case, FNAM suggests that the classic FCL training should be followed and that EBT training should be an option without redundant items.</p> <p>Therefore, in order to fit to all these cases of instructors and examiners, FNAM suggests that these EASA’s proposed disposals on EBT instructors initial training precise that EBT programme is only an option to FCL training programme without any redundant items. Plus, the EBT training programme should be adapted to examiners and instructors current EBT competences.</p> <p>PROPOSAL</p> <p>Precise that EBT programme is only an option to FCL programme without any redundant items with it by adding : ‘An instructor may be given credits on the topics of point (c) if the instructor has previously demonstrated competencies in those topics.’; and</p> <p>Adapt the EBT initial training programme to examiners and instructors EBT competences</p>
response	<p>Noted.</p> <p>EPAS includes a new safety promotion task (SPT.012) to provide guidance on the implementation of EBT.</p>
comment	<p>56 comment by: <i>FNAM</i></p> <p>ISSUE – (e)</p>



Since each operator may have a different EBT programme, the minimum time of training course proposed in this guidance (14 hours) seems not adapted to EBT philosophy and operational reality.

Plus, the minimum time provided is not in line with ICAO and IATA guidance. The advised IATA value is 3 to 5 days which cannot be transposed with the operational reality. Several cases of instructors training should be taken into account: brand new instructors, FCL instructors, EBT instructors from another instructors.

Additionally, TRI and SFI training quantities are provided in Implementing Rules in FCL.930.TRI TRI:

'(a) The TRI training course shall include, at least: (1) 25 hours of teaching and learning;

(2) 10 hours of technical training, including revision of technical knowledge, the preparation of lesson plans and the development of classroom/ simulator instructional skills;

(3) 5 hours of flight instruction on the appropriate aircraft or a simulator representing that aircraft for single-pilot aircraft and 10 hours for multi-pilot aircraft or a simulator representing that aircraft.'

Thus, FNAM suggests either to remove the precision on minimum time of training course; or to provide this requirement in AMC1 ORO.FC.145(a)(3).

PROPOSAL

Remove the precision on minimum time of training course; or

Provide this guidance in AMC1 ORO.FC.145(a)(3)

response

Not accepted.

EPAS includes a new safety promotion task (SPT.012) to provide guidance on the implementation of EBT. This task will monitor whether what FNAM highlights in this comment may impose a burden to the operators.

comment

148

comment by: *British Airways*

(a) Amend 'route' to 'root'

(a) GM1 uses the term 'root cause identification' and GM2 uses the term 'root cause analysis'. Which is it? Suggest 'analysis' is better as it's in common useage.

(b) Root cause is a term that's used a lot in the GM but does not appear once in the AMC. This is inconsistent.

(b) Suggest the sentence ends '...plus facilitated debriefing as learning objectives.' (objectives, plural)

(c) Suggest personnel 'are selected', not 'is selected'

(c) Suggest 'instructor proficiency meets the expectations', not 'practice'

(d)(2) Delete 'also' at the start, or add '; and' at the end of (d)(1)

(e) We strongly support keeping the recommended length of the course as GM. The EBT instructor course is written as learning objectives and so it is performance-based. The emphasis is that the EBT instructor must 'demonstrate proficiency' at the end of the course, so the outcome is important, not the length. There are also two ways of



verifying if the course is adequate. Firstly, the instructor must pass an assessment of competence at the end of the course, and secondly there are ongoing concordance assurance requirements. Both place the burden on the operator to ensure the instructors are trained to the correct standard, and both are subject to oversight by the competent authority.

response Partially accepted
Due to the number of comments covered in this entry, please refer to the EASA Opinion for more information.

comment 310 comment by: *easyJet Airlines Europe*

GM1 ORO.FC.145(a)(3)(e)	The EBT instructor training course may be a minimum of 14 hours (EBT instructor training) and the recommended length is between 21 to 24 hours (EBT instructor training plus assessment of competence).	The requirement shall stay at GM level as described in the document: “...the RMG decided not to include a prescriptive requirement regarding the number of hours needed to deliver the EBT instructor course and instead the information is provided in point (e) in this GM.”
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response Noted

comment 323 comment by: *CAA-NL*

GM1 ORO.FC.145(a)(3) point (e)
We support the inclusion of the duration of the instructor’s course in GM including the explanation therefor.

response Noted

comment 458 comment by: *France*

DGAC FR considers that the GM1 ORO.FC.145 (a) (3) should have the status of an AMC.

In addition the minimum of 14 hours for an EBT instructor training course is not sufficient for an initial instructor training and is not consistent with the IATA recommendation of a 3-day course. DGAC FR proposes to keep a minimum of 21 hours.

In terms of course duration the AMC should distinguish the situation of an instructor applying for the first time an EBT instructor privilege and an instructor having already an experience as EBT instructor within another operator. For the first case DGAC



	<p>believes that 21 hours is a minimum. For the second case DGAC supports paragraph (d) of AMC1 ORO.FC.145 (a)(3) allowing for a reduction of hours:</p> <p>AMC3 GM1 ORO.FC.145(a)(3) Provision of training</p> <p>EBT INSTRUCTOR — INITIAL STANDARDISATION [...]</p> <p>(e) The EBT instructor training course may be a minimum of 14 hours (EBT instructor training) and the recommended length is between 21 to 24 includes a minimum of 21 hours (EBT instructor training plus assessment of competence). Such duration might be reduced if the applicant has previously acted as an EBT instructor within an operator approved in accordance with the present regulation.</p>
response	Not accepted

comment	<p>477 comment by: AIRBUS</p> <p>page 34 GM1 ORO.FC.145 (a)(3)(d)(1):</p> <p>The sentence “this enable EBT instructor...” should be either removed (for simplification) or at least revised considering Airbus comments on the proposed grading system (refer to comment N° EASA 484 related to page 86).</p> <p>If sentence is to be kept, Airbus recommends to delete the grade examples put in brackets and the sentence would read as follows:</p> <p>1) To different level of performance. This enables EBT instructors to distinguish between pilots performing less than the minimum acceptable level of performance and those whose performance is at an acceptable level in all competencies. This may also include other performance examples.</p>
response	<p>Not accepted</p> <p>‘Grading 2 competent’ is in line with the views of the rulemaking group, the review group and the documentation and notes provided by ICAO and IATA.</p>

comment	<p>478 comment by: AIRBUS</p> <p>Page 34 GM1 ORO.FC.145 (a)(3)(e):</p> <p>Since the NPA promote competency-based training, it should not state training volume anymore but objectives to be achieved.</p>
response	Noted

comment	<p>571 comment by: AUA EBT</p>
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response Noted

comment

631

comment by: *European Cockpit Association*

Commented text:

Explanatory note to GM1 ORO.FC.145 (a)(3)

In the explanatory note “mentoring” after the completion of an EBT Instructor course is mentioned. Nevertheless there is insufficient explanation given about how and for how long such mentoring should be performed. **As ECA we fully support establishing of such mentoring principle.** However, we urge the Agency for a more detailed explanation.

ECA's proposal: either time (6 to 12 months) or a number of EBT cycles trained could be established.

response

Not accepted

comment

669

comment by: *IATA*

GM1 ORO FC 145 (a)(3) Provision of training

(e) The EBT instructor training course may be a minimum of 14 hours (EBT instructor training) and the recommended length is between 21 to 24 hours (EBT instructor training plus assessment of competence).

For TRI or SFI in FCL training quantities are in the IR

FCL.930.TRI TRI — Training course

- (a) The TRI training course shall include, at least:
- (1) 25 hours of teaching and learning;
 - (2) 10 hours of technical training, including revision of technical knowledge, the preparation of lesson plans and the development of classroom/ simulator instructional skills;
 - (3) 5 hours of flight instruction on the appropriate aircraft or a simulator representing that aircraft for single-pilot aircraft and 10 hours for multi-pilot aircraft or a simulator representing that aircraft.

Here these indications (different from ICAO DOC EBT 9995) are at a GM level. Is it consistent?

It could have been at least recommended to integrate this training part in the generic instructor training course and indicated at the AMC level as :

AMC1 ORI FC 145(a)(3) Provision of training

- (10) facilitate trainee learning, focusing on specific competency-based training needs; and
- (11) conduct a debrief using facilitation techniques.



(d) The EBT instructor training course should be included in the instructor course and may be, for the EBT subjects, of a minimum duration of 14 hours (EBT instructor training) and the recommended length is between 21 to 24 hours (EBT instructor training plus assessment of competence). An instructor may be given credits on the topics of point (c) if the instructor has previously demonstrated competencies in those topics.

response Not accepted

GM2 ORO.FC.145(a)(3) Provision of training

p. 35-36

comment 171 comment by: *M.Held / Lufthansa Airlines*

(a) EBT Programme (3)(ii)(C)

Do we need to assess ALL levels of performance during the concordance training or only DIFFERENT levels between 1-5?

response Noted.
GM regarding concordance training has been developed.

comment 218 comment by: *British Airways*

(a) All of the EBT programme, and in particular instructor standardisation, is 'subject to the acceptance of the competent authority' so this wording is unnecessary.

(b) Concordance is really a verification process, not training. In ORO.FC.231 it's called the 'concordance assurance programme' which seems to be a good title for the process. It's confusing to talk here about 'concordance training'. Suggest it's better to delete (b) and include the statement 'and to ensure concordance' in (a)

(b) There is overlap here with AMC1 ORO.FC.231(a)(4). For example this GM says 'Those EBT instructors who do not demonstrate concordance may require further training.' But the AMC says 'The programme ... should address those instructors who do not meet the standards required.' The AMC wording seems better because it relates to the 'concordance assurance programme' which seems a more coherent regulation. Suggest this (b) is deleted and reference is made to the AMC.

(c) Again there is overlap with AMC1 ORO.FC.231(a)(4) and SPT.012. Suggest it's better to delete this (c) and refer to the AMC and SPT.

response Partially accepted
Due to the number of comments covered in this entry, please refer to the EASA Opinion for more information.

comment 256 comment by: *SWISS Intl. Air Lines*



	<p>(d): Do we need to assess all levels of performance during the concordance training or only different levels from 1-5?</p>
response	<p>Noted. GM regarding concordance training has been developed.</p>
comment	<p>402 comment by: Lufthansa Cargo AG</p> <p>EBT INSTRUCTOR CONCORDANCE TRAINING <i>(d) Individual Instructor concordance will be assessed for a wide envelope of assessment. This includes:</i></p> <p><i>(1) assessing all competencies (9 if following the EASA competency framework);</i> <i>(2) assessing all levels of performance (1 to 5); and</i> <i>(3) different flight scenarios.</i></p> <p>Detailed Specification needed: Do we need to present 45 scenarios (9 competencies, 5 Grades) in each concordance assessment?</p>
response	<p>Noted GM regarding concordance training has been developed.</p>
comment	<p>459 comment by: European Cockpit Association</p> <p>GM2 ORO.FC.145(a)(3) Provision of training (b) Concordance training <i>The intent of this training is to provide the framework for existing instructors to develop their competence to conduct EBT. This may be conducted using media (distance learning); however, operators should be aware that this is subject to the acceptance of the competent authority. This training is one of the elements to assure concordance within the EBT instructor community. The operator will verify concordance for each individual EBT instructor at least once a year. Those EBT instructors who do not demonstrate concordance may require further training.</i></p> <p>Comments: Being one of the key elements of EBT - the concordance training should be moved to AMC.</p>
response	<p>Partially accepted Development of new AMC1 ORO.FC.231(a)(4) in regard to instructor concordance assurance programme that determines the amount of concordance training required.</p>
comment	<p>479 comment by: AIRBUS</p>

	<p>Page 35 GM2 ORO.FC.145(a)(3)(a):</p> <p>Airbus believes that distance learning is not appropriate for EBT refresher as a <u>systematic</u> means, and believe this should be reflected into the GM.</p>
response	<p>Not accepted</p> <p>However, the GM has been modified and the distance learning paragraph has been remove to avoid the perception/interpretation that the regulation recommends distance learning.</p>
comment	<p>499 comment by: <i>Vereinigung Cockpit</i></p> <p>GM2 ORO.FC.145(a)(3) Provision of training</p> <p>(b) Concordance training</p> <p>The intent of this training is to provide the framework for existing instructors to develop their competence to conduct EBT. This may be conducted using media (distance learning); however, operators should be aware that this is subject to the acceptance of the competent authority. This training is one of the elements to assure concordance within the EBT instructor community. The operator will verify concordance for each individual EBT instructor at least once a year. Those EBT instructors who do not demonstrate concordance may require further training.</p> <p>Comments: <i>Being one of the key element of EBT the concordance training should be moved to AMC</i></p>
response	<p>Partially accepted</p> <p>Development of new AMC1 ORO.FC.231(a)(4) in regard to instructor concordance assurance programme that determines the amount of concordance training required.</p>
comment	<p>572 comment by: <i>AUA EBT</i></p> <p>Wording - Do we need to assess ALL levels of performance during EACH concordance training or is it sufficient to assess DIFFERENT levels between 1-5?</p>
response	<p>Noted</p> <p>GM regarding concordance training has been developed.</p>

ORO.FC.230 Recurrent training and checking	p. 36
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comment	<p>130 comment by: <i>FlightSafety International - Regional Director Regulatory Affairs</i></p> <p>i. Location of EASA EBT Manual referenced in the NPA GM1 ORO.FC.230 page 36/220?</p>
response	<p>Noted</p> <p>The manual will be published following the adoption of this regulation by the European Commission.</p>



comment	<p>131 comment by: <i>FlightSafety International - Regional Director Regulatory Affairs</i></p> <p>i. Description of what constitutes Mixed Implementation is inadequate and the guidance is piecemeal. There should be a clear statement of requirements for Mixed Implementation with a table of distinctions between it and Baseline EBT. as an example, under ORO.FC.230 Recurrent training and checking GM1 ORO.FC.230(a);(b);(f) Recurrent training and checking MIXED EVIDENCE-BASED RECURRENT TRAINING AND CHECKING OF FLIGHT CREW CONDUCTED IN FLIGHT SIMULATION TRAINING DEVICES (FSTDs) page 36 of 223 in NPA 2018-07(B), it states: <i>Mixed EBT programme. The operator may undertake an implementation of the mixed EBT programme according to this GM. The ICAO baseline EBT programme is defined in ICAO Doc 9995 Chapter 4.3.1 and in Appendices 2 to 7; the <u>EASA EBT programme is defined in AMC2 to AMC7 ORO.FC.231(a)</u>. But which EASA EBT programme is being referred to, Mixed or Baseline?</i></p>
response	<p>Noted More explanation will be provided in SPT.012 with an EASA EBT manual.</p>
comment	<p>219 comment by: <i>British Airways</i></p> <p>(d) Again there is overlap with the SPT. Better to have all the requirements in one place.</p> <p>(d)(2) The SPT says the 'reference material should address every competency at a minimum of two levels per competency' (=18 per 3 years). This (d) says concordance will be assessed for all 9 competencies at all levels of performance (=45). This is far too many and unnecessary. Because of the Venn system, the process to grade a 2 in one competency is the same as the process to grade a 2 in every other competency.</p> <p>(e) This would be better placed in (d) as (d)(3) 'assessing root cause analysis'.</p>
response	<p>Partially accepted</p>
comment	<p>249 comment by: <i>HEAD OF TRAINING PROGRAMS AZ FLEET</i></p> <ul style="list-style-type: none"> In reference to ORO.FC.230 (b) (1) the legacy OPC requires that the check shall be completed by each pilot as part of a normal crew complement (Captain and Co-pilot). Does the EBT program require a specific crew complement for the evaluation and training phases? If yes, must it be the same persons for each day? i.e. CPT Brown and Copilot Rossi do the evaluation together on day1 . On day 2 the crew composition again must be CPT Brown and Copilot Rossi or can it also be Copilot Bianco in case that copilot Rossi go sick?
response	<p>Noted This is covered in ORO.FC.231 (a)(5) and AMC1 ORO.FC.231(a)(5), where the operator should propose this kind of details to their competent authority.</p>

ORO.FC.230 Recurrent training and checking

p. 37-40

comment	<p>132 comment by: <i>FlightSafety International - Regional Director Regulatory Affairs</i></p> <p>i. GM1 ORO.FC.230(a);(b);(f) Recurrent training and checking MIXED EVIDENCE-BASED RECURRENT TRAINING AND CHECKING OF FLIGHT CREW CONDUCTED IN FLIGHT SIMULATION TRAINING DEVICES (FSTDs) page 38 of 223 in NPA 2018-07(B), states: <i>Equivalency of malfunction may be used to guide the operator towards the implementation of a mixed EBT programme according to AMC1 ORO.FC.230(a)(4)(i)(A) and ORO.FC.145(d)</i>. Is equivalency of malfunctions and approaches required for mixed implementation?</p>
response	<p>Noted. This information is available in the EASA Oversight guidance for the transition to EBT Mixed Implementation.</p>
comment	<p>220 comment by: <i>British Airways</i></p> <p>The title on page 36 is far too complicated! In the text in various places it's called 'mixed EBT', 'mixed EBT implementation' and 'mixed EBT programme'. Suggest the title and all references are standardised to 'Mixed EBT Programme'. This would be consistent with 'EBT Programme' in ORO.FC.231.</p> <p>Is there going to be an EASA EBT manual? The last paragraph refers to the EASA checklist. Will the checklist be incorporated into the manual, so should this reference be deleted?</p> <p>Now that ORO.FC.231 is drafted, it raises some questions about Mixed EBT. For example, under equivalency of malfunctions, do you have to follow the ORO.FC.231 process? Or, because this is deliberately not full EBT, can the operator use a simpler process for their malfunction clustering? We can see NAAs having different views about that.</p> <p>Evaluation phase, amend 'items that should be included' to 'items that may be included'. This is GM not AMC.</p> <p>This is important. It means you don't always have to do items 1.4 and 1.6 in the Eval and you can start a scenario in the cruise. We have lots of experience of doing this for LOEs under ATQP and it works very well. We don't do it for all Evals, but starting a scenario in the cruise can be excellent training value. For example, starting a scenario mid-Atlantic to include contingency procedures and a diversion is very good for evaluating certain competencies. This is not something you can do with a shorter scenario if always forced to do pre-flight checks and a take-off. Pilots don't have a problem with it either, they quickly get familiar with starting a scenario in the cruise.</p> <p>Manoeuvres validation phase, amend 'should be included here' to 'may be included here'. This is GM not AMC.</p>
response	<p>Partially accepted.</p>



Due to the several comments in this entry, please refer to the EASA Opinion for more information.

comment	250	comment by: <i>HEAD OF TRAINING PROGRAMS AZ FLEET</i>
	<ul style="list-style-type: none"> In reference to ORO.FC.230 (b) (1) the legacy OPC requires that the check shall be completed by each pilot as part of a normal crew complement (Captain and Co-pilot). Does the EBT program require a specific crew complement for the evaluation and training phases? If yes, must it be the same persons for each day? i.e. CPT Brown and Copilot Rossi do the evaluation together on day1 . On day 2 the crew composition again must be CPT Brown and Copilot Rossi or can it also be Copilot Bianco in case that copilot Rossi go sick? 	
response	Noted. This is covered in ORO.FC.231(a)(5) and AMC1 ORO.FC.231(a)(5).	

ORO.FC.231 Evidence-based training (a) EBT PRPROGRAMME

p. 40-44

comment	16	comment by: <i>Michel Lacombe AF Training department and AF ATO</i>
	<p>Comment on this texte ORO.FC.231 point (a)(3)(iii) wording « line operations » page 43</p> <p>ORO.FC.231 Evidence-based training (a) EBT PROGRAMME</p> <p>(3) The operator shall ensure that each flight crew member: (i) is enrolled in the EBT programme;</p> <p>(A) the content of the approved EBT programme is completed for that module; and (ii) completes a minimum of 2 modules within the validity period of 12 months, separated by a period of not less than 3 months. The module is completed when:</p> <p>(B) an acceptable level of performance in all observed competencies has been demonstrated; and (C) will not continue line operations if during a module the performance observed was below the minimum acceptable level. The flight crew member continues line operations when a module is completed.</p> <p>should be labeled ORO.FC.231 point (a)(3)(ii) wording «line operations»</p>	
response	Accepted	
comment	57	comment by: <i>FNAM</i>



	<p>ISSUE – (a)(2)(ii)</p> <p>The EASA’s proposed disposal lists the different information required for the operators’ approved EBT programme. FNAM thanks for this clear list. Nevertheless, FNAM fears that some operators may not be able to present valuable and adapted data on a 3-year period. EBT principle should be encouraged to small operators in order to enhance flight safety level and improve the global European training efficiency. Flexible provisions should be provided for small operators in order to facilitate and organize resources and data pooling thanks to manufacturers or between operators to implement EBT. Therefore, an AMC or GM should allow operators to benefit of data from other operators performing the same type of operation or operating the same type of aircraft: a kind of data base shared between few operators.</p> <p>PROPOSAL</p> <p>Allow flexibilities for small operators and encourage EBT implementations thanks to pooling resources and data with manufacturers or between operators</p>
response	<p>Not accepted</p> <p>However, the issue will be studied during Phase 3 of RMT.0599. See the latest EPAS.</p>
comment	<p>58 comment by: FNAM</p> <p>AGREEMENT – (a)(3)(ii)</p> <p>The proposed disposal lists the different requirements for flight crew members. FNAM thanks for this clear list. The 2 required modules within the validity period of 12 months should not follow quickly and should at least be separated by 3 months. The training and the evaluation of the flight crew would be therefore improved and it would avoid to have all FSTD trainings in successive few days on a 12-month period.</p>
response	<p>Noted</p>
comment	<p>59 comment by: FNAM</p> <p>EDITORIAL ISSUE - (a)(3)(ii)(C)</p> <p>Page 43 and 44, the rationale refers to ORO.FC.231 (a)(3)(iii) for ‘line operations’ wording although this wording is used in ORO.FC.231 (a)(3)(ii)(C).</p> <p>PROPOSAL</p> <p>Modify the reference to ORO.FC.231 (a)(3)(ii)(C)</p>
response	<p>Accepted</p>
comment	<p>60 comment by: FNAM</p> <p>ISSUE – EBT PROGRAMME vs APPROVED EBT PROGRAMME</p> <p>The difference between EBT programme and approved EBT programme is clearly explained in ORO.FC.231 rational. Nevertheless, the fact that EBT programme is generic to an aircraft generation and that approved EBT programme is specific to the operator are not clearly explained in the regulation. Requirements for EBT programme and approved EBT programme are not distinguished in EASA’s proposed disposals. This difference is really important to understand EASA’s EBT philosophy and therefore to implement correctly the EBT and its European requirements.</p>



response	<p>FNAM suggests to clarify in the regulation the differences between EBT programme and approved EBT programme.</p> <p>PROPOSAL</p> <p>Clarify in the regulation requirements and definitions of EBT programme and approved EBT programme</p>
comment	<p>61 comment by: <i>FNAM</i></p> <p>ISSUE – (4)</p> <p>The EASA’s proposed disposals describe succinctly the instructor concordance assurance programme. FNAM suggests to more develop the means of compliance in AMC and GM in order to ensure the efficient interpretation and implementation of these requirements. Indeed, proposed AMC and Gm are not sufficient to ensure homogeneous implementations.</p> <p>PROPOSAL</p> <p>Develop more means of compliance to instructor concordance assurance programme in additional AMC and GM</p>
response	<p>Accepted.</p> <p>Please refer to Opinion No 08/2019.</p>
comment	<p>172 comment by: <i>M.Held / Lufthansa Airlines</i></p> <p>(a) EBT Programme (3)(ii)(C)</p> <p>– (C) should be listed as (iii) under “(3) The operator shall ensure that...” since the topic is not part of the definition “The module is completed when:”.</p>
response	<p>Accepted</p>
comment	<p>221 comment by: <i>British Airways</i></p> <p>As an overall comment, it is suggested the order of the first five sub-paragraphs of ORO.FC.231 is not very logical. The following order is suggested:</p> <ul style="list-style-type: none"> (a) EBT programme (b) Suitable training devices and volume to complete... (c) Competency framework (d) Grading system (e) Training system performance <p>Also, the current (e) contains two items that do not fit well together. 'Suitable training devices' and 'Volume to complete the programme' are both fundamental to the EBT programme. Therefore, suggest they are both included in (a) EBT programme where they would fit quite logically.</p> <p>(a)(2)(iii) There should be some flexibility in the order of the three phases of a module. Specifically, the MT and SBT phases should be under the same sub-para (B)</p>



so that the order of the two can be varied. Doc 9995 does not use the phrase 'in the following sequence' so why have EASA added it? After the Eval phase, the rest is all training to proficiency, so we do not see why MT must always be before SBT. For example, when doing ISI as part of SBT, it can be more efficient to do this at the end of the first simulator session because of the time it takes for the instructor to get in and out of the different operating seats. Some of MT can then be completed at the start of the second session, followed by the rest of the SBT. It is also relevant to note that AMC1 ORO.FC.231(a)(2) para (d) only mentions Eval and SBT, implying MT can fit anywhere. We do not think mandating the order of MT and SBT at IR level will last the test of time.

(a)(3)(ii) Which validity period is being referred to here? Is it the type rating validity period? If so, it should say so: 'within the validity period of the type rating, separated...'

(a)(3)(ii)(C) Looks like an error and this paragraph should be (a)(3)(iii), and should start 'does not...'

(a)(3)(ii)(C) The second sentence should be deleted because it's incorrect. The flight crew member returns to line operations when (A) and (B) apply, that is, when the module is completed and an acceptable level of performance has been observed in all observed competencies.

(a)(5) For clarity, unforeseen circumstances must include what to do if a pilot cannot attend the first session of a module because they are sick on the day or stuck in traffic on the motorway, etc. The existing procedure for many operators is that the first session can continue with the other pilot and instructor, although only for training, not for evaluation/assessment/checking. In an EBT programme, can the other pilot and instructor continue with the first session and do some MT or SBT? If not, this is a significant change to existing procedures with additional cost for operators.

response

Accepted.

Under legacy training, if Pilot 1 cannot attend day 1 due to unforeseen circumstances (e.g. sick on the day, stuck in traffic, compassionate reasons, etc.), the instructor and Pilot 2 can continue the day 1 session by completing the training items from day 2. When Pilot 1 (or a 'sandbag') attends on day 2, the legacy checks can be completed. In this way, the day 1 simulator session is not wasted (simulator and instructor resources) and Pilot 2 completes the check/training in two days so Pilot 2 can return to the line operations. Under EBT, with no flexibility, nothing can be completed on day 1, the resources are wasted and two pilots (not one) cannot fly, with further operational disruption.

The majority opinion was that flexibility should be allowed for these unforeseen circumstances, so that EBT does not impose additional costs and complexity. It was accepted that there will be reduction in the value of the training data in these circumstances, but this will be a relatively infrequent occurrence. By allowing some flexibility, it will allow, for example, the MT, ISI and some SBT to be completed on day 1 for Pilot 2, and then the EVAL plus the rest of SBT to be completed on day 2 when there are two pilots. In this way, Pilot 2 will still get an evaluation of competencies and training to competency on day 2. However, Pilot 1 will still need a third day to complete their MT, ISI and some SBT.



For the other comments the status is 'partially accepted' please see the latest Opinion.

comment 252 comment by: *HEAD OF TRAINING PROGRAMS AZ FLEET*

- ORO.FC.231 (a) (3) (ii) this ORO provides indication of a separation time between two modules (minimum 3 months). It does not indicate any time frame between Day1 and Day2 of a module. Is there any?

response Noted

No specific provisions are foreseen regarding the separation time between DAY 1 and Day 2. However, the proposed CS OPS.EBT.231.1 states 'timely'. AMC or GM may be developed if there is a safety concern around this provision.

comment 311 comment by: *easyJet Airlines Europe*

ORO.FC.231 point (a)(3)(iii) Vs ORO.FC.231 point (a)(3)(ii)(C)	Line operations	Point (a)(3)(iii) does not exist. However should be introduced by the RMG since it is the right reference according to the sequence. Point (a)(3)(ii)(C) is not correct since the content in (C) is not a subparagraph of (ii) Explanatory note at page 43 is not consistent with the explanatory note at page 44 (e.g. operator is allowed to conduct training flights and the pilot should be permitted to be trained in flight vs. If a low performance is observed.... the pilot should be removed from line operations until an acceptable level of performance can be achieved.
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response Partially accepted.
ORO.FC.231 has been redrafted

comment 399 comment by: *European Powered Flying Union*

ORO.FC.231
page 40...127/222

Considering its volume ORO.FC.231 is a very important part of NPA 2018-07(B), many AMC and GM are included in the text prepared by the Agency.

All AMC and GM included in the CRT index carry the title "Evidence-based training". May we propose to add a keyword/sentence in future similar publications?



response	<p>Example: AMC1 ORO.FC.231(a) Evidence-based training could read "AMC1 ORO.FC.231(a) EBT Assessment and training topics"</p> <p>Rationale: This would make the work of those who have to use the texts much easier because the contents of an AMC or a GM could be easier identified.</p>
	Noted
comment	<p>403 comment by: Lufthansa Cargo AG</p> <p>(a) EBT PROGRAMME <i>(3) The operator shall ensure that each flight crew member:</i> <i>(i) is enrolled in the EBT programme;</i> <i>(ii) completes a minimum of 2 modules within the validity period of 12 months, separated by a period of not less than 3 months. The module is completed when:</i> <i>(A) the content of the approved EBT programme is completed for that module; and</i> <i>(B) an acceptable level of performance in all observed competencies has been demonstrated; and</i> <i>(C) will not continue line operations if during a module the performance observed was below the minimum acceptable level. The flight crew member continues line operations when a module is completed.</i></p> <p>Editorial change needed: (C) should be listed as (iii) under "(3)</p>
response	<p>Accepted. ORO.FC.231 has been redrafted.</p>
comment	<p>462 comment by: France</p> <p>Regarding delegation of signature, DGAC does not agree with the following Agency statement:</p> <p><i>" Appendix 10 paragraph 5 point (c)(1) — Delegation of signature It should be noted that the intent of the RMG and EASA for the delegation of signature proposed in this NPA, is that the responsibility remains with the nominated person for crew training and it is not transferred to the person actually signing the licence. EASA may provide further guidance on the procedure to delegate the signature if found necessary during the consultation of the NPA. Readers are invited to provide comments in this regard."</i></p> <p>Depending on the legal system of the Member State, it has to be noted that the person to whom the delegation of signature has been given might also share the responsibility with the nominated person. For a legal perspective, the act of</p>

	administrative revalidation (signature on the licence) cannot be seen as having no particular consequences in terms of liability. Such consequences have to be properly assessed by Member States having in mind their own national legal rules.
response	Not accepted The delegation of signature should not put any responsibility to the person that actually doing the act. The responsibility remain in the nominated person or deputies.
comment	480 comment by: AIRBUS Page 40 ORO.FC.231 (a)(2)(iii)(B & C): In seat instruction (ISI) could also be part of maneuver training under sub§ B, as described for scenario –based training in C. This thus would be in line with recommended change as per comment N°EASA 474 related to Page 14 of the NPA.
response	Partially accepted. The definition of in-seat instruction has been changed to reflect this option.
comment	573 comment by: AUA EBT Editorial – (C) should be listed as (iii) under “(3) The operator shall ensure that...” since the topic is not part of the definition “The module is completed when:”. Question – Is this wording in according to the train to proficiency concept? Why is here stated DURING a module? Does it mean, if a flight crew member gets a 1 at the evaluation phase (day one), but a 2 or 3 at the end of the module (day two), he/she will also be grounded? Proposal: the flight crew member should not continue line operations, if the performance observed was below the minimum acceptable level at THE END of a module.
response	Accepted. The implementing rule has been redrafted.
comment	620 comment by: European Cockpit Association ORO.FC.231 (a)(2)(ii) <i>(...) ensures flight crew member are exposed to assessment and training topics derived from a large-scale analysis of operational data (...)</i> Comment : ECA proposes to clarify the term “large-scale” and what type of data is required. The term “large-scale” is not clearly defined in the explanatory note. Rationale:

	Depending on the size and complexity of the structure - it might be difficult for an operator to provide and prove certain data, even when EBT concepts have been proven beneficial.
response	Noted. The explanatory note has been amended.
comment	685 comment by: Ryanair ATO (4)(iii) Sufficient concordance must be demonstrated. <i>The explanatory note invites comment on the necessity for further information on verifying concordance. Implementation of EBT will require a new skill-set to be developed within many operators so that they will be able to collect and analyse large volumes of data thus ensuring that the EBT program is delivered effectively.</i> <i>For this reason GM should be produced to allow both Operators and Authorities to determine systems to monitor and analyse concordance and fully understand the data being presented.</i>
response	Accepted. New GM has been developed in AMC1 ORO.FC.231(a)(4).

AMC1 ORO.FC.231(a) Evidence-based training

p. 44-45

comment	62 comment by: FNAM ISSUE This AMC is transposing ICAO guidance for EBT assessment and training topics. FNAM thanks for this initiative. Nevertheless, FNAM wonders why the specific in-seat instruction are not described although ORO.FC.231 rational page 42 and 43 is insisting on how important are in-seat instruction. Thus, FNAM suggests to add the whole ICAO guidance on this subject and add 'Topics marked with 'ISI' are those considered only as part of a defined in-seat instruction or demonstration exercise.' PROPOSAL Add the whole ICAO guidance on this subject; Add 'Topics marked with 'ISI' are those considered only as part of a defined in-seat instruction or demonstration exercise.'
response	Not accepted. Please refer to the explanatory note of the NPA and the EASA Opinion.
comment	63 comment by: FNAM ISSUE This AMC is transposing clearly ICAO guidance for assessment and training topics for EBT. FNAM thanks for this initiative. Nevertheless, this AMC proposes to find tables



	<p>for each aircraft category in order to help operator to develop a recurrent EBT programme. FNAM suggests where the data could be found. Thus, FNAM suggests to add the exact references of these tables.</p> <p>PROPOSAL Add the exact references for tables each time they are quoted</p>
response	<p>Not accepted</p> <p>The tables are already included in Appendix II to Part ORO of Regulation (EU) No 965/2012. Please note that in the Opinion, Appendix II and its tables of assessment and training topics are moved to Certification specifications under ORO.FC.232.</p>
comment	<p>64 comment by: <i>FNAM</i></p> <p>ISSUE This AMC describes levels of frequency of assessments and trainings depending on aircraft categories. These requirements transpose ICAO guidance and FNAM thanks for this harmonization. Nevertheless, category B aircraft seems to have different requirements than ICAO guidance. Indeed, instead of ‘during alternate EBT modules (ie every other module in a series)’, this AMC requires a frequency ‘during every cycle’. On one hand, cycle definition compared to ICAO guidance would lead to each and every interpretations and therefore, implementations. On the other hand, EASA and ICAO proposals may have different meanings. In each case, the interpretation of the regulation would impact the implementation since it could be different depending on operators or NAA. The level-playing-field and also the flight safety objectives may be impacted. As it stands, the frequency of training may variate depending on the Member-State.</p> <p>PROPOSAL Keep the exact same requirements as ICAO guidance in Doc 9995</p>
response	<p>Not accepted</p> <p>Cycle is defined.</p>
comment	<p>222 comment by: <i>British Airways</i></p> <p>(a) Suggest amend to ‘...operators of the generations of aeroplanes...’</p> <p>(a) ‘listed below’? Do you mean listed in AMC2 to AMC6?</p>
response	<p>Partially accepted</p>
comment	<p>251 comment by: <i>HEAD OF TRAINING PROGRAMS AZ FLEET</i></p> <ul style="list-style-type: none"> • ORO.FC.231 (a) (3) (ii) this ORO provides indication of a separation time between two modules (minimum 3 months). It does not indicate any time frame between Day1 and Day2 of a module. Is there any?
response	<p>Noted</p>



No specific provisions are foreseen regarding the separation time between DAY 1 and Day 2. However, the proposed CS OPS.EBT.231.1 states 'timely'. AMC or GM may be developed if there is a safety concern around this provision.

comment 326 comment by: CAA-NL

AMC1 ORO.FC.231(a)

Point(c)(2): 'The priority of the topic to be considered in an EBT programme, according to **which** evidence is linked to a recommended frequency.' We think the word 'which' needs to be added to make the sentence run smoothly.

response Not accepted

comment 464 ❖ comment by: France

DGAC believes that an operator's prior ATQP experience should also be considered as relevant as mixed EBT experience to apply ORO.FC.231 and appendix 10. In other words an operator already approved for ATQP shall be exempted from the requirement of at least 2 years conducting an EBT programme which may include mixed EBT.

DGAC FR proposes to amend AMC1 ORO.FC.231 (a) (1) and appendix 10 accordingly.

Appendix 10 — Proficiency check type ratings, and proficiency check for IRs when combined with type rating — Practical assessment in competencies

A — General

1. The practical assessment in competencies within an approved EBT programme is equivalent to a proficiency check.

2. Appendix 10 only applies to:

(a) an operator with an approved EBT programme that has:

(1) an experience of at least 2 years conducting an EBT programme which may include mixed EBT **or ATQP programme with an appropriate pilot competency scheme**; and

AMC1 ORO.FC.231(a)(1) Evidence-based training

(a) MINIMUM EXPERIENCE TO SUBSTITUTE ORO.FC.230

The operator should have a minimum experience of 2 years of a mixed EBT programme (mixed EBT implementation) **or ATQP programme with an appropriate pilot competency scheme**.

response Not accepted
EASA published ED Decision 2015/027/R in December 2015 to provide guidance on EBT mixed implementation under ATQP programmes. Therefore, to ensure level playing field, the ATQP operators should demonstrate an experience of 2 years in EBT mixed.



comment	648 comment by: IATA
	<p>Concerning ORO.FC.231 Evidence-based training, proposition to add a paragraph in order to clarify the situation of ATQP operators in regards of substitution of ORO.FC.230. The proposal is to amend AMC1 ORO.FC.231(a)(1) Evidence-based training as per below:</p> <div style="border: 1px solid black; padding: 5px; margin: 10px 0;"> <p>AMC1 ORO.FC.231(a)(1) Evidence-based training</p> <p><i>(a) The operator should have a minimum experience of 2 years of a mixed EBT programme (mixed EBT implementation) or</i></p> <p><i>(b) The operator has more than two years of experience with an approved ATQP and,</i></p> <p><i>has already the competent authority approval to extend the validity of ORO.FC.230 and,</i></p> <p><i>Is able to demonstrate compliance with the check-list of the EASA “Oversight guidance for transition to EBT Mixed Implementation”.</i></p> </div>
response	<p>Not accepted</p> <p>EASA published ED Decision 2015/027/R in December 2015 to provide guidance on EBT mixed implementation under ATQP programmes. Therefore, to ensure level playing field, the ATQP operators should demonstrate an experience of 2 years in EBT mixed.</p>
comment	670 comment by: IATA
	<p>(2)</p> <p>In ICAO Doc 9995 PART II. 1.2.3 regarding frequency of topic B, it states: “B: assessment and training topic to be included with defined scenario elements during alternate EBT modules (i.e. every other module in a series). In the NPA EASA says ‘during every cycle’.</p> <p>It is proposed to keep the ICAO wording to avoid misunderstanding.</p>
response	<p>Not accepted.</p> <p>ICAO Doc 9995 has two different wordings, which were not aligned, to define frequency B. Therefore, it was not possible to transpose the wording.</p>

comment	327	comment by: CAA-NL
	<p>AMC8 ORO.FC.231(a)</p> <p>If and when UPRT is as important as stated in the explanatory material, would it then not automatically be included in the result of the analysis of the threads, errors, findings and the data analysis?</p>	
response	<p>Noted.</p> <p>The review group worked on the UPRT-related text. See the new proposal in the EASA Opinion.</p>	

AMC8 ORO.FC.231(a) Evidence-based training

p. 47-56

comment	65	comment by: FNAM
	<p>ISSUE – Safety Promotion</p> <p>The redaction of the safety promotion is confusing. On one hand, the safety promotion seems to be included in AMC8 ORO.FC.231(a) although it is UPRT requirements. On the other hand, proposed tables are clearly provided guidance for AMC1 ORO.FC.220&230 although they are amended by AMC8 ORO.FC.231(a). Additionally, FNAM wonders what is the legal status of these guidance. Is it a FAQ? Is it a hard law or is it a soft law? ‘Safety promotions’ are not GM nor AMC: they could be proposed without any stakeholders consultation. If these guidance are necessary, FNAM suggests to regroup all guidance in European regulations by integrating ‘safety promotions’ into GM; if not, to suppress ‘safety promotions’.</p> <p>Thus, FNAM suggests to apply all ICAO guidance and to transpose them in dedicated AMCs, <i>ie</i> AMC1 ORO.FC.220&230.</p> <p>PROPOSAL</p> <p>Transpose ICAO requirements in dedicated AMCs, <i>ie</i> AMC1 ORO.FC.220&230</p>	
response	<p>Partially accepted</p> <p>The review group worked on the UPRT-related text. See the new proposal in the EASA Opinion.</p>	

comment	223	comment by: British Airways
	<p>The format and order of the tables is very confusing. In particular:</p> <ul style="list-style-type: none"> • The AMC text for both (a) and (b) copied from ORO.FC.220&230 is combined into a table at the start of the SPT. It would be much clearer if the (a) text is positioned before the items of Table 1, and the (b) text is positioned before the items of Table 2, exactly as it is in ORO.FC.220&230. Also ‘(a)’ is not included in the SPT table, and (b) is included as ‘b.’, which is not helpful. • There is no title ‘Table 1: Elements and respective components of upset prevention training’, which again adds confusion. • The word ‘or’ is in a column before the EBT phase column which is very confusing. <p>Same comment as before, will the EASA Oversight guidance document still be available in two years and beyond? Also, the checklist was titled Oversight guidance for transition to EBT Mixed Implementation. Is the word ‘Mixed’ being dropped?</p>	



response Noted
EPAS includes a safety promotion task (SPT.012) to ensure implementation issues are addressed. SPT.012 will develop an oversight guidance document for the full implementation of EBT. The guidance for mixed implementation will remain as there may be operators transitioning to EBT mixed in the years to come.

AMC9 ORO.FC.231(a) Evidence-based training

p. 57

comment 393 comment by: *European Cockpit Association*

ECA proposes that EASA introduces some guidance on the following subject:

AMC9 ORO.FC.231(a) Evidence-based training

(b) When developing scenario elements, the operator should ensure there can be no negative training by asking pilots to induce their own errors.

Comment:

How is the operator going to ensure the absence of negative training when he is asking pilots to make voluntary errors? Guidance should be provided in the regulation.

See also comment on Definitions of ISI.

response Partially accepted
The provision has been modified to improve clarity.

comment 532 comment by: *SNPL FRANCE ALPA technical committee*

SNPL FRANCE ALPA proposes that EASA introduces some guidance on the following subject:

AMC9 ORO.FC.231(a) Evidence-based training

(b) When developing scenario elements, the operator should ensure there can be no negative training by asking pilots to induce their own errors.

Comment: How is the operator going to ensure the absence of negative training when he is asking pilots to make voluntary errors? Guidance should be provided in the regulation.

response Partially accepted
The provision has been modified to improve clarity.

comment 616 comment by: *Vereinigung Cockpit*

AMC9 ORO.FC.231(a) Evidence-based training

(b) When developing scenario elements, the operator should ensure there can be no negative training by asking pilots to induce their own errors.



Comment:

How is the operator going to ensure the absence of negative training when he is asking pilots to make voluntary errors? Guidance should be provided in the regulation.

See also comment on Definitions of ISI.

response

Partially accepted

The provision has been modified to improve clarity.

GM2 ORO.FC.231(a) Evidence-based training

p. 57-58

comment

224

comment by: *British Airways*

This detailed process for creating a competency map seems completely out of place. The AMC says an operator may 'develop scenario elements and a competency map', but there is no GM about how to develop scenario elements (which seems to be a more important step than the competency map). After all, the scenario element must be followed by the instructor, but they do not have to use the competency map (they should assess all observed competencies). So this GM describes a detailed process to create a competency map that the instructor doesn't have to use.

Suggest this GM is deleted as the text in the AMC is sufficient. Operators will of course use SMEs (experienced instructors) to develop both scenario elements and a competency map, as per the AMC, and this is subject to oversight in the normal way.

response

Partially accepted

The GM has been simplified.

comment

691

comment by: *EBT Foundation***Page No:** 57**Paragraph No:** GM2 ORO.FC.231(a) Note 1 and 2

Comment: The complexity of process described is something never considered during the development of EBT. To what does the scale of 1-5 relate to? It is only when all elements are linked that it is possible to have a reasonable view of the criticality of competencies and this is an iterative process which forms part of the development of the program. It should not be described in GM in this way. Competency mapping described in the AMC9 ORO.FC.231(a) describes what was done and is sufficient. The text in notes 1 and 2 is completely confusing and does not guide an operator in the development of the program. It is incomplete and factually incorrect.

Justification: Removal of contradictions and confusion**Proposed text:** Remove GM2 ORO.FC.231(a) Note 1 and 2

response Partially accepted
The GM has been simplified.

AMC1 ORO.FC.231(a)(1) Evidence-based training

p. 58-59

comment 66 comment by: *FNAM*

ISSUE

This EASA's proposed disposal describes the minimum experience to be allowed to substitute ORO.FC.230 with ORO.FC.231. FNAM fears that the restriction of a minimum of 2 years of mixed EBT programme would be a burden for most of operators. Indeed, some operators should be allowed to start EBT programme with ATQP experiences if they can demonstrate that their ATQP is compliant with mixed-EBT programme. FNAM suggests therefore to plan conditions also on ATQP experiences to be allowed to substitute ORO.FC.230 with ORO.FC.231.

PROPOSAL

Allow ATQP experiences to substitute ORO.FC.230 with ORO.FC.231 if operator can demonstrate that this ATQP is compliant with mixed-EBT programme

response Not accepted
EASA published ED Decision 2015/027/R in December 2015 to provide guidance on EBT mixed implementation under ATQP programmes. Therefore, to ensure level playing field, the ATQP operators should demonstrate an experience of 2 years in EBT mixed.

comment 150 comment by: *Olaf Birgels (DLH)*

AMC1 ORO.FC.231(a)(1) Evidence-based training

(a) MINIMUM EXPERIENCE TO SUBSTITUTE ORO.FC.230 The operator should have a minimum experience of 2 years of a mixed EBT programme (mixed EBT implementation).

Question:

What is the definition for the starting date of the 2 year period?
LH Group Proposal is: Approved OM-D for mixed EBT

response Noted
The related AMC has been modified to provide more clarity.

comment 173 comment by: *M.Held / Lufthansa Airlines*

What is the definition for the starting date of the 2 year period? LH Group Proposal is:
Approved OM-D for mixed EBT?

response Noted
The related AMC has been modified to provide more clarity.

comment 199 comment by: *Lufthansa CityLine GmbH*



	<p>AMC1 ORO.FC.231(a)(1) Evidence-based training (a) MINIMUM EXPERIENCE TO SUBSTITUTE ORO.FC.230 The operator should have a minimum experience of 2 years of a mixed EBT programme (mixed EBT implementation).</p> <p>Question - What is the definition for the starting date of the 2 year period? LH Group Proposal is: Approved OM-D for mixed EBT</p>
response	<p>Noted The related AMC has been modified to provide more clarity.</p>

comment	<p>225 comment by: <i>British Airways</i></p> <p>(a) The wording for ATQP is ‘operating with an approved ATQP’ so suggest this AMC is worded the same way: ‘minimum experience of 2 years of operating with an approved Mixed EBT Programme.’ and delete the words ‘mixed EBT implementation’ in brackets</p> <p>(b) The Explanatory Note is not correct about the word ‘complete’. The word ‘complete’ does not have the same meaning or context in the two places. In ORO.FC.230 ‘complete’ means <i>carry out</i> but here it’s being used to mean <i>entire</i>. Suggest this AMC is changed to simply ‘An EBT module substitutes an operator proficiency check (OPC).’ Clear and straightforward.</p> <p>(b) In the definitions on page 18 it is stated that ‘A practical assessment of competencies’ is equivalent to a proficiency check’. This paragraph states that an ‘EBT module substitutes a complete operator proficiency check’. Which is correct? The two statements are not consistent. This confusion is partly because the ‘Practical assessment of competencies’ on page 18 is not clearly defined.</p>
response	<p>Partially accepted The related AMC has been modified to provide more clarity.</p>

comment	<p>257 comment by: <i>SWISS Intl. Air Lines</i></p> <p>What is the definition for the starting date of the 2 year period? We would suggest: Date of approved OM-D for mixed EBT.</p>
response	<p>Noted The related AMC has been modified to provide more clarity.</p>

comment	<p>282 comment by: <i>Brussels Airlines</i></p> <p>AMC1 ORO.FC.231</p> <p>Who or what reference will determine the start date of the mixed EBT implementation ?</p>
response	<p>Noted</p>



The related AMC has been modified to provide more clarity.

comment

404

comment by: Lufthansa Cargo AG

AMC1 ORO.FC.231(a)(1) Evidence-based training

(a) MINIMUM EXPERIENCE TO SUBSTITUTE ORO.FC.230 The operator should have a minimum experience of 2 years of a mixed EBT programme (mixed EBT implementation)..

Detailed Specification needed:

When does the 2 year period start (e.g. OM-D approval for mixed EBT)?

response

Noted

The related AMC has been modified to provide more clarity.

comment

574

comment by: AUA EBT

Question - What is the definition for the starting date of the 2 year period? LH Group Proposal is:
Approved OM-D for mixed EBT

response

Noted

The related AMC has been modified to provide more clarity.

AMC1 ORO.FC.231(a)(2) Evidence-based training

p. 59-60

comment

67

comment by: FNAM

ISSUE

The proposed disposals describes the features of EBT programme. In particular, the content of the programme as the evaluation phase and the scenario-based training phase.

First, FNAM wonders why no manoeuvres training phase is including in the proposed AMC but in Annex I definition. Indeed, ICAO guidance chapter 7 of Doc 9995 describes 3 distinct phases for the structure of a module:

- Evaluation phase;
- Manoeuvres training phase;
- Scenario-based training phase.

On one hand, the description of evaluation phase and scenario-based training phase do not fit exactly with ICAO guidance. The proposed evaluation phase objective seems to be only identification of needs and data collection although in ICAO guidance, this phase finishes with assessment by qualified and authorized instructors 'that all required performance standards have been satisfactorily achieved.' Indeed, instructors should also observe and assess flight crew competencies during this phase. FNAM thinks that this guidance is not clearly expressed in the EASA's proposed disposal.



On the other hand, Manoeuvres training phase is described in definition and explained through a rationale page 16 of this NPA. EASA's Manoeuvres training phase should be better explained in the regulation in AMC or GM in order to ensure the correct implementations of EASA's proposed EBT trainings. Indeed, EASA's proposed Manoeuvres training has not the same philosophy than ICAO's proposed Manoeuvres training.

Thus, FNAM suggests to complete the proposed AMC1 in order to ensure the efficient interpretation of the EASA's Manoeuvres training phase objective but also to ensure the flight safety via a proper training.

PROPOSAL

Complete the proposed AMC1 with rationale from definition on Manoeuvres training phase such as:

'Manoeuvres training phase is not a real-time training but allows crews the time to practice and improve performance in largely psychomotor skill-based exercises. Repositioning of the flight simulation in order to focus training on the intended manoeuvres will be a commonly used FSTD feature for this phase.'

response

Not accepted.

The current definition has been transposed from ICAO documentation.

comment

226

comment by: *British Airways*

(d) There is no mention of the MT phase. It is also a 'feature of the programme' and should have a further description in the AMC to complement the IR. Suggest add a new (d)(2), or new (e) if preferred to keep it separate.

(f) Delete (OB) as this is in the Abbreviations already.

(h) This seems to repeat (d). Suggest delete.

response

Partially accepted

AMC1 ORO.FC.231(a)(2)(iv) Evidence-based training

p. 60-61

comment

68

comment by: *FNAM*

ISSUE

The proposed disposals describes personal providing assessments and trainings requirements. FNAM thanks for precisising TRI, FI and CRI training role. Nevertheless, no precision is providing for assessment requirement and definition. EBT programme depends on the operator context and specificities. EBT instructors should assess, train and be trained on specific operational situations representing the operator lines context. All instructors (including SFI and SFE) should therefore be trained and have a recent expertise of specific operator lines operations.

In the whole regulation and rationale, it is not clear if this privilege is allowed only for instructors or for examiner and instructors. Despite examiners role and nature, FNAM fears that only instructors would be able to assess EBT competencies. Thus, FNAM suggests to mention examiners each time instructors are mentioned in order to allow examiners to assess EBT competencies. This would better fit to operational reality.



response	<p>The EASA's proposed disposals propose that examiners would have to assess and validate license solely on the basis of instructors' declarations. FNAM wonders what is EASA's level of apprehension of this issue and its associated risk.</p> <p>PROPOSAL</p> <p>Define clearly the concept of assessment for examiners and instructors; and Ensure examiners responsibilities correspond to examiners assessment means</p>
comment	<p>228 comment by: <i>British Airways</i></p> <p>(b) It seems very odd to include 'EBT instructor' in (d) but not (b), despite what the Explanatory Note says. This AMC is part of ORO.FC.231, EBT programme, which does not involve any flight training, only FSTD training, so it seems out of place to mention it.</p> <p>Suggest (b) simply says 'FSTD training should be provided by EBT instructors.'. There is no need to say '...satisfies the operator's standardisation, experience and knowledge requirements, because you can't be an EBT instructor unless you have completed Initial and Recurrent Standardisation, as per ORO.FC.145.</p>
response	<p>Partially accepted</p>
comment	<p>394 comment by: <i>European Cockpit Association</i></p> <p>ECA proposes the following changes to AMC1 ORO.FC.231(a)(2)(iv):</p> <p>AMC1 ORO.FC.231(a)(2)(iv) Evidence-based training</p> <p>...</p> <p>(b) Flight training should be provided by a flight instructor (FI), type rating instructor (TRI) or class rating instructor (CRI) or, in the case of the FSTD content, a synthetic flight instructor (SFI), providing that</p> <p>(i) the FI, TRI, CRI or SFI satisfies the operator's standardisation, experience and knowledge requirements and</p> <p>(ii) is enrolled in the EBT programme of the operator and</p> <p>(iii) successfully completed the Operator's Recurrent training and Checking programme according to ORO.FC.231</p> <p>Comment:</p> <p>Following our comment on proposed FCL 905 SFI, only TRI/TRE are relevant for operational assessment in an EBT programme and according also to our comment on ORO.FC.145 EBT instructors must be enrolled and current in the EBT programme.</p> <p>Rationale:</p> <p>We agree with the drafting group analysis when explaining on page 41 of this NPA about ORO.FC.231:</p> <p>« <i>The paradigm shift proposed under the EBT programme is not simply to replace a set of critical events with a new set, but to use the events as a vehicle for developing and assessing crew performance across a range of competencies. In addition, EBT</i></p>



refocuses the instructor population onto analysis of the root causes to correct inappropriate actions, rather than simply asking a flight crew member to repeat a manoeuvre with no real understanding as to why it was not successfully flown in the first instance. »

As of June 26th 2018, no change referring to SFI privileges extension was proposed by the drafting group. So it seems that this proposal has not been discussed in presence of ECA/IFALPA representative and has just been added at the last minute which is not a fair practice owing to the importance of this proposed change.

response

Not accepted

Traditional recurrent training allows SFIs to perform such training. To ensure level playing field, it is necessary to maintain the approach regarding SFIs. However, EBT has proposed additional requirements for SFIs — they need to attend the EBT instructor course.

In addition, when the validity of the line evaluation of competence (old line check) is extended, an instructor enrolled in the airline (with a valid line evaluation of competence) is necessary to deliver the module once a year.

comment

533

comment by: SNPL FRANCE ALPA technical committee

SNPL FRANCE ALPA proposes the following changes to AMC1 ORO.FC.231(a)(2)(iv)

AMC1 ORO.FC.231(a)(2)(iv) Evidence-based training

...

(b) Flight training should be provided by a flight instructor (FI), type rating instructor (TRI) or class rating instructor (CRI) ~~or, in the case of the FSTD content, a synthetic flight instructor (SFI),~~ providing that

(i) the FI, TRI, CRI ~~or SFI~~ satisfies the operator's standardisation, experience and knowledge requirements and

(ii) is enrolled in the EBT programme of the operator and

(iii) successfully completed the Operator's Recurrent training and Checking programme according to ORO.FC.231

Comment: following our comment on proposed FCL 905 SFI, only TRI/TRE are relevant for operational assessment in an EBT programme and according also to our comment on ORO.FC.145 EBT instructors must be enrolled and current in the EBT programme.

Rationale : we agree with the drafting group analysis when explaining on page 41 of this NPA about ORO.FC.231:

« The paradigm shift proposed under the EBT programme is not simply to replace a set of critical events with a new set, but to use the events as a vehicle for developing and assessing crew performance across a range of competencies. In addition, EBT refocuses the instructor population onto analysis of the root causes to correct inappropriate actions, rather than simply asking a flight crew member to repeat a manoeuvre with no real understanding as to why it was not successfully flown in the first instance. »



response

As of June 26th 2018, no change referring to SFI privileges extension was proposed by the drafting group. So it seems that this proposal has not been discussed in presence of ECA/IFALPA representative and has just been added at the last minute which is not a fair practice owing to the importance of this proposed change.

Not accepted

Traditional recurrent training allows SFIs to perform such training. To ensure level playing field, it is necessary to maintain the approach regarding SFIs. However, EBT has proposed additional requirements for SFIs — they need to attend the EBT instructor course.

In addition, when the validity of the line evaluation of competence (old line check) is extended, an instructor enrolled in the airline (with a valid line evaluation of competence) is necessary to deliver the module once a year.

comment

617

comment by: Vereinigung Cockpit

AMC1 ORO.FC.231(a)(2)(iv) Evidence-based training

b) Flight training should be provided by a flight instructor (FI), type rating instructor (TRI) or class rating instructor (CRI) ~~or, in the case of the FSTD content, a synthetic flight instructor (SFI),~~

providing that

(i) the FI, TRI, CRI ~~or SFI~~ satisfies the operator's standardisation, experience and knowledge requirements and

(ii) is enrolled in the EBT programme of the operator and

(iii) successfully completed the Operator's Recurrent training and Checking programme according to ORO.FC.231

Comment:

Following our comment on proposed FCL 905 SFI, only TRI/TRE are relevant for operational assessment in an EBT programme and according also to our comment on ORO.FC.145 EBT instructors must be enrolled and current in the EBT programme.

Rationale:

We agree with the drafting group analysis when explaining on page 41 of this NPA about ORO.FC.231:

« The paradigm shift proposed under the EBT programme is not simply to replace a set of critical events with a new set, but to use the events as a vehicle for developing and assessing crew performance across a range of competencies. In addition, EBT refocuses the instructor population onto analysis of the root causes to correct inappropriate actions, rather than simply asking a flight crew member to repeat a manoeuvre with no real understanding as to why it was not successfully flown in the first instance. »

As of June 26th 2018, no change referring to SFI privileges extension was proposed by the drafting group. So it seems that this proposal has not been discussed in presence of ECA/IFALPA representative and has just been added at the last minute which is not a fair practice owing to the importance of this proposed change.



response	<p>Not accepted</p> <p>Traditional recurrent training allows SFIs to perform such training. To ensure level playing field, it is necessary to maintain the approach regarding SFIs. However, EBT has proposed additional requirements for SFIs — they need to attend the EBT instructor course.</p> <p>In addition, when the validity of the line evaluation of competence (old line check) is extended, an instructor enrolled in the airline (with a valid line evaluation of competence) is necessary to deliver the module once a year.</p>
comment	<p>632 comment by: <i>European Cockpit Association</i></p> <p>ECA believes that <u>Instructors</u> must be trained in, or hold, CRM-I in order to become an EBT instructor. Therefore, ECA proposes the following wording:</p> <p>AMC1 ORO.FC.231 (a)(2)(iv)</p> <p><i>(b) Flight training should be provided by a flight instructor (FI), type rating instructor (TRI) or class rating instructor (CRI) or, in the case of the FSTD content, a synthetic flight instructor (SFI), providing that the FI, TRI, CRI or SFI satisfies the operator's standardisation, experience and knowledge requirements, including CRM-I</i></p> <p>Rationale:</p> <p>As said in cmt#627 ECA believes that without a deep understanding of HF and CRM, it is IMPOSIBLE for an Instructor (regardless of the type and/or experience) to be able to identify, train and assess competencies, from which at least the "Attitude" is based on CRM principles.</p>
response	<p>Noted</p> <p>EPAS includes a safety promotion task (SPT.012) to ensure implementation issues are addressed. SPT.012 will study the issue and provide when necessary, the required documentation.</p>
comment	<p>634 comment by: <i>European Cockpit Association</i></p> <p>ECA believes that <u>Instructors</u> must be trained in, or hold, CRM-I in order to become an EBT instructor. Therefore, ECA proposes the following wording:</p> <p>Commented text:</p> <p>AMC1 ORO.FC.231 (a)(2)(iv)</p> <p><i>(d) CRM should be provided by EBT instructors or...</i></p> <p>Rationale:</p> <p>How will an EBT instructor be able to train CRM if he/she is not a CRM-I? Requesting CRM-I to EBT-I is more than reasonable and consistent with regulation.</p> <p>This comment is aligned and consistent with ECA's Comments #627 & 632</p>
response	<p>Noted</p>

EPAS includes a safety promotion task (SPT.012) to ensure implementation issues are addressed.

AMC1 ORO.FC.231(a)(3)(i) Evidence-based training p. 62

comment 227 comment by: *British Airways*
 (c) For consistency with (b) amend ‘applicants’ to ‘flight crew members’
 response Accepted

comment 312 comment by: *easyJet Airlines Europe*

AMC1 ORO.FC.231(a)(3)(i)	EBT enrollment	Additional examples would be required for examples (e.g. pilot who enrol in the system and have an LPC expiring within 3 months). As per AMC1 ORO.FC.231(a)(1) point (b) a complete LPC corresponds to 2 complete EBT modules.
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response Noted
 More guidance is provided to clarify this matter in the EASA Opinion.

comment 395 comment by: *European Cockpit Association*

ECA proposes the following:
AMC1 ORO.FC.231(a)(3)(i) Evidence-based training
 EBT PROGRAMME — ENROLMENT
 (a) Enrolment is when a flight crew member commences the first EBT module, **with a valid licence holding the appropriate valid class or type rating.**

Comment:
 EBT is a new way of training for recurrent training, it is not entitled to deliver neither licence, nor class or type rating. As specified in explanation of AMC1 ORO.FC.231(a)(3)(i), clarity is required.

Rationale:
 To be enrolled in an EBT programme, a pilot must have a valid licence and the appropriate type rating.

response Not accepted

comment 534 comment by: *SNPL FRANCE ALPA technical committee*
 SNPL FRANCE ALPA proposes the following :



	<p>AMC1 ORO.FC.231(a)(3)(i) Evidence-based training EBT PROGRAMME — ENROLMENT</p> <p>(a) Enrolment is when a flight crew member commences the first EBT module, with a valid licence holding the appropriate valid class or type rating.</p> <p>Comment : EBT is a new way of training for recurrent training, it is not entitle to deliver neither licence, nor class or type rating. As specified in explanation of AMC1 ORO.FC.231(a)(3)(i), clarity is required.</p> <p>Rationale : To be enrolled in an EBT programme, a pilot must have a valid licence and the appropriate type rating.</p>
response	Not accepted

comment	618	comment by: <i>Vereinigung Cockpit</i>
	<p>AMC1 ORO.FC.231(a)(3)(i) Evidence-based training EBT PROGRAMME — ENROLMENT</p> <p>(a) Enrolment is when a flight crew member commences the first EBT module, with a valid licence holding the appropriate valid class or type rating.</p> <p>Comment: <i>EBT is a new way of training for recurrent training, it is not entitle to deliver neither licence, nor class or type rating. As specified in explanation of AMC1 ORO.FC.231(a)(3)(i), clarity is required.</i></p> <p>Rationale: <i>To be enrolled in an EBT programme, a pilot must have a valid licence and the appropriate type rating.</i></p>	
response	Not accepted	

AMC1 ORO.FC.231(a)(4) Evidence-based training	p. 62-63
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comment	460	comment by: <i>European Cockpit Association</i>
	<p>AMC1 ORO.FC.231(a)(4) Evidence-based training INSTRUCTOR CONCORDANCE ASSURANCE PROGRAMME</p> <p>(a) <i>The concordance assurance programme must be able to identify areas of weak concordance in order to drive improvement in the quality and validity of the grading data.</i></p> <p>(b) <i>The programme should identify good concordance and address those instructors who do not meet the standards required.</i></p> <p>Comments: Fully agree with the content, however ECA proposes to introduce GM on how to achieve concordance. Especially in the light of normative versus criterion based grading.</p>	



response	Accepted Further AMC and GM to ORO.FC.231(a)(4) have been developed.
comment	500 comment by: <i>Vereinigung Cockpit</i> AMC1ORO.FC.231(a)(4) Evidence-based training INSTRUCTOR CONCORDANCE ASSURANCE PROGRAMME (a) The concordance assurance programme must be able to identify areas of weak concordance in order to drive improvement in the quality and validity of the grading data. (b) The programme should identify good concordance and address those instructors who do not meet the standards required. <i>Comments: Fully agree with the content, however propose to introduce GM on how to achieve concordance. Especially in the light of normative versus criterion based grading.</i>
response	Accepted Further AMC and GM to ORO.FC.231(a)(4) have been developed.

GM1 ORO.FC.231(a)(4) Evidence-based training

p. 63-65

comment	69 comment by: <i>FNAM</i> ISSUE – Safety Promotion The EASA's proposed disposals present guidance <i>via</i> a new vector : the 'safety promotions'. FNAM wonders what is the legal status of these guidance. Is it a FAQ? Is it a hard law or is it a soft law? 'Safety promotions' are not GM nor AMC: they could be proposed without any stakeholders consultation. If these guidance are necessary, FNAM suggests to regroup all guidance in European regulations by integrating 'safety promotions' into GM; if not, to suppress 'safety promotions'. PROPOSAL Regroup all guidance in this regulation by integrating 'safety promotions' into GM
response	Not accepted Safety promotion actions will be compiled into an EASA EBT manual.
comment	133 comment by: <i>FlightSafety International - Regional Director Regulatory Affairs</i> i. SPT.012 ORO.FC.231(a)(4) — safety promotion task 012 — safety material for EBT — CONCORDANCE. (page 63) The statement: ' <i>Different statistics may be appropriate for different types of measurement. Some options are: joint-probability of agreement, Cohen's kappa, Scott's pi and the related Fleiss' kappa, inter-rater correlation, concordance correlation coefficient, and intra-class correlation...</i> ' is unlikely to be understood by non-statisticians, it should be deleted or explained in a simpler manner. A concise guide to how to assess concordance would be invaluable.
response	Partially accepted



New AMC and GM to ORO.FC.231(a)(4) are proposed and new safety promotion is envisaged in safety promotion task SPT.012.

comment

229

comment by: *British Airways*

(a) Suggest reword to ‘Instructor concordance is a tool for continuous improvement of the EBT programme.’

(b) How can this be ‘guaranteed’? Suggest amend to ‘is very important’

(c) Revalidation of licences is the norm under EBT, so this will give authorities the means to impose ‘certain criteria’. We have a concern that operators, especially smaller operators, may be forced to adopt unreasonable or overcomplicated concordance requirements, out of proportion to their size. . Better to simply say ‘Minimum concordance standards are set by the operator, and are subject to agreement of the competent authority.’

The SPT is disproportionate to the requirement. While the principle of concordance is accepted, the level of data analysis required will be a major disincentive to operators considering EBT. Operators will immediately be put off by the statistical methods quoted, and are unlikely to have the expertise to set up a concordance assurance programme without external help. The Impact Assessment document (A) does not itemise this as an identified expense, only ‘general external assistance for the whole programme’ or ‘purchase of equipment’. Neither of these two items mentions the concordance programme, even though this is a major difference (and expense) compared to running a legacy recurrent training programme.

It’s also important to note that statistical methods require a statistically significant sample size. How many operators in Europe are big enough to have a statistically significant sample size of instructors? The statistical methods quoted might be good theoretical models, but how practical will they be to use? Has EASA tested any of these methods to see if they can practically support a concordance assurance programme in a representative operator? We believe EASA should review and test/trial this SPT to consider what is practical for small to medium size operators to implement, while retaining the principle of a concordance assurance programme.

response

Partially accepted

comment

313

comment by: *easyJet Airlines Europe*

<p>GM1 ORO.FC.231(a)(4) point (c)</p>	<p>Minimum concordance standards are normally set by the operator; however, the competent authority may recommend certain criteria, especially when the revalidation of licences is performed under EBT.</p>	<p>This leave space to the Authority to recommend criteria all time.</p>
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response Noted

comment

481

comment by: AIRBUS

Page 63 GM1 ORO.FC.231(a)(4):

Airbus confirms the importance of measuring instructor concordance. However, a more precise guidance regarding how to verify instructor concordance should be provided in the GM. If statistical methods are recommended (e.g. Cohen's kappa), operators should ensure that the database is large enough to avoid any statistical bias"

response

Partially accepted

New AMC and GM to ORO.FC.231(a)(4) are proposed and new safety promotion is envisaged in safety promotion task SPT.012.

comment

692

comment by: EBT Foundation

Page No: 63

Paragraph No: GM1 ORO.FC.231(a)(4) and related SPT.012 ORO FC.231(a)(4)

Comment:

The term concordance is not understood by many operators.

The purpose of assuring inter rater reliability is to identify any instructors who are outside the normal range of assessment. This is done by a variety of means, including work in a classroom or e-learning environment using videos created for the purpose, and in service it is a monitoring function for the training management system. Until the publication of this NPA, there has never been an attempt by rulemaking bodies to describe inter rater reliability. If such provisions and guidance are to be developed, they should be applied uniformly to all regulated training programmes. The publication of this material appears to be based on an assumption that instructor sand examiners exhibit strong inter rater reliability according to loosely defined criteria which exist in Part-FCL Appendix 9. This is a huge assumption which should be validated before imposing a selective burden on those operators choosing EBT. The SPT material needs simplification or will be a huge deterrent to the implementation of EBT. Overall this provision illustrates a level of granularity being applied to EBT which has never been applied before, and the material is ill conceived and confusing for both competent authorities and operators alike.

Justification: Simplification and clarity

Proposed text: Every time the phrase "concordance" is used, include (inter-rater reliability) in parenthesis. Remove and rework SPT.012 ORO FC 231 (a) (4) in consultation with operators engaged in the EBT program. Define simple steps and objectives. Operators can learn a great deal during the mixed implementation phase.

response

Not accepted



AMC1 ORO.FC.231(a)(5) Evidence-based training

p. 65-66

comment	70	comment by: <i>FNAM</i>
	AGREEMENT	
	FNAM agrees that if pilots miss one module, examiner should assess of pilot competences and perform trainings instead of instructors	
response	Noted	

comment	151	comment by: <i>Olaf Birgels (DLH)</i>
	AMC1 ORO.FC.231(a)(5) Evidence-based training	
	CONTINGENCY PROCEDURES FOR UNFORESEEN FACTORS WHICH MAY AFFECT THE DELIVERY OF THE EBT PROGRAMME	
	(a) The operator should detail in the EBT programme the contingency procedures in the event unforeseen factors occur which may affect the delivery of the operator's approved EBT programme.	
	(b) In case of unforeseen interruption of a module at any point, the missing parts of the module should be rescheduled.	
	(1) The applicant may continue line flying until the expiry of the validity period unless the performance observed was below the minimum acceptable level.	
	(2) If the interruption results in an instructor change, the operator must ensure that the instructor completing the module is provided with the details of the performance of the pilots.	
	(c) In case the pilot misses modules and the pilot does not meet the requirements of recent experience (FCL.060):	
	(1) when the pilot misses one module and has not completed 2 modules in the last 12 months, the evaluation phase of the missing module should be rescheduled before the pilot can resume line operations, and the manoeuvres and scenario-based training phases should be completed 30 days after the evaluation phase or before the expiry date whichever occurs first.	
	(2) When the pilot misses one module in the preceding 12 months but the pilot's rating is expired by less than 3 months, the missing module should be rescheduled before the pilot can resume line operations.	
	(3) When the pilot misses one module in the preceding 12 months but the pilot's rating is expired by longer than 3 months but shorter than 1 year, the missing module should be rescheduled using EBT instructor (s) with examiner privileges before the pilot can resume line operations.	
	(4) When the pilot misses two modules and the pilot rating is valid:	
	(i) one module should be rescheduled before line operations using EBT instructor(s) with examiner privileges; and	
	(ii) the training topics B and C of the second module should be rescheduled before the expiry date. In such case, the 3-month separation requirement between modules may not apply.	
	(5) When the pilot misses two modules and the pilot's rating is expired by less than 1 year:	



(i) one module should be rescheduled using EBT instructor(s) with examiner privileges; and
(ii) the training topics B and C **of the second module** before he/she can resume line operations. In such case, the period of 3-month separation between modules may not apply.
(6) If the amount of time lapsed since the expiry of the rating is more than 1 year the pilot is de-enrolled AMC1 FCL.625(a) 'IR — Validity, revalidation and renewal' and AMC1 FCL.740(b)(1) 'Validity and renewal of class and type ratings' applies.
(d) In the case of other situations not covered by points (b) or (c), point (a) applies.

Question:

Why is this (c) linked to FCL.060 (3 takeoffs and landings within 90 days)?

response

Noted

To ensure the rule is not applied during short team member absence such as short sick leave, annual leave.

comment

174

comment by: *M.Held / Lufthansa Airlines*

(c) In case the pilot misses modules and the pilot does not meet the requirements of recent experience (FCL.060):

Why is this (c) linked to FCL.060 (3 takeoffs and landings within 90 days)?

response

Noted

To ensure the rule is not applied during short team member absence such as short sick leave, annual leave.

comment

175

comment by: *M.Held / Lufthansa Airlines*

(C)

(1) when the pilot misses one module and has not completed 2 modules in the last 12 months, the evaluation phase of the missing module should be rescheduled before the pilot can resume line operations, **and the manoeuvres and scenario-based training phases should be completed 30** days after the evaluation phase or before the expiry date whichever occurs first

add: of the missing modules

response

Accepted

comment

176

comment by: *M.Held / Lufthansa Airlines*

(4) When the pilot misses two modules and the pilot rating is valid:

(i) one module should be rescheduled before line operations using EBT instructor(s) with examiner privileges; and



response	<p>(ii) the training topics B and C of the second module should be rescheduled before the expiry date. In such case, the 3-month separation requirement between modules may not apply.</p> <p>change "of the other module" vs. "the second"</p> <p>Accepted</p>
comment	<p>177 comment by: <i>M.Held / Lufthansa Airlines</i></p> <p>(5) When the pilot misses two modules and the pilot's rating is expired by less than 1 year:</p> <p>(i) one module should be rescheduled using EBT instructor(s) with examiner privileges; and</p> <p>(ii) the training topics B and C of the second module before he/she can resume line operations. In such case, the period of 3-month separation between modules may not apply.</p> <p>Change "of the other module" instead of "the second"</p>
response	<p>Accepted</p>
comment	<p>200 comment by: <i>Lufthansa CityLine GmbH</i></p> <p>(c) In case the pilot misses modules and the pilot does not meet the requirements of recent experience (FCL.060):</p> <p>Question – Why is this (c) linked to FCL.060 (3 takeoffs and landings within 90 days)?</p>
response	<p>Noted</p> <p>To ensure the rule is not applied during short team member absence such as short sick leave, annual leave.</p>
comment	<p>230 comment by: <i>British Airways</i></p> <p>(b)(1) Is it 'applicant' or 'pilot? The term 'pilot' is used elsewhere in this AMC. However, the IR uses the term 'flight crew member'. It should all be consistent.</p> <p>(b)(1) What validity period? As a general point, this AMC variously refers to 'validity period', 'expiry date', 'pilot's rating', 'pilot rating' and 'expiry of the rating'. Suggest the language is much clearer and consistent throughout. Suggest only using the terms 'pilot's type rating' and 'expiry date of the pilot's type rating' (avoid 'validity period'). Or even just use 'pilot's rating' so it can apply to both class or type rating.</p> <p>(b)(2) For consistency with (b)(1), suggest amend to '...details of the performance observed prior to the interruption.'</p> <p>(c) What is the relevance of recency requirements for EBT modules? The principle of EBT seems clear: a pilot must complete 2 modules every 12 months, separated by not less than 3 months. If a pilot misses a module, but can still comply with the 2 in</p>

12 and 3/9 months, then they can continue to fly (=short term absence). If not, they need to complete a module. This is equivalent to ORO.FC.230: if a pilot misses an OPC they can continue to fly until the OPC expiry (=short term absence). Additionally, but separately, they must comply with the recency requirements of FCL.060. Therefore, suggest amend (c) to: 'In case a module or modules are missed, and the requirements of ORO.FC.231 (a)(3)(ii) cannot be met:'

(c)(1) This seems unnecessarily complicated. For consistency with (2) and (3) suggest amend to: 'When a pilot misses one module and the pilot's type rating has not expired, the missing module should be completed before the pilot can resume line operations.'. Note, the module needs to be completed, not just 're-scheduled' before resuming line operations.

(c)(2) Are the words 'in the preceding 12 months' necessary? Suggest amend to 'When a pilot misses one module and the pilot's type rating has expired by less than 3 months...'

(c)(3) Are the words 'in the preceding 12 months' necessary? Suggest amend to 'When a pilot misses one module and the pilot's type rating has expired by more than 3 months but less than 1 year...'

(c)(3), (c)(4)(i) and (c)(5)(i) What is the relevance of using an EBT instructor with examiner privileges? What can an examiner do that any other EBT instructor cannot? It's an EBT module, it's not a test. It's still an evaluation of competence and training to proficiency. What's the point of instructor concordance if you then decide not all instructors are the same? There is no Explanatory Note for this. Why have EASA written this? This is unjustified, a complication and a burden for operators.

(c)(4)(ii) and (c)(5)(ii) For clarity, suggest amend to '...B and C of the other module...'

(c)(6) Why is a pilot de-enrolled after just 1 year? This seems unnecessary and disproportionate. We have commented further about this in the GM section.

(c)(6) Add a full stop after 'de-enrolled'.

(d) Is this really necessary? (a) applies anyway, you don't need another sentence to say (a) applies.

response Partially accepted

comment 258 comment by: *SWISS Intl. Air Lines*

(c):
Why is this linked to Recency (FCL.060, 3 TKOFs and LDGs withing 90d)?

response Noted
To ensure the rule is not applied during short team member absence such as short sick leave, annual leave.

comment 283 comment by: *Brussels Airlines*



	<p>AMC1. ORO.FC231 Evidence-based training</p> <p>Missing modules : Can this directives concerning recent experience be used as guideline for the refresher training ?</p>
response	<p>Noted</p> <p>To ensure the rule is not applied during short team member absence such as short sick leave, annual leave.</p>

comment	<p>314 comment by: <i>easyJet Airlines Europe</i></p> <table border="1" style="width: 100%; background-color: #f4a460;"> <tr> <td style="width: 30%; padding: 5px;"> <p>AMC1 ORO.FC.231(a)(5) point (c)(3) and (c)(4)</p> </td> <td style="width: 35%; padding: 5px;"> <p>When the pilot misses one module in the preceding 12 months but the pilot's rating is expired by longer than 3 months but shorter than 1 year, the missing module should be rescheduled using <u>EBT instructor (s) with examiner privileges</u> before the pilot can resume line operations.</p> </td> <td style="width: 35%; padding: 5px;"> <p>Additional explanatory notes would be required in order to understand the rationale of the examiner requirements. In fact there is an inconsistency between this point and the GM1 where 2 cases are identified. The examiner is only required if the applicant missed 2 modules of the EBT programme.</p> </td> </tr> </table>	<p>AMC1 ORO.FC.231(a)(5) point (c)(3) and (c)(4)</p>	<p>When the pilot misses one module in the preceding 12 months but the pilot's rating is expired by longer than 3 months but shorter than 1 year, the missing module should be rescheduled using <u>EBT instructor (s) with examiner privileges</u> before the pilot can resume line operations.</p>	<p>Additional explanatory notes would be required in order to understand the rationale of the examiner requirements. In fact there is an inconsistency between this point and the GM1 where 2 cases are identified. The examiner is only required if the applicant missed 2 modules of the EBT programme.</p>
<p>AMC1 ORO.FC.231(a)(5) point (c)(3) and (c)(4)</p>	<p>When the pilot misses one module in the preceding 12 months but the pilot's rating is expired by longer than 3 months but shorter than 1 year, the missing module should be rescheduled using <u>EBT instructor (s) with examiner privileges</u> before the pilot can resume line operations.</p>	<p>Additional explanatory notes would be required in order to understand the rationale of the examiner requirements. In fact there is an inconsistency between this point and the GM1 where 2 cases are identified. The examiner is only required if the applicant missed 2 modules of the EBT programme.</p>		
response	<p>Noted</p>			

comment	<p>405 comment by: <i>Lufthansa Cargo AG</i></p> <p>AMC1 ORO.FC.231(a)(5) Evidence-based training CONTINGENCY PROCEDURES FOR UNFORESEEN FACTORS WHICH MAY AFFECT THE DELIVERY OF THE EBT PROGRAMME</p> <p><i>(a) The operator should detail in the EBT programme the contingency procedures in the event unforeseen factors occur which may affect the delivery of the operator's approved EBT programme.</i></p> <p><i>(b) In case of unforeseen interruption of a module at any point, the missing parts of the module should be rescheduled.</i></p> <p><i>(1) The applicant may continue line flying until the expiry of the validity period unless the performance observed was below the minimum acceptable level.</i></p> <p><i>(2) If the interruption results in an instructor change, the operator must ensure that the instructor completing the module is provided with the details of the performance of the pilots.</i></p> <p><i>(c) In case the pilot misses modules and the pilot does not meet the requirements of recent experience (FCL.060):</i></p> <p><i>(1) when the pilot misses one module and has not completed 2 modules in the last 12 months, the evaluation phase of the missing module should be rescheduled before the pilot can resume line operations, and the manoeuvres and scenario-based training phases should be completed 30 days after the evaluation phase or</i></p>
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before the expiry date whichever occurs first.

(2) When the pilot misses one module in the preceding 12 months but the pilot's rating is expired by less than 3 months, the missing module should be rescheduled before the pilot can resume line operations.

(3) When the pilot misses one module in the preceding 12 months but the pilot's rating is expired by longer than 3 months but shorter than 1 year, the missing module should be rescheduled using EBT instructor (s) with examiner privileges before the pilot can resume line operations.

(4) When the pilot misses two modules and the pilot rating is valid:

(i) one module should be rescheduled before line operations using EBT instructor(s) with examiner privileges; and

(ii) the training topics B and C **of the second module** should be rescheduled before the expiry date. In such case, the 3-month separation requirement between modules may not apply.

(5) When the pilot misses two modules and the pilot's rating is expired by less than 1 year:

(i) one module should be rescheduled using EBT instructor(s) with examiner privileges; and

(ii) the training topics B and C **of the second module** before he/she can resume line operations. In such case, the period of 3-month separation between modules may not apply.

(6) If the amount of time lapsed since the expiry of the rating is more than 1 year the pilot is de-enrolled AMC1 FCL.625(a) 'IR — Validity, revalidation and renewal' and AMC1 FCL.740(b)(1) 'Validity and renewal of class and type ratings' applies.

(d) In the case of other situations not covered by points (b) or (c), point (a) applies.

Detailed Specification needed:

If a pilot misses modules but meets the requirements of FCL.060, (1)-(6) must not be applied?

response

Noted

To ensure the rule is not applied during short team member absence such as short sick leave, annual leave.

The implementing rule provides a general requirement for the operator to develop contingency procedures when unforeseen conditions occur.

comment

417

comment by: *European Cockpit Association*

ECA proposes the following amendment:

AMC1 ORO.FC.231(a)(5) Evidence-based training

(b)...

(2) If the interruption results in an instructor change, the operator must ensure that the instructor completing the module is provided with the details of the performance of the pilots **and at least a full simulator session will be completed to validate the module.**

Rationale:



	In case of instructor change he/she needs sufficient time to be able to correctly evaluate the crew performance as he/she has not observed the previous part of the module.
response	Not accepted
comment	<p>418 comment by: <i>European Cockpit Association</i></p> <p>ECA proposes the following change:</p> <p>AMC1 ORO.FC.231(a)(5) Evidence-based training CONTINGENCY PROCEDURES FOR UNFORESEEN FACTORS WHICH MAY AFFECT THE DELIVERY OF THE EBT (c) In case the pilot misses modules and the pilot does not meet the requirements of recent experience (FCL.060): (1) when the pilot misses one module and has not completed 2 modules in the last 12 months, the evaluation phase of the missing module should be rescheduled before the pilot can resume line operations, and the manoeuvres and scenariobased training phases should be completed 30 days after the evaluation phase or before the expiry date whichever occurs first. (2) When the pilot misses one module in the preceding 12 months but the pilot's rating is expired by less than 3 months, the missing module should be rescheduled before the pilot can resume line operations. (3) When the pilot misses one module in the preceding 12 months but the pilot's rating is expired by longer than 3 months but shorter than 1 year, the missing module should be rescheduled using EBT instructor (s) with examiner privileges before the pilot can resume line operations. (4) When the pilot misses two modules and the pilot rating is valid: In such case, the 3 month separation requirement between modules may not apply. (i) one module should be rescheduled before line operations using EBT instructor(s) with examiner privileges; and (ii) the training topics B and C of the second module should be rescheduled before the expiry date. (5) When the pilot misses two modules and the pilot's rating is expired by less than 1 year: (i) one module should be rescheduled using EBT instructor(s) with examiner privileges; and (ii) the training topics B and C of the second module before he/she can resume line operations. In such case, the period of 3-month separation between modules may not apply. (6) If the amount of time lapsed since the expiry of the rating is more than 1 year the pilot is de-enrolled AMC1 FCL.625(a) 'IR — Validity, revalidation and renewal' and AMC1 FCL.740(b)(1) 'Validity and renewal of class and type ratings' applies (d) (c) In the case of other situations not covered by points (b) or (c), point (a) applies.</p> <p>Comment: ECA is opposed to the possibility of renewal of type rating within an EBT programme. As EBT is a new way of training for recurrent training, it is not entitled to deliver or renew a licence, class or type rating.</p>

	<p>Rationale:</p> <p>To be enrolled in an EBT programme, a pilot must have a valid licence and the appropriate type rating. In case of any disruption in the EBT, the pilot should renew its licence and possibly class or type rating under Appendix 9 with a proficiency check. This organisation is in line with the existing system which has proven to be safe, and simplify the EBT rules: a pilot is enrolled with valid type rating and stays in as long his type rating is valid or when the operator “is no longer responsible for the administrative action for the flight crew’s licence revalidation” as per AMC1 ORO.FC23(a)(3)(i) (b).</p> <p>This also implies the licence to remain under the scope of national authorities fulfilling ICAO rules, and easing article 30 of ICAO convention.</p> <p>If recent experience is lost - EBT environment will change the lack of recent experience.</p>
response	<p>Not accepted</p> <p>Before the introduction of Regulation (EU) No 1178/2011, the renewals could be made at a type rating training organisation (TRTO). These organisations were not a school for the issue of licences. The TRTOs were normally at operator level. No safety concern was raised due to this fact.</p> <p>There is a strong regulatory oversight of operators; the same as for approved training organisations.</p>
comment	<p>482 comment by: AIRBUS</p> <p>Page 65 AMC1 ORO.FC.231(a)(5) and GM1 ORO.FC.231(a)(5):</p> <p>Airbus considers that the contingency procedures described in this paragraph are too complex and will be difficult to implement as currently written especially § (C) . Same remark applies to GM1 ORO.FC.231(a)(5).</p>
response	<p>Noted</p>
comment	<p>535 comment by: SNPL FRANCE ALPA technical committee</p> <p>SNPL FRANCE ALPA proposes the following amendment:</p> <p>AMC1 ORO.FC.231(a)(5) Evidence-based training (b)...</p> <p>(2) If the interruption results in an instructor change, the operator must ensure that the instructor completing the module is provided with the details of the performance of the pilots and at least a full simulator session will be completed to validate the module.</p> <p>Rationale: in case of instructor change he needs sufficient time to be able to correctly evaluate the crew performance as he has not observed the previous part of the module.</p>
response	<p>Not accepted</p>

comment

536

comment by: SNPL FRANCE ALPA technical committee

SNPL FRANCE ALPA proposes the following change:

AMC1 ORO.FC.231(a)(5) Evidence-based training

CONTINGENCY PROCEDURES FOR UNFORESEEN FACTORS WHICH MAY AFFECT THE DELIVERY OF THE EBT

~~(c) In case the pilot misses modules and the pilot does not meet the requirements of recent experience (FCL.060):~~

~~(1) when the pilot misses one module and has not completed 2 modules in the last 12 months, the evaluation phase of the missing module should be rescheduled before the pilot can resume line operations, and the manoeuvres and scenariobased training phases should be completed 30 days after the evaluation phase or before the expiry date whichever occurs first.~~

~~(2) When the pilot misses one module in the preceding 12 months but the pilot's rating is expired by less than 3 months, the missing module should be rescheduled before the pilot can resume line operations.~~

~~(3) When the pilot misses one module in the preceding 12 months but the pilot's rating is expired by longer than 3 months but shorter than 1 year, the missing module should be rescheduled using EBT instructor (s) with examiner privileges before the pilot can resume line operations.~~

~~(4) When the pilot misses two modules and the pilot rating is valid:~~

~~In such case, the 3-month separation requirement between modules may not apply.~~

~~(i) one module should be rescheduled before line operations using EBT instructor(s) with examiner privileges; and~~

~~(ii) the training topics B and C of the second module should be rescheduled before the expiry date.~~

~~(5) When the pilot misses two modules and the pilot's rating is expired by less than 1 year:~~

~~(i) one module should be rescheduled using EBT instructor(s) with examiner privileges; and~~

~~(ii) the training topics B and C of the second module before he/she can resume line operations. In such case, the period of 3-month separation between modules may not apply.~~

~~(6) If the amount of time lapsed since the expiry of the rating is more than 1 year the pilot is de-enrolled AMC1 FCL.625(a) 'IR — Validity, revalidation and renewal' and AMC1 FCL.740(b)(1) 'Validity and renewal of class and type ratings' applies~~

~~(d) (c) In the case of other situations not covered by points (b) or (c), point (a) applies.~~

Comment : SNPL is opposed to the possibility of renewal of type rating within an EBT programme. As EBT is a new way of training for recurrent training, it is not entitled to deliver or renew a licence, class or type rating.

Rationale : To be enrolled in an EBT programme, a pilot must have a valid licence and the appropriate type rating. In case of any disruption in the EBT, the pilot should renew its licence and possibly class or type rating under appendix 9 with a proficiency check. This organisation is in line with the existing system which has proven to be safe, and simplify the EBT rules : a pilot is enrolled with valid type rating and stays in as long his type rating is valid or when the operator "is no longer responsible for the



	<p>administrative action for the flight crew's licence revalidation" as per AMC1 ORO.FC23(a)(3)(i) (b).. This also implies the licence to remain under the scope of national authorities fulfilling ICAO rules, and easing article 30 of ICAO convention. If recent experience is lost EBT environment will change the lack of recent experience.</p>
response	<p>Not accepted</p> <p>Before the introduction of Regulation (EU) No 1178/2011, the renewals could be made at a type rating training organisation (TRTO). These organisations were not a school for the issue of licences. The TRTOs were normally at operator level. No safety concern was raised due to this fact.</p> <p>There is a strong regulatory oversight of operators; the same as for approved training organisations.</p>
comment	<p>575 comment by: AUA EBT</p> <p>Question – Why is this (c) linked to FCL.060 (3 takeoffs and landings within 90 days)?</p> <p>Wording – “and the manoeuvres and scenario-based training phases” - add: of the missing modules</p>
response	<p>Accepted</p> <p>The introduction of the FCL.060 is to ensure the rule is not applied during short team absent such as short sick leave, annual leave.</p>
comment	<p>619 comment by: Vereinigung Cockpit</p> <p>AMC1 ORO.FC.231(a)(5) Evidence-based training</p> <p>(b)...</p> <p>(2) If the interruption results in an instructor change, the operator must ensure that the instructor completing the module is provided with the details of the performance of the pilots and at least a full simulator session will be completed to validate the module.</p> <p>Rationale:</p> <p><i>In case of instructor change he/she needs sufficient time to be able to correctly evaluate the crew performance as he/she has not observed the previous part of the module.</i></p> <p>CONTINGENCY PROCEDURES FOR UNFORESEEN FACTORS WHICH MAY AFFECT THE DELIVERY OF THE EBT</p> <p>(c) In case the pilot misses modules and the pilot does not meet the requirements of recent experience (FCL.060):</p> <p>(1) when the pilot misses one module and has not completed 2 modules in the last 12 months, the evaluation phase of the missing module should be rescheduled before the pilot can resume line operations, and the manoeuvres and scenariobased training phases should be completed 30 days after the evaluation phase or before the expiry date whichever occurs first.</p>



~~(2) When the pilot misses one module in the preceding 12 months but the pilot's rating is expired by less than 3 months, the missing module should be rescheduled before the pilot can resume line operations.~~

~~(3) When the pilot misses one module in the preceding 12 months but the pilot's rating is expired by longer than 3 months but shorter than 1 year, the missing module should be rescheduled using EBT instructor (s) with examiner privileges before the pilot can resume line operations.~~

~~(4) When the pilot misses two modules and the pilot rating is valid:
In such case, the 3-month separation requirement between modules may not apply.
(i) one module should be rescheduled before line operations using EBT instructor(s) with examiner privileges; and
(ii) the training topics B and C of the second module should be rescheduled before the expiry date.~~

~~(5) When the pilot misses two modules and the pilot's rating is expired by less than 1 year:
(i) one module should be rescheduled using EBT instructor(s) with examiner privileges; and
(ii) the training topics B and C of the second module before he/she can resume line operations. In such case, the period of 3-month separation between modules may not apply.~~

~~(6) If the amount of time lapsed since the expiry of the rating is more than 1 year the pilot is de-enrolled AMC1 FCL.625(a) 'IR — Validity, revalidation and renewal' and AMC1 FCL.740(b)(1) 'Validity and renewal of class and type ratings' applies
(d) (c) In the case of other situations not covered by points (b) or (e), point (a) applies.~~

Comment:

ECA is opposed to the possibility of renewal of type rating within an EBT programme. As EBT is a new way of training for recurrent training, it is not entitled to deliver or renew a licence, class or type rating.

Rationale:

To be enrolled in an EBT programme, a pilot must have a valid licence and the appropriate type rating. In case of any disruption in the EBT, the pilot should renew its licence and possibly class or type rating under Appendix 9 with a proficiency check. This organisation is in line with the existing system which has proven to be safe, and simplify the EBT rules: a pilot is enrolled with valid type rating and stays in as long his type rating is valid or when the operator "is no longer responsible for the administrative action for the flight crew's licence revalidation" as per AMC1 ORO.FC23(a)(3)(i) (b).

This also implies the licence to remain under the scope of national authorities fulfilling ICAO rules, and easing article 30 of ICAO convention.

If recent experience is lost - EBT environment will change the lack of recent experience.

response

Not accepted

Before the introduction of Regulation (EU) No 1178/2011, the renewals could be made at a type rating training organisation (TRTO). These organisations were not a school for the issue of licences. The TRTOs were normally at operator level. No safety concern was raised due to this fact.



There is a strong regulatory oversight of operators; the same as for approved training organisations.

comment

671

comment by: IATA

(c)(6)

...AMC1 FCL.625(a) 'IR... should read
AMC1 FCL.625(c) 'IR

response

Accepted

GM1 ORO.FC.231(a)(5) Evidence-based training

p. 66-67

comment

182

comment by: M.Held / Lufthansa Airlines

(2) In Part-FCL, when the expiry is longer than 3 months but shorter than 1 year, there need to be two training sessions. In EBT, there are be two cases:

(i) One module is missing: the applicant must complete the missing module (2 simulator sessions) before line operations. Following that, the nominated person for crew training (or the deputy(ies)) for the type rating may renew the licence in accordance with Appendix 10 as the EBT programme is now completed (2 modules in the last 12 months).

(ii) Two modules are missing: the applicant must complete one module (2 simulator sessions) and **the training topics B and C** (extra simulator session) with a total of 3 simulator sessions. Training data is gathered in a short time period; therefore, an EBT instructor with examiner privilege is introduced to ensure the proficiency of the pilot.

“the training topics B and C” add: of the **other missing module**

response

Accepted

comment

231

comment by: British Airways

Title should be RENEWAL not REVALIDATION (all the text is about renewal)

Again, there's no consistency with terminology. The AMC uses 'pilot' but the GM uses 'applicant'. Also 'licence' is used when it should be 'type rating'. Or maybe better to use 'rating' so it can apply to both class and type ratings.

(a)(1) To simplify, suggest 'If the type rating has expired by less than 3 months no additional training is required. Following completion of the missing module, the nominated person for crew training (or deputy(ies)) may renew the type rating.

(a)(2) For consistency with Part-FCL language, suggest '...1 year, there should be a minimum of two training sessions. In EBT there are two cases:'



(a)(2)(i) To simplify, suggest: 'One module has been missed: the missing module is completed (two training sessions). The nominated person for crew training (or deputy(ies)) may then renew the type rating.' All the other words are unnecessary.

(a)(2)(ii) To simplify, suggest: 'Two modules have been missed: One module is completed (two training sessions) plus the training topics B & C from the other module (one training session). The nominated person for crew training (or deputy(ies)) may then renew the type rating.' All the other words are unnecessary.

(a)(2)(ii) 'Training data is gathered in a short time period; therefore, an EBT instructor with examiner privileges is introduced to ensure the proficiency of the pilot.' This makes no sense at all. What has an examiner got to do with gathering training data? The examiner's extra skills are in checking and testing, which is nothing to do with training topics in EBT. We can see no logical reason why an examiner has special expertise in the requirements of an EBT programme and running an EBT module. All EBT instructors, including examiners, must complete initial and recurrent standardisation, and be subject to the concordance assurance programme. We strongly disagree with this GM requirement. It's imposing a false, legacy mentality in a modern, competency-based training programme.

(b) '...as the EBT system may not have sufficient training data for the pilot'. Again, this makes no sense. EBT modules are not designed around individual pilots. The great advantage of EBT is that the evaluation phase assesses competencies and identifies individual training needs, with training to proficiency in the MT and SBT. This format can apply regardless of the time the pilot has been absent. The difference is that the training to proficiency will take longer the more time the pilot has been absent.

A clear principle can apply:

- Miss one module = do the module (2 sessions)
- Miss two modules = do the most recent module plus the B & C topics from the other module (3 sessions)
- Miss more than two modules = do the most recent module plus all the B & C topics missed (4 sessions)
- Absent for more than 3 years = do the initial training again.

This aligns perfectly with Part-FCL. No need for proficiency checks, no need for examiners. All modern, competency-based training that will last the test of time.

(b)(1) 'the most important malfunctions' what does this mean? How are these defined? This terminology doesn't align with equivalency of malfunctions or ORO.FC.230.

response Partially accepted

comment 315

comment by: *easyJet Airlines Europe*



GM1 ORO.FC.231(a)(5) point (a)(2)(ii)	Two modules are missing: the applicant must complete one module (2 simulator sessions) and the training topics B and C (extra simulator session) with a total of 3 simulator sessions. <u>Training data is gathered in a short time period; therefore, an EBT instructor with examiner privilege is introduced to ensure the proficiency of the pilot.</u>	Additional explanatory notes would be required in order to understand the rationale of the examiner requirements. If the logic is the short time period during which data is collected, than it might be understood that for the initial implementation of the EBT programme examiners would be required for all applicants in order to ensure proficiency?
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response Noted

comment 406

comment by: Lufthansa Cargo AG

EBT PROGRAMME — CONTINGENCY PROCEDURES — LICENCE REVALIDATION

(a) The renewal of licences in EBT follows the Annex I (Part-FCL) to the Aircrew Regulation provisions ‘Renewal of class and type ratings’ (IRs and AMC) and it is complemented with the provisions covered in AMC1 ORO.FC.231(a)(5) for ‘contingency procedures for unforeseen factors’. The ATO or AOC will determine the amount of training following Part-FCL; however, as EBT combines assessment and training, the following guidance is applicable:

(1) Expiry shorter than 3 months may not require additional training in Part-FCL. In EBT the missing module is rescheduled with an EBT instructor. Following that, the nominated person for crew training (or the deputy(ies)) for the type rating may renew the licence without extra training, as the EBT programme is now completed (at least 2 modules in the last 12 months).

(2) In Part-FCL, when the expiry is longer than 3 months but shorter than 1 year, there need to be two training sessions. In EBT, there are be two cases:

(i) One module is missing: the applicant must complete the missing module (2 simulator sessions) before line operations. Following that, the nominated person for crew training (or the deputy(ies)) for the type rating may renew the licence in accordance with Appendix 10 as the EBT programme is now completed (2 modules in the last 12 months).

*(ii) Two modules are missing: the applicant must complete one module (2 simulator sessions) and **the training topics B and C** (extra simulator session) with a total of 3 simulator sessions. Training data is gathered in a short time period; therefore, an EBT instructor with examiner privilege is introduced to ensure the proficiency of the pilot.*

Detailed Specification needed:

“the training topics B and C” of the other missing module ?

response Accepted



comment	419	comment by: <i>European Cockpit Association</i>
	<p>ECA proposes the following change:</p> <p>GM1 ORO.FC.231(a)(5) Evidence-based training</p> <p>(a) The renewal of licences in EBT follows the Annex I (Part-FCL) to the Aircrew Regulation provisions ‘Renewal of class and type ratings’ (IRs and AMC) and it is complemented with the provisions covered in AMC1 ORO.FC.231(a)(5) for ‘contingency procedures for unforeseen factors’. The ATO or AOC will determine the amount of training following Part-FCL; however, as EBT combines assessment and training, the following guidance is applicable:</p> <p>(1) Expiry shorter than 3 months may not require additional training in Part-FCL. In EBT the missing module is rescheduled with an EBT instructor. Following that, the nominated person for crew training (or the deputy(ies)) for the type rating may renew the licence without extra training, as the EBT programme is now completed (at least 2 modules in the last 12 months).</p> <p>(2) In Part-FCL, when the expiry is longer than 3 months but shorter than 1 year, there need to be two training sessions. In EBT, there are be two cases:</p> <p>(i) One module is missing: the applicant must complete the missing module (2 simulator sessions) before line operations. Following that, the nominated person for crew training (or the deputy(ies)) for the type rating may renew the licence in accordance with Appendix 10 as the EBT programme is now completed (2 modules in the last 12 months).</p> <p>(ii) Two modules are missing: the applicant must complete one module (2 simulator sessions) and the training topics B and C (extra simulator session) with a total of 3 simulator sessions. Training data is gathered in a short time period; therefore, an EBT instructor with examiner privilege is introduced to ensure the proficiency of the pilot.</p> <p>(b) In case of an expiry longer than 1 year, the requirements of (Annex I) Part-FCL will be followed and the proficiency checks will be performed in accordance with Appendix 9 as the EBT system may not have sufficient training data for the pilot:</p> <p>(1) Expiry longer than 1 year but shorter than 3 years: a minimum of three training sessions in which the most important malfunctions in the available system are covered plus a proficiency check in accordance with Appendix 9 to renew the licence.</p> <p>(2) Expiry longer than 3 years: the applicant should again undergo the training for the initial issue of the rating.</p> <p>Comment:</p> <p>This proposed suppression is the logical follow up of the previous comment on the AMC1 ORO.FC.231(a)(5) Evidence-based training page 65, and should therefore be read in conjunction with that comment.</p>	
response	<p>Not accepted</p> <p>Before the introduction of Regulation (EU) No 1178/2011, the renewals could be made at a type rating training organisation (TRTO). These organisations were not a school for the issue of licences. The TRTOs were normally at operator level. No safety concern was raised due to this fact.</p> <p>There is a strong regulatory oversight of operators; the same as for approved training organisations.</p>	
comment	537	comment by: <i>SNPL FRANCE ALPA technical committee</i>

SNPL FRANCE ALPA proposes the following change:

GM1 ORO.FC.231(a)(5) Evidence-based training

~~(a) The renewal of licences in EBT follows the Annex I (Part-FCL) to the Aircrew Regulation provisions ‘Renewal of class and type ratings’ (IRs and AMC) and it is complemented with the provisions covered in AMC1 ORO.FC.231(a)(5) for ‘contingency procedures for unforeseen factors’. The ATO or AOC will determine the amount of training following Part-FCL; however, as EBT combines assessment and training, the following guidance is applicable:~~

~~(1) Expiry shorter than 3 months may not require additional training in Part-FCL. In EBT the missing module is rescheduled with an EBT instructor. Following that, the nominated person for crew training (or the deputy(ies)) for the type rating may renew the licence without extra training, as the EBT programme is now completed (at least 2 modules in the last 12 months).~~

~~(2) In Part-FCL, when the expiry is longer than 3 months but shorter than 1 year, there need to be two training sessions. In EBT, there are be two cases:~~

~~(i) One module is missing: the applicant must complete the missing module (2 simulator sessions) before line operations. Following that, the nominated person for crew training (or the deputy(ies)) for the type rating may renew the licence in accordance with Appendix 10 as the EBT programme is now completed (2 modules in the last 12 months).~~

~~(ii) Two modules are missing: the applicant must complete one module (2 simulator sessions) and the training topics B and C (extra simulator session) with a total of 3 simulator sessions. Training data is gathered in a short time period; therefore, an EBT instructor with examiner privilege is introduced to ensure the proficiency of the pilot.~~

~~(b) In case of an expiry longer than 1 year, the requirements of (Annex I) Part-FCL will be followed and the proficiency checks will be performed in accordance with Appendix 9 as the EBT system may not have sufficient training data for the pilot:~~

~~(1) Expiry longer than 1 year but shorter than 3 years: a minimum of three training sessions in which the most important malfunctions in the available system are covered plus a proficiency check in accordance with Appendix 9 to renew the licence.~~

~~(2) Expiry longer than 3 years: the applicant should again undergo the training for the initial issue of the rating.~~

Comment : this proposed suppression is the logical follow up of the previous comment on the AMC1 ORO.FC.231(a)(5) Evidence-based training **page 65**.

response

Not accepted

Before the introduction of Regulation (EU) No 1178/2011, the renewals could be made at a type rating training organisation (TRTO). These organisations were not a school for the issue of licences. The TRTOs were normally at operator level. No safety concern was raised due to this fact.

There is a strong regulatory oversight of operators; the same as for approved training organisations.

comment

593

comment by: AUA EBT

Wording – “the training topics B and C” add: of the **other missing module**

response

Accepted



comment

621

comment by: Vereinigung Cockpit

GM1 ORO.FC.231(a)(5) Evidence-based training

~~(a) The renewal of licences in EBT follows the Annex I (Part-FCL) to the Aircrew Regulation provisions 'Renewal of class and type ratings' (IRs and AMC) and it is complemented with the provisions covered in AMC1 ORO.FC.231(a)(5) for 'contingency procedures for unforeseen factors'. The ATO or AOC will determine the amount of training following Part FCL; however, as EBT combines assessment and training, the following guidance is applicable:~~

~~(1) Expiry shorter than 3 months may not require additional training in Part FCL. In EBT the missing module is rescheduled with an EBT instructor. Following that, the nominated person for crew training (or the deputy(ies)) for the type rating may renew the licence without extra training, as the EBT programme is now completed (at least 2 modules in the last 12 months).~~

~~(2) In Part FCL, when the expiry is longer than 3 months but shorter than 1 year, there need to be two training sessions. In EBT, there are be two cases:~~

~~(i) One module is missing: the applicant must complete the missing module (2 simulator sessions) before line operations. Following that, the nominated person for crew training (or the deputy(ies)) for the type rating may renew the licence in accordance with Appendix 10 as the EBT programme is now completed (2 modules in the last 12 months).~~

~~(ii) Two modules are missing: the applicant must complete one module (2 simulator sessions) and the training topics B and C (extra simulator session) with a total of 3 simulator sessions. Training data is gathered in a short time period; therefore, an EBT instructor with examiner privilege is introduced to ensure the proficiency of the pilot.~~

~~(b) In case of an expiry longer than 1 year, the requirements of (Annex I) Part FCL will be followed and the proficiency checks will be performed in accordance with Appendix 9 as the EBT system may not have sufficient training data for the pilot:~~

~~(1) Expiry longer than 1 year but shorter than 3 years: a minimum of three training sessions in which the most important malfunctions in the available system are covered plus a proficiency check in accordance with Appendix 9 to renew the licence.~~

~~(2) Expiry longer than 3 years: the applicant should again undergo the training for the initial issue of the rating.~~

Comment:

*This proposed suppression is the logical follow up of the previous comment on the AMC1 ORO.FC.231(a)(5) Evidence-based training **page 65**, and should therefore be read in conjunction with that comment.*

3) include observable behaviours required for safe, effective and efficient operations; and

Comments:

Terms effective and efficient are not licensing terms; furthermore these may be different for different operators.

response

Not accepted

According to ICAO Doc 9995, 'The aim of this programme is to identify, develop and evaluate the competencies **required** to operate safely, effectively and efficiently in a commercial air transport environment whilst addressing the most relevant threats



according to evidence collected in accidents, incidents, flight operations and training.'

comment 672 comment by: IATA

The title is 'Licence Revalidation' but the content is about Renewal. It is suggested to amend the title.

response Accepted

comment 673 comment by: IATA

(a)(2)(ii)
"the training topics B and C" add: of the **other missing module**

response Accepted

ORO.FC.231 Evidence-based training — (b) Competency framework

p. 67-68

comment 71 comment by: FNAM

ISSUE – NPA STRUCTURE

FNAM does not understand why the modification of part of this IR is in the middle of two GM and AMC dedicated to this same IR. the structure and philosophy of the proposed regulation are really confusing and difficult to understand.

PROPOSAL

Review the structure of the NPA

response Noted

comment 72 comment by: FNAM

ISSUE

A list of principles of a competency framework and assumptions are clearly provide in rational. Since these guidance could be useful for operators to support them in their EBT implementations, FNAM suggests to add a dedicated GM listing these principles of competency and assumptions. This GM should also introduce these information by insisting on the non-mandatory purpose of GM information.

PROPOSAL

Add a dedicated GM listing these principles of competency and assumptions; and Introduce these information by insisting on the non-mandatory purpose of GM information

response Not accepted



	The safety promotion task SPT.012 will monitor possible implementation issues.	
comment	232	comment by: <i>British Airways</i>
	(b) Suggest title is COMPETENCY FRAMEWORK singular, the same as (c) Grading System (singular)	
response	Accepted	
comment	324	comment by: <i>CAA-NL</i>
	ORO.FC.231 (a)(2)(iii)(C)	
	We think there is a typo, 'scenario-based training phase, a comprising line-orientated flight scenario (s) and....' The 'a' can be deleted. (page 8 and 44)	
response	Accepted	
comment	325	comment by: <i>CAA-NL</i>
	ORO.FC.231	
	Item (a)(3)(ii)(C) is at the wrong level within the point, it should be up one layer and be (a)(3)(iii), as it is related to the operators responsibility to ensure and not to when a module is completed. In the blue text of the explanation this is used correctly. (page 8 and 44)	
response	Accepted	
comment	461	comment by: <i>European Cockpit Association</i>
	GM1ORO.FC.231(a)(5) Evidence-based training	
	(b) COMPETENCY FRAMEWORKS	
	3) include observable behaviours required for safe, effective and efficient operations; and	
	Comments:	
	Terms <i>effective and efficient</i> are not licensing terms; furthermore these may be different for different operators.	
response	Not accepted The wording is used in ICAO Doc 9995. Furthermore, it links the competencies to the safety objective covered in ORO.FC.231 point (a).	
comment	501	comment by: <i>Vereinigung Cockpit</i>
	GM1ORO.FC.231(a)(5) Evidence-based training	
	(b) COMPETENCY FRAMEWORKS	
	3) include observable behaviours required for safe, effective and efficient operations; and	

	Comments: <i>Effective and efficient are not a licensing term; furthermore these may be different for different operators.</i>
response	Not accepted The wording is used in ICAO Doc 9995. Furthermore, it links the competencies to the safety objective covered in ORO.FC.231 point (a).

AMC1 ORO.FC.231(b) Evidence-based training

p. 68-77

comment	73	comment by: <i>FNAM</i>
	<p>ISSUE</p> <p>The rational presents the proposed competency framework table as an example. Since it is an example, FNAM suggests to address it in a GM. By their nature, AMC would be mandatory for operators. It is a lot of work to develop and make accepted an AltMoc. That is why, in order to be adapted to all operators size and activities, FNAM suggests to include this example of competency framework in a dedicated GM information by insisting on the non-mandatory purpose of GM information.</p> <p>PROPOSAL</p> <p>Include this example of competency framework in a dedicated GM information by insisting on the non-mandatory purpose of GM information</p>	
response	Not accepted In order to ensure standardisation, the competency framework should be at the level of AMC. This competency framework works for big and small operators. Other competencies in top of the core competencies are allowed.	

comment	74	comment by: <i>FNAM</i>
	<p>ISSUE</p> <p>FNAM thanks EASA to participate to ICAO discussions and to be aware of possible modifications depending on future ICAO guidance. Thus, FNAM would like to ensure that no European regulation would be published since ICAO discussions and new documents are not finished and published ('it may be approved in 2019 and it may be applicable in November 2020')</p> <p>PROPOSAL</p> <p>Ensure that no European regulation would be published since ICAO discussions and new documents are not finished and published</p>	
response	Accepted	

comment	242	comment by: <i>British Airways</i>
	<p>Why is the abbreviation for Application of Procedures 'APK'? Where has the 'K' come from? Perhaps this is a leftover from when procedures and knowledge were combined, but this is inappropriate now. The abbreviation you've used for Application of Knowledge is 'KNO' so suggest Application of Procedures should be 'PRO'. Or perhaps both would be better as 'APK' and 'APP'? Whatever is decided, APK needs to be amended throughout the regulations.</p>	



response	Accepted
comment	<p>420 comment by: <i>European Cockpit Association</i></p> <p>ECA proposes the following change: Situation awareness (SAW) ... <i>Observable behaviour</i> Identifies and assesses accurately the state of the aircraft and its systems. Identifies and assesses accurately the aircraft's vertical and lateral position, and its anticipated flight path. Identifies and assesses accurately the general environment as it may affect the operation. Keeps track of time and fuel. Maintains awareness of the people involved in or affected by the operation and their capacity to perform as expected. Maintains a constant watch and research of information(s) that could affect the situation in the future Anticipates accurately what could happen, plans and stays ahead of the situation. Develops effective contingency plans based upon potential threats. Identifies and manages threats to the safety of the aircraft and people. Recognises and effectively responds to indications of reduced situation awareness.</p> <p>Comment: In the competencies SAW - observable behaviour: the constant research of information(s) relating to the aircraft situation is missing. ECA proposes to introduce it.</p>
response	Not accepted in order to maintain the alignment with ICAO.
comment	<p>421 comment by: <i>European Cockpit Association</i></p> <p>ECA proposes the following change:</p> <p>Workload management (WLM) <i>Competency description</i> Manages available resources efficiently, to-prioritise and perform tasks in a timely manner under all circumstances.</p> <p>Comment: Delete the <u>to</u> before prioritise.</p> <p>Rationale: One doesn't manage available resources to prioritize, in fact prioritization is a way to efficiently manage resources.</p>
response	Not accepted in order to maintain the alignment with ICAO.
comment	<p>422 comment by: <i>European Cockpit Association</i></p>

	<p>Comment on: Workload Management <i>Observable behaviour</i> Maintains self-control in all situations.</p> <p>Comment: Delete the Maintains self-control in all situations.</p> <p>Rationale: That belongs to LTW not to WLM, or another competency about personal qualities that is missing which could encompass self control, fairness to others, rectitude, honesty, exemplarity...</p>
response	Not accepted in order to maintain the alignment with ICAO.

comment	<p>463 comment by: <i>European Cockpit Association</i></p> <p>AMC1ORO.FC.231(b) Evidence-based training COMPETENCY FRAMEWORK — GENERAL Communication (COM)</p> <table border="1" style="width: 100%;"> <tr> <td style="padding: 2px;"><i>Competency description</i></td> </tr> <tr> <td style="padding: 2px;"><i>Demonstrates effective oral, non-verbal and written communications, in normal and non-normal situations.</i></td> </tr> </table> <p>Comments: Non verbal communication cannot necessarily be observed and definitely not be objectively assessed....Delete the “non verbal”</p>	<i>Competency description</i>	<i>Demonstrates effective oral, non-verbal and written communications, in normal and non-normal situations.</i>
<i>Competency description</i>			
<i>Demonstrates effective oral, non-verbal and written communications, in normal and non-normal situations.</i>			
response	Not accepted in order to maintain the alignment with ICAO.		

comment	<p>465 comment by: <i>European Cockpit Association</i></p> <table border="1" style="width: 100%;"> <tr> <td style="padding: 2px;"><i>Observable behaviour</i></td> </tr> <tr> <td style="padding: 2px;"><i>Ensures the recipient is ready and able to receive the information.</i></td> </tr> <tr> <td style="padding: 2px;"><i>Selects appropriately what, when, how and with whom to communicate.</i></td> </tr> <tr> <td style="padding: 2px;"><i>Conveys messages clearly, accurately and concisely.</i></td> </tr> <tr> <td style="padding: 2px;"><i>Confirms that the recipient correctly understands important information.</i></td> </tr> <tr> <td style="padding: 2px;"><i>Listens actively and demonstrates understanding when receiving information.</i></td> </tr> <tr> <td style="padding: 2px;"><i>Asks relevant and effective questions.</i></td> </tr> <tr> <td style="padding: 2px;"><i>Adheres to standard radiotelephone phraseology and procedures.</i></td> </tr> <tr> <td style="padding: 2px;"><i>Accurately reads and interprets required company and flight documentation.</i></td> </tr> <tr> <td style="padding: 2px;"><i>Accurately reads, interprets, constructs and responds to datalink messages.</i></td> </tr> </table>	<i>Observable behaviour</i>	<i>Ensures the recipient is ready and able to receive the information.</i>	<i>Selects appropriately what, when, how and with whom to communicate.</i>	<i>Conveys messages clearly, accurately and concisely.</i>	<i>Confirms that the recipient correctly understands important information.</i>	<i>Listens actively and demonstrates understanding when receiving information.</i>	<i>Asks relevant and effective questions.</i>	<i>Adheres to standard radiotelephone phraseology and procedures.</i>	<i>Accurately reads and interprets required company and flight documentation.</i>	<i>Accurately reads, interprets, constructs and responds to datalink messages.</i>
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<i>Accurately reads, interprets, constructs and responds to datalink messages.</i>											



	<p>Completes accurate reports as required by operating procedures.</p> <p>Correctly interprets non-verbal communication.</p> <p>Uses eye contact, body movement and gestures that are consistent with and support verbal messages.</p> <p>Comments: Non verbal communication cannot necessarily be observed and definitely not be objectively assessed. An interpretation is always subjective and can therefore never be assessed.</p>
response	Not accepted in order to maintain the alignment with ICAO.
comment	<p>466 comment by: <i>European Cockpit Association</i></p> <p>AMC1ORO.FC.231(b) Evidence-based training COMPETENCY FRAMEWORK — GENERAL Flight path management <input type="checkbox"/> — manual control (FPM)</p> <p>Comments: Especially when addressing GEN 4 (envelope protected) aircraft - a thorough definition of the term <u>manual</u> control/<u>manual</u> flight is required.</p>
response	Not accepted in order to maintain the alignment with ICAO.
comment	<p>483 comment by: <i>AIRBUS</i></p> <p>Page 69 AMC1 ORO.FC.231(b):</p> <p>a) Under “Communication (COM)”, the observable behavior “Accurately reads and interprets required company and flight documentation” seems not to be a communication matter.</p> <p>b) Having experienced in Airbus training organization for six years a grading system similar to the one recommended by the NPA, based on experience the Airbus observable behaviors have been refined overtime and include now monitoring tasks. The current behaviors in place now since 3 years in Airbus are the ones promoted by ICAO. Thus Airbus recommends the adoption of the ICAO competency framework.</p>
response	Accepted In order to maintain the alignment with ICAO.
comment	<p>502 comment by: <i>Vereinigung Cockpit</i></p> <p>AMC1ORO.FC.231(b) Evidence-based training COMPETENCY FRAMEWORK — GENERAL</p>



Communication (COM)*Competency description*

Demonstrates effective oral, ~~non-verbal~~ and written communications, in normal and non-normal situations.

Comments:

Non verbal communication cannot necessarily be observed and definitely not be objectively assessed....Delete the "non verbal"

Observable behaviour

Ensures the recipient is ready and able to receive the information.

Selects appropriately what, when, how and with whom to communicate.

Conveys messages clearly, accurately and concisely.

Confirms that the recipient correctly understands important information.

Listens actively and demonstrates understanding when receiving information.

Asks relevant and effective questions.

Adheres to standard radiotelephone phraseology and procedures.

Accurately reads and interprets required company and flight documentation.

Accurately reads, interprets, constructs and responds to datalink messages.

Completes accurate reports as required by operating procedures.

~~Correctly interprets non-verbal communication.~~

Uses eye contact, body movement and gestures that are consistent with and support verbal messages.

Comments:

Non verbal communication cannot necessarily be observed and definitely not be objectively assessed.

An interpretation is always subjective and can therefore never be assessed.

Flight path management – manual control (FPM)

Comments: *Especially when addressing GEN 4 (envelope protected) Aircraft a thorough definition of the term manual control/manual flight is required.*

Situation awareness (SAW)

...

Observable behaviour

Identifies and assesses accurately the state of the aircraft and its systems.

Identifies and assesses accurately the aircraft's vertical and lateral position, and its anticipated flight path.

Identifies and assesses accurately the general environment as it may affect the operation.



Keeps track of time and fuel.
 Maintains awareness of the people involved in or affected by the operation and their capacity to perform as expected.
Maintains a constant watch and research of information(s) that could affect the situation in the future
 Anticipates accurately what could happen, plans and stays ahead of the situation.
 Develops effective contingency plans based upon potential threats.
 Identifies and manages threats to the safety of the aircraft and people.
 Recognises and effectively responds to indications of reduced situation awareness.

Comment:
In the competencies SAW - observable behaviour: the constant research of information(s) relating to the aircraft situation is missing. ECA proposes to introduce it.

Workload management (WLM)

Competency description
 Manages available resources efficiently, to prioritise and perform tasks in a timely manner under all circumstances.

Comment:
Delete the to before prioritise.

Rationale:
One doesn't manage available resources to prioritize, in fact prioritization is a way to efficiently manage resources.

Comment on:
Workload Management
Observable behaviour
~~*Maintains self-control in all situations.*~~

Comment:
~~*Delete the Maintains self-control in all situations.*~~

Rationale:
That belongs to LTW not to WLM, or another competency about personal qualities that is missing which could encompass self control, fairness to others, rectitude, honesty, exemplarity...

response Not accepted in order to maintain the alignment with ICAO.

comment 538 comment by: SNPL FRANCE ALPA technical committee
 SNPL FRANCE ALPA proposes the following change:



Situation awareness (SAW)

...

Observable behaviour

Identifies and assesses accurately the state of the aircraft and its systems.

Identifies and assesses accurately the aircraft's vertical and lateral position, and its anticipated flight path.

Identifies and assesses accurately the general environment as it may affect the operation.

Keeps track of time and fuel.

Maintains awareness of the people involved in or affected by the operation and their capacity to perform as expected.

Maintains a constant watch and research of information(s) that could affect the situation in the future

Anticipates accurately what could happen, plans and stays ahead of the situation.

Develops effective contingency plans based upon potential threats.

Identifies and manages threats to the safety of the aircraft and people.

Recognises and effectively responds to indications of reduced situation awareness.

Comment: in the competencies SAW - observable behaviour : the constant research of informations relating of the aircraft situation is missing. So SNPL proposes to introduce it.

response Not accepted in order to maintain the alignment with ICAO.

comment 539 comment by: SNPL FRANCE ALPA technical committee

SNPL FRANCE ALPA proposes the following change:

Workload management (WLM)*Competency description*

Manages available resources efficiently, to prioritise and perform tasks in a timely manner under all circumstances.

Comment: suppress the to before prioritise.

Rationale: one doesn't manages available resources to prioritize, in fact prioritization is a way to efficiently manage resources.

response Not accepted in order to maintain the alignment with ICAO.

comment 540 comment by: SNPL FRANCE ALPA technical committee

SNPL FRANCE ALPA proposes the following change:

Workload Management*Observable behaviour*

~~Maintains self-control in all situations.~~

Comment: suppress the above observable behaviour



	<p><i>Rationale: that belong to LTW not to WLM, or another competency about personal qualities that is missing which could encompass self control, fairness to others, rectitude, honesty, exemplarity...</i></p>
response	Not accepted in order to maintain the alignment with ICAO.
comment	<p>566 comment by: CAE</p> <p>Some Operators may require a degree of flexibility with regards the naming of competencies, since some are including other 'competencies' within their training system. We would advise to re-classify this proposed AMC material as Guidance Material (GM) only. It can then act as guidance on which to build the Operator's 'adapted' competency framework. This would concur with ICAO's CBTA-task force direction on providing a Pilot Competency Framework which may be 'adaptable'.</p>
response	<p>Not accepted</p> <p>In order to ensure standardisation, the competency framework should be at the level of AMC. This competency framework works for big and small operators. Other competencies in top of the core competencies are allowed.</p>
comment	<p>693 comment by: EBT Foundation</p> <p>Page No: 72</p> <p>Paragraph No: AMC1 ORO.FC.231(b) explanatory note para 1</p> <p>Comment:</p> <p>The first paragraph is factually incorrect. The large expert industry group develop a competency framework which was agreed by all, then substantially altered during the publication process by the ICAO secretariat. What is published is not in fact the agreed result of the large industry group's work. The text here is taken from a document developed to explain to ICAO what had been done. It does not refer to the published result.</p> <p>The graphic relating to root cause analysis and the over simplification of the description in the previous paragraph is incorrect and confusing.</p> <p>Justification: Corrections and clarity</p> <p>Proposed text: If it is to remain in any published state the explanatory text here should be reworked and corrected</p>
response	<p>Not accepted.</p> <p>Please refer to the IATA Evidence-based training implementation guide July 2013. '3.6 COMPETENCIES</p> <p>The competencies listed in Appendix A have been developed by a large expert industry working group based upon systems tested and validated and in operational use today. (...)'.</p>



AMC2 ORO.FC.231(b) Evidence-based training

p. 78-79

comment	<p>18 comment by: <i>Michel Lacombe AF Training department and AF ATO</i></p> <p>This text doesn't refer to the right AMC, instead if AMC1 ORO FC 231(g) it should be referred to AMC1.ORO.FC.231(b)</p> <p>AMC2.ORO.FC.231(b) Evidence-based training ALTERNATIVE COMPETENCY FRAMEWORKS (a) An operator seeking to develop an alternative competency framework under ORO.GEN.120 should: (1) identify positive behaviours and use language that avoids ambiguity; and (2) demonstrate equivalence to the competency framework in AMC1 ORO.FC.231(g). (b) In order to demonstrate equivalence, the operator should map the competencies and observable behaviours to the recommended competency framework. (c) When the operator is translating AMC1 ORO.FC.231(g) into its common language, the application of ORO.GEN.120 may not be necessary. The translation may not be literal.</p> <p>It it should be written :</p> <p>AMC2.ORO.FC.231(b) Evidence-based training ALTERNATIVE COMPETENCY FRAMEWORKS (a) An operator seeking to develop an alternative competency framework under ORO.GEN.120 should: (1) identify positive behaviours and use language that avoids ambiguity; and (2) demonstrate equivalence to the competency framework in AMC1 ORO.FC.231(b). (b) In order to demonstrate equivalence, the operator should map the competencies and observable behaviours to the recommended competency framework. (c) When the operator is translating AMC1 ORO.FC.231(b) into its common language, the application of ORO.GEN.120 may not be necessary. The translation may not be literal.</p>
response	Accepted

comment	<p>75 comment by: <i>FNAM</i></p> <p>EDITORIAL ISSUE This AMC refers to AMC1 ORO.FC.231(g) in points (a)(2) and (c). According to this EASA's proposed AMC requirements, the reference should be AMC1 ORO.FC.231(b) instead of (g). PROPOSAL Refer to AMC1 ORO.FC.231(b) instead of AMC1 ORO.FC.231(g)</p>
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response	Accepted
comment	<p>233 comment by: <i>British Airways</i></p> <p>(a)(2) The correct reference is AMC1 ORO.FC.231(b)</p> <p>(c) The correct reference is AMC1 ORO.FC.231(b)</p>
response	Accepted
comment	<p>674 comment by: <i>IATA</i></p> <div style="border: 1px solid black; padding: 10px;"> <p>This text doesn't refer to the right AMC, instead if AMC1 ORO FC 231(g) it should be referred to AMC1.ORO.FC.231(b)</p> <p>AMC2.ORO.FC.231(b) Evidence-based training ALTERNATIVE COMPETENCY FRAMEWORKS (a) An operator seeking to develop an alternative competency framework under ORO.GEN.120 should: (1) identify positive behaviours and use language that avoids ambiguity; and (2) demonstrate equivalence to the competency framework in AMC1 ORO.FC.231(g). (b) In order to demonstrate equivalence, the operator should map the competencies and observable behaviours to the recommended competency framework. (c) When the operator is translating AMC1 ORO.FC.231(g) into its common language, the application of ORO.GEN.120 may not be necessary. The translation may not be literal.</p> <p>It it should be written :</p> <p>AMC2.ORO.FC.231(b) Evidence-based training ALTERNATIVE COMPETENCY FRAMEWORKS (a) An operator seeking to develop an alternative competency framework under ORO.GEN.120 should: (1) identify positive behaviours and use language that avoids ambiguity; and (2) demonstrate equivalence to the competency framework in AMC1 ORO.FC.231(b). (b) In order to demonstrate equivalence, the operator should map the competencies and observable behaviours to the recommended competency framework. (c) When the operator is translating AMC1 ORO.FC.231(b) into its common language, the application of ORO.GEN.120 may not be necessary. The translation may not be literal.</p> </div>



response Accepted

GM1 to AMC2 ORO.FC.231(b) Evidence-based training

p. 79

comment 134 comment by: *FlightSafety International - Regional Director Regulatory Affairs*

i. TYPOs: GM1 to AMC2 ORO.FC.231(b) (1) The EBT system performance shall be measured and evaluated through a feedback system in order to: ~~(iii)~~ (i) validate and refine the operator's approved EBT programme; and ~~(iv)~~ (ii) ascertain that the operator's approved EBT programme develops pilot competencies.

response Accepted

ORO.FC.231 Evidence-based training – (c) TRAINING SYSTEM PERFORMAN

p. 80

comment 76 comment by: *FNAM*

ISSUE – NPA STRUCTURE

FNAM does not understand why the modification of part of this IR is in the middle of two GM and AMC dedicated to this same IR. the structure and philosophy of the proposed regulation are really confusing and difficult to understand.

PROPOSAL

Review the structure of the NPA

response Noted

comment 152 comment by: *Olaf Birgels (DLH)*

(c) TRAINING SYSTEM PERFORMANCE

(1) The EBT system performance shall be measured and evaluated through a feedback system in order to:

(iii) validate and refine the operator's approved EBT programme; and

(iv) ascertain that the operator's approved EBT programme develops pilot competencies.

(2) The feedback system shall be included in the operator's management system.

Question:

Which feedback?

- Pilot to instructor
- Instructor to pilot
- Pilot to trainings department

response Partially accepted
More guidance is provided in the Opinion.



comment	183	comment by: <i>M.Held / Lufthansa Airlines</i>
	<p>(c) TRAINING SYSTEM PERFORMANCE</p> <p>(1) The EBT system performance shall be measured and evaluated through a feedback system in order to:</p> <p>(iii) validate and refine the operator's approved EBT programme; and</p> <p>(iv) ascertain that the operator's approved EBT programme develops pilot competencies.</p> <p>(i) vs. (iii) and (ii) vs. (iv)</p>	
response	Accepted	
comment	201	comment by: <i>Lufthansa CityLine GmbH</i>
	<p>(2) The feedback system shall be included in the operator's management system.</p> <p>Question: What kind of feedback?</p>	
response	Partially accepted More guidance is provided in the Opinion.	
comment	234	comment by: <i>British Airways</i>
	<p>(c)(1) The two sub-paras should be (i) and (ii)</p> <p>(c)(2) This is unnecessary. It is not required by Doc 9995, which just says that the quality system of the operator should monitor alignment with the guidelines of Doc 9995. The feedback system is a component of the EBT programme, and as such it managed by the training department. The operator's quality system (and the competent authority) will then audit compliance with the regulations. Note also, the AMC says the operator may use an existing system for measurement of training system performance (not part of the operators' management system). Mandating that the feedback system is part of the operator's management system adds an unnecessary burden and complexity.</p>	
response	Partially accepted More guidance is provided in the Opinion.	
comment	259	comment by: <i>SWISS Intl. Air Lines</i>
	<p>(c) (2): What kind of operator management system? Which feedback? Pilot-instructor/instructor-pilot/pilot-trainings department?</p>	
response	Partially accepted More guidance is provided in the Opinion.	

comment	407	comment by: <i>Lufthansa Cargo AG</i>
	<p>(c) TRAINING SYSTEM PERFORMANCE (1) The EBT system performance shall be measured and evaluated through a feedback system in order to: (iii) validate and refine the operator's approved EBT programme; and (iv) ascertain that the operator's approved EBT programme develops pilot competencies. (2) The feedback system shall be included in the operator's management system.</p> <p>Detailed Specification needed: Where are the points (i) and (ii) ? Pls define operator's management system</p>	
response	Partially accepted More guidance is provided in the Opinion.	

AMC1 ORO.FC.231(c) Evidence-based training	p. 80-81
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comment	77	comment by: <i>FNAM</i>
	<p>ISSUE – EBT PROGRAMME vs APPROVED EBT PROGRAMME The difference between EBT programme and approved EBT programme is clearly explained in ORO.FC.231 rational. Nevertheless, the fact that EBT programme is generic to an aircraft generation and that approved EBT programme is specific to the operator are not clearly explained in the regulation. Requirements for EBT programme and approved EBT programme are not distinguished in EASA's proposed disposals. This difference is really important to understand EASA's EBT philosophy and therefore to implement correctly the EBT and its European requirements. FNAM suggests to clarify in the regulation the differences between EBT programme and approved EBT programme.</p> <p>PROPOSAL Clarify in the regulation requirements and definitions of EBT programme and approved EBT programme</p>	
response	Noted The review group has carried out a consistency check.	

AMC2 ORO.FC.231(c) Evidence-based training	p. 81
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comment	236	comment by: <i>British Airways</i>
	<p>Data protection. What problem has EASA identified that needs fixing? All operators collect training data today, and have company policies and procedures in place already for data protection. Training data is personal/individual records. All operators have policies for handling personal data, for all employees, not just pilots. GDPR applies to training records, the same as other personal data. Just because EBT will collect increased training data makes no difference at all. It's still all personal</p>	



data. This AMC and GM are unnecessary and should be removed. The Explanatory Note says 'some provision must be made to protect individual data (data protection)'. This is correct, GDPR applies! There is no need for rules specific to EBT. If necessary the AMC and GM can be replaced with a statement to say that policies and procedures for handling personal/individual data also apply to training data.

Note also, the comparison with flight data is a false one. Flight data is not linked to an individual without processing. Training data is directly linked to an individual. Training data is collected by direct observation of the individual being assessed and trained – it's obvious to the pilot that data is being collected. Flight data is not direct observation and is for broad flight safety analysis, not to target individuals – it's not obvious to the pilot.

response Not accepted

comment

423

comment by: *European Cockpit Association*

ECA proposes to add the following sub-paragraphs to paragraph (b):

AMC2 ORO.FC.231(c) Evidence-based training

DATA PROTECTION — FEEDBACK SYSTEM — GRADING SYSTEM

(a) The data access and security policy should restrict information access to authorised persons.

(b) The procedure to prevent disclosure of crew identity should be written in a document, physical or digital, which should be signed by all parties involved (airline management and flight crew member representatives nominated either by the union or the flight crew themselves).

(i) a data access and security policy that may restrict access to information to specifically authorised persons identified by their position. The required authorised person(s) does (do) not necessarily need to be the nominated person for crew training (or their deputy(ies)), but could be the EBT programme manager or a third party mutually acceptable to unions or staff and management. (Note: access to the last 12 months training data is required for the examiner that will revalidate the pilot licence);

(ii) the identified data retention policy and accountability, including the measures taken to ensure the security of the data (iii) the method to obtain de-identified crew feedback on those occasions that require specific follow-up;

(iv) the conditions under which advisory briefing or remedial training should take place. This should always be carried out in a constructive and non-punitive manner;

(v) the conditions under which the confidentiality may be withdrawn for reasons of gross negligence or significant continuing safety concern;

(vi) the participation of flight crew member representative(s) in the assessment of the data, the action and review process and the consideration of recommendations; and

(vii) the policy for publishing the findings resulting from the EBT programme.

(viii) Data or findings from the EBT programme shall not be used for any disciplinary actions against a crew member, including redundancies or court actions.

Comment:

In line with EASA proposal to introduce the same data protection as per FDM in OPS at AMC level.



	<p>Due to the state of technology, electronic formats should be accepted, when its integrity has been proved, under the procedures of operator.</p> <p>Rationale: Data protection is essential for EBT implementation and it is crucial for both the operator and the pilots. We therefore ask to introduce the OPS wording in AMC2 ORO.FC.231(c) Evidence-based training.</p>
response	<p>Partially accepted More guidance is provided in the Opinion; however, the wording proposed is not transposed.</p>
comment	<p>541 comment by: SNPL FRANCE ALPA technical committee</p> <p>SNPL FRANCE ALPA proposes to add the following sub-paragraphs to paragraph (b)</p> <p>AMC2 ORO.FC.231(c) Evidence-based training DATA PROTECTION — FEEDBACK SYSTEM — GRADING SYSTEM</p> <p>(a) The data access and security policy should restrict information access to authorised persons.</p> <p>(b) The procedure to prevent disclosure of crew identity should be written in a document, which should be signed by all parties involved (airline management and flight crew member representatives nominated either by the union or the flight crew themselves).</p> <p>(i) a data access and security policy that may restrict access to information to specifically authorised persons identified by their position. The required authorised person(s) does (do) not necessarily need to be the nominated person for crew training (or their deputy(ies)), but could be the EBT programme manager or a third party mutually acceptable to unions or staff and management. (Note: access to the last 12 months training data is required for the examiner that will revalidate the pilot licence);</p> <p>(ii) the identified data retention policy and accountability, including the measures taken to ensure the security of the data (iii) the method to obtain de-identified crew feedback on those occasions that require specific follow-up;</p> <p>(iv) the conditions under which advisory briefing or remedial training should take place. This should always be carried out in a constructive and non-punitive manner;</p> <p>(v) the conditions under which the confidentiality may be withdrawn for reasons of gross negligence or significant continuing safety concern;</p> <p>(vi) the participation of flight crew member representative(s) in the assessment of the data, the action and review process and the consideration of recommendations; and</p> <p>(vii) the policy for publishing the findings resulting from the EBT programme.</p> <p>comment : In line with EASA proposal to introduce the same data protection as per FDM in OPS at AMC level.</p> <p>Rationale : Data protection is essential for EBT implementation and it is crucial for both the operator and the pilots. Therefore we ask to introduce the OPS wording in AMC2 ORO.FC.231(c) Evidence-based training.</p>

response Partially accepted
More guidance is provided in the Opinion; however, the wording proposed is not transposed.

comment 624 comment by: *Vereinigung Cockpit*

AMC2 ORO.FC.231(c) Evidence-based training

DATA PROTECTION — FEEDBACK SYSTEM — GRADING SYSTEM

(a) The data access and security policy should restrict information access to authorised persons.

(b) The procedure to prevent disclosure of crew identity should be written in a document, which should be signed by all parties involved (airline management and flight crew member representatives nominated either by the union or the flight crew themselves).

(i) a data access and security policy that may restrict access to information to specifically authorised persons identified by their position. The required authorised person(s) does (do) not necessarily need to be the nominated person for crew training (or their deputy(ies)), but could be the EBT programme manager or a third party mutually acceptable to unions or staff and management. (Note: access to the last 12 months training data is required for the examiner that will revalidate the pilot licence);

(ii) the identified data retention policy and accountability, including the measures taken to ensure the security of the data (iii) the method to obtain de-identified crew feedback on those occasions that require specific follow-up;

(iv) the conditions under which advisory briefing or remedial training should take place. This should always be carried out in a constructive and non-punitive manner;

(v) the conditions under which the confidentiality may be withdrawn for reasons of gross negligence or significant continuing safety concern;

(vi) the participation of flight crew member representative(s) in the assessment of the data, the action and review process and the consideration of recommendations; and

(vii) the policy for publishing the findings resulting from the EBT programme.

Comment:

In line with EASA proposal to introduce the same data protection as per FDM in OPS at AMC level.

Rationale:

Data protection is essential for EBT implementation and it is crucial for both the operator and the pilots. We therefore ask to introduce the OPS wording in AMC2 ORO.FC.231(c) Evidence-based training.

response Partially accepted
More guidance is provided in the Opinion; however, the wording proposed is not transposed.

GM1 ORO.FC.231(c) Evidence-based training

p. 81-82

comment 78 comment by: *FNAM*

ISSUE



	<p>The proposed guidance is transposed from ICAO Doc 9995 guidance chapter 5.3.1. FNAM thanks for the effort of harmonizing European requirements with ICAO guidance. Nevertheless, FNAM does not understand why there are some differences between ICAO guidance and these EASA's proposed disposals.</p> <p>First (a)(3) wording seems more complex than ICAO guidance by replacing : 'skill retention capability versus skill type' from ICAO guidance with 'distribution of level of performance within the range of competencies'. This complexity may lead to different interpretation and thus different implementation.</p> <p>Then, in (a)(5), the European disposals ensure that 'it is essential to stress that the purpose of this system is not to spy on instructors' although ICAO guidance ensure that it is essential to impress that the purpose of this system is not to spy on instructors'. Even if the meaning is quiet close, FNAM wonders the justification of this modification.</p> <p>PROPOSAL Fit to ICAO guidance without change of wording</p>
response	Not accepted
comment	<p>235 comment by: <i>British Airways</i></p> <p>(a)(5) Suggest this is simply 'instructor concordance assurance programme'. The rest of the wording is unnecessary as it's all covered in some detail in the relevant AMC and GM.</p>
response	Not accepted
comment	<p>284 comment by: <i>Brussels Airlines</i></p> <p>DATA PROTECTION -FEEDBACK SYSTEM</p> <p>What data must be accessible ? Performance information, including individual grades must be available to the instructor or examiner conducting Evidence Based Training, but will this be against the rule of Data Protection ?</p>
response	<p>Noted</p> <p>More guidance is provided on the grading system. However, the answer to the question of this comment should be decided between the operator, the authority and the pilot representatives. See more information in ORO.FC.231 (c) and (d) and the related AMC and GM.</p>
comment	<p>424 comment by: <i>European Cockpit Association</i></p> <p>ECA proposes that GM1 ORO.FC.231(c) Evidence-based training is <u>upgraded to AMC status</u></p> <p>Rationale: This material in this GM is really important and should be transferred in a AMC to ensure a consistent implementation.</p>
response	Partially accepted

comment	594	comment by: AUA EBT
	Question – (a) What kind of training data? Just “module completed” or information about grades and comments?	
response	Noted More guidance is provided on the grading system. However, the answer to the question of this comment should be decided between the operator, the authority and the pilot representatives. See more information in ORO.FC.231 (c) and (d) and the related AMC and GM.	
comment	625	comment by: Vereinigung Cockpit
	VC proposes that GM1 ORO.FC.231(c) Evidence-based training is upgraded to AMC status	
	Rationale: <i>This material in this GM is really important and should be transferred in a AMC to ensure a consistent implementation.</i>	
response	Partially accepted	

GM2 ORO.FC.231(c) Evidence-based training

p. 82-83

comment	79	comment by: FNAM
	ISSUE This GM describes the best way to protect data. A note mentions that, despite data protection, 12-month training data should be available for the examiner which would validate the pilot license. It highlights the issue that the person following and performing the training would not be the same than the one validating the license. Examiners would have to assess and validate license once per year solely on the basis of instructors' declarations. Plus, in the whole regulation and rationale, it is not clear if assessment privilege is allowed only for instructors or for examiners and instructors. Despite examiners role and nature, FNAM fears that only instructors would be able to assess EBT competencies. Thus, FNAM suggests to mention in this regulation examiners each time instructors are mentioned in order to allow examiners to assess EBT competencies. This would better fit to operational reality. Plus, the EASA's proposed disposals propose that examiners would have to assess and validate license solely on the basis of instructors' declarations. FNAM wonders what is EASA's level of apprehension of this issue and its associated risk.	
	PROPOSAL Define clearly the concept of assessment for examiners and instructors; and Ensure examiners responsibilities correspond to examiners assessment means	
response	Noted	
comment	80	comment by: FNAM



	<p>ISSUE – (d) This EASA’s proposed disposal introduces conditions of just culture for the EBT advisory briefing or remedial training. FNAM thanks EASA for this necessary criteria. Nevertheless, these conditions should not be described in GM. GM purpose is only guidance and would therefore not be required. FNAM fears that not all operators would play the game of just culture. FNAM suggests to move ‘This should be always be carried out in a constructive and non-punitive manner’ in AMC instead in GM.</p> <p>PROPOSAL Move ‘This should be always be carried out in a constructive and non-punitive manner’ in AMC instead in GM</p>
response	<p>Partially accepted EASA provides more guidance in ORO.FC.231(c) and (d). However, the wording proposed has been deleted.</p>
comment	<p>81 comment by: FNAM</p> <p>ISSUE This GM should be splitted in different GM since it address several issues.</p> <p>PROPOSAL Split this GM</p>
response	<p>Partially accepted EASA provides more guidance in ORO.FC.231(c) and (d). However, the wording proposed has been deleted.</p>
comment	<p>153 comment by: Olaf Birgels (DLH)</p> <p>DATA PROTECTION — FEEDBACK SYSTEM — GRADING SYSTEM The procedure to prevent disclosure of crew identity may, as a minimum, define: a) a data access and security policy that may restrict access to information to specifically authorised persons identified by their position. The required authorised person(s) does (do) not necessarily need to be the nominated person for crew training (or their deputy(ies)), but could be the EBT programme manager or a third party mutually acceptable to unions or staff and management. (Note: access to the last 12 months training data is required for the examiner that will revalidate the pilot licence);</p> <p>Question: (a) What kind of training data? Just “module completed” or information about grades and comments?</p>
response	<p>Noted More guidance is provided on the grading system. However, the answer to the question of this comment should be decided between the operator, the authority</p>



and the pilot representatives. See more information in ORO.FC.231 (c) and (d) and the related AMC and GM.

comment

178

comment by: *M.Held / Lufthansa Airlines***DATA PROTECTION — FEEDBACK SYSTEM — GRADING SYSTEM**

The procedure to prevent disclosure of crew identity may, as a minimum, define:

a) a data access and security policy that may restrict access to information to specifically authorised persons identified by their position. The required authorised person(s) does (do) not necessarily need to be the nominated person for crew training (or their deputy(ies)), but could be the EBT programme manager or a third party mutually acceptable to unions or staff and management. (Note: access to the last 12 months training data is required for the examiner that will revalidate the pilot licence);

What kind of training data? Just “module completed” or information about grades and comments?

response

Noted

More guidance is provided on the grading system. However, the answer to the question of this comment should be decided between the operator, the authority and the pilot representatives. See more information in ORO.FC.231 (c) and (d) and the related AMC and GM.

comment

202

comment by: *Lufthansa CityLine GmbH*

The procedure to prevent disclosure of crew identity may, as a minimum, define:

(a) a data access and security policy that may restrict access to information to specifically authorised persons identified by their position. The required authorised person(s) does (do) not necessarily need to be the nominated person for crew training (or their deputy(ies)), but could be the EBT programme manager or a third party mutually acceptable to unions or staff and management. (Note: access to the last 12 months training data is required for the examiner that will revalidate the pilot licence);

Question – (a) What kind of training data? Just “module completed” or information about grades and comments?

response

Noted

More guidance is provided on the grading system. However, the answer to the question of this comment should be decided between the operator, the authority and the pilot representatives. See more information in ORO.FC.231 (c) and (d) and the related AMC and GM.

comment

237

comment by: *British Airways*

A lot of this is inappropriate:



	<ul style="list-style-type: none"> • ‘the method to obtain de-identified crew feedback on those occasions that require specific follow-up’. This makes no sense in a training context. • ‘the conditions under which remedial training should take place’. This is nothing to do with data protection, this is training policy for arranging remedial training. • ‘the conditions under which confidentiality may be withdrawn for continuing safety concerns’. It is really suggested grades below the minimum standard are confidential until the training manager asks for the confidentiality to be withdrawn? • ‘policy for publishing the findings’. Who publishes identified training data today? <p>This copy and paste of text from flight data monitoring is not appropriate for training data and should be deleted.</p>
response	<p>Partially accepted Some of the proposed deletions have been accepted.</p>

comment	<p>260 comment by: <i>SWISS Intl. Air Lines</i></p> <p>(a): What kind of data must be accessible to the examiner that will revalidate the licence? Just "module completed" or also information about grades and comments?</p>
response	<p>Noted More guidance is provided on the grading system. However, the answer to the question of this comment should be decided between the operator, the authority and the pilot representatives. See more information in ORO.FC.231 (c) and (d) and the related AMC and GM.</p>

comment	<p>408 comment by: <i>Lufthansa Cargo AG</i></p> <p>DATA PROTECTION — FEEDBACK SYSTEM — GRADING SYSTEM <i>The procedure to prevent disclosure of crew identity may, as a minimum, define:</i> <i>a) a data access and security policy that may restrict access to information to specifically authorised persons identified by their position. The required authorised person(s) does (do) not necessarily need to be the nominated person for crew training (or their deputy(ies)), but could be the EBT programme manager or a third party mutually acceptable to unions or staff and management. (Note: access to the last 12 months training data is required for the examiner that will revalidate the pilot licence);</i></p> <p>Detailed Specification needed: What is the detail level of the training data required for the examiner?</p>
response	<p>Noted More guidance is provided on the grading system. However, the answer to the question of this comment should be decided between the operator, the authority</p>



and the pilot representatives. See more information in ORO.FC.231 (c) and (d) and the related AMC and GM.

comment	<p>425 comment by: <i>European Cockpit Association</i></p> <p>ECA proposes that GM2 ORO.FC.231(c) Evidence-based training is upgraded to AMC status</p> <p>Rationale: This material in this GM is really important and should be transferred in a AMC to ensure a consistent implementation.</p>
response	Partially accepted

comment	<p>426 comment by: <i>European Cockpit Association</i></p> <p>GM2 ORO.FC.231 (c)</p> <ul style="list-style-type: none"> • (c) TRAINING SYSTEM PERFORMANCE • (3) • (a) The operator shall establish and maintain a training data monitoring programme, • (b) The training data monitoring programme shall be non-punitive and contain adequate safeguards to protect the source(s) of the data. <p>Comment: EBT is data driven, provision should be equivalent as per FDM</p> <p>Rationale: EBT is data driven, it is of outmost importance to raise data collection and protection at an adequate level. Reference to OPS are given in GM material. This is not only relevant to protect systemic but also individual personal data. Therefore we suggest the following change and move GM 2 ORO FC 231 (c) in an AMC, to maintain binding regulation on this very sensible subject.</p>
response	<p>Not accepted</p> <p>However, provisions to ensure data protection and a NON-punitive environment have been introduced.</p>

comment	<p>542 comment by: <i>SNPL FRANCE ALPA technical committee</i></p> <p>SNPL FRANCE ALPA proposes that GM1 ORO.FC.231(c) Evidence-based training is upgraded to AMC status</p> <p>Comment : EBT is data driven, provision should be equivalent as per FDM</p> <p>Rationale : this material in this GM is really important and should be transferred in a AMC to ensure a consistent implementation. EBT is data driven, it is of outmost</p>
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response	<p>importance to raise data collection and protection at an adequate level. Reference to OPS are given in GM material. This is not only relevant to protect systemic but also individual personal data.</p> <p>Partially accepted</p>
comment	<p>626 comment by: <i>Vereinigung Cockpit</i></p> <p>VC proposes that GM2 ORO.FC.231(c) Evidence-based training is upgraded to AMC status</p> <p>Rationale: <i>This material in this GM is really important and should be transferred in a AMC to ensure a consistent implementation.</i></p> <ul style="list-style-type: none"> • (c) TRAINING SYSTEM PERFORMANCE • (3) • (a) The operator shall establish and maintain a training data monitoring programme, • (b) The training data monitoring programme shall be non-punitive and contain adequate safeguards to protect the source(s) of the data. <p>Comment: <i>EBT is data driven, provision should be equivalent as per FDM</i></p> <p>Rationale: <i>EBT is data driven, it is of outmost importance to raise data collection and protection at an adequate level. Reference to OPS are given in GM material. This is not only relevant to protect systemic but also individual personal data. Therefore we suggest the following change and move GM 2 ORO FC 231 (c) in an AMC, to maintain biding regulation on this very sensible subject.</i></p>
response	<p>Partially accepted</p>
comment	<p>675 comment by: <i>IATA</i></p> <div style="border: 1px solid black; padding: 5px; margin: 5px 0;"> <p>'(Note: access to the last 12 months training data is required for the examiner that will revalidate the pilot licence)'</p> <p>Question – What kind of training data? Just “module completed” or information about grades and comments?</p> </div>
response	<p>Noted</p> <p>More guidance is provided on the grading system. However, the answer to the question of this comment should be decided between the operator, the authority</p>



and the pilot representatives. See more information in ORO.FC.231 (c) and (d) and the related AMC and GM.

ORO.FC.231 Evidence-based training — (d) GRADING SYST

p. 83-86

comment	82	comment by: <i>FNAM</i>
	<p>ISSUE – NPA STRUCTURE FNAM does not understand why the modification of part of this IR is in the middle of two GM and AMC dedicated to this same IR. the structure and philosophy of the proposed regulation are really confusing and difficult to understand.</p> <p>PROPOSAL Review the structure of the NPA</p>	
response	Noted	
comment	238	comment by: <i>British Airways</i>
	<p>(d) The sub-paras should be (1) and (2)</p> <p>(d)(4) We disagree with verification at regular intervals. We have commented further about this in the AMC section.</p> <p>(d)(4) Suggest omitting the words ‘...against a criterion-referenced system.’ Better that the IR simply says verification is required, but leave the details to the AMC/GM.</p>	
response	Not accepted. However, the wording has been revised in order to improve clarity.	
comment	489	comment by: <i>RV</i>
	<p>Comments: In AMC1 ORO.FC.231 (d)(1) GRADING SYSTEM, it is described that grading 2 to 5 means competent. Then proficient must be also 2 and above, but continue being different levels of proficiency among pilots. If not graded, very valuable source of information not only as a pilot and his historic, but also as a whole for the airline from the point of view of the training performance feedback, information for feedback loops and design of efficient future modules that include training needs of the airline as a whole would be lost. Manoeuvres training SHOULD be graded, at least in FPM and FMA, and possibly APK.</p> <p>Proposal: Change of wording.</p> <p>Comments: The norm level seems to be grade 3. Therefore, below the norm but above the minimum acceptable level should be 2 and not 3 as described.</p> <p>Proposal: Change of wording.</p> <p>Comments: It seems a mistake, as if it shouldn't be released to unsupervised line operations, it should be an assessment in the SIM previous to resume line operations.</p>	



Proposal: Clarify the process to demonstrate the minimum acceptable level of performance before resuming line operations.

Comments: In GM1X Annex I Definitions EVIDENCE-BASED TRAINING states that: “the evaluation phase is a first assessment of competencies in order to identify individual training needs. On completion of the evaluation phase, any areas that do not meet the minimum competency standard will become the focus of the subsequent training”.

It opens the possibility to train these Areas below minimum competency the second day of the module and reassess again. So it would be not any additional training (extra SIM) but a tailored training for the pilot.

Proposal: Clarify the definition of additional training and tailored training (customized) and leave in a GM to the discretion of airlines how to use this figures.

Comments: Same as above. Why a competency rated 2 in three consecutive modules requires additional training (extra SIM session) and an evaluation with three competencies rated 2 can be dispatch only with tailor training next day? What about if the combination of two are on first day evaluation, or what if they are on second day training without another SIM to tailor train in the same module? Lots of different cases.

Proposal: Clarify the definition of additional training and tailored training (customized) and leave in a GM to the discretion of airlines how to use this figures and agreed it with their own NAA’s.

response Partially accepted

AMC1 ORO.FC.231(d)(1) Evidence-based training

p. 86

comment 13 comment by: *Michel Lacombe AF Training department and AF ATO*

There are 5 levels described, where level 3 is the norm and level 4 determines that the pilot is above the norm.

But with these 2 terms “adequately” and “effectively” we do not reach this result.

When we look for these terms in English dictionaries we can read :

Level 3 : Adequately

1. **as much or as good as necessary** for some requirement or purpose; fully sufficient, **suitable**, or fit (often followed by *to* or *for*): *This car is adequate to our needs. adequate food for fifty people.*
2. **barely sufficient or suitable:** *Being adequate is not good enough.*

It means that we are just under the expected level so that’s : “less than standard”

Level 4 : Effectively

1. adequate to accomplish a purpose; **producing the intended or expected result:** *effective teaching methods; effective steps toward peace.*



	<p>2. actually in operation or in force; functioning: <i>The law becomes effective at midnight.</i></p> <p>3. producing a deep or vivid impression; striking: <i>an effective photograph.</i></p> <p>4. prepared and available for service, especially military service.</p> <p>It means that we are at the level expected, that should be our “standard”.</p>
response	<p>Not accepted</p> <p>The issue will be evaluated under safety promotion task SPT.012. The results of the evaluation during the implementation phase of this regulation will determine the next course of action.</p>
comment	<p>83 comment by: FNAM</p> <p>ISSUE</p> <p>The explanation of the grading scale is not clear and not adapted to EBT principle. Although Level 2 is clearly described, Level 3 is not precise enough and Levels 4 and 5 are really difficult to differentiate. EBT representation would be more adapted with only 4 levels. Plus, it has been demonstrate that the evaluation on 5 levels risks to increase naturally statistics Level 3. The rating would be therefore less representative than with a 4-level evaluation.</p> <p>Indeed, level 3 is the norm and level 4 determines that the pilot is above the norm. Nevertheless, the wordings for this two levels is confusing : “adequately” and “effectively”. English dictionaries would ensure the following interpretations :</p> <p>For Level 3 : Adequately</p> <p>‘1. as much or as good as necessary for some requirement or purpose; fully sufficient, suitable, or fit (often followed by <i>to</i> or <i>for</i>): <i>This car is adequate to our needs. adequate food for fifty people.</i></p> <p>2. barely sufficient or suitable: <i>Being adequate is not good enough.</i>’</p> <p>It means that we are just under the expected level so that’s : “less than standard”</p> <p>For Level 4 : Effectively</p> <p>‘1. adequate to accomplish a purpose; producing the intended or expected result: <i>effective teaching methods; effective steps toward peace.</i></p> <p>2. actually in operation or in force; functioning: <i>The law becomes effective at midnight.</i></p> <p>3. producing a deep or vivid impression; striking: <i>an effective photograph.</i></p> <p>4. prepared and available for service, especially military service.’</p> <p>It means that we are at the level expected, that should be our “standard”.</p> <p>In order to ensure a proper and homogenous evaluation of the grading system throughout each companies, clear descriptions of the grading scale should be proposed in this NPA on 4-level evaluation. Thus, FNAM suggests to explain precisely the correspondence of each and every scale and to limit the scale to 4 levels.</p> <p>PROPOSAL</p> <p>Explain precisely the correspondence of each and every scale; and Limit the scale to 4 levels instead of 5</p>
response	<p>Not accepted</p>



The issue will be evaluated under safety promotion task SPT.012. The results of the evaluation during the implementation phase of this regulation will determine the next course of action.

comment 169 comment by: *Olaf Birgels (DLH)*

AMC1 ORO.FC.231(d)(1) Evidence-based training
GRADING SYSTEM

Question:

Why does level 4 (above the norm) not enhance safety?

response Noted
In order to avoid confusion with level 5.

comment 194 comment by: *M.Held / Lufthansa Airlines*

AMC1 ORO.FC.231(d)(1) Evidence-based training
GRADING SYSTEM

Why does level 4 (above the norm) not enhance safety?

response Noted
In order to avoid confusion with level 5.

comment 217 comment by: *Lufthansa CityLine GmbH*

AMC1 ORO.FC.231(d)(1) Evidence-based training
GRADING SYSTEM

Question - Why does level 4 (above the norm) not enhance safety?

response Noted
In order to avoid confusion with level 5.

comment 276 comment by: *SWISS Intl. Air Lines*

Why does Level 4 (which is above the norm) not enhance safety?

response Noted
In order to avoid confusion with level 5.

comment 328 comment by: *CAA-NL*

AMC1 ORO.FC.231(d)(1)

Grading system, Grade 2 is minimum for line operations and is used throughout the proposal as the lowest level to be considered competent. This level stands for 'only applying competences sometime without ending up in an unsafe situation'. Within this AMC, level 2 is rated as 'below the norm'. We wonder whether a level 2 grade is actually save enough for line operations without a second pilot in the cockpit of level 4 or 5 to compensate.



response	Noted
comment	<p>363 comment by: <i>Czech Technical University</i></p> <p>Our study of grading has identified a 5-level scale as ideal for the purpose of pilot evidence based training. However, use of 'numerical grades' (1 to 5) indicate lower accuracy than use of 'description/named grades' (e.g. Ideal, Effective, Satisfactory, Acceptable, Unsafe). Instructors using 'numerical grades' may tend to 'instructor-evaluator laziness'. This discrepancy can possibly be mitigated by robust instructor training.</p>
response	Noted
comment	<p>427 comment by: <i>European Cockpit Association</i></p> <p>ECA proposes the following change:</p> <p>AMC1 ORO.FC.231(d)(1) Evidence-based training GRADING SYSTEM</p> <p>(a) The grading system should provide quantifiable data for the measurement of the training system performance. It should quantify what was the outcome of threat, error and undesired aircraft state management relating specifically to the competency being assessed</p> <p>Comment: Introduce the outcome of TEM into the grading system at AMC level and not only in GM1 ORO.FC.231 (d) (1) related to VENN on page 90 of the NPA</p> <p>Rationale: This outcome should be an integral part of the performance assessment. The result of the performance in terms of outcome cannot be separated from the description of the OB's.</p>
response	<p>Partially accepted</p> <p>The TEM model is introduced at AMC level; however, the wording is different from that proposed in the comment.</p>
comment	<p>467 comment by: <i>France</i></p> <p>DGAC wonders if it is relevant to define a 5 level grading system in an AMC. The AMC1 ORO.FC.231 (d) (1) should be downgraded to a GM.</p> <p>From DGAC FR understanding, AMC2 ORO.FC.231(d)(1) provides a possibility for an operator to adopt a different grading system than the one described in the first AMC (AMC1 ORO.FC.231 (d) (1)).</p> <p>Further clarification is needed. In any case DGAC FR suggests not be too prescriptive. Operators having an ATQP programme have already grading system in place. Moving to EBT should not force them to change their grading system (if adapted to EBT) to a new one. Changing an existing grading system is a not trivial.</p>

response Not accepted
The proposed text offers flexibility by recommending a grading scale in AMC1 and allowing the necessary flexibility in AMC2.

comment 484 comment by: AIRBUS

Page 86 AMC1 ORO.FC.231(d)(1) (b):

Airbus believes that the text proposed for the grading system should be modified. Airbus would like to stress that initially the Airbus grading system was in line with what is proposed in the NPA. But experience (over 6 years) has shown that overall competency at Level 2 in relationship to Appendix 9 criteria was not necessarily adequate for the release on line operations, as a good level of airmanship is required. Considering the observable behaviors and the VENN word pictures, Airbus believes that having a grade 2 does not mean having demonstrating a good airmanship and is therefore not acceptable for line operations. In the existing Airbus grading system, the norm is set at 3 and, in case of any competency below 3, additional training has to be considered.

We thus recommend EASA to consider amending the text, which by itself introduce a “contradiction” as it states:

“Level 2 (below the norm) determine a minimum acceptable...”. We fail to understand how below the norm can be an acceptable minimum.

Therefore airbus proposed text would read as follows:

(b) The grading scale should be 1 to 5, where:

- (1) Level 1 determines.... (Unchanged)
- (2) Level 3 to 5 determine an outcome of COMPETENT for the competent authority
- (3) Level 2 (below the norm) indicate a need for additional training to elevate performance to the norm,
- (4) Level 3 on a 5 point scale is the norm,
- (5) Level 4 determines that the pilot is above the norm
- (6) Level 5 (exemplary) determines that the pilot is above the norm (enhanced safety, effectiveness and efficiency).

response Not accepted
'Grading 2 competent' is in line with the views of the rulemaking group, the review group and the documentation and notes provided by ICAO and IATA.

comment 543 comment by: SNPL FRANCE ALPA technical committee

SNPL FRANCE ALPA proposes the following change:

AMC1 ORO.FC.231(d)(1) Evidence-based training

GRADING SYSTEM

(a) The grading system should provide quantifiable data for the measurement of the training system performance. **It should quantify what was the outcome of threat, error and undesired aircraft state management relating specifically to the competency being assessed.**



response	<p>Comment : introduce the outcome of TEM into the grading system at AMC level and not only in GM1 ORO.FC.231 (d) (1) related to VENN on page 90 of this NPA</p> <p>Rationale: this outcome should be an integral part of the performance assessment. The result of the performance in terms of outcome cannot be separated from the description of the OB's.</p>
	<p>Partially accepted.</p> <p>The TEM model is introduced at AMC level; however, the wording is different from that proposed in the comment.</p>
comment	<p>544 comment by: <i>British Airways</i></p> <p>(b)(1) 'An outcome of ADDITIONAL TRAINING REQUIRED should be recorded.' This wording is not necessary and should be deleted. The first sentence is clear enough, as is the Implementing Rule at ORO.FC.231(a)(3)(ii)(C). In addition, the wording is too explicit for an AMC. The grading system can simply say 'Not Competent' or equivalent. If you have this wording in an AMC, all operators will be forced to upgrade their grading systems at unnecessary cost.</p>
response	<p>Partially accepted</p>
comment	<p>567 comment by: <i>CAE</i></p> <p>With regards to grading systems, the industry must have flexibility in deciding on the system to use. Proposing AMC on the grading system scale to be used is restrictive, and would require alternative means to justify a scale which is different. We propose to move this to guidance material (GM) only and reduce the restrictions.</p>
response	<p>Not accepted.</p> <p>The proposed text offers flexibility by recommending a grading scale in AMC1 and allowing the necessary flexibility in AMC2.</p>
comment	<p>576 comment by: <i>SNPL FRANCE ALPA technical committee</i></p> <p>SNPL FRANCE ALPA proposes the following changes</p> <p>AMC1 ORO.FC.231(d)(1) Evidence-based training GRADING SYSTEM</p> <p>(d) The grading scale should be 1 to 5 4, where:</p> <p>(1) Level 1 determines that a minimum acceptable level of performance was NOT achieved for the conduct of line operations. An outcome of ADDITIONAL TRAINING REQUIRED should be recorded.</p> <p>(2) Levels 2 to 5 4 determine an outcome of COMPETENT for the competent authority.</p> <p>(3) Level 2 (below the norm) determines that the minimum acceptable level was achieved for the conduct of line operations.</p> <p>(4) Consistent Level 2 grading indicates a need for additional training to elevate performance to the norm.</p>

	<p>(5) Level 3 on a 5 4 point scale is the norm. (6) Level 4 determines that the pilot is above the norm. (7) Level 5 (exemplary) determines that the pilot is above the norm (enhanced safety, effectiveness and efficiency).</p> <p>Comment : suppress the grading level 5 Rationale: this level will be very seldom used by raters, it is of no interest as regards to crew competence and there is no action resulting from the grading level, it is just adding complexity to the system and therefore will add workload for the raters.</p>
response	<p>Not accepted The explanatory note presents why EASA opted for the grading of 1 to 5. Furthermore, AMC2 ORO.FC.231(d)(2) allows for an alternative grading system of 1 to 4.</p>
comment	<p>608 comment by: AUA EBT</p> <p>Question - Why does level 4 (above the norm) not enhance safety?</p>
response	<p>Noted In order to avoid confusion with level 5.</p>
comment	<p>628 comment by: Vereinigung Cockpit</p> <p>AMC1 ORO.FC.231(d)(1) Evidence-based training GRADING SYSTEM (a) The grading system should provide quantifiable data for the measurement of the training system performance. It should quantify what was the outcome of threat, error and undesired aircraft state management relating specifically to the competency being assessed</p> <p>Comment: Introduce the outcome of TEM into the grading system at AMC level and not only in GM1 ORO.FC.231 (d) (1) related to VENN on page 90 of the NPA</p> <p>Rationale: This outcome should be an integral part of the performance assessment. The result of the performance in terms of outcome cannot be separated from the description of the OB's.</p>
response	<p>Partially accepted. The TEM model is introduced at AMC level; however, the wording is different from that proposed in the comment.</p>
comment	<p>649 comment by: IATA</p> <p>Concerning ORO.FC.231 Evidence-based training (d) GRADING SYSTEM, there are two AMC related to ORO.FC.231 (d)(1) and only the AMC2 ORO.FC.231(d)(1) Evidence-based training corresponds to an Acceptable Mean of</p>

Compliance to the rule. The AMC1 ORO.FC.231 (d)(1) provides an illustration on how to achieve the AMC2 ORO.FC.231(d)(1).

Therefore the proposition are:

1/ to integrate the content of AMC1 ORO.FC.231 (d)(1) into the GM1 ORO.FC.231(d)(1) at point (d)

2/ to keep one AMC to ORO.FC.231 (d)(1) based on the content of AMC2 ORO.FC.231(d)(1)

AMC1 ORO.FC.231(d)(1) Evidence-based training

GRADING SYSTEM — ~~ALTERNATIVE SYSTEM~~

(a) The grading system should provide quantifiable data for the measurement of the training system performance.

(b) The grading scale for each competency should:

(1) determine the grade at which the performance is considered:

- (i) NOT COMPETENT for the conduct of line operations. An outcome of ADDITIONAL TRAINING REQUIRED should be recorded; and
- (ii) COMPETENT for the conduct of line operations; and

(2) determine for the pilot whose performance is considered competent for the conduct of line operations:

(i) if the pilot needs additional training to elevate their performance to the operator specified norm.

(ii) if the pilot is at the operator specified norm.

(iii) if the pilot is above the norm (it can be one or more levels e.g. above the norm and exemplary).

response Not accepted

AMC2 ORO.FC.231(d)(1) Evidence-based training

p. 86-89

comment 84

comment by: FNAM

AGREEMENT

The details provided for a potential alternative system for the grading system is clear. Plus, FNAM agrees to allow the possibility for operators to have different grading system. Since the basic is described in this proposed GM, all grading system would be adapted to the regulatory purpose but also to the operational reality of each operators. Thus, FNAM agrees that the operators should have the choice to use their own grading system without any involvement of the competent authority.

response Noted



comment	<p data-bbox="368 197 1394 241">239 comment by: <i>British Airways</i></p> <p data-bbox="368 264 1394 472">(b)(1)(i) 'An outcome of ADDITIONAL TRAINING REQUIRED should be recorded.' This wording is not necessary and should be deleted. The first sentence is clear enough, as is the Implementing Rule at ORO.FC.231(a)(3)(ii)(C). In addition, the wording is too explicit for an AMC. The grading system can simply say 'Not Competent' or equivalent. If you have this wording in an AMC, all operators will be forced to upgrade their grading systems at unnecessary cost.</p> <p data-bbox="368 510 1394 544">Alternative system:</p> <p data-bbox="368 584 1394 792">We support the view that operators should have the choice to use their own grading system, subject to some guidance material. There is no one perfect grading system, which is why every operator seems to have their own. Most are variations around a 2-level, 3-level, 4-level or 5-level scale. We support AMC2 here for an Alternative System as it gives the clarity and the level of detail needed. It also has equivalence with AMC1 for Competent and Not Competent.</p> <p data-bbox="368 833 1394 1115">However, we suggest one amendment: (b)(2)(iii) should be removed. Many operators have a 3-point system of 'proficient', 'minimum proficiency' and 'not proficient'. This equates directly to levels 3, 2 and 1 in AMC1. These operators do not see a need to sub-divide above the norm to 'very proficient' and 'very, very proficient'. It doesn't mean they don't try to improve the proficiency of all their pilots, it's just they don't see the need to record different grades above 'proficient'. We believe such a system is perfectly valid and an 'above the norm' grade should not be required in AMC2.</p> <p data-bbox="368 1155 1394 1189">Data exchange:</p> <p data-bbox="368 1229 1394 1615">The Explanatory Note asks for comments about whether more guidance is needed in regard to data exchange. We do not believe there should be any more guidance in this area at this time. A lot needs to happen before training data is exchanged to support any European initiatives, such as Data4Safety. The rationale and objectives for the sharing of training data will need to be established – why should data be exchanged and for what purpose? Protocols will need to be agreed for use of the data, and the concerns of operators and pilot's representatives will need to be addressed. When that eventually happens, it will be necessary to draft enabling regulations that meets all the requirements. It therefore seems inappropriate to try and draft anything for EBT at this stage, when data exchange is no more than a future idea.</p>
response	Partially accepted
comment	<p data-bbox="368 1749 1394 1794">364 comment by: <i>Czech Technical University</i></p> <p data-bbox="368 1834 1394 1899">Although we understand the concern, we believe, that operators should be discouraged from use of alternative grading system in a long term.</p>
response	Noted



comment	690	comment by: Ryanair ATO
	<i>The explanatory notes relating to Alternative Grading Systems are very useful and should be retained in GM or another published document to allow Operators and Authorities to refer to this information in the future.</i>	
response	Noted Please refer to the explanatory note of the EASA Opinion.	

GM1 ORO.FC.231(d)(1) Evidence-based training

p. 89-97

comment	85	comment by: FNAM
	ISSUE – (e) SBT is introduced in this EASA’s proposed disposal but is not defined in GM2 Annex I in the acronym list. In order to ensure understanding of these disposals, FNAM suggests to describe SBT in GM2 Annex I.	
	PROPOSAL Describe SBT in GM2 Annex I	
response	Accepted	

comment	86	comment by: FNAM
	AGREEMENT FNAM thanks for describing precisely the VENN system with different grades. This table provides a good and concrete idea of EASA’s attempts and seems to fit with operational reality. Indeed, requirements are precise but flexible.	
response	Noted	

comment	87	comment by: FNAM
	ISSUE – Safety Promotion The EASA’s proposed disposals present guidance <i>via</i> a new vector : the ‘safety promotions’. FNAM wonders what is the legal status of these guidance. Is it a FAQ? Is it a hard law or is it a soft law? ‘Safety promotions’ are not GM nor AMC: they could be proposed without any stakeholders consultation. If these guidance are necessary, FNAM suggests to regroup all guidance in European regulations by integrating ‘safety promotions’ into GM; if not, to suppress ‘safety promotions’.	
	PROPOSAL Regroup all guidance in this regulation by integrating ‘safety promotions’ into GM	
response	Not accepted Safety promotion will be compiled into an EASA EBT manual.	

comment	135	comment by: FlightSafety International - Regional Director Regulatory Affairs
	i. GM1 ORO.FC.231(d)(1) Evidence-based training - Grading System specifies: (5) <i>Evaluate performance by determining a grade in each competency using the VENN</i>	



response	<p>system and the following dimensions according to the <u>observed behaviours related to the OB</u>. The underlined text does not make sense since OB means observed behaviours. Suggest amend as follows: <u>and the following dimensions according to the observed behaviours.</u> related to the OB.</p> <p>Accepted The GM has been redrafted to improve clarity.</p>
comment	<p>154 comment by: <i>Olaf Birgels (DLH)</i></p> <p>(d) Where any competency is determined below the minimum acceptable level of performance (for example, level 1 on a 5-point scale), the flight crew member may not be released to unsupervised line operations until each competency is demonstrated at or above the minimum acceptable level of performance, <u>during a subsequent line evaluation of competence.</u></p> <p>Question: Why is (d) related to a line evaluation of competency?</p>
response	<p>Noted 'Subsequent line evaluation of competence' has been deleted from the GM.</p>
comment	<p>155 comment by: <i>Olaf Birgels (DLH)</i></p> <p>(e) The word pictures below support a VENN system. The example system is based on a 5-point scale with 3 being the norm, 1 determining unacceptable performance and 2 being the minimum acceptable level of performance. A means of utilising this system may be to determine that at the EBT module:</p> <p>(1) Any competency rated 1 at the end of the module requires additional training prior to release to line flying.</p> <p>(2) Any competency rated 2 in two consecutive simulator sessions in different recurrent modules requires individual customised training within 3 months of the completion date of the EBT module. (1st Module SBT rated 2, 2nd Module EVAL rated 2, thus SBT should trigger an individual customised training).</p> <p>(3) Any competency rated 2 in three consecutive modules requires additional training at the end of the third module within three months (following the example in (2): 3rd Module EVAL is rated 2 again, the pilot should receive additional training).</p> <p>(4) Any evaluation simulator session with three or more competencies rated 2 requires individual customised training in the SBT phase. If at the end of the module the three competencies continue being rated 2, the pilot requires additional training.</p> <p>(5) Individual customised training: it means a simulator session tailored to the pilot's individual training needs which may require a different programme. Normally, there is not an increase of FSTD volume (no extra simulator session).</p> <p>(6) Additional training: it means the simulator session is tailored to the pilot's individual training needs and an extra simulator session. It normally happens after an individual customised training.</p> <p>(7) The word pictures are standardised according to the VENN system but may be simplified once instructors become familiar with the system.</p> <p>Question:</p>

	(e)(1) to (7) reads more like AMC. Should remain only as GM?
response	Accepted. Some of the provisions contained in the GM have been moved to AMC.
comment	179 comment by: <i>M.Held / Lufthansa Airlines</i> (c) Grades may be determined during each EBT module as follows: (1) Evaluation phase (EVAL) — grading at the end of the phase Note: Manoeuvres training — training to proficiency, no need to grade. Is grading of FPM and FPA sufficient only in in EVAL?
response	Noted The text has been amended to clarify the grading.
comment	180 comment by: <i>M.Held / Lufthansa Airlines</i> (d) Where any competency is determined below the minimum acceptable level of performance (for example, level 1 on a 5-point scale), the flight crew member may not be released to unsupervised line operations until each competency is demonstrated at or above the minimum acceptable level of performance, during a subsequent line evaluation of competence. Why is (d) related to a line evaluation of competency?
response	Noted 'Subsequent line evaluation of competence' has been deleted from the GM.
comment	181 comment by: <i>M.Held / Lufthansa Airlines</i> (e)(1) to (7) reads more like AMC. Should it remain only as GM?
response	Accepted Some of the provisions contained in the GM have been moved to AMC.
comment	203 comment by: <i>Lufthansa CityLine GmbH</i> GRADING SYSTEM — VENN ... (d) Where any competency is determined below the minimum acceptable level of performance (for example, level 1 on a 5-point scale), the flight crew member may not be released to unsupervised line operations until each competency is demonstrated at or above the minimum acceptable level of performance, during a subsequent line evaluation of competence. Question – Why is (d) related to a line evaluation of competency?

response	Noted 'Subsequent line evaluation of competence' has been deleted from the GM.
comment	<p>204 comment by: <i>Lufthansa CityLine GmbH</i></p> <p>(e) The word pictures below support a VENN system. The example system is based on a 5-point scale with 3 being the norm, 1 determining unacceptable performance and 2 being the minimum acceptable level of performance. A means of utilising this system may be to determine that at the EBT module:</p> <p>(1) Any competency rated 1 at the end of the module requires additional training prior to release to line flying.</p> <p>(2) Any competency rated 2 in two consecutive simulator sessions in different recurrent modules requires individual customised training within 3 months of the completion date of the EBT module. (1st Module SBT rated 2, 2nd Module EVAL rated 2, thus SBT should trigger an individual customised training).</p> <p>(3) Any competency rated 2 in three consecutive modules requires additional training at the end of the third module within three months (following the example in (2): 3rd Module EVAL is rated 2 again, the pilot should receive additional training).</p> <p>(4) Any evaluation simulator session with three or more competencies rated 2 requires individual customised training in the SBT phase. If at the end of the module the three competencies continue being rated 2, the pilot requires additional training.</p> <p>(5) Individual customised training: it means a simulator session tailored to the pilot's individual training needs which may require a different programme. Normally, there is not an increase of FSTD volume (no extra simulator session).</p> <p>(6) Additional training: it means the simulator session is tailored to the pilot's individual training needs and an extra simulator session. It normally happens after an individual customised training.</p> <p>(7) The word pictures are standardised according to the VENN system but may be simplified once instructors become familiar with the system.</p> <p>Question – (e)(1) to (7) reads more like AMC. Should remain only as GM?</p>
response	Accepted Some of the provisions contained in the GM have been moved to AMC.
comment	<p>240 comment by: <i>British Airways</i></p> <p>(b)(5) There's repetition, suggest delete '...related to the OBs.'</p> <p>(b)(5) Again, unnecessary repetition, suggest delete '...by the following steps below...'</p> <p>(b)(5)(i) For consistency with (ii) and (iii), amend to '...when they were required;'</p> <p>(c)(1) No need to grade MT? This is unexpected and there's no Explanatory Note to explain why. What if the pilot only achieves a minimum standard of proficiency? What if the pilot only achieves a minimum standard of proficiency every module? MT is maintaining skill to fly critical flight manoeuvres – the pilot needs to demonstrate a certain level of proficiency in FPM and FPA. Are FPM and FPA only graded in the Eval and SBT, despite the most demanding manoeuvres likely to be in MT?</p>

(c)(4) How is this different to (c)(2)? Suggest delete.

(c)(5) 'An outcome of ADDITIONAL TRAINING REQUIRED should be recorded.' This wording is not necessary and should be deleted. The first sentence is clear enough, as is the Implementing Rule at ORO.FC.231(a)(3)(ii)(C). In addition, the wording is too explicit. The grading system can simply say 'Not Competent' or equivalent.

(c)(6) Some unnecessary repetition, suggest delete the second reference to '(level 3 on a 5 point scale).'

(d) The last few words are new: '...during a subsequent line evaluation of competence.' Why have EASA added this? There is no Explanatory Note. What is the relevance to doing a LEOC based on performance in the simulator? This conflicts with the IR ORO.FC.231(a)(3)(ii)(C) which doesn't mention a LEOC. This is a significant addition that is different to existing requirements. Currently, if an LPC or OPC is failed, there is training and another LPC/OPC. There's no need to do a Line Check. Also, how would this LEOC be scheduled? It's not easy and very disruptive (and expensive) to schedule a Line Check/LEOC at short notice, especially on longhaul fleets. This is inconsistent, without justification, and without any regulatory impact assessment.

(e) As a general comment, this guidance is very detailed, not very logical and somewhat subjective. Why is it necessary to provide such guidance? Operators already have procedures to deal with poor performance in the simulator (for example, what to do if someone has the equivalent of a grade 2 in a current simulator session). In AMC1 ORO.FC.231(a)(5) operators are required to detail contingency procedures for unforeseen circumstances, so in this GM it should say that operators may details procedures for utilising their grading system. It's okay to give examples in this GM, but the principle should be that the operator should have their own procedures (subject to oversight by the competent authority).

(e)(1) No mention of Line Evaluation of Competence here so not consistent with (d).

(e)(2) This isn't logical. The grades for the Eval (before training to competence) and grades for SBT (after training to competence) are not comparable. In the example given, what happens if the grade for the competency in the 2nd module SBT is then 3 – is the additional training still required?

(e)(3) 'rated 2 in three consecutive modules'. Rated where in the three consecutive modules? After the Eval, after the SBT, or both, or either?

(e)(5) All SBT is 'customised training'. SBT is training to focus on identified training needs following the Eval. Especially where, as indicated here, there is no extra simulator session. It's not clear how customised training differs from SBT.

response

Partially accepted.

Due to the large number of elements of this comment, please refer to the EASA Opinion.

comment

261

comment by: *SWISS Intl. Air Lines*



	(c)(1): is it not necessary to grade FPM/FPA after manoeuvres training? Is there enough evidence when grading FPM/FPA only in EVAL phase?	
response	Noted More guidance is provided in the EASA Opinion.	
comment	262 (d): Why is this related to a line evaluation of competence?	comment by: <i>SWISS Intl. Air Lines</i>
response	Noted 'Subsequent line evaluation of competence' has been deleted from the GM.	
comment	263 (e)(1-7): is this an AMC or GM? Reads more like an AMC. Should it remain only as a GM?	comment by: <i>SWISS Intl. Air Lines</i>
response	Accepted Some of the provisions contained in the GM have been moved to AMC.	
comment	285 GRADING - VENN (d) : If performance is below acceptable level, why should the performance be evaluated again during subsequent line evaluation?	comment by: <i>Brussels Airlines</i>
response	Noted 'Subsequent line evaluation of competence' has been deleted from the GM.	
comment	365 This methodology provides high quality data for further analysis and shall be promoted.	comment by: <i>Czech Technical University</i>
response	Noted	
comment	366 For better clarity: Consider re-ordering table Outcome/How many/How often/How well from grade 5 to 1 to match order in previous tables.	comment by: <i>Czech Technical University</i>
response	Accepted	
comment	409 GRADING SYSTEM — VENN	comment by: <i>Lufthansa Cargo AG</i>



...

(c) Grades may be determined during each EBT module as follows:

(1) Evaluation phase (EVAL) — grading at the end of the phase

Note: Manoeuvres training — training to proficiency, no need to grade.

(2) Scenario-based training phase (SBT) — grading at the end of the phase

Note: In-seat instruction (ISI) should not be included in any assessment.

(3) For each assigned grade:

(i) the observed performance should be identified with one or more OBs; and

(ii) the OB should simply link the observed performance to the competency; they are not to be used as a checklist.

(4) At the completion of the module, grades should be assigned for each competency, based on the overall assessment of training during the SBT.

(5) Where any competency is rated below the minimum acceptable level of performance (level 1 on a 5-point scale), an outcome of ADDITIONAL TRAINING REQUIRED should be recorded.

(6) Where all competencies are determined at or above the minimum acceptable level of performance, (for example, level 2 on a 5-point scale) the outcome should be COMPETENT. Grades consistently below the norm (level 3 on a 5-point scale) may indicate a need for additional training to elevate performance to the norm (level 3 on a 5-point scale).

(d) Where any competency is determined below the minimum acceptable level of performance (for example, level 1 on a 5-point scale), the flight crew member may not be released to unsupervised line operations until each competency is demonstrated at or above the minimum acceptable level of performance, **during a subsequent line evaluation of competence.**

(e) The word pictures below support a VENN system. The example system is based on a 5-point scale with 3 being the norm, 1 determining unacceptable performance and 2 being the minimum acceptable level of performance. A means of utilising this system may be to determine that at the EBT module:

(1) Any competency rated 1 at the end of the module requires additional training prior to release to line flying.

(2) Any competency rated 2 in two consecutive simulator sessions in different recurrent modules requires individual customised training within 3 months of the completion date of the EBT module. (1st Module SBT rated 2, 2nd Module EVAL rated 2, thus SBT should trigger an individual customised training).

(3) Any competency rated 2 in three consecutive modules requires additional training at the end of the third module within three months (following the example in (2): 3rd Module EVAL is rated 2 again, the pilot should receive additional training).

(4) Any evaluation simulator session with three or more competencies rated 2 requires individual customised training in the SBT phase. If at the end of the module the three competencies continue being rated 2, the pilot requires additional training.

(5) Individual customised training: it means a simulator session tailored to the pilot's individual training needs which may require a different programme. Normally, there is not an increase of FSTD volume (no extra simulator session).



(6) Additional training: it means the simulator session is tailored to the pilot's individual training needs and an extra simulator session. It normally happens after an individual customised training.

(7) The word pictures are standardised according to the VENN system but may be simplified once instructors become familiar with the system.

Detailed Specification needed:

What competencies are mandatory to grade in EVAL ?
 Why isn't it possible to substitute the competency demonstration during a line evaluation with an evaluation in the simulator (additional training/evaluation)?

response

Noted
 Q1: The new GM1 ORO.FC.231(d)(1) clarifies this element. Points (d)(4), (d)(5) and (d)(6) may be relevant.
 Q2: 'Subsequent line evaluation of competence' has been deleted from the GM.

comment

486 comment by: AIRBUS

Attachment [#2](#)

Page 91 GM1 ORO.FC.231(d)(1)(e):

The proposal seems too complex for adequate implementation. Airbus suggest replacing proposal under (e) by the following:

Additional training prior to release to line flying operations is required in case of a rating at:

- a) A grade 1 in any competency.
- b) A grade 2 in any competency. In this case, however, training or line operation may continue if the instructor is convinced at the end of the debriefing that the trainee will be able to achieve grade 3 at the next training session.
- c) Two successive grade 2 in a same competency.

Regarding the word pictures and considering the norm set at 3 (center of the scale) as per suggested comment N°EASA 484, would EASA align the grading to the Airbus proposal, the word pictures would need to be reformulated. Airbus recommends to reformulate the word pictures using the following table (in attachment) rather than the "big table" from page 91 to 94, as the proposed table is valid whatever the competency concerned.

response

Partially accepted.
 The column of 'how many' has been modified transposing the proposal of the commenter.

comment

595 comment by: AUA EBT



Question – Is grading of FPM and FPA sufficient if done only in EVAL phase? The EVAL phase should be a Loft scenario where there are one or more occurrences for evaluating one or more key elements of the required competencies. If we have to grade ALL competencies during these phase, there has ALWAYS be a part of manual flying. Is assessing FPM during TOFF or landing enough? Don't we need a longer period, at least until clean up or a complete approach?
If we include some maneuvers to the evaluation phase for assessing FPM, we could create a more realistic loft scenario for the EVAL phase. Or the other way round, if all autopilots are u/s in the loft part, we could assess FPA during one or more maneuvers.

response

Noted
Please refer to the EASA Opinion and the safety promotion material of SPT.012.

comment

596

comment by: AUA EBT

Wording – should it be level 1 iso 2 and level 2 iso 3?

Question – Why is (d) related to a **line** evaluation of competency?

Question – (e)(1) to (7) reads more like AMC. Should remain only as GM?

response

Noted
'Subsequent line evaluation of competence' has been deleted from the GM.
Some of the provisions contained in the GM, referred to in the last question, have been moved to AMC.

comment

676

comment by: IATA

(c)(1) Note: Maneuvers training — training to proficiency, no need to grade.

Comment :

Valuable information on the level of proficiency for the overall organization might be recorded with a grade. It is suggested a wording like 'grade not necessary but possible for statistical assessment'.

response

Noted



The text has been amended to clarify the grading.

comment

677

comment by: IATA

(d) Where any competency is determined below the minimum acceptable level of performance (for example, level 1 on a 5-point scale), the flight crew member may not be released to unsupervised line operations until each competency is demonstrated at or above the minimum acceptable level of performance, during a subsequent line evaluation of competence.

Comment : Why is (d) related to a line evaluation of competency?

response

Noted

'Subsequent line evaluation of competence' has been deleted from the GM.

AMC1 ORO.FC.231(d)(2) Evidence-based training

p. 98

comment

156

comment by: Olaf Birgels (DLH)

VERIFICATION OF THE ACCURACY OF THE GRADING SYSTEM

(a) Part-FCL Appendix 9 provides a valid criterion-referenced system to determine the accuracy of the grading system.

(b) The operator should identify the mandatory exercises for the proficiency check for type rating and instrument rating in accordance with Part-FCL Appendix 9. Those exercises marked with the letter 'M' in the proficiency check column indicate a mandatory exercise or a choice where more than one exercise appears.

(c) The operator should then design a single module where all the mandatory exercises are performed to assess the accuracy of the grading system.

(d) Instructors should record for the purpose of data analysis if the pilots would have passed the proficiency check should they have taken the check in accordance with Appendix 9. Note: individual pilots are still graded and assessed according to the EBT grading system and Appendix 10; the result of the verification may not be used against the individual pilot.

Question:

Is an EBT instructor (TRI), only trained according to EBT and only conducting EBT modules, capable to "check" according appendix 9?

If he is capable to "check" appendix 9 items, he should be entitled to revalidate a rating!

response

Partially accepted



The AMC and GM have been modified. See the EASA Opinion for more information.

comment 184 comment by: *M.Held / Lufthansa Airlines*

(d) Instructors should record for the purpose of data analysis if the pilots would have passed the proficiency check should they have taken the check in accordance with Appendix 9. Note: individual pilots are still graded and assessed according to the EBT grading system and Appendix 10; the result of the verification may not be used against the individual pilot.

Is an EBT instructor (TRI), only trained according to EBT and only conducting EBT modules, capable to "check" according appendix 9?
If he is capable to "check" appendix 9 items, he should be entitled to revalidate a rating!

response Partially accepted
The AMC and GM have been modified. See the EASA Opinion for more information.

comment 205 comment by: *Lufthansa CityLine GmbH*

VERIFICATION OF THE ACCURACY OF THE GRADING SYSTEM

...

(d) Instructors should record for the purpose of data analysis if the pilots would have passed the proficiency check should they have taken the check in accordance with Appendix 9. Note: individual pilots are still graded and assessed according to the EBT grading system and Appendix 10; the result of the verification may not be used against the individual pilot.

Question - Is an EBT instructor (TRI), only trained according to EBT and only conducting EBT modules, capable to "check" according appendix 9?
If he is capable to "check" appendix 9 items, he should be entitled to revalidate a rating!

response Partially accepted
The AMC and GM have been modified. See the EASA Opinion for more information.

comment 264 comment by: *SWISS Intl. Air Lines*

(d):
Is an EBT Instructor (only trained acc. EBT and only conducting EBT modules) capable to "check" according appx. 9?
If he is capable to "check" acc. appx. 9 items, he should also be entitled to revalidate a rating!

response Partially accepted
The AMC and GM have been modified. See the EASA Opinion for more information.



comment	<p>278</p> <p style="text-align: right;">comment by: <i>KLM</i></p> <p>In AMC1 ORO.FC.231(d)(2) and ORO.FC.231(d)(2) page 99 and on, is mentioned the use of a EBT norm-referenced system instead of a criterion-referenced system in ATQP.</p> <p>Both systems are used in KLM’s ATQP proces. Behavioural indicators are used, on EASA competencies, as integral part of the ATQP tasks analyses.</p> <p>If the EBT proces is implemented KLM seeks credit for the experience acquired with the present ATQP proces.</p> <p>Text proposal: An ATO may ask their local competent authority a specific implementation proces based on their history and experience and the local competent authority may grant the deviation.</p>
response	<p>Noted</p> <p>ORO.GEN.120 allows alternative means of compliance.</p>

comment	<p>286</p> <p style="text-align: right;">comment by: <i>Brussels Airlines</i></p> <p>VERIFICATION OF THE ACCURACY OF THE GRADING SYSTEM</p> <p>Can a TRI perform the evaluation of the performamnce in accordance with Appendix 9 ? This evaluation is the privilege of a TRE.</p>
response	<p>Partially accepted</p> <p>The AMC and GM have been modified. See the EASA Opinion for more information.</p>

comment	<p>316</p> <p style="text-align: right;">comment by: <i>easyJet Airlines Europe</i></p>	
	<p>AMC1 ORO.FC.231(d)(2) point (d)</p>	<p>ALTERNATIVE COMPETENCY FRAMEWORKS Instructors should record for the purpose of data analysis if the pilots would have passed the proficiency check should they have taken the check in accordance with Appendix 9.</p>
	<p>FOR INFO ONLY: easyJet’s observable behaviour list is not 100% compliant with the one proposed in the NPA, as per the AMC we should demonstrate equivalence. Minor problem since the equivalence is easy to demonstrate. After 6/9 years of EBT this might be generating confusion among the EBTI community. As known the EBT programme is a norm-reference system as opposed to Appendix 9 which is criterion-reference system.</p>	



response

Noted

We recommend the standard competency framework. Alternative competency frameworks are subject to AltMoC.

comment

338

comment by: *British Airways*

The following comments refer to both the AMC and the GM.

We support a system for verification of the grading system. However, we believe what is proposed is not practical and we believe the AMC and GM lacks sufficient information.

According to the AMC the only verification record is if the proficiency check would have been passed. But passed according to what criteria? We follow the UK CAA guidance for proficiency checks, which uses the concept of a 2 attempt test. However, in EBT, if an initial competency is grade 1 it is the competency that is trained to proficiency, not the item. So the item (= Appendix 9 exercise) may not necessarily be repeated (= no attempt 2), and so it's not know if it would've been passed. In Mixed EBT, we use the 2 attempt concept in Manoeuvres Validation, because it's a complete Appendix 9 proficiency check. But in full EBT there is no Manoeuvres Validation, only Manoeuvres Training. MT is training to proficiency, with no concept of attempt 1, attempt 2, repeat or re-test. Surely you're not suggesting that these concepts are required in MT? That would be very confusing for everyone – sim designers, instructors and pilots. And the pilots will see it for what it is – a 2 attempt test is a proficiency check! A big step backwards.

According to the GM, the % of pilots who would've failed the proficiency check is compared to the % of pilots scoring grade 1. But what does 'scoring grade 1' mean? There is no 'overall score'. Each of the 9 competencies is given a grade after the Eval, and then again at the end of the module. So there are 18 grades in total in each module. Also, under EBT, the rating is revalidated after completing the EBT programme for the previous 12 months, which means 2 modules, which means 36 competency grades every 12 months. Do you only look at the grades after an Eval? Or after the SBT, or both?

Example 1 in the GM it says '...scoring 1 is maintained across all the technical competencies.' What does that mean? Should it really say 'any' of the technical competencies? And which are the 'technical competencies'? This is new terminology. Presumably only FPM, because the comparison is with a proficiency check – a skills test. But what about FPA, APK and KNO, which are also generally considered to be 'technical competencies'?

In addition, Evals don't usually contain much FPM. If operators are required to do a 'pseudo-Appendix 9' every 3 years, they will put the evaluation of FPM in the 'Appendix 9 Eval'. Therefore the previous two Evals probably won't contain any FPM. Verification against previous Eval grades in 'technical competencies' will therefore be meaningless. In EBT, most skill-based training is in the MT phase, but in GM1 ORO.FC.231(d)(1) it states that for MT there is 'no need to grade'. So again, any



verification against grades in previous modules will be meaningless because a pilot's FPM skill has largely not been graded.

The two examples in the GM have the phrases 'assuming the data is statistically relevant' and 'provided the data is statistically significant'. How is that measured? There is no guidance. What if it isn't statistically significant? How will verification be carried out? There are no answers in the GM or EN. Many (most!) operators in Europe are not big enough to have a statistically significant sample size of instructors. What then?

In the examples, it is suggested 3% versus 0.5%, and 1% versus 5% are not good enough, and action is required. What are the thresholds for this verification? How far apart do the grades for EBT modules and the 'proficiency check' have to be before the person nominated for crew training needs to start an investigation? There is no guidance or suggested method.

Has EASA tested this concept of verification? Has EASA worked through an actual example of what grades are being compared? There is a lack of guidance material about how it will practically be carried out. The AMC is all theoretical and the examples in the GM raise more questions than answers. This whole concept of verification needs more thought and clarity.

'The verification does not require an examiner'. Yes, but it does need EBT instructors who can accurately grade to Appendix 9 criteria. This will need extra training ... and concordance! The AMC and GM assume that the Appendix 9 verification records (criterion-referenced) will be perfect, and any differences will mean there's a problem with the competency grading (norm-referenced). That is a false assumption. It is false to assume the Appendix 9 'flight test tolerances' are absolute and will be applied perfectly and consistently. As any examiner will tell you, there is more to assessing if an engine failure at take-off has been passed than if the heading was maintained within +/- 10 deg.

In 3 years time, due a natural turnover of personnel, many of the EBT instructors will never have been examiners, and many who have been examiners may not have carried out any checks for 3 years. Currently, TREs are expected to maintain recency in running proficiency checks, and pass an Assessment of Competence every 3 years – they are standardised. In contrast, EBT instructors will be asked to apply criterion they are not familiar with, and only once every 3 years, and so there will inevitably be some variability in their 'pass' grades. And after 6 years and 9 years, fewer and fewer will have ever been examiners. The verification will become more and more inaccurate and meaningless. We suggest any verification should only be a one-off exercise after 3 years. An operator will have already conducted Mixed EBT for at least 2 years, and must have demonstrated to the competent authority the accuracy of their grading system and the concordance of their instructors. So the verification is taking place after 5 years of using the grading system. We believe this is sufficient time to identify and correct any issues, and the verification checks this to be the case. EASA could provide guidance about acceptable tolerances for the verification, and if an operator meets them then no further verification is required.

The comparison with ATQP is also false. The extract from ORO.FC.245 in the Explanatory Note is all about LOEs and LOE events. It is nothing to do with a



proficiency check or any requirement to have a criterion-referenced system to measure the effectiveness of the programme

However, ATQP does require the operator to ‘maintain at least an equivalent level of proficiency ...of ORO.FC.230’. This is achieved by knowing the proficiency of the pilots before ATQP (a ‘baseline’) and then assessing against this proficiency standard at regular intervals. This is easily achieved by comparing pass rates for the manoeuvres of the proficiency check under ATQP versus the baseline. Any significant drift from the baseline then requires action and correction.

The big difference here is that ‘verification’ under ATQP is by checking proficiency of individual manoeuvres. In contrast, the proposed verification under EBT is by comparing overall grades. The EBT concept is much harder to define, to practically carry out and to have valid results.

If, as the GM suggests, it’s the ‘technical competencies’ that are relevant, then a similar concept to ATQP could be adopted for the verification check in EBT. The process could be something like the following:

- Use manoeuvres that are common to both programmes (Appendix 9 and EBT). These are already listed in the table of assessment and training topics, manoeuvres training section.
- Establish a baseline proficiency standard for these manoeuvres prior to full EBT (for example, during the two years of mixed EBT). This baseline should be: what % of pilots were not proficient at the first attempt at each of the manoeuvres.
- Once every 3 years ask the EBT instructors to record during MT what % of pilots were not proficient at the first attempt of each manoeuvre, according to Appendix 9 criteria (criterion-referenced)
- Verify the level of proficiency by comparing the results to the baseline. The operator should define a list of actions to be taken if the verification identifies deviations above certain levels.

A system like this would achieve the following:

- Maintain the principle of verification using a criterion-referenced system
- Use manoeuvres that are core to the Appendix 9
- Make a clear comparison of ‘first look’ to ‘first look’
- Avoid the confusion of comparing an Appendix 9 ‘pass’ to EBT competency grades
- Avoid the complication of designing a ‘mixed EBT’ simulator session while trying to follow the EBT syllabus
- Be straightforward for operators of all sizes to administer
- Be straightforward for competent authorities to audit
- Provide consistent Europe-wide data for EASA to ensure a level-playing field

response

Partially accepted

The AMC and GM have been modified. See the EASA Opinion for more information.

comment

410

comment by: *Lufthansa Cargo AG*



VERIFICATION OF THE ACCURACY OF THE GRADING SYSTEM

(a) Part-FCL Appendix 9 provides a valid criterion-referenced system to determine the accuracy of the grading system.

(b) The operator should identify the mandatory exercises for the proficiency check for type rating and instrument rating in accordance with Part-FCL Appendix 9. Those exercises marked with the letter 'M' in the proficiency check column indicate a mandatory exercise or a choice where more than one exercise appears.

(c) The operator should then design a single module where all the mandatory exercises are performed to assess the accuracy of the grading system.

(d) Instructors should record for the purpose of data analysis if the pilots would have passed the proficiency check should they have taken the check in accordance with Appendix 9. Note: individual pilots are still graded and assessed according to the EBT grading system and Appendix 10; the result of the verification may not be used against the individual pilot.

Comment:

This 'plausibility check' might be useful in the mixed implementation, but not in baseline/enhanced EBT.

response Partially accepted
The AMC and GM have been modified. See the EASA Opinion for more information.

comment 487 comment by: AIRBUS

Page 98 AMC1 ORO.FC231(d)(2) (c):

Airbus does not understand why a single module should be designed since the accuracy of the grading system using the methodology proposed in this AMC can be applied over a cycle or even over the 3 year period.

In addition, a single module including all Appendix 9 mandatory items is not considered in line with the EBT principles, as it will impose to have a module almost only manoeuvre oriented.

response Partially accepted
The AMC and GM have been modified. See the EASA Opinion for more information.

comment 577 comment by: SNPL FRANCE ALPA technical committee

SNPL FRANCE ALPA proposes the following change:

AMC1 ORO.FC.231(d)(2) Evidence-based training**VERIFICATION OF THE ACCURACY OF THE GRADING SYSTEM**

...

(c) The operator should then design a single module where all the mandatory exercises are performed to assess the accuracy of the grading system.

(d) Instructors **TRE** should record for the purpose of data analysis if the pilots would have passed the proficiency check should they have taken the check in accordance with Appendix 9.



	<p>Note: individual pilots are still graded and assessed according to the EBT grading system and Appendix 10; the result of the verification may not be used against the individual pilot.</p> <p>Comment: delete Instructor and replace by TRE.</p> <p>Rationale: the instructors are not qualified with the use of appendix 9 only the TRE are and as one of the module must done by a TRE (see comment on appendix 10) that will not be a problem.</p>
response	<p>Partially accepted</p> <p>The AMC and GM have been modified. See the EASA Opinion for more information.</p>
comment	<p>597 comment by: AUA EBT</p> <p>Question - Is an EBT instructor (TRI), only trained according to EBT and only conducting EBT modules, capable to "check" according appendix 9? If he is capable to "check" appendix 9 items, he should be entitled to revalidate a rating!</p>
response	<p>Partially accepted</p> <p>The AMC and GM have been modified. See the EASA Opinion for more information.</p>
comment	<p>679 comment by: IATA</p> <div style="border: 1px solid black; padding: 5px;"> <p>(d) Instructors should record for the purpose of data analysis if the pilots would have passed the proficiency check should they have taken the check in accordance with Appendix 9.</p> <p>Question - Is an EBT instructor (TRI), only trained according to EBT and only conducting EBT modules, capable to "check" according appendix 9? If he is capable to "check" appendix 9 items, he should be entitled to revalidate a rating!</p> </div>
response	<p>Partially accepted</p> <p>The AMC and GM have been modified. See the EASA Opinion for more information.</p>
comment	<p>694 comment by: EBT Foundation</p> <p>Page No: 98</p> <p>Paragraph No: AMC2 ORO.FC.231(d)(2)</p> <p>Comment: A competency-based grading system should be criterion referenced, meaning there are absolutes in terms of expected levels of safety. The VENN system previously</p>



	<p>described is a criterion referenced system, the criteria being the performance indicators and word pictures. This was clearly evidenced in the analysis performed by the EU funded multinational consortium research project Man4Gen, where the system was used for research purposes and applied across a wide range of activities.</p> <p>Justification: Correct misunderstanding of rating systems and remove unnecessary burden on the operators.</p> <p>Proposed text: Remove AMC2 ORO.FC.231(d)(2) and associated GM</p>
response	<p>Not accepted</p> <p>We encourage the commenter to read the explanatory note and familiarise themselves with:</p> <ul style="list-style-type: none"> • the definitions of a criterion reference; • conditions for a criterion-referenced system; and • how to assess competencies. <p>Man4Gen correctly used several sources to analyse performance such as observations, eye tracking, simulation data, etc. — the reason being the limitations of the expert observation. Please see Table 1 in ‘manual operation’ of 4th Generation Airliners where the methods/tools used to ensure and verify the accuracy of the data obtained are clearly explained. The methodology used in Man4Gen is currently not available for a regular airline and is only available for researchers. In Man4Gen, on top of expert observations, eye tracking, heart rate, questionnaires, video analysis, simulator data are required in order to ensure the accuracy of the data obtained.</p>

GM1 ORO.FC.231(d)(2) Evidence-based training	p. 98-104
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comment

88

comment by: FNAM

ISSUE

‘The verification does not require examiner, and EBT instructors may provide the necessary data for the grading verification.’

Since examiners would validate pilot license, they should be concerted for EBT grading system. In that way, instructors and examiners would work together in order to improve efficiency of EBT programme. Examiners should be consulted for each EBT changes since their responsibilities are involved in final EBT assessment.

Plus, in the whole regulation and rationale, it is not clear if assessment privilege is allowed only for instructors or for examiners and instructors. Despite examiners role and nature, FNAM fears that only instructors would be able to assess EBT competencies. Thus, FNAM suggests to mention in this regulation examiners each time instructors are mentioned in order to allow examiners to assess EBT competencies. This would better fit to operational reality.

Plus, the EASA’s proposed disposals propose that examiners would have to assess and validate license solely on the basis of instructors’ declarations. FNAM wonders what is EASA’s level of apprehension of this issue and its associated risk.

PROPOSAL

Define clearly the concept of assessment for examiners and instructors; and

Ensure examiners responsibilities correspond to examiners assessment means;

Ensure that, examiners would be consulted when EBT changes and improvements are discussed between instructors



response	<p>Not accepted EBT instructors are qualified to perform the task.</p>
comment	<p>428 comment by: <i>European Cockpit Association</i></p> <p>ECA proposes the following change:</p> <p>AMC1 ORO.FC.231(d)(2) Evidence-based training VERIFICATION OF THE ACCURACY OF THE GRADING SYSTEM ...</p> <p>(c) The operator should then design a single module where all the mandatory exercises are performed to assess the accuracy of the grading system.</p> <p>(d) Instructors TRE should record for the purpose of data analysis if the pilots would have passed the proficiency check should they have taken the check in accordance with Appendix 9.</p> <p>Note: individual pilots are still graded and assessed according to the EBT grading system and Appendix 10; the result of the verification may not be used against the individual pilot.</p> <p>Comment: Delete <i>Instructor</i> and replace by TRE</p> <p>Rationale: The instructors are not qualified with the use of Appendix 9, only the TRE are and as one of the module must be done by a TRE (see comment on Appendix 10) that will not be a problem.</p>
response	<p>Not accepted EBT instructors are qualified to perform the task.</p>
comment	<p>429 comment by: <i>European Cockpit Association</i></p> <p>ECA proposes the following change:</p> <p>GM1 ORO.FC.231(d)(2) Evidence-based training VERIFICATION OF THE ACCURACY OF THE GRADING SYSTEM — FEEDBACK LOOP ...</p> <p>The statistical result of the verification against Appendix 9 in one single module can provide the operator with a criterion-referenced system in order to adjust the accuracy of the grading system. The verification does not require an examiner, and EBT instructors may provide the necessary data for the grading verification</p> <p>Comment: Delete the last phrase of the third paragraph in GM1</p> <p>Rationale: This statement is just not true, because only TRE's are trained to the use of Annex 9</p>

response	Not accepted EBT instructors are qualified to perform the task.
comment	<p>578 comment by: SNPL FRANCE ALPA technical committee</p> <p>SNPL FRANCE ALPA proposes the following change :</p> <p>GM1 ORO.FC.231(d)(2) Evidence-based training VERIFICATION OF THE ACCURACY OF THE GRADING SYSTEM — FEEDBACK LOOP ... The statistical result of the verification against Appendix 9 in one single module can provide the operator with a criterion-referenced system in order to adjust the accuracy of the grading system. The verification does not require an examiner, and EBT instructors may provide the necessary data for the grading verification</p> <p>Comment: delete the last phrase of the third paragraph in GM1</p> <p>Rationale: this statement is just not true, because only TRE's are trained to the use of annex 9</p>
response	Not accepted EBT instructors are qualified to perform the task.
comment	<p>629 comment by: Vereinigung Cockpit</p> <p>AMC1 ORO.FC.231(d)(2) Evidence-based training VERIFICATION OF THE ACCURACY OF THE GRADING SYSTEM ... (c) The operator should then design a single module where all the mandatory exercises are performed to assess the accuracy of the grading system. (d) Instructors TRE should record for the purpose of data analysis if the pilots would have passed the proficiency check should they have taken the check in accordance with Appendix 9. Note: individual pilots are still graded and assessed according to the EBT grading system and Appendix 10; the result of the verification may not be used against the individual pilot.</p> <p>Comment: Delete Instructor and replace by TRE</p> <p>Rationale: The instructors are not qualified with the use of Appendix 9, only the TRE are and as one of the module must be done by a TRE (see comment on Appendix 10) that will not be a problem.</p> <p>...</p> <p>The statistical result of the verification against Appendix 9 in one single module can provide the operator with a criterion-referenced system in order to adjust the</p>

	<p>accuracy of the grading system. The verification does not require an examiner, and EBT instructors may provide the necessary data for the grading verification</p> <p>Comment: Delete the last phrase of the third paragraph in GM1</p> <p>Rationale: This statement is just not true, because only TRE's are trained to the use of Annex 9</p>
response	<p>Not accepted EBT instructors are qualified to perform the task.</p>

ORO.FC.231 Evidence-based training — (e) SUITABLE TRAINING DEVICES AND VOLUME TO COMPLETE THE OPERATOR'S APPROVED EBT PRO

p. 104-105

comment	<p>89 comment by: <i>FNAM</i></p> <p>ISSUE – NPA STRUCTURE FNAM does not understand why the modification of part of this IR is in the middle of two GM and AMC dedicated to this same IR. the structure and philosophy of the proposed regulation are really confusing and difficult to understand.</p> <p>PROPOSAL Review the structure of the NPA</p>
response	<p>Noted</p>
comment	<p>339 comment by: <i>British Airways</i></p> <p>(e) Clearly, these two items do not sit very well together as the title is so long! Also, both seem like fundamental parts of the EBT programme. Suggest delete this sub-para (e) and move the two requirements to (a).</p>
response	<p>Not accepted However, the text has been reviewed and amended. See the EASA Opinion for more information.</p>
comment	<p>568 comment by: <i>CAE</i></p> <p>CAE views that this AMC is pre-emptive and cannot be finalised until the work of the RMT.0196 is completed. (e)(1) also contradicts the proposed text in the same AMC 'VOLUME AND FSTD' (c) which states the EBT programme should be performed in a full-flight simulator (FFS) level C or D.</p> <p>I summary, the AMC developed for these areas (SUITABLE TRAINING DEVICES AND VOLUME TO COMPLETE THE OPERATOR'S APPROVED TRAINING PROGRAMME) is not mature enough and is dependent on other RMT work, and decisions in other areas that have not been fully disclosed yet by EASA, before being completed.</p>



response	Partially accepted The implementing rule text has been reviewed and amended. See the EASA Opinion for more information.
comment	656 ❖ comment by: Ryanair ATO (e)(1) Each EBT module shall be conducted in an FSTD with a qualification level adequate to complete proficiency check/training. <i>The train/check "slash" (/) here is ambiguous. Does it mean training and checking OR training or checking. If the latter, then there is scope for a device that can be used for training (As per the new EASA concept of FSTD DNA). If the former, it means that the device must be capable of being used for a check which implies an FFS.</i>
response	Noted The implementing rule text has been reviewed and amended. See the EASA Opinion for more information.

AMC1 ORO.FC.231(e) Evidence-based training

p. 105

comment	14 comment by: Lufthansa Group AMC1 ORO.FC.231(e) restricts EBT to FFSs. From my point of view, this is not in line with the new EASA understanding of FSTD qualification and the targeted flexibilisation strategy (refer to RMT.0196 / FSTD Task Force). As EBT aims for "more training, less checking", it should be possible to perform <u>training elements</u> in a FSTD with a suitable qualification level according to (new) Appendix 9 Part-FCL.
response	Partially accepted The implementing rule text has been reviewed and amended. See the EASA Opinion for more information.
comment	90 comment by: FNAM ISSUE The EASA's proposed disposal require that FSTD sessions for EBT should be performed with a full flight simulator (FFS) level C or D. First, ICAO Document 9995 guidance requires that the simulator should only be qualified for the purpose. That means not full-flight simulators should be used for all training sessions. This is against the proposed European disposal. Then, considering the full-flight simulators availabilities and their costs for operators depending on the type of aircraft, this proposed disposal should requires only that the simulator used for EBT programme is qualified for the purpose. In that way, much more operators would be able to implement EBT programme since its cost and schedule impacts would be reduced. PROPOSAL Rely more on ICAO Doc 9995 wording ; and Modify (c) to require only that the simulator used for EBT programme is qualified for the purpose



response	Not accepted. The implementing rule text has been reviewed and amended. This should allow more flexibility in the use of FSTD. See the EASA Opinion for more information.
comment	340 comment by: <i>British Airways</i> (b) Suggest 'should not' rather than 'should never'. This is better language for an AMC ('never' goes with 'shall', not 'should').
response	Accepted
comment	468 comment by: <i>European Cockpit Association</i> AMC1ORO.FC.231(e) Evidence-based training VOLUME AND FSTD (a) <i>The EBT programme has been developed to include a notional exemplar of 48 FSTD hours over a 3-year</i> Comments: Upgrade (a) to IR; Rationale: ICAO doc 9995 states 48h over a three year period, since EBT being new, that basic assumption shall be followed by EASA. Reference: ICAO doc 9995, PART I, Chapter 3, 3.6.1 and ICAO doc 9995, PART II, Chapter 1, 1.1.1 (b) Subject to authority approval, the operator may reduce the number of FSTD hours provided an equivalent level of safety is achieved. The programme should never be less than 36 FSTD hours. Comments: Delete (b); Reduction below the basic assumption of ICAO should not be part of an AMC, but subject to exemptional approval by the competent authority, ensuring a full approval process, and risk assessment. (c) <i>In addition, the EBT programme should be performed in a full-flight simulator (FFS) level C or D.</i> Comments: <u>Upgrade (c) to IR</u>
response	Not accepted The AMC text has been reviewed and amended so that the competent authority and EASA have more control over the point concerned in this comment (point b). See the EASA Opinion for more information.
comment	503 comment by: <i>Vereinigung Cockpit</i> AMC1ORO.FC.231(e) Evidence-based training VOLUME AND FSTD (a) The EBT programme has been developed to include a notional exemplar of 48 FSTD hours over a 3-year



	<p>Comments: Upgrade (a) to IR; Rationale: ICAO doc 9995 states 48h over a three year period, since EBT being new, that basic assumption shall be followed by EASA. Reference: ICAO doc 9995, PART I, Chapter 3, 3.6.1 and ICAO doc 9995, PART II, Chapter 1, 1.1.1</p> <p>(b) Subject to authority approval, the operator may reduce the number of FSTD hours provided an equivalent level of safety is achieved. The programme should never be less than 36 FSTD hours.</p> <p>Comments: Reduction below the basic assumption of ICAO should not be part of an AMC, but subject to exemptional approval by the competent authority, ensuring a full approval process, and risk assesement.</p> <p>(c) In addition, the EBT programme should be performed in a full-flight simulator (FFS) level C or D.</p> <p>Comments: Upgrade (c) to IR</p>
response	<p>Not accepted</p> <p>The AMC text has been reviewed and amended so that the competent authority and EASA have more control over the point concerned in this comment (point b). See the EASA Opinion for more information.</p>
comment	<p>678 comment by: Ryanair ATO</p> <p>AMC1 ORO.FC.231)(e) - Evidence-based training VOLUME AND FSTD</p> <p>(a) The EBT programme has been developed to include a notional exemplar of 48 FSTD hours over a 3-year programme for each flight crew member.</p> <p>(b) Subject to authority approval, the operator may reduce the number of FSTD hours provided an equivalent level of safety is achieved. The programme should never be less than 36 FSTD hours.</p> <p>(c) In addition, the EBT programme should be performed in a full-flight simulator (FFS) level C or D.</p> <p><i>Point (b) - This text does not agree with ICAO Doc 9995 and increases the scope for variation in the implementation of EBT across operators. EASA should be careful about reducing requirements for training below what is the existing EBT industry best practice as expressed in Doc 9995. The potential for varying content and standards enabled by such a wide range of acceptable hours in an EBT program will increase the oversight burden on EASA across its member states. The introduction of an EBT programme alone should not be used as the rationale to drive a reduction in the duration of the operator's existing recurrent FSTD training and checking.</i></p> <p><i>Point (c) - The IR and AMC should provide for scope for training the Scenario-based Training Phase elements in an FSTD that is not an FFS. It is also possible that the Manoeuvres Training Phase, or elements thereof, could be completed in a FSTD that is not an FFS.</i></p> <p><i>It is recommended that the progressive work of EASA and its FSTD Task Force which will enable the 'task to tool' concept to be implemented in the use of FSTDs in Part-</i></p>

	<p><i>FCL and ORO.FC training, be embraced by the EBT RMG. Language should be inserted in the AMC to allow training experts to choose the appropriate training tool for the required training task. This flexibility is foreseen by the Rule Making Group in its Blended Learning related commentary on page 105 of the NPA. Based on the progressive nature of this explanatory text, there should be little difficulty in embracing the up-to-date work that EASA has presented to industry since this NPA was written.</i></p> <p><i>Note: Even if one agrees that EBT must be conducted in an FFS, the restriction to Level C & D is not justified and is overly restrictive. Level B FFS devices are currently approved for recurrent training and checking and removing this qualification would be counterproductive and would provide no benefit to pilots.</i></p>
response	<p>Not accepted</p> <p>The AMC text has been reviewed and amended so that the competent authority and EASA have more control over the point concerned in this comment (point b). See the EASA Opinion for more information.</p> <p>Regarding the second comment, the implementing rule text has been reviewed and amended. This should allow more flexibility in the use of FSTD. See the EASA Opinion for more information.</p>

ORO.FC.231 Evidence-based training — (f) EQUIVALENCY OF MALFUNCTION	p. 105-106
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comment	<p>91 comment by: <i>FNAM</i></p> <p>ISSUE – NPA STRUCTURE</p> <p>FNAM does not understand why the modification of part of this IR is in the middle of two GM and AMC dedicated to this same IR. the structure and philosophy of the proposed regulation are really confusing and difficult to understand.</p> <p>PROPOSAL</p> <p>Review the structure of the NPA</p>
response	<p>Noted</p>

comment	<p>92 comment by: <i>FNAM</i></p> <p>ISSUE - (3)</p> <p>‘Crew shall be exposed to at least one malfunction for each characteristic at the frequency determined by the table of assessment and training topics.’</p> <p>FNAM thanks EASA for transposing ICAO Doc 9995 guidance in European regulations. Nevertheless, the transposition for recurrence of malfunction system training is not exactly what is proposed by ICAO. Indeed, for all types of aircraft generation, ICAO guidance requires that ‘at least one malfunction with each characteristic should be included every year’. Since this NPA main objective is to transpose ICAO requirements, FNAM suggests to fit exactly with ICAO requirements and guidance. Indeed, this EASA’s proposed requirement may be more restrictive than ICAO since ICAO frequency does not require an annually check on malfunctions.</p> <p>PROPOSAL</p> <p>Fit exactly with ICAO requirements and guidance</p>
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response Noted

comment

317

comment by: *easyJet Airlines Europe*

(f) EQUIVALENCY OF MALFUNCTIONS	GRADING SYSTEM EQUIVALENCY OF MALFUNCTIONS	FOR INFO ONLY As above AMC suggests a grading system from 1 to 5. Shall it be considered to put the 5 characteristics at AMC level? Same logic is applied for the Approach equivalency
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response

Partially accepted

The implementing rule text has been reviewed and amended. See the EASA Opinion for more information.

comment

341

comment by: *British Airways*

(f)(2) We believe listing the five characteristics in the Implementing Rule is a mistake. We don't believe the five characteristics will last the test of time. Priorities and risks will vary over time, and this list will soon be challenged.

We are already having difficulty finding enough malfunctions for every characteristic that 'place a significant demand on a proficient crew'. Modern aircraft design means most major system faults lead to automatic reconfiguration, with no particular demand on the crew, other than to assess the risks and options, and to manage the subsequent approach and landing. For example, for Immediacy, modern types have very few malfunctions with memory items. And for Loss of Instrumentation, some types only have one malfunction that places a significant demand on a proficient crew – airspeed unreliable. Already we're finding that we're training the same or similar malfunctions every year, so that, ironically, EBT has become a less varied training programme for malfunctions compared to ORO.FC.230. Suggest (f)(2) is reworded to say something like: 'Aircraft system malfunctions that place a significant demand on a proficient crew shall be organised by reference to characteristics based on the underlying elements of crew performance required to manage them.' This uses text from Doc 9995, 3.8.3.

We strongly suggest the list of characteristics is moved to AMC. This will also make it consistent with equivalency of approaches.

response

Partially accepted

The implementing rule text has been reviewed and amended. See the EASA Opinion for more information.

comment	<p>93</p> <p style="text-align: right;">comment by: <i>FNAM</i></p> <p>ISSUE – (a) The equivalency malfunction process should be undertaken by subject matter experts (SME) who hold or have held a type rating on the aeroplane type. Nevertheless, FNAM fears that small operators may not be able to respond to this requirement. EBT principle should be encouraged to small operators in order to enhance flight safety level and improve the training efficiency. Flexible provisions should be provided for small operators in order to facilitate and organize resources and data pooling thanks to manufacturers or between operators to implement EBT. Therefore, an AMC or GM should allow operators to benefit of data from other operators performing the same type of operation or operating the same type of aircraft: a kind of data base shared between few operators.</p> <p>PROPOSAL Allow flexibilities for small operators and encourage EBT implementations thanks to pooling resources and data with manufacturers or between operators</p>
response	<p>Not accepted However, the issue will be studied during Phase 3 of RMT.0599. See the latest EPAS.</p>

comment	<p>318</p> <p style="text-align: right;">comment by: <i>easyJet Airlines Europe</i></p> <table border="1" style="width: 100%; background-color: #f4a460;"> <tr> <td style="width: 25%; vertical-align: top;"> <p>AMC1 ORO.FC.231(f) point (c)</p> </td> <td style="width: 45%; vertical-align: top;"> <p>Instructors should record for the purpose of data analysis if the pilots would have passed the proficiency check should they have taken the check in accordance with Appendix 9. Malfunctions included in the equivalency of malfunctions but not included in the EBT FSTD programme require review and appropriate procedural knowledge training, conducted in suitable alternative environment (classroom, flight procedure training device, computer-based training, etc.).</p> </td> <td style="width: 30%; vertical-align: top;"> <p>After 6/9 years of EBT this might be generating confusion among the EBTI community. As known the EBT programme is a norm-reference system as opposed to Appendix 9 which is criterion-reference system. This point requires more explanation since it may appear in contrast with the definition of malfunction equivalence. As it is written it may be interpreted that all malfunctions, <u>with same characteristics</u>, shall be trained. However the note to Doc 9995 table I-3-1 reports: “Other malfunctions <u>not covered by the characteristics detailed in 3.8.2 and 3.8.3</u> continue to require review and appropriate procedural knowledge training conducted in a less qualified but suitable environment (classroom, flight procedures training device, etc.), as an additional component of EBT.</p> </td> </tr> </table>	<p>AMC1 ORO.FC.231(f) point (c)</p>	<p>Instructors should record for the purpose of data analysis if the pilots would have passed the proficiency check should they have taken the check in accordance with Appendix 9. Malfunctions included in the equivalency of malfunctions but not included in the EBT FSTD programme require review and appropriate procedural knowledge training, conducted in suitable alternative environment (classroom, flight procedure training device, computer-based training, etc.).</p>	<p>After 6/9 years of EBT this might be generating confusion among the EBTI community. As known the EBT programme is a norm-reference system as opposed to Appendix 9 which is criterion-reference system. This point requires more explanation since it may appear in contrast with the definition of malfunction equivalence. As it is written it may be interpreted that all malfunctions, <u>with same characteristics</u>, shall be trained. However the note to Doc 9995 table I-3-1 reports: “Other malfunctions <u>not covered by the characteristics detailed in 3.8.2 and 3.8.3</u> continue to require review and appropriate procedural knowledge training conducted in a less qualified but suitable environment (classroom, flight procedures training device, etc.), as an additional component of EBT.</p>
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response

Noted

The EASA Opinion provides more guidance. In addition, the safety promotion task SPT.012 will monitor the issue and evaluate during the implementation phase whether more information is required to facilitate the implementation of EBT.

comment

342

comment by: *British Airways*

Suggest new AMC1 which gives the five characteristics, moved from the IR.

(a) Suggest delete '(SMEs)' as this abbreviation is not used elsewhere in the AMC or GM. It is written in full in the GM.

(b) Step 1, is not clear language. Suggest 'Review all the system malfunctions provided by the OEM, for example FCOM or AFM.' The other words read like GM, and are already repeated in the GM.

(c) This conflicts with the IR (f)(4). The implication of this AMC is that the IR is wrong. This is because the other malfunctions with the same characteristics are not considered 'equivalent', they will still require review and procedural knowledge training. In other words, there is no equivalency of malfunctions. All malfunctions that place a significant demand on a proficient crew must be trained, whether in the FSTD or elsewhere.

This is not what Doc 9995 says. It says that 'other malfunctions not covered by the characteristics ... continue to require review'. The important word is 'not'.

EASA seem to have got around this by defining 'equivalency of malfunctions' as all malfunctions that place a significant demand on a proficient crew regardless of whether or not they are used in the EBT modules. This is a fudge. Equivalency of malfunctions is a process, not a list. The definition goes against the spirit of Doc 9995.

Suggest that (c) simply says 'Other malfunctions not included in the EBT FSTD programme...'. This then allows operators to cover other malfunctions in the training programme that are particularly relevant to their aircraft types, relevant to their operations, and relevant to reports and incidents in their operations, as well as learning from the experiences of others.

This is a major issue for EBT. The programme will have no credibility if it lacks the flexibility to include training in malfunctions that are seen through the operator's and industry's experience. The consequence is that all the simulator time in the FSTD will be taken up training the same list of demanding malfunctions, and all the time in the classroom will be taken up training the other demanding malfunctions from the list. The list will not vary from year to year. Operators will end up ticking boxes rather than enriching the programme.

Another issue with (c) is that it gives no frequency. It could be implied that because Aircraft Systems Malfunctions is frequency B in the table of assessment and training topics, this means the procedural training of the other demanding malfunctions is



	also frequency B, i.e. every year. Is that what EASA intends? ORO.FC.230 requires all major failures to be covered in a 3-year period and this should be made clear in (c). Suggest adding words like '...over a 3-year period'.
response	Partially accepted. Some of the editorials highlighted in this comment are accepted. According to ICAO Doc 9995, all malfunctions that put a significant demand on a proficient crew must be trained; the document offers the possibility to perform this training in an alternative but suitable training environment. This concept was transposed to the NPA and to the EASA Opinion.
comment	488 comment by: AIRBUS Page 106 AMC1 ORO.FC.231(e): Airbus believes that prescribing training volumes is against the performance-based training concept. Since training items and their frequency are defined and since the level of competence to be reached is defined, there is no need to set a minimum training volume. The minimum 36 hours proposed also appears to be dogmatic.
response	Not accepted In order to ensure level playing field and legal certainty as well as to remain aligned with ICAO Doc 9995, a minimum quantity is transposed. The EASA Opinion offers more flexibility than ICAO Doc 9995 by including the possibility of 36 hours.

AMC1 ORO.FC.231(f)(3) Evidence-based training

p. 107-108

comment	157 comment by: Olaf Birgels (DLH) CREW EXPOSURE TO AT LEAST ONE MALFUNCTION FOR EACH CHARACTERISTIC Unless specified in the OSD, each crew member should be exposed to the characteristics of degraded control and loss of instrumentation in the role of pilot flying.
response	Partially accepted The AMC has been modified to include the possibility of having an alternative means of compliance subject to a risk assessment in accordance with ORO.GEN.120.
comment	185 comment by: M.Held / Lufthansa Airlines CREW EXPOSURE TO AT LEAST ONE MALFUNCTION FOR EACH CHARACTERISTIC



response	<p>Unless specified in the OSD, each crew member should be exposed to the characteristics of degraded control and loss of instrumentation in the role of pilot flying.</p> <p>Difficult to realize on some aircrafts (f.e. B747). Would an ORE be a tool to extend the interval for training?</p> <p><i>(for info only: Proposal for amendment of the AMC was send to F. Arenas by Email)</i></p> <p>Partially accepted The AMC has been modified to include the possibility of having an alternative means of compliance subject to a risk assessment in accordance with ORO.GEN.120.</p>
comment	<p>206 comment by: Lufthansa CityLine GmbH</p> <p>CREW EXPOSURE TO AT LEAST ONE MALFUNCTION FOR EACH CHARACTERISTIC Unless specified in the OSD, each crew member should be exposed to the characteristics of degraded control and loss of instrumentation in the role of pilot flying.</p> <p>Question - Difficult to realize on some aircrafts (f.e. B747). Would an ORE be a tool to extend the interval for training? <i>(for info only: Proposal for amendment of the AMC was send to F. Arenas by Email)</i></p>
response	<p>Partially accepted The AMC has been modified to include the possibility of having an alternative means of compliance subject to a risk assessment in accordance with ORO.GEN.120.</p>
comment	<p>265 comment by: SWISS Intl. Air Lines</p> <p>This is difficult on highly redunant aircrafts. Would an ORE be a reasonalbe tool to extend interval for training?</p>
response	<p>Partially accepted The AMC has been modified to include the possibility of having an alternative means of compliance subject to a risk assessment in accordance with ORO.GEN.120.</p>
comment	<p>343 comment by: British Airways</p> <p>As per previous comments, modern aircraft design meant we are finding it difficult to find enough worthwhile variety in malfunctions with these characteristics. We are finding we are repeating the same malfunctions for each crew member. This requirement is not in Doc 9995. Suggest this AMC is deleted as it add little value and questionable training benefit in the training programme.</p>
response	<p>Partially accepted</p>

The AMC has been modified to include the possibility of having an alternative means of compliance subject to a risk assessment in accordance with ORO.GEN.120.

comment

411

comment by: Lufthansa Cargo AG

CREW EXPOSURE TO AT LEAST ONE MALFUNCTION FOR EACH CHARACTERISTIC
Unless specified in the OSD, each crew member should be exposed to the characteristics of degraded control and loss of instrumentation in the role of pilot flying.

Detailed Specification needed:

What is the interval for this exercises? How could OSD influence interval/kind of exercise?

response

Partially accepted

The AMC has been modified to include the possibility of having a different frequency in accordance with the OSD.

comment

598

comment by: AUA EBT

Question - Difficult to realize on some aircrafts (f.e. B747, B767) Would an ORE be a tool to extend the interval for training?

(for info only: Proposal for amendment of the AMC was send to F. Arenas by Email

response

Partially accepted

The AMC has been modified to include the possibility of having an alternative means of compliance subject to a risk assessment in accordance with ORO.GEN.120.

GM1 ORO.FC.231(f) Evidence-based training

p. 108

comment

344

comment by: British Airways

(a)(2) Suggest 'procedure' singular to align with the preceding text in (a)

(a)(5) Suggest 'a significant increase in workload'. It should be singular, not plural.

(b) Isn't this already stated or implicit from the IR and AMC? Suggest this is unnecessary.

response

Partially accepted

GM2 ORO.FC.231(f) Evidence-based training

p. 108

comment

94

comment by: FNAM

ISSUE - (a)



	<p>The EASA's proposed disposal describes in details what is the immediacy criteria for equivalency malfunctions. FNAM thanks EASA for transposing ICAO Doc 9995 guidance in this GM. However, the provided example does not fit with ICAO examples and does not reflect properly this criteria. Thus, FNAM suggest to replace this example with one of ICAO example : 'Fire, Smoke,' etc.</p> <p>PROPOSAL Replace 'malfunction with memory items' with one of ICAO example : 'Fire, Smoke,' etc.</p>
response	Not accepted
comment	<p>95 comment by: FNAM</p> <p>ISSUE - (d) & (e) The EASA's proposed disposals describe in details what are the loss of instrumentation and the management of consequences criterion for equivalency malfunctions. FNAM thanks EASA for transposing ICAO Doc 9995 guidance in this GM. However, the provided guidance do not fit with ICAO guidance and do not reflect properly this criteria. First, FNAM suggest to replace the term 'system malfunction' by ICAO terms 'system failure'. Then, FNAM suggests that Management of consequences criteria explanation fits exactly to ICAO guidance. Since this NPA main objective is to transpose ICAO requirements, FNAM suggests to fit exactly with ICAO requirements and guidance.</p> <p>PROPOSAL Replace the term 'system malfunction' by ICAO terms 'system failure'; and Fit exactly to ICAO guidance</p>
response	Not accepted
comment	<p>430 comment by: European Cockpit Association</p> <p>ECA proposes to upgrade this GM to an AMC:</p> <p>GM2 ORO.FC.231(f) Evidence-based training EQUIVALENCY OF MALFUNCTIONS — MALFUNCTION CHARACTERISTICS The following may be considered suitable definitions for each of the characteristics: (a) 'Immediacy': System malfunctions requiring immediate and urgent crew intervention or decision (e.g. malfunctions with memory items) b) (b) 'Complexity': System malfunctions requiring recovery procedures with multiple options to analyse and/or multiple decision paths to apply c) (c) 'Degradation of aircraft control': System malfunctions resulting in significant degradation of flight controls in combination with abnormal handling characteristics d) (d) 'Loss of instrumentation': System malfunctions that require monitoring and management of the flight path using degraded or alternative displays e) (e) 'Management of consequences': System malfunctions affecting significantly the flight crew standard task sharing and/or the workload management and/or the decision-making process during an extensive period Note:</p>



	<p>Equivalency of malfunctions may be undertaken in consultation with the aircraft OEM. The objective of the OEM consultation is to review the operator analysis regarding the OEM operational certification (e.g. OSD) documents and to the general OEM operation and training policy.</p> <p>Comment: Definitions does not belong to GM they should be placed at least in an AMC.</p>
response	Not accepted
comment	<p>579 comment by: SNPL FRANCE ALPA technical committee</p> <p>SNPL FRANCE ALPA proposes to upgrade this GM to an AMC :</p> <p>GM2 ORO.FC.231(f) Evidence-based training EQUIVALENCY OF MALFUNCTIONS — MALFUNCTION CHARACTERISTICS The following may be considered suitable definitions for each of the characteristics: (a) 'Immediacy': System malfunctions requiring immediate and urgent crew intervention or decision (e.g. malfunctions with memory items) b) (b) 'Complexity': System malfunctions requiring recovery procedures with multiple options to analyse and/or multiple decision paths to apply c) (c) 'Degradation of aircraft control': System malfunctions resulting in significant degradation of flight controls in combination with abnormal handling characteristics d) (d) 'Loss of instrumentation': System malfunctions that require monitoring and management of the flight path using degraded or alternative displays e) (e) 'Management of consequences': System malfunctions affecting significantly the flight crew standard task sharing and/or the workload management and/or the decision-making process during an extensive period Note: Equivalency of malfunctions may be undertaken in consultation with the aircraft OEM. The objective of the OEM consultation is to review the operator analysis regarding the OEM operational certification (e.g. OSD) documents and to the general OEM operation and training policy.</p> <p>Comment : definitions does not belong to GM they should be at least in an AMC</p>
response	Not accepted
comment	<p>630 comment by: Vereinigung Cockpit</p> <p>GM2 ORO.FC.231(f) Evidence-based training EQUIVALENCY OF MALFUNCTIONS — MALFUNCTION CHARACTERISTICS The following may be considered suitable definitions for each of the characteristics: (a) 'Immediacy': System malfunctions requiring immediate and urgent crew intervention or decision (e.g. malfunctions with memory items) b) (b) 'Complexity': System malfunctions requiring recovery procedures with multiple options to analyse and/or multiple decision paths to apply</p>

c) (c) 'Degradation of aircraft control': System malfunctions resulting in significant degradation of flight controls in combination with abnormal handling characteristics
 d) (d) 'Loss of instrumentation': System malfunctions that require monitoring and management of the flight path using degraded or alternative displays
 e) (e) 'Management of consequences': System malfunctions affecting significantly the flight crew standard task sharing and/or the workload management and/or the decision-making process during an extensive period

Note:

Equivalency of malfunctions may be undertaken in consultation with the aircraft OEM. The objective of the OEM consultation is to review the operator analysis regarding the OEM operational certification (e.g. OSD) documents and to the general OEM operation and training policy.

Comment:

Definitions does not belong to GM they should be placed at least in an AMC.

response Not accepted

GM3 ORO.FC.231(f) Evidence-based training

p. 109

comment 96

comment by: *FNAM*

ISSUE

The proposed guidance describes that the equivalency of malfunctions needs isolation from an environmental or operational context. FNAM thanks EASA for transposing ICAO Doc 9995 guidance. Nevertheless, since this NPA main objective is to transpose ICAO requirements, FNAM suggests to fit exactly with ICAO requirements and guidance.

Indeed, the wording in the proposed guidance is slightly different with ICAO guidance which is more direct and simpler to understand.

Thus, FNAM suggests to modify this GM and integrate ICAO guidance: 'Malfunction characteristics should be considered in isolation from any environmental or operational context'

PROPOSAL

Integrate ICAO guidance: 'Malfunction characteristics should be considered in isolation from any environmental or operational context'

response Not accepted

GM4 ORO.FC.231(f) Evidence-based training

p. 109

comment 97

comment by: *FNAM*

ISSUE – (c), (d), (e), (f), & (g)

Since examiners would validate pilot license, they should be concerted for equivalency of malfunctions selection. In that way, instructors and examiners would work together in order to improve EBT programme efficiency. Examiners



responsibilities are involved in final EBT assessment; they should be consulted for each EBT changes and building.

Plus, in the whole regulation and rationale, it is not clear if assessment privilege is allowed only for instructors or for examiners and instructors. Despite examiners role and nature, FNAM fears that only instructors would be able to assess EBT competencies. Thus, FNAM suggests to mention in this regulation examiners each time instructors are mentioned in order to allow examiners to assess EBT competencies. This would better fit to operational reality.

Plus, the EASA's proposed disposals propose that examiners would have to assess and validate license solely on the basis of instructors' declarations. FNAM wonders what is EASA's level of apprehension of this issue and its associated risk.

PROPOSAL

Define clearly the concept of assessment for examiners and instructors; and

Ensure examiners responsibilities correspond to examiners assessment means; and

Ensure that, examiners would be consulted for equivalency of malfunctions selection

response

Not accepted

EBT instructors are qualified to perform the task.

comment

345

comment by: *British Airways*

This is an unnecessary and overcomplicated regulation. It is an unwarranted additional burden compared to ORO.FC.230 and ORO.FC.245 that is disproportionate to the output required.

ORO.FC.230 requires that all major failures are covered in a 3-year period, and there is no GM about how to establish that list. ORO.FC.245 requires a 'systematic review' to create a task analysis, but no GM on how to do it. Part-FCL Appendix 9 requires examiners to choose six normal, abnormal and emergency procedures from a list as part of a proficiency check, but does not otherwise restrict their choice. In all of these cases, the operator already uses subject matter experts to carry out the task of creating a list of malfunctions, typically instructors and examiners on type. Have competent authorities ever had a major issue with the resulting lists that operators produce?

What problem is EASA trying to solve here? The Explanatory Note describes the Delphi process, but not why EASA felt it necessary to require operators to use it for EBT. Has EASA consulted with the operators doing Mixed EBT? Did any of them say that a Delphi process was necessary, and that using a smaller group of SMEs didn't work?

What happens if an OEM publishes their own Equivalency of Malfunctions analysis? Airbus has just done this in the new A320 Flight Crew Training Standards document. Why does an operator need to duplicate this work with a large group of instructors? Surely a small group of SMEs can validate the OEM list for their own operations.

Operators using Delphi will probably still produce different lists for the same aircraft type. But that doesn't matter! This is because 'demonstrated proficiency in the management of one malfunction is considered equivalent to demonstrated proficiency in the management of other malfunctions with the same characteristics'. So as long as a representative malfunction is used in the FSTD, it doesn't matter if



different operators produce slightly different lists and use different malfunctions. It also doesn't matter if a small group of SMEs produces a slightly different list to a large group of SMEs using Delphi. It's the quality of training that matters, not the exact list of malfunctions that are used.

We suggest that GM4 and the SPT is removed. The AMC text is entirely adequate: the '...process should be undertaken by subject matter experts...'

response Not accepted

comment 695 comment by: *EBT Foundation*

Paragraph No: GM4 ORO.FC.231(f)

Comment:

The use of a statistical process should not be considered as useful in the development of the equivalency of malfunctions for each fleet. As an example, OEM's do not consult widely in the development of classes of equivalence in training. The burden imposed by this is huge. To prescribe surveys in this way will have the result that pilots will complete the survey as quickly as possible, and results will not be usable. The objective is to identify useful aircraft threats according to each characteristic and have a variety of possibilities for the development of real time training, which is the notion of EBT. Multiple consequent malfunctions will often be used and where possible, introduced in a manner where the simple checklist responses may not be adequate to resolve the problem.

Any analysis should be conducted by those charged with development of the EBT programme. it is usually only by working collectively with 2-3 people that good decisions are taken, and this is the experience to-date with the system.

Justification: Remove unnecessary burden on operators and provide for a quality driven approach over bogus statistics derived from pilots with little interest in the concept.

Proposed text: Remove GM4 ORO.FC.231(f)

response Not accepted
This provision is a GM; therefore, the arguments used are not consistent.

GM4 ORO.FC.231(f) Evidence-based training	p. 110-113
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comment 98 comment by: *FNAM*

ISSUE – Safety promotion material

The proposed safety promotion material details the equivalency of malfunctions process. Several non-sense and issues are risen:

First, this proposal suggests that TRI or TRE should be the only ones to carry out the analysis of the grouping of abnormal and emergency procedures. Since examiners are involved in assessment and license validation and that TRI are involved in all EBT



phases, both entities should be represented for the analysis. Thus, FNAM suggest to modify 'or' by 'and'.

Then, the safety promotion material suggests that 'abnormal and emergency should be considered in isolation, from any environmental or operational context.' FNAM thanks EASA for transposing ICAO Doc 9995 guidance. However, it is not only abnormal and emergency but all malfunction characteristics which should be considered in isolation from any environmental or operation context. Since the proposed guidance does not cover ICAO guidance, FNAM fears that the proposed regulation on equivalency of malfunctions would not be properly implemented and may even impact flight safety.

Finally, FNAM wonders what is the legal status of these guidance. Is it a FAQ? Is it a hard law or is it a soft law? 'Safety promotions' are not GM nor AMC: they could be proposed without any stakeholders consultation. If these guidance are necessary, FNAM suggests to regroup all guidance in one document by integrating 'safety promotions' into GM; if not, to suppress 'safety promotions'.

PROPOSAL

Modify 'or' by 'and' in the first paragraph; and
 Fit exactly to ICAO Doc 9995 by replacing 'abnormal and emergency' by 'malfunction characteristics'; and
 Regroup all guidance in this regulation by integrating 'safety promotions' into GM

response Not accepted

comment 99 comment by: FNAM

ISSUE - Rationale

These EASA's proposed disposals describe in details what are the loss of instrumentation and the management of consequences criterion for equivalency malfunctions. FNAM thanks EASA for transposing ICAO Doc 9995 guidance in this GM. However, EASA's proposed guidance do not fit with ICAO guidance and do not reflect properly this criteria.

First, FNAM suggests to replace the term 'system malfunction' by ICAO terms 'system failure'.

Then, FNAM suggests that Management of consequences criteria explanation fits exactly to ICAO guidance. Since this NPA main objective is to transpose ICAO requirements, FNAM suggests to fit exactly with ICAO requirements and guidance.

PROPOSAL

Replace the term 'system malfunction' by ICAO terms 'system failure'; and
 Fit exactly to ICAO guidance

response Not accepted
 In the EU regulation the wording 'system malfunction' is normally used instead of 'system failure'.

ORO.FC.231 — (g) EQUIVALENCY OF APPROACHES RELEVANT TO OPERATIO p. 113

comment 100 comment by: FNAM

ISSUE – NPA STRUCTURE



	<p>FNAM does not understand why the modification of part of this IR is in the middle of two GM and AMC dedicated to this same IR. the structure and philosophy of the proposed regulation are really confusing and difficult to understand.</p> <p>PROPOSAL Review the structure of the NPA</p>
response	Noted

AMC1 ORO.FC.231(g) Evidence-based training	p. 113
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comment	101	comment by: <i>FNAM</i>
	<p>ISSUE – EBT PROGRAMME vs APPROVED EBT PROGRAMME</p> <p>The difference between EBT programme and approved EBT programme is clearly explained in ORO.FC.231 rational. Nevertheless, the fact that EBT programme is generic to an aircraft generation and that approved EBT programme is specific to the operator are not clearly explained in the regulation. Requirements for EBT programme and approved EBT programme are not distinguished in EASA’s proposed disposals. This difference is really important to understand EASA’s EBT philosophy and therefore to implement correctly the EBT and its European requirements. FNAM suggests to clarify in the regulation the differences between EBT programme and approved EBT programme.</p> <p>PROPOSAL Clarify in the regulation requirements and definitions of EBT programme and approved EBT programme</p>	
response	<p>Noted</p> <p>The text has been modified and ‘EBT programme’ is used to refer to the operator’s approved EBT programme while the tables in Appendix II are referred to as ‘assessment and training topics’. Please note that in the Opinion, Appendix II and its tables of assessment and training topics are moved to Certification specifications under ORO.FC.232.</p>	

comment	346	comment by: <i>British Airways</i>
	<p>(a)(2)(i) The language doesn’t flow naturally. All approaches have ‘approach design’. Suggest change to: ‘unusual approach design’</p> <p>(a)(2)(ii) Again the flow of language is odd. Suggest change to: ‘low frequency of exposure’</p> <p>(a)(2)(iii) Delete the word ‘and’ at the end of the line</p> <p>(a)(3)Note. Is this correct? What if SBT is designed with more approaches than those given in Section 2 (as would be normal). Why can't you include an approach with one of the characteristics in Section 3? I think this Note should be redrafted to mean only approaches of different types and methods listed in Section 2 need to be selected, but approaches with different characteristics can be included at any point in the Eval or SBT (sections 2 and 3).</p>	



	(b) Suggest delete 'in the operational network'. Where else could they be?
response	Partially accepted Point (a)(3) refers to the table of assessment and training topics and Section 2 contains the approach types and methods that must be used for the approach clustering. Section 2 refers to MT but as well to EVAL and SBT.

AMC2 ORO.FC.231(g) Evidence-based training

p. 113

comment	102	comment by: <i>FNAM</i>
	<p>ISSUE – EBT PROGRAMME vs APPROVED EBT PROGRAMME</p> <p>The difference between EBT programme and approved EBT programme is clearly explained in ORO.FC.231 rational. Nevertheless, the fact that EBT programme is generic to an aircraft generation and that approved EBT programme is specific to the operator are not clearly explained in the regulation. Requirements for EBT programme and approved EBT programme are not distinguished in EASA's proposed disposals. This difference is really important to understand EASA's EBT philosophy and therefore to implement correctly the EBT and its European requirements. FNAM suggests to clarify in the regulation the differences between EBT programme and approved EBT programme.</p> <p>PROPOSAL</p> <p>Clarify in the regulation requirements and definitions of EBT programme and approved EBT programme</p>	
response	<p>Noted</p> <p>The text has been modified and 'EBT programme' is used to refer to the operator's approved EBT programme while the tables in Appendix II are referred to as 'assessment and training topics'. Please note that in the Opinion, Appendix II and its tables of assessment and training topics are moved to Certification specifications under ORO.FC.232.</p>	

GM1 ORO.FC.231(g) Evidence-based training

p. 113-114

comment	103	comment by: <i>FNAM</i>
	<p>ISSUE – EBT PROGRAMME vs APPROVED EBT PROGRAMME</p> <p>The difference between EBT programme and approved EBT programme is clearly explained in ORO.FC.231 rational. Nevertheless, the fact that EBT programme is generic to an aircraft generation and that approved EBT programme is specific to the operator are not clearly explained in the regulation. Requirements for EBT programme and approved EBT programme are not distinguished in EASA's proposed disposals. This difference is really important to understand EASA's EBT philosophy and therefore to implement correctly the EBT and its European requirements. FNAM suggests to clarify in the regulation the differences between EBT programme and approved EBT programme.</p> <p>PROPOSAL</p> <p>Clarify in the regulation requirements and definitions of EBT programme and approved EBT programme</p>	



response	<p>Noted</p> <p>The text has been modified and 'EBT programme' is used to refer to the operator's approved EBT programme while the tables in Appendix II are referred to as 'assessment and training topics'. Please note that in the Opinion, Appendix II and its tables of assessment and training topics are moved to Certification specifications under ORO.FC.232.</p>
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GM2 ORO.FC.231(g) Evidence-based training	p. 114
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comment	<p>347 comment by: <i>British Airways</i></p> <p>The first sentence is stating the obvious and already covered by AMC1 ORO.FC.231(a). Suggest it is deleted.</p> <p>For the second sentence, surely this should be AMC, firstly because the tables of assessment and training topics are AMC, and secondly because the same statement for equivalency of malfunctions is IR. Suggest move this into AMC1 ORO.FC.231(G) as a new para (b).</p> <p>This second sentence also needs rewording. Currently it doesn't require all the approach characteristics to be included, only 'at least one', which could be the same one every time. The wording needs to say 'each characteristic', as per malfunctions. Suggest something like 'At least one approach of each type and method should be included at the frequency given in the table of assessment and training topics. Crew should also be exposed to approaches with each characteristic at the frequency given in the table of assessment and training topics.'</p>
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response	Accepted
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GM2 ORO.FC.231(g) Evidence-based training	p. 115-117
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comment	<p>104 comment by: <i>FNAM</i></p> <p>ISSUE – EBT PROGRAMME vs APPROVED EBT PROGRAMME</p> <p>The difference between EBT programme and approved EBT programme is clearly explained in ORO.FC.231 rational. Nevertheless, the fact that EBT programme is generic to an aircraft generation and that approved EBT programme is specific to the operator are not clearly explained in the regulation. Requirements for EBT programme and approved EBT programme are not distinguished in EASA's proposed disposals. This difference is really important to understand EASA's EBT philosophy and therefore to implement correctly the EBT and its European requirements. FNAM suggests to clarify in the regulation the differences between EBT programme and approved EBT programme.</p>
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response	<p>PROPOSAL</p> <p>Clarify in the regulation requirements and definitions of EBT programme and approved EBT programme</p>
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response	Noted
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ORO.FC.231 — (h) LINE EVALUATION OF COMPETEN

p. 117-118

comment	105	comment by: FNAM
	<p>ISSUE – NPA STRUCTURE FNAM does not understand why the modification of part of this IR is in the middle of two GM and AMC dedicated to this same IR. the structure and philosophy of the proposed regulation are really confusing and difficult to understand.</p> <p>PROPOSAL Review the structure of the NPA</p>	
response	Noted	
comment	106	comment by: FNAM
	<p>AGREEMENT FNAM agrees that operators should be able to extend the oversight frequency depending on certain conditions.</p>	
response	Noted	
comment	107	comment by: FNAM
	<p>ISSUE – (h)(1) FNAM disagrees with (h)(1) rationale. Indeed, ICAO guidance ensure that competencies are identified to operate safely although the EASA's proposed requirements ensures that pilot can operate safely in normal operations. Thus, it is not the same purpose. Indeed, to operate safely, pilot should be able to manage all case of flight and not only normal operations. It includes for example abnormal and emergency operations. FNAM suggests to fit to ICAO guidance for this requirements in order to ensure a high flight-safety level.</p> <p>PROPOSAL Ensure that all operations could be manage by pilots</p>	
response	Not accepted Refer to the explanatory note of ORO.FC.231(h)(1).	
comment	108	comment by: FNAM
	<p>ISSUE – Safety Promotion EASA's proposed disposals present guidance <i>via</i> a new vector : the 'safety promotions'. FNAM wonders what is the legal status of these guidance. Is it a FAQ? Is it a hard law or is it a soft law? 'Safety promotions' are not GM nor AMC: they could be proposed without any stakeholders consultation. If these guidance are necessary, FNAM suggests to regroup all guidance in European regulations by integrating 'safety promotions' into GM; if not, to suppress 'safety promotions'.</p> <p>PROPOSAL Regroup all guidance in this regulation by integrating 'safety promotions' into GM</p>	
response	Not accepted	



Safety promotion actions will be compiled into an EASA EBT manual.

comment	348	comment by: <i>British Airways</i>
	(h)(1) Why 'enrolled'? Isn't it implicit as this is an EBT programme? Also (5) doesn't use 'enrolled'. Suggest delete 'enrolled'.	
	(h)(1) Suggest delete 'in flight' because it's obvious, and also because the GM talks about preflight and post-flight activities.	
	(h)(1) Suggest replace 'specified' with 'described' to align with the IR for a Line Check in ORO.FC.230.	
response	Accepted	

comment	490	comment by: <i>AIRBUS</i>
	Page 118 AMC2 ORO.FC.231(g)(h)(5):	
	Airbus considers that any grade 2 in competencies is not a successful outcome for a line evaluation.	
	Same comment that comment (N° EASA 484) related to NPA page 86 AMC1 ORO.FC.231(d)(1) (b):	
response	Not accepted 'Grading 2 competent' is in line with the views of the rulemaking group, the review group and the documentation and notes provided by ICAO and IATA.	

AMC1 ORO.FC.231(h) Evidence-based training

p. 118-119

comment	109	comment by: <i>FNAM</i>
	ISSUE	
	The use of the term 'normal operation' could be confusing and may lead to wrong implementations of the regulation. (See previous comment ISSUE – (h)(1) of ORO.FC.231 – (h))	
	Thus, FNAM suggests to replace 'normal operation' to 'typical and specific operations form the operator'.	
	PROPOSAL	
	Replace 'normal operation' to 'typical and specific operations form the operator'	
response	Not accepted Refer to the explanatory note of ORO.FC.231(h)(1).	
comment	110	comment by: <i>FNAM</i>
	ISSUE – (c)	
	Training may be differentiate between monitoring pilot and flying pilot. In order to reduce redundancies and alleviate any supplemental burden for operators, FNAM	



	<p>suggests that any redundant items between monitoring and flying pilots should be avoided.</p> <p>PROPOSAL</p> <p>Avoid any redundant items between monitoring and flying pilots</p>
response	<p>Not accepted</p> <p>The proposal of line evaluation of competence follows the current approach for line check.</p>
comment	<p>136 comment by: <i>FlightSafety International - Regional Director Regulatory Affairs</i></p> <p>i. TYPO: AMC1 ORO.FC.231(h) Evidence-based trainingb) Each flight crew member should be assessed according to the competency framework and grading system system approved for their operator's approved EBT programme.</p>
response	<p>Accepted</p>
comment	<p>349 comment by: <i>British Airways</i></p> <p>(c) 'Therefore, they should be checked on one flight sector as pilot flying and on another flight sector as pilot monitoring'. Why has this been added by EASA? This is new regulation added by EASA that is not in ORO.FC.230. Why is there no Explanatory Note to explain this new regulation? This is a significant additional requirement that will adversely affect those operators who have procedures that require the pilots to act in the role of pilot flying and pilot monitoring at different times on one sector (monitored approach). Have you consulted with those operators and the competent authorities who regulate them? To be clear, we do not operate this way to gain some commercial advantage. We do it because we believe it is the best way to operate. Other operators use these SOPs for low visibility approaches, and we believe the rationale and advantages are applicable to all approaches, not just low visibility approaches.</p> <p>This is a significant and unjustified additional requirement for operators and should be removed.</p> <p>(d) Should be 'commanders' plural (two uses of the word).</p> <p>(f) Very odd to have text here that relates to operation on more than one type or variant. This should be move to ORO.FC.240, where there is already new text that refers back to ORO.FC.231. All the text for LEOCs should be together in ORO.FC.240.</p> <p>(f) We disagree with the proposal. For an experienced operator under EBT, the result will be that pilots on one type will do a LEOC every 3 years, and pilots on two types will do a LEOC every year. This is illogical and out of proportion. We suggest extension of the validity period of the LEOC is allowed up to 2 year (but not 3 years), and for only 2 types or variants, not more. The result will be that pilots will do a LEOC every 2 years, but on alternate types. They will therefore do a LEOC more frequently that pilots flying only one type, albeit they will only do a LEOC on each type every 4 years. However, that's the whole point! The types are similar enough that a LEOC on one</p>



response	<p>type is equivalent and therefore revalidates the LEOC on another type – which is precisely what you’ve drafted in AMC1 ORO.FC.240(a)(4)(vii)(B).</p> <p>Partially accepted, The proposal regarding point (c) is not accepted. EASA is introducing a change in AMC1 ORO.FC.230 to ensure level playing field for all airlines in Europe. This ensures a two-sector line check. The EBT proposal aligns with the NPA 2019-08 ‘update of ORO.FC’ The comments to points (d) and (f) are accepted.</p>
comment	<p>469 comment by: <i>European Cockpit Association</i></p> <p>AMC1ORO.FC.231(h) Evidence-based training LINE EVALUATION OF COMPETENCE (d) The operator should inform the competent authority about the suitably qualified commander nominated to undertake line evaluations of competence. The commander should be trained following the applicable provisions contained in AMC1 ORO.FC.145 (a)(3)</p> <p>Comments: Line <u>evaluation</u> shall be done by an examiner.</p> <p>Rationale: Examiners are the only ones having sufficient training and experience to ensure consistent quality. Consistency with rationale given by EASA in GM.ORO:FC 231(h)(b): “The line evaluation of competence is considered a particularly important factor in the development ,maintenance and refinement of high operating standards, and can provide the operator with a valuable indication of the usefulness of its training policy and methods.”</p>
response	<p>Not accepted Currently, the line check is performed by a ‘nominated captain’ in legacy training.</p>
comment	<p>504 comment by: <i>Vereinigung Cockpit</i></p> <p>AMC1ORO.FC.231(h) Evidence-based training LINE EVALUATION OF COMPETENCE (d) The operator should inform the competent authority about the suitably qualified commander nominated to undertake line evaluations of competence. The commander should be trained following the applicable provisions contained in AMC1 ORO.FC.145 (a)(3)</p> <p>Comments: Line <u>evaluation</u> shall be done by an examiner. Rationale: Examiners are the only one’s having sufficient training and experience to ensure consistent quality. Consistency with rationale given by EASA in GM.ORO:FC 231(h)(b): “The line evaluation of competence is considered a particularly important factor in the development, maintenance and refinement of high operating standards, and can provide the operator with a valuable indication of the usefulness of its training policy and methods.”</p>

response	Not accepted Currently, the line check is performed by a 'nominated captain' in legacy training.
comment	599 comment by: AUA EBT Question – What is the majority and how can they demonstrate their ability?
response	Noted The requirement referred to in this comment has been deleted.
comment	684 ❖ comment by: Ryanair ATO ORO.FC.231(h)(4) Page 10 (4) Evaluation of competencies during line operations shall be conducted by a suitably qualified commander nominated by the operator and trained in EBT concepts and the assessment of competencies. AMC1 ORO.FC.231(h) Page 119 (b) Each flight crew member should be assessed according to the competency framework and grading system approved for their operator's approved EBT programme. (d) The operator should inform the competent authority about the suitably qualified commander nominated to undertake line evaluations of competence. The commander should be trained following the applicable provisions contained in AMC1 ORO.FC.145 (a)(3) (c) Flight Crew members should be the assessed in duties as pilot flying and pilot monitoring: they should be evaluated in each role..... ORO.FC.145 (a)(3) Page 27 (i) personnel providing assessment and training shall hold an Annex I (Part-FCL) instructor or examiner certificate; and <i>The proposed IR in ORO.FC.231(h) refers only to the Line <u>Evaluation</u> of Competence. It does not use the word assessment or refer to a Line Assessment of Competencies. It is assumed that this language is carefully chosen to avoid the full requirements of ORO.FC.145 being applied to the 'suitably qualified commander'. Based on the totality of the proposed IR, AMC and GM, if the Evaluation is deemed to be an Assessment then the suitably qualified person would have to hold an Annex I (Part-FCL) instructor or examiner certificate.</i> <i>It follows therefore, that there must be <u>no use</u> of the word 'Assessment' in the AMC. In paragraphs (b) and (c) on page 119 the word Assessment is used in reference to Line Evaluations. The word Assessment should be replaced by "Evaluation" in paragraphs (b) and (c) to AMC1 ORO.fc.231(h). This prevents any confusion between the terms and ensures that Line Evaluation of Competence can be carried out by suitably qualified commanders, who may not be a certificate holder, but will have received suitable training from the operator in EBT methodologies.</i> <i>ORO.FC.145 (a)(3) requires all personnel providing Assessment and training shall hold an Instructor or Examiner certificate. This will therefore require all Line Training/Check Captains to hold a TRI certificate. This is not only impractical but</i>



unnecessary. Having to train a large number of Line training/Check Captains to be Type Rating Instructors will deter medium or large operators from undertaking EBT.

We appreciate this may not have been the intention of the RMG but while this ambiguity exists there is a possibility for competent authorities to interpret it in this way and insist on all line training/check captains being trained to be a TRI.

Note: At least one EASA NAA regards GM as having the same weight as AMC when evaluating an Operator's proposals. This is the background to the above commentary and proposal.

response

Partially accepted

The comment includes several issues across the EBT proposal. Please refer to the EASA Opinion for more information regarding the amendments proposed by the commenter.

AMC2 ORO.FC.231(h) Evidence-based training	p. 119-120
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comment

15

comment by: *Michel Lacombe AF Training department and AF ATO*

AMC2 ORO.FC.231(h)(3) Evidence-based training

LINE EVALUATION OF COMPETENCE

In order to extend the validity of the line evaluation of competence to:

(a) 2 years, the operator should comply with the minimum experience to substitute ORO.FC.230 (AMC1 ORO.FC.231(a)(1)) and the majority of EBT instructors delivering the EBT modules should demonstrate their ability to efficiently complete the operator's line evaluation of competence;

(b) 3 years, in addition to point (1) above, the operator should have a feedback system for the monitoring of.....

As there is no where a rule to be sure that pilots are at least trained and assessed sometimes (to be defined) by TRI(A), Point (a) implies that the regulators accept that a large part of pilot's population could (with no extension requested and even with the 2 years extension requested) be only trained and assessed by instructors who could be unable to demonstrate they capacity to efficiently complete the operator's line evaluation of competence.

Will the European NAA be ready to accept à so big change from FCL ?

response

Accepted

Point (a) has been modified and agreed with the review group to ensure that every year an EBT instructor enrolled in the operator's EBT programme delivers the evaluation phase.



comment	111	comment by: <i>FNAM</i>
	<p>AGREEMENT FNAM agrees that operators should be able to extend the oversight frequency depending on certain conditions.</p>	
response	Noted	
comment	112	comment by: <i>FNAM</i>
	<p>EDITORIAL ISSUE This guidance refer to point (1). There is no point (1) in this guidance but points (a) and (b). Therefore, FNAM suggests to refer to point (a). PROPOSAL Refer to point (a) instead of point (1)</p>	
response	Noted	
comment	158	comment by: <i>Olaf Birgels (DLH)</i>
	<p>AMC2 ORO.FC.231(h)(3) Evidence-based training LINE EVALUATION OF COMPETENCE In order to extend the validity of the line evaluation of competence to: (a) 2 years, the operator should comply with the minimum experience to substitute ORO.FC.230 (AMC1 ORO.FC.231(a)(1)) and the majority of EBT instructors delivering the EBT modules should demonstrate their ability to efficiently complete the operator's line evaluation of competence;</p> <p>Question: What is the majority and how can they demonstrate their ability?</p>	
response	Noted The requirement referred to in this comment has been deleted.	
comment	186	comment by: <i>M.Held / Lufthansa Airlines</i>
	<p>AMC2 ORO.FC.231(h)(3) Evidence-based training LINE EVALUATION OF COMPETENCE In order to extend the validity of the line evaluation of competence to: (a) 2 years, the operator should comply with the minimum experience to substitute ORO.FC.230 (AMC1 ORO.FC.231(a)(1)) and the majority of EBT instructors delivering the EBT modules should demonstrate their ability to efficiently complete the operator's line evaluation of competence;</p> <p>What is the majority and how can they demonstrate their ability?</p>	
response	Noted The requirement referred to in this comment has been deleted.	

comment	207	comment by: <i>Lufthansa CityLine GmbH</i>
	<p>AMC2 ORO.FC.231(h)(3) Evidence-based training LINE EVALUATION OF COMPETENCE</p> <p>In order to extend the validity of the line evaluation of competence to: (a) 2 years, the operator should comply with the minimum experience to substitute ORO.FC.230 (AMC1 ORO.FC.231(a)(1)) and the majority of EBT instructors delivering the EBT modules should demonstrate their ability to efficiently complete the operator's line evaluation of competence;</p> <p>Question – What is the majority and how can they demonstrate their ability?</p>	
response	<p>Noted</p> <p>The requirement referred to in this comment has been deleted.</p>	
comment	266	comment by: <i>SWISS Intl. Air Lines</i>
	<p>(a): what is the definition of "...majority of EBT instructors..."? How can they demonstrate their ability?</p>	
response	<p>Noted</p> <p>The requirement referred to in this comment has been deleted.</p>	
comment	287	comment by: <i>Brussels Airlines</i>
	<p>AMC2 ORO.FC.231 LINE EVALUATION OF COMPETENCE</p> <p>Can "majority" be defined ? How can their ability be demonstrated?</p>	
response	<p>Noted</p> <p>The requirement referred to in this comment has been deleted.</p>	
comment	350	comment by: <i>British Airways</i>
	<p>(a) We understand the Explanatory Note, but the wording of the regulation is not clear. Suggest something like '...and more than 50% of EBT instructors should also be enrolled flight crew members in the operator's approved EBT programme and complete line evaluations of competence.' There is no need to say 'delivering EBT modules', as that is what EBT instructors do.</p> <p>(b)(5) What is the point of monitoring this? Operators can't change the design of the 'machine'. Suggest delete this item.</p>	
response	<p>Partially accepted</p> <p>The requirement referred to in the first comment on point paragraph (a) has been deleted.</p> <p>The second comment is not accepted. This is covered in Doc 9803 as a cause of normalisation of deviance and therefore should be monitored.</p> <p>ICAO Doc 9803 Line Operations Safety Audit (LOSA) (...)“Second, and most important, incident reporting is vulnerable to what has been called “normalization of deviance”. Over time, operational personnel develop</p>	

informal and spontaneous group practices and shortcuts to circumvent deficiencies in equipment design, clumsy procedures or policies that are incompatible with the realities of daily operations, all of which complicate operational tasks.”(...)

comment

412

comment by: *Lufthansa Cargo AG*

AMC2 ORO.FC.231(h)(3) Evidence-based training LINE EVALUATION OF COMPETENCE

In order to extend the validity of the line evaluation of competence to: (a) 2 years, the operator should comply with the minimum experience to substitute ORO.FC.230 (AMC1 ORO.FC.231(a)(1)) and the majority of EBT instructors delivering the EBT modules should demonstrate their ability to efficiently complete the operator’s line evaluation of competence;

Detailed Specification needed:

Why only the majority of EBT instructors and not all?

How can EBT instructors specifically demonstrate their ability to efficiently complete the operator’s line evaluation of competence?

response

Noted

The requirement referred to in this comment has been deleted.

comment

431

comment by: *European Cockpit Association*

ECA proposes the following change:

**AMC2 ORO.FC.231(h)(3) Evidence-based training
LINE EVALUATION OF COMPETENCE**

In order to extend the validity of the line evaluation of competence to:

(a) 2 years, the operator should comply with the minimum experience to substitute ORO.FC.230 (AMC1 ORO.FC.231(a)(1)) and the ~~majority of~~ EBT instructors delivering the EBT modules should demonstrate their ability to efficiently complete the operator’s line evaluation of competence;

(b) 3 years, in addition to point (1 a) above, the operator should have a feedback system for the monitoring of line operations (e.g. LOQE/FOQA), which:...

Comment:

ECA is opposed to SFI's participation in EBT programme as a general rule as proposed in this NPA. Only TRI/TRE are competent for that programme. So it is not the majority **but the totality of EBT instructors who are concerned.**

response

Not accepted

However, the requirement referred to in this comment on ‘majority of EBT instructors’ has been deleted.

comment

580

comment by: *SNPL FRANCE ALPA technical committee*

SNPL FRANCE ALPA proposes the following change:



AMC2 ORO.FC.231(h)(3) Evidence-based training

LINE EVALUATION OF COMPETENCE

In order to extend the validity of the line evaluation of competence to:

(a) 2 years, the operator should comply with the minimum experience to substitute ORO.FC.230 (AMC1 ORO.FC.231(a)(1)) and the ~~majority of~~ EBT instructors delivering the EBT modules should demonstrate their ability to efficiently complete the operator's line evaluation of competence;

(b) 3 years, in addition to point (1 a) above, the operator should have a feedback system for the monitoring of line operations (e.g. LOQE/FOQA), which:...

Comment : As SNPL is opposed to SFI participation in EBT programme as proposed in this NPA, only TRI/TRE are competent for that programme. So it is not the majority but the totality of EBT instructors who are concerned.

response Not accepted
However, the requirement referred to in this comment on 'majority of EBT instructors' has been deleted.

comment 633 comment by: *Vereinigung Cockpit*

AMC2 ORO.FC.231(h)(3) Evidence-based training

LINE EVALUATION OF COMPETENCE

In order to extend the validity of the line evaluation of competence to:

(a) 2 years, the operator should comply with the minimum experience to substitute ORO.FC.230 (AMC1 ORO.FC.231(a)(1)) and the ~~majority of~~ EBT instructors delivering the EBT modules should demonstrate their ability to efficiently complete the operator's line evaluation of competence;

(b) 3 years, in addition to point (1 a) above, the operator should have a feedback system for the monitoring of line operations (e.g. LOQE/FOQA), which:...

Comment:

ECA is opposed to SFI's participation in EBT programme as a general rule as proposed in this NPA. Only TRI/TRE are competent for that programme. So it is not the majority but the totality of EBT instructors who are concerned.

response Not accepted
However, the requirement referred to in this comment on 'majority of EBT instructors' has been deleted.

GM1 ORO.FC.231(h) Evidence-based training

p. 120-121

comment 351 comment by: *British Airways*

There are no checks in EBT. Suggest amend to simply '...whereas other EBT assessment and training is primarily ...'

response Accepted

GM1 ORO.FC.231(h)(4) Evidence-based training

p. 121-122



comment	<p>159 comment by: <i>Olaf Birgels (DLH)</i></p> <p>SUITABLY QUALIFIED COMMANDER TRAINED IN EBT CONCEPTS AND THE ASSESSMENT OF COMPETENCIES</p> <p>...</p> <p>(a) AMC1.ORO.FC.145(a)(3) 'Provision of training' provides under 'EBT instructor training' suitable learning objectives which may be used to qualify the commander nominated by the operator to perform line evaluation of competence. The course may comprise theoretical and practical training. At the completion, the commander should:</p> <p>(1) have knowledge of EBT, including the following underlying principles:</p> <ul style="list-style-type: none"> (i) competency-based training; (ii) learning from positive performance; (iii) building resilience; and (iv) data-driven training; <p>(b) Instructors may be given credits on the topics of point (c) if they have previously demonstrated competencies in those topics.</p> <p>Question / Editorial: (b) There are no topics listed since there is no point (c). Should it be (a)(1)?</p>
response	<p>Noted The requirement has been deleted.</p>
comment	<p>187 comment by: <i>M.Held / Lufthansa Airlines</i></p> <p>(b) Instructors may be given credits on the topics of point (c) if they have previously demonstrated competencies in those topics.</p> <p>There are no topics listed since there is no point (c). Should it be (a)(1)?</p>
response	<p>Noted The requirement has been deleted.</p>
comment	<p>208 comment by: <i>Lufthansa CityLine GmbH</i></p> <p>SUITABLY QUALIFIED COMMANDER TRAINED IN EBT CONCEPTS AND THE ASSESSMENT OF COMPETENCIES</p> <p>...</p> <p>(a) AMC1.ORO.FC.145(a)(3) 'Provision of training' provides under 'EBT instructor training' suitable learning objectives which may be used to qualify the commander nominated by the operator to perform line evaluation of competence. The course may comprise theoretical and practical training. At the completion, the commander should:</p> <p>(1) have knowledge of EBT, including the following underlying principles:</p> <ul style="list-style-type: none"> (i) competency-based training;

	<p>(ii) learning from positive performance; (iii) building resilience; and (iv) data-driven training;</p> <p>(b) Instructors may be given credits on the topics of point (c) if they have previously demonstrated competencies in those topics.</p> <p>Question / Editorial – (b) There are no topics listed since there is no point (c). Should it be (a)(1)?</p>
response	<p>Noted The requirement has been deleted.</p>

comment	<p>267 comment by: <i>SWISS Intl. Air Lines</i></p> <p>there is no (c)</p>
response	<p>Noted The requirement has been deleted.</p>

comment	<p>352 comment by: <i>British Airways</i></p> <p>(b) Should be ‘point (a)’ not ‘point (c)’</p> <p>(b) Is the word ‘topics’ correct? See comments in AMC1 ORO.FC.145(a)(3)</p> <p>(b) Should be ‘competence’ not ‘competencies’</p>
response	<p>Noted The requirement has been partially deleted. The word has been changed in accordance with the comment.</p>

comment	<p>413 comment by: <i>Lufthansa Cargo AG</i></p> <p>SUITABLY QUALIFIED COMMANDER TRAINED IN EBT CONCEPTS AND THE ASSESSMENT OF COMPETENCIES</p> <p>...</p> <p><i>(a) AMC1.ORO.FC.145(a)(3) ‘Provision of training’ provides under ‘EBT instructor training’ suitable learning objectives which may be used to qualify the commander nominated by the operator to perform line evaluation of competence. The course may comprise theoretical and practical training. At the completion, the commander should:</i></p> <p><i>(1) have knowledge of EBT, including the following underlying principles:</i></p> <p><i>(i) competency-based training;</i></p> <p><i>(ii) learning from positive performance;</i></p> <p><i>(iii) building resilience; and</i></p> <p><i>(iv) data-driven training;</i></p> <p><i>(b) Instructors may be given credits on the topics of point (c) if they have previously demonstrated competencies in those topics.</i></p>
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	<p>Detailed Specification needed: What are the topics of point (c)</p>
response	<p>Noted The requirement has been deleted.</p>
comment	<p>470 comment by: <i>European Cockpit Association</i></p> <p>GM10RO.FC.231(h)(4) Evidence-based training SUITABLY QUALIFIED COMMANDER TRAINED IN EBT CONCEPTS AND THE ASSESSMENT OF COMPETENCIES</p> <p>Comments: See the comment to AMC10RO.FC.231(h) (d) Evidence-based training, Line evaluation of competence. Line <u>evaluation</u> shall be done by an examiner. Rationale: Examiners are the only one’s having sufficient training and experience to ensure consistent quality. Consistency with rationale given by EASA in GM.ORO:FC 231(h)(b): “The line evaluation of competence is considered a particularly important factor in the development, maintenance and refinement of high operating standards, and can provide the operator with a valuable indication of the usefulness of its training policy and methods.”</p>
response	<p>Not accepted Currently, the line check is performed by a ‘nominated captain’ in legacy training.</p>
comment	<p>505 comment by: <i>Vereinigung Cockpit</i></p> <p>GM10RO.FC.231(h)(4) Evidence-based training SUITABLY QUALIFIED COMMANDER TRAINED IN EBT CONCEPTS AND THE ASSESSMENT OF COMPETENCIES</p> <p>Comments: See the comment to AMC10RO.FC.231(h) (d) Evidence-based training, Line evaluation of competence. Line <u>evaluation</u> shall be done by an examiner. Rationale: Examiners are the only one’s having sufficient training and experience to ensure consistent quality. Consistency with rationale given by EASA in GM.ORO:FC 231(h)(b): “The line evaluation of competence is considered a particularly important factor in the development, maintenance and refinement of high operating standards, and can provide the operator with a valuable indication of the usefulness of its training policy and methods.”</p>
response	<p>Not accepted Currently, the line check is performed by a ‘nominated captain’ in legacy training.</p>
comment	<p>680 comment by: <i>IATA</i></p>



(b) Instructors may be given credits on the topics of point (c) if they have previously demonstrated competencies in those topics.

Editorial – (b) There are no topics listed since there is no point (c). Should it be (a)(1)?

response Noted
The requirement has been deleted.

ORO.FC.231 — (i) GROUND TRAINING

p. 122

comment 113 comment by: FNAM

ISSUE – NPA STRUCTURE

FNAM does not understand why the modification of part of this IR is in the middle of two GM and AMC dedicated to this same IR. the structure and philosophy of the proposed regulation are really confusing and difficult to understand.

PROPOSAL

Review the structure of the NPA

response Noted

comment 114 comment by: FNAM

AGREEMENT – (2)

FNAM agrees that operators should be able to extend the oversight frequency depending on certain conditions.

response Noted

comment 581 comment by: SNPL FRANCE ALPA technical committee

SNPL FRANCE ALPA proposes to change the new ORO.FC.231(i) as follows:

ORO.FC.231(i) Ground training

(i) GROUND TRAINING

(1) Each flight crew member shall undergo ground training **and checking** and training on the location and use of all emergency and safety equipment carried on the aircraft at least every 12 calendar months.

(2) The operator may, with the approval of the competent authority, extend the period of training on the location and use of all emergency and safety equipment carried on the aircraft to 24 months.

Comment: reinstate checking in ORO.FC.231 as in ORO.FC.230



	<p>Rationale: Ground training and emergency equipment training is not modified by EBT (ground instructors are not EBT trained), only the recurrence maybe changed from one to two years. In addition the AMC1 ORO.FC.231(i)(a)(2) states: (2) Knowledge of the ground training should be verified by a questionnaire or other suitable methods. So what is the difference between verified and checked in the context of ground training?</p>
response	<p>Partially accepted A new requirement has been introduced in ORO.FC.231(i) to ensure the knowledge of the emergency and safety equipment training is verified.</p>

AMC1 ORO.FC.231(i) Evidence-based training

p. 122-123

comment	<p>168 comment by: <i>Olaf Birgels (DLH)</i></p> <p>AMC1 ORO.FC.231(i) Evidence-based training</p> <p>Question AMC1 ORO.FC231 (a) is equivalent to AMC1 ORO.FC230 (a). Why are the ground training requirements not adopted to EBT principles? Ground training should be based on operator data and evidence.</p>
response	<p>Accepted New requirements at AMC level have been developed for ground training where the principles of EBT are adopted. See the new proposal in the EASA Opinion.</p>
comment	<p>193 comment by: <i>M.Held / Lufthansa Airlines</i></p> <p>AMC1 ORO.FC.231(i) Evidence-based training GROUND TRAINING</p> <p>AMC1 ORO.FC231 (a) is equivalent to AMC1 ORO.FC230 (a). Why are the ground training requirements not adopted to EBT principles? Ground training should be based on operator data and evidence.</p>
response	<p>Accepted New requirements at AMC level have been developed for ground training where the principles of EBT are adopted. See the new proposal in the EASA Opinion.</p>
comment	<p>216 comment by: <i>Lufthansa CityLine GmbH</i></p> <p>Question – AMC1 ORO.FC231 (a) is equivalent to AMC1 ORO.FC230 (a). Why are the ground training requirements not adopted to EBT principles? Ground training should be based on operator data and evidence.</p>
response	<p>Accepted New requirements at AMC level have been developed for ground training where the principles of EBT are adopted. See the new proposal in the EASA Opinion.</p>



comment	<p>275 comment by: <i>SWISS Intl. Air Lines</i></p> <p>AMC1 ORO.FC231 (a) is equivalent to AMC1 ORO.FC230 (a). Why are the ground training requirements not adopted to EBT principles? Ground training should be based on operator data and evidence.</p>
response	<p>Accepted</p> <p>New requirements at AMC level have been developed for ground training where the principles of EBT are adopted. See the new proposal in the EASA Opinion.</p>
comment	<p>432 comment by: <i>European Cockpit Association</i></p> <p>ECA proposes to change the new ORO.FC.231(i) as follows:</p> <p>ORO.FC.231(i) Ground training (i) GROUND TRAINING (1) Each flight crew member shall undergo ground training and checking and training on the location and use of all emergency and safety equipment carried on the aircraft at least every 12 calendar months. (2) The operator may, with the approval of the competent authority, extend the period of training on the location and use of all emergency and safety equipment carried on the aircraft to 24 months.</p> <p>Comment: Reinstate checking in ORO.FC.231 as in ORO.FC.230</p> <p>Rationale: Ground training and emergency equipment training is not modified by EBT (ground instructors are not EBT trained), only the recurrence may be changed from one to two years. In addition the AMC1 ORO.FC.231(i)(a)(2) states: (2) Knowledge of the ground training should be verified by a questionnaire or other suitable methods. So it is unclear what the difference is between verified and checked in the context of ground training?</p>
response	<p>Partially accepted</p> <p>A new requirement has been introduced in ORO.FC.231(i) to ensure the knowledge of the emergency and safety equipment training is verified.</p>
comment	<p>635 comment by: <i>Vereinigung Cockpit</i></p> <p>ORO.FC.231(i) Ground training (i) GROUND TRAINING (1) Each flight crew member shall undergo ground training and checking and training on the location and use of all emergency and safety equipment carried on the aircraft at least every 12 calendar months.</p>

(2) The operator may, with the approval of the competent authority, extend the period of training on the location and use of all emergency and safety equipment carried on the aircraft to 24 months.

Comment:

Reinstate checking in ORO.FC.231 as in ORO.FC.230

Rationale:

Ground training and emergency equipment training is not modified by EBT (ground instructors are not EBT trained), only the recurrence may be changed from one to two years.

In addition the AMC1 ORO.FC.231(i)(a)(2) states:

(2) Knowledge of the ground training should be verified by a questionnaire or other suitable methods.

So it is unclear what the difference is between verified and checked in the context of ground training?

response

Partially accepted

A new requirement has been introduced in ORO.FC.231(i) to ensure the knowledge of the emergency and safety equipment training is verified.

AMC1 ORO.FC.240 Operation on more than one type or variant

p. 127

comment

433

comment by: *European Cockpit Association*

ECA proposes to delete the provision for renewal in EBT programme:

AMC1 ORO.FC.240 a) 4) vii) Operation on more than one type or variant (vii) (A) ...

For approved EBT programmes, ORO.FC.231(a)(3) requires to complete a minimum of 2 modules of the EBT programme, separated by a period of more than 3 months, within a 12-month period, and is trained according to assessment and training topics distributed across a 3-year period at the defined frequency relevant to the type or variant of aircraft.

When credits are defined in operational suitability data established in accordance with Commission Regulation (EU) No 748/2012, EBT modules should alternate between types. The EBT modules may be combined for revalidation ~~or renewal~~ of the aeroplane type rating or the instrument rating in accordance with Commission Regulation (EU) No 1178/2011. When operating more than one type of different generation, the operator has to fulfil both generation base line programmes as per AMC2 ORO.FC.231(a).

Comment :

ECA is opposed to the possibility of renewal of type rating within an EBT programme. As EBT is a new way of training for recurrent training, it is not entitled to deliver or renew a licence, class or type rating. As specified in explanation of AMC1 ORO.FC.231(a)(3)(i), clarity is required.

ECA proposes this change to be consistent with the proposition on AMC1 ORO.FC.231(a) (5) evidence based training on page 65.



	<p>Rationale:</p> <p>To be enrolled in an EBT programme, a pilot must have a valid licence and the appropriate type rating. In case of any disruption in the EBT, the pilot should renew its licence and possibly class or type rating under Appendix 9 with a proficiency check. This organisation is in line with the existing system which has proven to be safe, and simplify the EBT rules : a pilot is enrolled with valid type rating and stays in as long his type rating is valid or when the operator “is no longer responsible for the administrative action for the flight crew’s licence revalidation” as per AMC1 ORO.FC23(a)(3)(i) (b).. This also implies the licence to remain under the scope of national authorities fulfilling ICAO rules, and easing article 30 of ICAO convention.</p>
response	<p>Not accepted</p> <p>Before the introduction of Regulation (EU) No 1178/2011, the renewals could be made at a type rating training organisation (TRTO). These organisations were not a school for the issue of licences. The TRTOs were normally at operator level. No safety concern was raised due to this fact.</p> <p>There is a strong regulatory oversight of operators; the same as for approved training organisations.</p>
comment	<p>636 comment by: <i>Vereinigung Cockpit</i></p> <p>VC proposes to delete the provision for renewal in EBT programme:</p> <p>AMC1 ORO.FC.240</p> <p>a) 4) vii) Operation on more than one type or variant (vii) (A)</p> <p>For approved EBT programmes, ORO.FC.231(a)(3) requires to complete a minimum of 2 modules of the EBT programme, separated by a period of more than 3 months, within a 12-month period, and is trained according to assessment and training topics distributed across a 3-year period at the defined frequency relevant to the type or variant of aircraft.</p> <p>When credits are defined in operational suitability data established in accordance with Commission Regulation (EU) No 748/2012, EBT modules should alternate between types. The EBT modules may be combined for revalidation or renewal of the aeroplane type rating or the instrument rating in accordance with Commission Regulation (EU) No 1178/2011. When operating more than one type of different generation, the operator has to fulfil both generation base line programmes as per AMC2 ORO.FC.231(a).</p> <p>Comment :</p> <p><i>ECA is opposed to the possibility of renewal of type rating within an EBT programme. As EBT is a new way of training for recurrent training, it is not entitled to deliver or renew a licence, class or type rating. As specified in explanation of AMC1 ORO.FC.231(a)(3)(i), clarity is required.</i></p> <p><i>ECA proposes this change to be consistent with the proposition on AMC1 ORO.FC.231(a) (5) evidence based training on page 65.</i></p> <p>Rationale:</p> <p><i>To be enrolled in an EBT programme, a pilot must have a valid licence and the appropriate type rating. In case of any disruption in the EBT, the pilot should renew</i></p>

its licence and possibly class or type rating under Appendix 9 with a proficiency check. This organisation is in line with the existing system which has proven to be safe, and simplify the EBT rules : a pilot is enrolled with valid type rating and stays in as long his type rating is valid or when the operator "is no longer responsible for the administrative action for the flight crew's licence revalidation" as per AMC1 ORO.FC23(a)(3)(i) (b).. This also implies the licence to remain under the scope of national authorities fulfilling ICAO rules, and easing article 30 of ICAO convention.

response

Not accepted

Before the introduction of Regulation (EU) No 1178/2011, the renewals could be made at a type rating training organisation (TRTO). These organisations were not a school for the issue of licences. The TRTOs were normally at operator level. No safety concern was raised due to this fact.

There is a strong regulatory oversight of operators; the same as for approved training organisations.

AMC1 ORO.FC.240 Operation on more than one type or variant

p. 128-130

comment

353

comment by: *British Airways*

(a)(4)(vii)(A) Last line, the word 'base line' is not appropriate. Also, the reference should be to more than one generation AMC. Suggest amend to '...the operator should fulfil both generation EBT programmes as per AMC2 ORO,FC.231(a) to AMC7 ORO.FC.231(a).'

(a)(4)(vii)(B) We have commented about this under AMC1 ORO.FC.231(h), sub-para (f). We disagree that the LEOC cannot be extended for operations on more than one type or variant. We also, therefore, disagree that this paragraph should say '...ORO.FC.231(h) requires one line evaluation of competence every year.' Suggest instead it is amended to 'For approved EBT programmes, when credits...'

response

Partially accepted

The text has been modified following the indications of the first comment. As regards the second comment, the understanding of the rulemaking group was that the alternation of line evaluation of competence (line check in traditional training) allowed in ORO.FC.240 is an extension of validity already. In order to avoid the abuse of having a line evaluation of competence every 4 years, this provision has been introduced. In order to clarify the intent, this provision was moved to AMC1 ORO.FC.240.

comment

582

comment by: *SNPL FRANCE ALPA technical committee*

SNPL FRANCE ALPA proposes to delete the provision for renewal in EBT programme:

AMC1 ORO.FC.240 a) 4) vii) Operation on more than one type or variant
(vii) (A)

For approved EBT programmes, ORO.FC.231(a)(3) requires to complete a minimum of 2 modules of the EBT programme, separated by a period of more than 3 months, within a 12-month period, and is trained according to assessment and training topics



distributed across a 3-year period at the defined frequency relevant to the type or variant of aircraft.

When credits are defined in operational suitability data established in accordance with Commission Regulation (EU) No 748/2012, EBT modules should alternate between types. The EBT modules may be combined for revalidation ~~or renewal~~ of the aeroplane type rating or the instrument rating in accordance with Commission Regulation (EU) No 1178/2011. When operating more than one type of different generation, the operator has to fulfil both generation base line programs as per AMC2 ORO.FC.231(a).

Comment : SNPL is opposed to the possibility of renewal of type rating within an EBT programme. As EBT is a new way of training for recurrent training, it is not entitled to deliver or renew a licence, class or type rating. As specified in explanation of AMC1 ORO.FC.231(a)(3)(i), clarity is required.

SNPL proposes this change to be consistent with the proposition on AMC1 ORO.FC.231(a) (5) evidence based training on page 65.

Rationale : To be enrolled in an EBT programme, a pilot must have a valid licence and the appropriate type rating. In case of any disruption in the EBT, the pilot should renew its licence and possibly class or type rating under appendix 9 with a proficiency check. This organisation is in line with the existing system which has proven to be safe, and simplify the EBT rules : a pilot is enrolled with valid type rating and stays in as long his type rating is valid or when the operator “is no longer responsible for the administrative action for the flight crew’s licence revalidation” as per AMC1 ORO.FC23(a)(3)(i) (b).. This also implies the licence to remain under the scope of national authorities fulfilling ICAO rules, and easing article 30 of ICAO convention.

response

Not accepted

Before the introduction of Regulation (EU) No 1178/2011, the renewals could be made at a type rating training organisation (TRTO). These organisations were not a school for the issue of licences. The TRTOs were normally at operator level. No safety concern was raised due to this fact.

There is a strong regulatory oversight of operators; the same as for approved training organisations.

AMC1 to Appendix II — EBT program

p. 130

comment

115

comment by: *FNAM*

ISSUE

FNAM thanks for explaining with concrete examples of aircraft proposed categories. Since exhaustive lists seem to be provided, FNAM fears that it would be difficult to include new future aircraft models in this regulation. Indeed, these examples are provided in AMC, new consultation should be provided when a new model of aircraft would be added to this list. FNAM suggests to transpose these requirements into GM, in order to allow flexibility to these lists.

PROPOSAL

Transpose these requirements into GM



response	Not accepted EBT is based on evidence; AMC1 provides the aircraft type rating for which evidence was studied. The addition of a new aircraft type must follow a study of its evidence. GM is not the right regulatory level to ensure a proper study of the evidence.
comment	354 comment by: <i>British Airways</i> Are there any operators in Europe who are flying generation 2 jets and who are going to do EBT? Suggest it could simplify things greatly if generation 2 jets and generation 1 jets are removed entirely from the whole EBT rule-making. That would leave just gen 4 and gen 3 jets and gen 3 and gen 2 turboprops. Much simpler with no disadvantage to anyone.
response	Accepted Generation 2 jets has been deleted from the tables of assessment and training topics.
comment	400 comment by: <i>European Powered Flying Union</i> Appendix II EBT Programme page 130...205 Please consider our comment no 399 as regards keywords/sentences, many thanks.
response	Noted

AMC2 to Appendix II — EBT program	p. 133
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comment	304 comment by: <i>easyJet Airlines Europe</i>			
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 25%; padding: 5px;"> AMC1 ORO.FC.231(f) point (c) </td> <td style="width: 45%; padding: 5px;"> Instructors should record for the purpose of data analysis if the pilots would have passed the proficiency check should they have taken the check in accordance with Appendix 9. Malfunctions included in the equivalency of malfunctions but not included in the EBT FSTD programme require review and appropriate procedural knowledge training, conducted in suitable alternative environment (classroom, flight procedure training device, computer-based training, etc.). </td> <td style="width: 30%; padding: 5px;"> After 6/9 years of EBT this might be generating confusion among the EBTI community. As known the EBT programme is a norm-reference system as opposed to Appendix 9 which is criterion-reference system. This point requires more explanation since it may appear in contrast with the definition of malfunction equivalence. As it is written it may be interpreted that all malfunctions, <u>with same characteristics</u>, shall be trained. However the note to Doc 9995 table I-3-1 reports: </td> </tr> </table>		AMC1 ORO.FC.231(f) point (c)	Instructors should record for the purpose of data analysis if the pilots would have passed the proficiency check should they have taken the check in accordance with Appendix 9. Malfunctions included in the equivalency of malfunctions but not included in the EBT FSTD programme require review and appropriate procedural knowledge training, conducted in suitable alternative environment (classroom, flight procedure training device, computer-based training, etc.).	After 6/9 years of EBT this might be generating confusion among the EBTI community. As known the EBT programme is a norm-reference system as opposed to Appendix 9 which is criterion-reference system. This point requires more explanation since it may appear in contrast with the definition of malfunction equivalence. As it is written it may be interpreted that all malfunctions, <u>with same characteristics</u> , shall be trained. However the note to Doc 9995 table I-3-1 reports:
AMC1 ORO.FC.231(f) point (c)	Instructors should record for the purpose of data analysis if the pilots would have passed the proficiency check should they have taken the check in accordance with Appendix 9. Malfunctions included in the equivalency of malfunctions but not included in the EBT FSTD programme require review and appropriate procedural knowledge training, conducted in suitable alternative environment (classroom, flight procedure training device, computer-based training, etc.).	After 6/9 years of EBT this might be generating confusion among the EBTI community. As known the EBT programme is a norm-reference system as opposed to Appendix 9 which is criterion-reference system. This point requires more explanation since it may appear in contrast with the definition of malfunction equivalence. As it is written it may be interpreted that all malfunctions, <u>with same characteristics</u> , shall be trained. However the note to Doc 9995 table I-3-1 reports:		



		<p>“Other malfunctions <u>not covered by the characteristics detailed in 3.8.2 and 3.8.3</u> continue to require review and appropriate procedural knowledge training conducted in a less qualified but suitable environment (classroom, flight procedures training device, etc.), as an additional component of EBT.</p>
response	<p>Noted. The EASA Opinion provides more guidance. In addition, the safety promotion task SPT.012 will monitor the issue and evaluate during the implementation phase whether more information is required to facilitate the implementation of EBT.</p>	

comment

355	<p style="text-align: right;">comment by: <i>British Airways</i></p> <p>All the comments about AMC2 are equally applicable to AMC3 to AMC7.</p> <p>Section 1, Manoeuvres Training phase: Rejected take-off, Engine-out approach & go-around and Engine-out landing manoeuvres are all A frequency. We believe they should be B frequency. This is a significant issue and is not consistent with the other parts of the NPA.</p> <p>We are an ATQP and Mixed EBT operator. Under ATQP the OPC has a period of validity of 12 months, so our pilots have been checked flying these manoeuvres at B frequency for 10 years now. We have 10 years of data that shows our pilots are equally proficient flying these manoeuvres with an interval of 12 months, as they were with an interval of 6 months. ATQP requires us to maintain that ‘equal level of proficiency’, and we do. We use a feedback loop to monitor proficiency in these manoeuvres, and we schedule additional training if we see an adverse trend (= A frequency). But, importantly, we only do this for the manoeuvre(s) that need it, when they need it. Other ATQP operators no doubt have similar data which also demonstrates an equivalent level of safety if these manoeuvres are checked/trained at B frequency.</p> <p>EBT, like ATQP, will also require us to maintain levels of proficiency and to run a feedback loop. We see no reason why EBT operators cannot also ensure their pilots maintain proficiency in flying these manoeuvres at B frequency. Mandating A frequency for these manoeuvres is a major step backwards. The background text to Doc 9995 states that existing requirements (ORO.FC.230) are based on the simple view that to mitigate risk ‘simply repeating an event was sufficient’. It goes on to say that the paradigm shift proposed for EBT is to replace the outdated set of critical events with a way of developing crew performance over a range of competencies. What EASA has proposed it to maintain an old list of events that we will carry on repeating every 6 months.</p>
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For ATQP operators (many of which are also Mixed EBT), this will be seen as possibly an unacceptable step backwards. Before deciding to move to full EBT, the benefits of the Appendix 10 and the line evaluation of competence will need to be balanced against going back to '6 monthly OPCs'. It will be impossible to explain to pilots why EBT is somehow better, and more 'evidence-based', if they have to do a manually-flown engine-out ILS every 6 months. It is box-ticking and negative training of the worst kind.

In addition, these A frequency manoeuvres do not maintain consistency with other parts of the NPA. In the Explanatory Note to ORO.FC.231(h), Line Evaluation of Competence, it states that 'the intent of this rule is to permit those operators who have been conducting ATQP ... to continue to apply a 24-month Line Evaluation when they transition to EBT'. Additionally, in the Explanatory Note for ORO.FC.231(i), and the AMC1, Ground Training, it states that 'the alleviation is consistent with the existing alleviation provided for ATQP' and '...the ATQP provision is fit for purpose for the extension of validity'. In other words, EASA has accepted the ATQP principle for extension of periods of validity for the Line Check and for Ground Training. So why not for the OPC (= these three manoeuvres)?

Mixed EBT is starting to look quite attractive and we will have to think hard about whether it's worth moving to full EBT. Do EASA want the pioneering Mixed EBT operators to reject moving to full EBT?

Other comments about the table of assessment and training topics are:

All sections, Flight phase for activation column. This is in the wrong position. The flight phase relates directly to the Example Scenario Elements. See page 135, Automation Management, as an example. Suggest move the Flight phase column next to the Example scenario elements column, and annotate it as 'Guidance material (GM)' for consistency.

Section 1, Manoeuvres Training phase: Go-around. The Explanatory Note says that the 3 go-arounds have been merged, which is much better and less confusing. All 3 go-arounds have a Description of 'Go-around, all engines operative', however one of them also says 'followed by visual circuit, manually flown'. This text is repeated in the Example Scenario Elements column. It seems that this extra text in the Description column is an error, and it should only be an example of an all-engines go-around. Suggest remove this text from the Description column. Note, this is an important point. For some operators, training a visual circuit straight after a go-around is highly inappropriate. We never train our pilots to carry out an unbriefed visual circuit. It goes against the other competencies we teach, notably workload management. We don't want to be forced to train something, and then have to tell our pilots they should never do it on the line. EBT will lose credibility.

Section 2, Manoeuvres Training phase: Equivalency of Approaches. The approaches listed here do not correspond with the approaches listed in the Explanatory Note for GM2 ORO.FC.231(g) on page 116. For the MT phase, the table only lists one approach: Type A, 2D. However, in the table of assessment and training topics, another approach is listed: Type A or B, 3D. Where has this come from? What is the rationale for this? Is this an error? Suggest it is removed.



response Partially accepted
The comment includes several issues across the EBT proposal. Please refer to the EASA Opinion for more information regarding the amendments proposed by the commenter.

AMC2 to Appendix II — EBT program

p. 134-146

comment 160 comment by: *Olaf Birgels (DLH)*

Section 2 Equivalency of Approaches relevant to operations

Approach Type A - frequency B – flight method 3D

Question:

Is it possible to change to "2D or 3D" iso "3D" to allow training on A/Cs where only 2D approaches are available under specific conditions (e.g. A319 OEI)

response Accepted
Approach type A in the 'EVAL or SBT phase' has been amended to '3D or 2D'.

comment 209 comment by: *Lufthansa CityLine GmbH*

Section 2 Equivalency of Approaches relevant to operations

Approach Type A - frequency B – flight method 3D

Question – is it possible to change to "2D or 3D" iso "3D" to allow training on A/Cs where only 2D approaches are available under specific conditions (A319 OEI)

response Accepted
Approach type A in the 'EVAL or SBT phase' has been amended to '3D or 2D'.

comment 268 comment by: *SWISS Intl. Air Lines*

Section 2:

Approach Type A / Frequency B:

would it be possible to change to "2D or 3D" iso "3D"?

This would allow to train also on ACFT which are only 2D capable under certain conditions (eg A319, OEI).

response Accepted
Approach type A in the 'EVAL or SBT phase' has been amended to '3D or 2D'.

comment 319 comment by: *easyJet Airlines Europe*

AMC2 to Appendix II — EBT programme	EQUIVALENCY OF MALFUNCTIONS GENERATION 4 (JET) — TABLE OF ASSESSMENT	OF AND	Shall it be considered to put the 5 characteristics at AMC level? Same logic is applied for the Approach equivalency
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	<p>TRAINING TOPICS REFERRED TO IN AMC2 ORO.FC.231(a)</p>	<p>The first approach reported for MT: “Approach type a or B flight method 3D” was not described in the “SELECTED APPROACHES AT THE FREQUENCY GIVEN IN THE EBT PROGRAMME” (p.117) explanatory notes.</p>
response	<p>Partially accepted The characteristics have been moved to Certification Specifications.</p>	

comment	<p>356</p> <p>comment by: <i>British Airways</i></p> <p>Section 3, Eval and SBT phases, Aircraft System Malfunctions. Desired Outcome column, last line, suggest this should be ‘period’, not ‘cycle’, to align with the Explanatory Note on page 42.</p> <p>Section 3, Eval and SBT phases, Aircraft System Malfunctions. Example Scenario Elements column. See comments under AMC1 ORO.FC.231(f)(3) - we believe the AMC should be deleted, and so you should not reduce the number of malfunctions below 5 for each crew member every year.</p>
response	<p>Partially accepted The wording has been amended to refer to ‘period’. The wording has been amended to refer to 7 malfunctions for each crew, instead of each crew member. The idea is that each pilot performed the characteristics of degraded control and loss of instrumentation as pilot flying, therefore 2 malfunctions for the captain and 2 for the first officer. The other 3 characteristics either as PF or PM, therefore an additional 3. The total as a crew is 7 = 2+2 +3.</p>

comment	<p>414</p> <p>comment by: <i>Lufthansa Cargo AG</i></p> <p>Section 2 Equivalency of Approaches relevant to operations Approach Type A - frequency B – flight method 3D</p> <p>Recommendation: Is it possible to change the flight method to "2D or 3D" to be more flexible in the design of the training program?</p>
response	<p>Accepted Approach type A in the ‘EVAL or SBT phase’ has been amended to ‘3D or 2D’.</p>

comment	<p>681</p> <p>comment by: <i>IATA</i></p>
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Section 2 Equivalency of approaches relevant to operations
Approach type A or B flight method 3D

Question – is it possible to change to "2D or 3D" iso "3D" to allow training on A/Cs where only 2D approaches are available under specific conditions (A319 OEI)

response Accepted
Approach type A in the 'EVAL or SBT phase' has been amended to '3D or 2D'.

Annex I (Part-FCL) to Regulation (EU) No1178/2011 — Concept of revalidation within an EBT program

p. 206-207

comment 116

comment by: FNAM

ISSUE

EASA's proposed disposals should clearly differentiate each type of instructors and examiners (TRI, TRE, SFI, SFE, CRI, CRE, etc.) for EBT since they don't benefit of equal trainings and activities. Currently, they don't have the same responsibilities; it is therefore necessary to present adapted disposals for trainings and requirements for each type of instructors and examiners. For example, compared to TRI and TRE, SFI and SFE should demonstrate additional conditions in order to ensure their competences to provide EBT trainings or validate EBT licenses.

Moreover, in NPA 2018-07 (A) we can read: 'Although the amount of training in EBT remains unchanged, the role of the trainer will be now performed under the privileges of type rating instructor (TRI) license, instead of type rating examiner (TRE) license.'

Why in NPA 2018-07 (B) the same wording is not used? This lack of precision allow all type of instructors to be acceptable for EBT, even if they have no experience of line operations and of the operator's context (SFI, CRI).

Additionally, ICAO Doc 9995 defines EBT instructors such as: 'A person who has undergone a screening and selection process, successfully completed an approved course in delivering competency-based training, and is subsequently authorized to conduct recurrent assessment and training within an approved EBT programme.'

Current AMC1 ORO.FC.230 disposals require that instructors demonstrate sufficient experience and knowledge to instruct:

'Part OPS

AMC1 ORO.FC.230 Recurrent training and checking

Personnel providing training and checking

Training and checking should be provided by the following personnel:

- (1) ground and refresher training by suitably qualified personnel;
- (2) flight training by a flight instructor (FI), type rating instructor (TRI) or class rating instructor (CRI) or, in the case of the FSTD content, a synthetic flight instructor (SFI), providing that the FI, TRI, CRI or SFI satisfies the operator's experience and knowledge requirements sufficient to instruct on the items specified in paragraphs (a)(1)(i)(A) and (B);'

FNAM suggests that instructors should demonstrate that they benefit of complete recent experiences of instructors and examiners before providing trainings or



validating EBT licenses. Indeed, if trainings are based unexpected events on line, how instructors with no experience (or very old experience) on line operations will be able to train and assess properly. Pilots losing their license could therefore be used as SFI only for the first two years as being EBT enrolled, after 2 years as SFI they will be restricted to the TR training and no more on the recurrent. Instructors without proper competences may have significant impacts on flight safety since the EASA's proposed disposals would allow license validation solely based on declarations and would allow EBT trainings by instructors and examiners with inhomogeneous competences.

PROPOSAL

Ensure that SFI and SFE can demonstrate complete recent experiences of instructors and examiners before providing trainings or validating licenses

response

Not accepted

However, the review group took into account the safety objective of this comment, and they decided to modify the requirement in point (a) of AMC2 ORO.FC.231(h)(3) to ensure during the EBT modules the trainee maintains a regular exposure to an instructor with valid line experience.

comment

117

comment by: *FNAM***ISSUE**

EASA's proposed EBT disposals describe requirements for all instructors and examiners without precising if it should be TRI, TRE, SFI and SFE only. All types of instructor and examiner should therefore be able to follow dedicated training to be EBT competent. FNAM wonders why only TRI and SFI requirements are completed in these EASA's proposed disposals in Part-FCL. Why FI, CRI, IRI, MCCI or STI are not modified to include EBT privileges?

FNAM suggests therefore to harmonize the proposed regulation by; either precising in EBT disposals the exact types of instructors and examiners allowed to perform EBT training or validate EBT programme and training; or adding EBT disposals for each type of instructor in Part-FCL.

PROPOSAL

Precise in EBT disposals the exact types of instructors and examiners allowed to perform EBT training or validate EBT programme and training; or
Add EBT disposals for each type of instructor in Part-FCL

response

Not accepted

comment

362

comment by: *Czech Technical University*

FCL.740(b)(1) allows an AOC to provide a refresher training for an expired type rating. However, a refresher for an expired IR can only be done by an ATO.

We suggest to allow an AOC to provide both IR and TR refresher. Please consider amending **FCL.625(c)(1)** as follows:

response	<p><i>'go through refresher training at an ATO, or an AOC approved for such refresher, to reach the level of proficiency needed to pass the instrument element of the skill test in accordance with Appendix 9 to this Part; and'</i></p> <p>Accepted</p>
comment	<p>434 comment by: <i>European Cockpit Association</i></p> <p>ECA proposes the following deletion:</p> <p>FCL.625 IR — Validity, revalidation and renewal</p> <ul style="list-style-type: none"> • (c) Renewal. If an IR has expired, in order to renew their privileges applicants shall: • (1) go through refresher training at an ATO to reach the level of proficiency needed to pass the instrument element of the skill test in accordance with Appendix 9 to this Part; and • (2) complete a proficiency check in accordance with Appendix 9 or Appendix 10 to this Part, in the relevant aircraft category. <p>Comment:</p> <p>ECA is opposed to the possibility of renewal of type rating within an EBT programme. As EBT is a new way of training for recurrent training, it is not entitled to deliver or renew a licence, class or type rating. As specified in explanation of AMC1 ORO.FC.231(a)(3)(i), clarity is required.</p> <p>ECA proposes this change to be consistent with the propositions on AMC1 ORO.FC.231 (a) (5) evidence based training on page 65 ; AMC1 ORO.F.C.240 (a) (4) (vii) on page 127.</p> <p>Rationale:</p> <p>To be enrolled in an EBT programme, a pilot must have a valid licence and the appropriate type rating. In case of any disruption in the EBT, the pilot should renew its licence and possibly class or type rating under appendix 9 with a proficiency check. This organisation is in line with the existing system which has proven to be safe, and simplify the EBT rules: a pilot is enrolled with valid type rating and stays in as long his type rating is valid or when the operator “is no longer responsible for the administrative action for the flight crew’s licence revalidation” as per AMC1 ORO.FC23(a)(3)(i) (b).. This also implies the licence to remain under the scope of national authorities fulfilling ICAO rules, and easing article 30 of ICAO convention.</p>
response	<p>Not accepted</p> <p>Before the introduction of Regulation (EU) No 1178/2011, the renewals could be made at a type rating training organisation (TRTO). These organisations were not a school for the issue of licences. The TRTOs were normally at operator level. No safety concern was raised due to this fact.</p> <p>There is a strong regulatory oversight of operators; the same as for approved training organisations.</p>
comment	<p>583 comment by: <i>SNPL FRANCE ALPA technical committee</i></p> <p>SNPL FRANCE ALPA proposes the following deletion :</p>



FCL.625 IR — Validity, revalidation and renewal

- (c) Renewal. If an IR has expired, in order to renew their privileges applicants shall:
- (1) go through refresher training at an ATO to reach the level of proficiency needed to pass the instrument element of the skill test in accordance with Appendix 9 to this Part; and
- (2) complete a proficiency check in accordance with Appendix 9 ~~or Appendix 10~~ to this Part, in the relevant aircraft category.

Comment : SNPL is opposed to the possibility of renewal of type rating within an EBT programme. As EBT is a new way of training for recurrent training, it is not entitled to deliver or renew a licence, class or type rating. As specified in explanation of AMC1 ORO.FC.231(a)(3)(i), clarity is required.

SNPL proposes this change to be consistent with the propositions on AMC1 ORO.FC.231 (a) (5) evidence based training on page 65 ; AMC1 ORO.F.C.240 (a) (4) (vii) on page 127.

Rationale : To be enrolled in an EBT programme, a pilot must have a valid licence and the appropriate type rating. In case of any disruption in the EBT, the pilot should renew its licence and possibly class or type rating under appendix 9 with a proficiency check. This organisation is in line with the existing system which has proven to be safe, and simplify the EBT rules : a pilot is enrolled with valid type rating and stays in as long his type rating is valid or when the operator “is no longer responsible for the administrative action for the flight crew’s licence revalidation” as per AMC1 ORO.FC23(a)(3)(i) (b).. This also implies the licence to remain under the scope of national authorities fulfilling ICAO rules, and easing article 30 of ICAO convention.

response

Not accepted

Before the introduction of Regulation (EU) No 1178/2011, the renewals could be made at a type rating training organisation (TRTO). These organisations were not a school for the issue of licences. The TRTOs were normally at operator level. No safety concern was raised due to this fact.

There is a strong regulatory oversight of operators; the same as for approved training organisations.

comment

637

comment by: *Vereinigung Cockpit***FCL.625 IR — Validity, revalidation and renewal**

- (c) Renewal. If an IR has expired, in order to renew their privileges applicants shall:
- (1) go through refresher training at an ATO to reach the level of proficiency needed to pass the instrument element of the skill test in accordance with Appendix 9 to this Part; and
- (2) complete a proficiency check in accordance with Appendix 9 ~~or Appendix 10~~ to this Part, in the relevant aircraft category.

Comment:

ECA is opposed to the possibility of renewal of type rating within an EBT programme. As EBT is a new way of training for recurrent training, it is not entitled to deliver or renew a licence, class or type rating. As specified in explanation of AMC1 ORO.FC.231(a)(3)(i), clarity is required.



ECA proposes this change to be consistent with the propositions on AMC1 ORO.FC.231 (a) (5) evidence based training on page 65 ; AMC1 ORO.F.C.240 (a) (4) (vii) on page 127.

Rationale:

To be enrolled in an EBT programme, a pilot must have a valid licence and the appropriate type rating. In case of any disruption in the EBT, the pilot should renew its licence and possibly class or type rating under appendix 9 with a proficiency check. This organisation is in line with the existing system which has proven to be safe, and simplify the EBT rules: a pilot is enrolled with valid type rating and stays in as long his type rating is valid or when the operator “is no longer responsible for the administrative action for the flight crew’s licence revalidation” as per AMC1 ORO.FC23(a)(3)(i) (b).. This also implies the licence to remain under the scope of national authorities fulfilling ICAO rules, and easing article 30 of ICAO convention.

response

Not accepted

Before the introduction of Regulation (EU) No 1178/2011, the renewals could be made at a type rating training organisation (TRTO). These organisations were not a school for the issue of licences. The TRTOs were normally at operator level. No safety concern was raised due to this fact.

There is a strong regulatory oversight of operators; the same as for approved training organisations.

FCL.740 — Validity and renewal of class and type rating

p. 207

comment

247

comment by: HEAD OF TRAINING PROGRAMS AZ FLEET

- FCL. 740 a) in reference to the appendix 10:.... should be excluded of 3 months preceding the expiry date. Is this still applicable to the EBT program? In our understanding the EBT program performs a continuous practical assessment (all modules) and not a single check as the operator proficiency check.

response

Not accepted.

The administrative action should be done within the 3 months. The EBT modules can be done as per ORO.FC.231.

comment

435

comment by: European Cockpit Association

ECA proposes deletion of AMC2 FCL.740 (b) (1) validity and renewal of class and type ratings

AMC2 FCL.740(b)(1) Validity and renewal of class and type ratings

RENEWAL OF CLASS AND TYPE RATINGS: REFRESHER TRAINING — AOC

~~Point (b)(1) of FCL.740 determines that if a class or type rating has lapsed, the applicant shall take refresher training. An AOC approved for such purpose can provide such training only for their own pilots when enrolled under an approved EBT programme. The maximum amount of time elapsed since the expiry of the validity~~



~~period of the rating should be no more than one year. If more than 1 year has elapsed, the training should be performed in an ATO and AMC1 FCL.740(b)(1) applies.~~

Comment:

ECA is opposed to the possibility of renewal of type rating within an EBT programme. As EBT is a new way of training for recurrent training, it is not entitled to deliver or renew a licence, class or type rating. As specified in explanation of AMC1 ORO.FC.231(a)(3)(i), clarity is required.

ECA proposes this change to be consistent with the propositions on AMC1 ORO.FC.231 (a) (5) evidence based training on page 65 ; AMC1 ORO.F.C.240 (a) (4) (vii) on page 127 and FCL.625 IR on page 208.

Rationale:

To be enrolled in an EBT programme, a pilot must have a valid licence and the appropriate type rating. In case of any disruption in the EBT, the pilot should renew its licence and possibly class or type rating under appendix 9 with a proficiency check. This organisation is in line with the existing system which has proven to be safe, and simplify the EBT rules: a pilot is enrolled with valid type rating and stays in as long his type rating is valid or when the operator “is no longer responsible for the administrative action for the flight crew’s licence revalidation” as per AMC1 ORO.FC23(a)(3)(i) (b).. This also implies the licence to remain under the scope of national authorities fulfilling ICAO rules, and easing article 30 of ICAO convention.

response Not accepted

AMC2 FCL.740(b)(1) Validity and renewal of class and type ratings

p. 208

comment

545

comment by: *British Airways*

‘An AOC approved for such purpose...’. How is an AOC approved? Isn’t it an ATO that’s approved?

Suggest change ‘pilots’ to ‘applicants’.

The ‘maximum amount of time’ sentence doesn’t directly relate to anything. Suggest the second and third sentences are amended to something like: ‘An AOC with an ATO may provide the refresher training for applicant’s enrolled under their approved EBT programme, but only if the class or type rating has lapsed by no more than one year. If the class or type rating has lapsed by more than one year the refresher training...’.

response

Partially accepted.

The editorials proposed have been accepted.

The suggestion ‘AOC with an ATO’ is not accepted.

Before the introduction of Regulation (EU) No 1178/2011, the renewals could be made at a type rating training organisation (TRTO). These organisations were not a school for the issue of licences. The TRTOs were normally at operator level. No safety concern was raised due to this fact.

There is a strong regulatory oversight of operators; the same as for approved training organisations.



comment	<p>584 comment by: SNPL FRANCE ALPA technical committee</p> <p>SNPL FRANCE ALPA proposes deletion of AMC2 FCL.740 (b) (1) validity and renewal of class and type ratings</p> <p>AMC2 FCL.740(b)(1) Validity and renewal of class and type ratings RENEWAL OF CLASS AND TYPE RATINGS: REFRESHER TRAINING — AOC Point (b)(1) of FCL.740 determines that if a class or type rating has lapsed, the applicant shall take refresher training. An AOC approved for such purpose can provide such training only for their own pilots when enrolled under an approved EBT programme. The maximum amount of time elapsed since the expiry of the validity period of the rating should be no more than one year. If more than 1 year has elapsed, the training should be performed in an ATO and AMC1 FCL.740(b)(1) applies.</p> <p>Comment : SNPL is opposed to the possibility of renewal of type rating within an EBT programme. As EBT is a new way of training for recurrent training, it is not entitled to deliver or renew a licence, class or type rating. As specified in explanation of AMC1 ORO.FC.231(a)(3)(i), clarity is required.</p> <p>SNPL proposes this change to be consistent with the propositions on AMC1 ORO.FC.231 (a) (5) evidence based training on page 65 ; AMC1 ORO.F.C.240 (a) (4) (vii) on page 127 and FCL.625 IR on page 208.</p> <p>Rationale : To be enrolled in an EBT programme, a pilot must have a valid licence and the appropriate type rating. In case of any disruption in the EBT, the pilot should renew its licence and possibly class or type rating under appendix 9 with a proficiency check. This organisation is in line with the existing system which has proven to be safe, and simplify the EBT rules : a pilot is enrolled with valid type rating and stays in as long his type rating is valid or when the operator “is no longer responsible for the administrative action for the flight crew’s licence revalidation” as per AMC1 ORO.FC23(a)(3)(i) (b).. This also implies the licence to remain under the scope of national authorities fulfilling ICAO rules, and easing article 30 of ICAO convention.</p>
response	<p>Not accepted</p> <p>Before the introduction of Regulation (EU) No 1178/2011, the renewals could be made at a type rating training organisation (TRTO). These organisations were not a school for the issue of licences. The TRTOs were normally at operator level. No safety concern was raised due to this fact.</p> <p>There is a strong regulatory oversight of operators; the same as for approved training organisations.</p>
comment	<p>638 comment by: Vereinigung Cockpit</p> <p>AMC2 FCL.740(b)(1) Validity and renewal of class and type ratings RENEWAL OF CLASS AND TYPE RATINGS: REFRESHER TRAINING — AOC Point (b)(1) of FCL.740 determines that if a class or type rating has lapsed, the applicant shall take refresher training. An AOC approved for such purpose can provide such training only for their own pilots when enrolled under an approved EBT programme. The maximum amount of time elapsed since the expiry of the validity</p>

~~period of the rating should be no more than one year. If more than 1 year has elapsed, the training should be performed in an ATO and AMC1 FCL.740(b)(1) applies.~~

Comment:

ECA is opposed to the possibility of renewal of type rating within an EBT programme. As EBT is a new way of training for recurrent training, it is not entitled to deliver or renew a licence, class or type rating. As specified in explanation of AMC1 ORO.FC.231(a)(3)(i), clarity is required.

ECA proposes this change to be consistent with the propositions on AMC1 ORO.FC.231 (a) (5) evidence based training on page 65 ; AMC1 ORO.F.C.240 (a) (4) (vii) on page 127 and FCL.625 IR on page 208.

Rationale:

To be enrolled in an EBT programme, a pilot must have a valid licence and the appropriate type rating. In case of any disruption in the EBT, the pilot should renew its licence and possibly class or type rating under appendix 9 with a proficiency check. This organisation is in line with the existing system which has proven to be safe, and simplify the EBT rules: a pilot is enrolled with valid type rating and stays in as long his type rating is valid or when the operator "is no longer responsible for the administrative action for the flight crew's licence revalidation" as per AMC1 ORO.FC23(a)(3)(i) (b).. This also implies the licence to remain under the scope of national authorities fulfilling ICAO rules, and easing article 30 of ICAO convention.

response

Not accepted

Before the introduction of Regulation (EU) No 1178/2011, the renewals could be made at a type rating training organisation (TRTO). These organisations were not a school for the issue of licences. The TRTOs were normally at operator level. No safety concern was raised due to this fact.

There is a strong regulatory oversight of operators; the same as for approved training organisations.

FCL.905.TRI TRI — Privileges and conditio

p. 208

comment

118

comment by: FNAM

ISSUE

EASA's proposed disposals should clearly differentiate each type of instructors and examiners (TRI, TRE, SFI, SFE, CRI, CRE, etc.) for EBT since they don't benefit of equal trainings and activities. Currently, they don't have the same responsibilities; it is therefore necessary to present adapted disposals for trainings and requirements for each type of instructors and examiners. For example, compared to TRI and TRE, SFI and SFE should demonstrate additional conditions in order to ensure their competences to provide EBT trainings or validate EBT licenses.

Moreover, in NPA 2018-07 (A) we can read: 'Although the amount of training in EBT remains unchanged, the role of the trainer will be now performed under the privileges of type rating instructor (TRI) license, instead of type rating examiner (TRE) license.'

Why in NPA 2018-07 (B) the same wording is not used? This lack of precision allow all type of instructors to be acceptable for EBT, even if they have no experience of line operations and of the operator's context (SFI, CRI).



Additionally, ICAO Doc 9995 defines EBT instructors such as: 'A person who has undergone a screening and selection process, successfully completed an approved course in delivering competency-based training, and is subsequently authorized to conduct recurrent assessment and training within an approved EBT programme.'

Current AMC1 ORO.FC.230 disposals require that instructors demonstrate sufficient experience and knowledge to instruct:

'Part OPS

AMC1 ORO.FC.230 Recurrent training and checking

Personnel providing training and checking

Training and checking should be provided by the following personnel:

- (1) ground and refresher training by suitably qualified personnel;
- (2) flight training by a flight instructor (FI), type rating instructor (TRI) or class rating instructor (CRI) or, in the case of the FSTD content, a synthetic flight instructor (SFI), providing that the FI, TRI, CRI or SFI satisfies the operator's experience and knowledge requirements sufficient to instruct on the items specified in paragraphs (a)(1)(i)(A) and (B);'

FNAM suggests that instructors should demonstrate that they benefit of complete recent experiences of instructors and examiners before providing trainings or validating EBT licenses. Indeed, if trainings are based unexpected events on line, how instructors with no experience (or very old experience) on line operations will be able to train and assess properly. Pilots losing their license could therefore be used as SFI only for the first two years as being EBT enrolled, after 2 years as SFI they will be restricted to the TR training and no more on the recurrent. Instructors without proper competences may have significant impacts on flight safety since the EASA's proposed disposals would allow license validation solely based on declarations and would allow EBT trainings by instructors and examiners with inhomogeneous competences.

PROPOSAL

Ensure that SFI and SFE can demonstrate complete recent experiences of instructors and examiners before providing trainings or validating licenses

response

Not accepted

However, the review group took into account the safety objective of this comment, and they decided to modify the requirement in point (a) of AMC2 ORO.FC.231(h)(3) to ensure during the EBT modules the trainee maintains a regular exposure to an instructor with valid line experience.

In addition, the EASA Opinion proposes mitigation measures to ensure the necessary quality in the contracted activities. Among others, there is an assessment of competence and instructor training every year specific for the operator.

comment

119

comment by: FNAM

ISSUE

EASA's proposed EBT disposals describe requirements for all instructors and examiners without precising if it should be TRI, TRE, SFI and SFE only. All types of instructor and examiner should therefore be able to follow dedicated training to be EBT competent. FNAM wonders why only TRI and SFI requirements are completed in these EASA's proposed disposals in Part-FCL. Why FI, CRI, IRI, MCCI or STI are not modified to include EBT privileges?



	<p>FNAM suggests therefore to harmonize the proposed regulation by; either precisising in EBT disposals the exact types of instructors and examiners allowed to perform EBT training or validate EBT programme and training; or adding EBT disposals for each type of instructor in Part-FCL.</p> <p>PROPOSAL</p> <p>Precise in EBT disposals the exact types of instructors and examiners allowed to perform EBT training or validate EBT programme and training; or Add EBT disposals for each type of instructor in Part-FCL</p>
response	Not accepted
comment	<p>546 comment by: <i>British Airways</i></p> <p>(b) Suggest better wording is: ‘...Part ORO, the privileges of a TRI are additionally to conduct practical assessments of competencies.’</p>
response	Accepted

FCL.905.SFI SFI — Privileges and conditio	p. 208
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comment	<p>120 comment by: <i>FNAM</i></p> <p>ISSUE</p> <p>EASA’s proposed disposals should clearly differentiate each type of instructors and examiners (TRI, TRE, SFI, SFE, CRI, CRE, etc.) for EBT since they don’t benefit of equal trainings and activities. Currently, they don’t have the same responsibilities; it is therefore necessary to present adapted disposals for trainings and requirements for each type of instructors and examiners. For example, compared to TRI and TRE, SFI and SFE should demonstrate additional conditions in order to ensure their competences to provide EBT trainings or validate EBT licenses.</p> <p>Moreover, in NPA 2018-07 (A) we can read: ‘Although the amount of training in EBT remains unchanged, the role of the trainer will be now performed under the privileges of type rating instructor (TRI) license, instead of type rating examiner (TRE) license.’</p> <p>Why in NPA 2018-07 (B) the same wording is not used? This lack of precision allow all type of instructors to be acceptable for EBT, even if they have no experience of line operations and of the operator’s context (SFI, CRI).</p> <p>Additionally, ICAO Doc 9995 defines EBT instructors such as: ‘A person who has undergone a screening and selection process, successfully completed an approved course in delivering competency-based training, and is subsequently authorized to conduct recurrent assessment and training within an approved EBT programme.’</p> <p>Current AMC1 ORO.FC.230 disposals require that instructors demonstrate sufficient experience and knowledge to instruct:</p> <p>‘Part OPS</p> <p>AMC1 ORO.FC.230 Recurrent training and checking</p> <p>Personnel providing training and checking</p> <p>Training and checking should be provided by the following personnel:</p> <p>(1) ground and refresher training by suitably qualified personnel;</p> <p>(2) flight training by a flight instructor (FI), type rating instructor (TRI) or class rating instructor (CRI) or, in the case of the FSTD content, a synthetic flight instructor (SFI),</p>
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	<p>providing that the FI, TRI, CRI or SFI satisfies the operator's experience and knowledge requirements sufficient to instruct on the items specified in paragraphs (a)(1)(i)(A) and (B);'</p> <p>FNAM suggests that instructors should demonstrate that they benefit of complete recent experiences of instructors and examiners before providing trainings or validating EBT licenses. Indeed, if trainings are based unexpected events on line, how instructors with no experience (or very old experience) on line operations will be able to train and assess properly. Pilots losing their license could therefore be used as SFI only for the first two years as being EBT enrolled, after 2 years as SFI they will be restricted to the TR training and no more on the recurrent. Instructors without proper competences may have significant impacts on flight safety since the EASA's proposed disposals would allow license validation solely based on declarations and would allow EBT trainings by instructors and examiners with inhomogeneous competences.</p> <p>PROPOSAL</p> <p>Ensure that SFI and SFE can demonstrate complete recent experiences of instructors and examiners before providing trainings or validating licenses</p>
response	<p>Not accepted</p> <p>However, the review group took into account the safety objective of this comment, and they decided to modify the requirement in point (a) of AMC2 ORO.FC.231(h)(3) to ensure during the EBT modules the trainee maintains a regular exposure to an instructor with valid line experience.</p>
comment	<p>121 comment by: FNAM</p> <p>ISSUE</p> <p>EASA's proposed EBT disposals describe requirements for all instructors and examiners without precising if it should be TRI, TRE, SFI and SFE only. All types of instructor and examiner should therefore be able to follow dedicated training to be EBT competent. FNAM wonders why only TRI and SFI requirements are completed in these EASA's proposed disposals in Part-FCL. Why FI, CRI, IRI, MCCI or STI are not modified to include EBT privileges?</p> <p>FNAM suggests therefore to harmonize the proposed regulation by; either precising in EBT disposals the exact types of instructors and examiners allowed to perform EBT training or validate EBT programme and training; or adding EBT disposals for each type of instructor in Part-FCL.</p> <p>PROPOSAL</p> <p>Precise in EBT disposals the exact types of instructors and examiners allowed to perform EBT training or validate EBT programme and training; or Add EBT disposals for each type of instructor in Part-FCL</p>
response	<p>Not accepted</p>
comment	<p>122 comment by: FNAM</p> <p>ISSUE</p> <p>These EASA's proposed disposals describe the EBT instructor recurrent training.</p>

Since the EBT implementation would be on a long period of time, instructors and examiners already in service would be trained. Therefore, the EBT programme for instructors and examiners trainings should take into account the current and already performed FCL training. FNAM suggests to avoid any redundancies between these two programmes.

EBT recurrent training programme should also take into account the case when instructors and examiners are moving to another operator. Since EBT training is provided by the operator, unnecessary may persist when instructors and examiners are moving to another operators. In order to avoid these unnecessary burden, FNAM suggests that the EBT recurrent training programme takes into account the previous EBT training and competences of instructors and examiners.

Plus, there would be also brand new instructors and examiners for which entire trainings should be provided. For this case, FNAM suggests that the classic FCL training should be followed and that EBT training should be an option without redundant items.

Therefore, in order to fit to all these cases of instructors and examiners, FNAM suggests that these EASA's proposed disposals on EBT instructors recurrent training precise that EBT programme is only an option to FCL training programme without any redundant items. Plus, the EBT training programme should be adapted to examiners and instructors current EBT competences.

PROPOSAL

Precise that EBT programme is only an option to FCL programme without any redundant items with it; and

Adapt the EBT recurrent training programme to examiners and instructors EBT competences

response

Noted.

EPAS includes a new safety promotion task SPT.012 to provide guidance on the implementation of EBT.

comment

436

comment by: *European Cockpit Association*

ECA proposes the following change:

FCL.905.SFI SFI — Privileges and conditions

...

~~(b) After successful completion of the operator's EBT instructor standardisation in accordance with Part ORO, the SFI has additionally the privilege to conduct practical assessment in competencies.~~

Comment:

Delete SFI privileges for EBT as explained in our proposition on page 12

Rationale:

ECA agrees with the drafting group analysis when explaining on page 41 of this NPA about ORO.FC.231:

« *The paradigm shift proposed under the EBT programme is not simply to replace a set of critical events with a new set, but to use the events as a vehicle for developing and assessing crew performance across a range of competencies. In addition, EBT refocuses the instructor population onto analysis of the root causes to correct inappropriate actions, rather than simply asking a flight crew member to repeat a*



	<p><i>manoeuvre with no real understanding as to why it was not successfully flown in the first instance. »</i></p> <p>When SFI have competency for type rating instruction, additional EBT training will not bring any operational background, SFIs don't fly the line, may never have flown it in a commercial environment. See Proposal on FCL 905 on page 12</p> <p>As of June 26th 2018 no change referring to SFI privileges extension was proposed by the drafting group. So it seems that this proposal has not been discussed in presence of ECA/IFALPA representative and has just been added at the last minute which is not a fair practice owing to the importance of this proposed change.</p>
response	<p>Not accepted</p> <p>Traditional recurrent training allows SFIs to perform such training. To ensure level playing field, it is necessary to maintain the approach regarding SFIs. However, EBT has proposed additional requirements for SFIs — they need to attend the EBT instructor course.</p> <p>In addition, when the validity of the line evaluation of competence (old line check) is extended, an instructor enrolled in the airline (with a valid line evaluation of competence) is necessary to deliver the module once a year.</p>
comment	<p>547 comment by: <i>British Airways</i></p> <p>(b) Suggest better wording is: '...Part ORO, the privileges of an SFI are additionally to conduct practical assessments of competencies.'</p>
response	<p>Noted</p>
comment	<p>585 comment by: <i>SNPL FRANCE ALPA technical committee</i></p> <p>SNPL FRANCE ALPA proposes the following change</p> <p>FCL.905.SFI SFI — Privileges and conditions</p> <p>...</p> <p>(b) After successful completion of the operator's EBT instructor standardisation in accordance with Part ORO, the SFI has additionally the privilege to conduct practical assessment in competencies.</p> <p>Comment: delete SFI privileges for EBT as explained in our proposition on page 12</p> <p>Rationale : SNPL agrees with the drafting group analysis when explaining on page 41 of this NPA about ORO.FC.231:</p> <p><i>« The paradigm shift proposed under the EBT programme is not simply to replace a set of critical events with a new set, but to use the events as a vehicle for developing and assessing crew performance across a range of competencies. In addition, EBT refocuses the instructor population onto analysis of the root causes to correct inappropriate actions, rather than simply asking a flight crew member to repeat a manoeuvre with no real understanding as to why it was not successfully flown in the first instance. »</i></p> <p>When SFI have competency for type rating instruction, additional EBT training will not bring any operational background, SFIs don't fly the line, may never have flown it in a commercial environment. See Proposal on FCL 905 on page 12</p>



response	<p>As of June 26th 2018 no change referring to SFI privileges extension was proposed by from the drafting group. So it seems that this proposal has not been discussed in presence of ECA/IFALPA representative and has just been added at the last minute which is not a fair practice owing to the importance of this proposed change.</p> <p>Not accepted</p> <p>Traditional recurrent training allows SFIs to perform such training. To ensure level playing field, it is necessary to maintain the approach regarding SFIs. However, EBT has proposed additional requirements for SFIs — they need to attend the EBT instructor course.</p> <p>In addition, when the validity of the line evaluation of competence (old line check) is extended, an instructor enrolled in the airline (with a valid line evaluation of competence) is necessary to deliver the module once a year.</p>
comment	<p>639 comment by: <i>Vereinigung Cockpit</i></p> <p>FCL.905.SFI SFI — Privileges and conditions</p> <p>...</p> <p>(b) After successful completion of the operator's EBT instructor standardisation in accordance with Part ORO, the SFI has additionally the privilege to conduct practical assessment in competencies.</p> <p>Comment: <i>Delete SFI privileges for EBT as explained in our proposition on page 12</i></p> <p>Rationale: <i>ECA agrees with the drafting group analysis when explaining on page 41 of this NPA about ORO.FC.231:</i> <i>« The paradigm shift proposed under the EBT programme is not simply to replace a set of critical events with a new set, but to use the events as a vehicle for developing and assessing crew performance across a range of competencies. In addition, EBT refocuses the instructor population onto analysis of the root causes to correct inappropriate actions, rather than simply asking a flight crew member to repeat a manoeuvre with no real understanding as to why it was not successfully flown in the first instance. »</i> <i>When SFI have competency for type rating instruction, additional EBT training will not bring any operational background, SFIs don't fly the line, may never have flown it in a commercial environment. See Proposal on FCL 905 on page 12</i> <i>As of June 26th 2018 no change referring to SFI privileges extension was proposed by the drafting group. So it seems that this proposal has not been discussed in presence of ECA/IFALPA representative and has just been added at the last minute which is not a fair practice owing to the importance of this proposed change.</i></p>
response	<p>Not accepted</p> <p>Traditional recurrent training allows SFIs to perform such training. To ensure level playing field, it is necessary to maintain the approach regarding SFIs. However, EBT has proposed additional requirements for SFIs — they need to attend the EBT instructor course.</p> <p>In addition, when the validity of the line evaluation of competence (old line check) is extended, an instructor enrolled in the airline (with a valid line evaluation of competence) is necessary to deliver the module once a year.</p>



FCL.1025 Validity, revalidation and renewal of examiner certificates

p. 209

comment

161

comment by: *Olaf Birgels (DLH)***REVALIDATION OF EXAMINERS UNDER AN APPROVED EBT PROGRAMME**

FCL.1025 requires for the revalidation of the examiner certificate at least two proficiency checks or assessments of competence every year. A practical assessment in competencies is equivalent to a proficiency check; however, the EBT programme uses two practical assessments in competencies to complete the proficiency check, therefore the examiner under EBT **revalidates with four practical assessments** of competencies, which complete two proficiency checks. The practical assessment in competencies within an approved EBT programme is equivalent to a proficiency check.

Question:

Are 4 practical assessments 4 EBT modules or an assessment of 4 pilots (2 modules with 2 pilots each)?

(for info only: *Opinion of EASA was that 4 assessments are done with 4 pilots in 2 modules*)

response

Noted

The provision has been modified to improve clarity.

comment

288

comment by: *Brussels Airlines***REVALIDATION OF EXAMINERS**

Is a practical assessment one individual assessment of a "single" pilot ? Can 2 EBT modules, with 2X2 pilots counts as the four assessments ?

response

Noted

The provision has been modified to improve clarity.

comment

415

comment by: *Lufthansa Cargo AG***REVALIDATION OF EXAMINERS UNDER AN APPROVED EBT PROGRAMME**

*FCL.1025 requires for the revalidation of the examiner certificate at least two proficiency checks or assessments of competence every year. A practical assessment in competencies is equivalent to a proficiency check; however, the EBT programme uses two practical assessments in competencies to complete the proficiency check, therefore the examiner under EBT **revalidates with four practical assessments** of competencies, which complete two proficiency checks. The practical assessment in competencies within an approved EBT programme is equivalent to a proficiency check.*

Detailed Specification needed:

	What are 4 practical assessments (4 EBT modules or assessment of 4 pilots in 2 EBT modules, or ...)?
response	Noted The provision has been modified to improve clarity.

GM1 FCL.1025(b)(1) Validity, revalidation and renewal of examiner certificates	p. 209
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comment	188	comment by: <i>M.Held / Lufthansa Airlines</i>
	Are 4 practical assessments 4 EBT modules or an assessment of 4 pilots (2 modules with 2 pilots each)?	
	<p>REVALIDATION OF EXAMINERS UNDER AN APPROVED EBT PROGRAMME</p> <p>FCL.1025 requires for the revalidation of the examiner certificate at least two proficiency checks or assessments of competence every year. A practical assessment in competencies is equivalent to a proficiency check; however, the EBT programme uses two practical assessments in competencies to complete the proficiency check, therefore the examiner under EBT revalidates with four practical assessments of competencies, which complete two proficiency checks. The practical assessment in competencies within an approved EBT programme is equivalent to a proficiency check.</p>	
response	Noted The provision has been modified to improve clarity.	

comment	269	comment by: <i>SWISS Intl. Air Lines</i>
	What are 4 practical assessments? 4 EBT modules? An assessment of 4 pilots? (2 modules with 2 modules)	
response	Noted The provision has been modified to improve clarity.	

comment	309	comment by: <i>easyJet Airlines Europe</i>			
	<table border="1"> <tr> <td style="background-color: #f4a460;">GM1 FCL.1025 (b)(1)</td> <td style="background-color: #f4a460;">...the EBT programme uses two practical assessments in competencies to complete the proficiency check, therefore the examiner under EBT revalidates with four practical assessments of competencies, which complete two proficiency checks. The practical assessment in competencies within an approved EBT programme is equivalent to a proficiency check.</td> <td style="background-color: #f4a460;">Shall the TRE AoC cover both days if planned during an EBT event? Or shall it be considered under the AMC1 ORO.FC.145(a)(3)(e) framework? EASA should clarify in FCL.1020</td> </tr> </table>		GM1 FCL.1025 (b)(1)	...the EBT programme uses two practical assessments in competencies to complete the proficiency check, therefore the examiner under EBT revalidates with four practical assessments of competencies, which complete two proficiency checks. The practical assessment in competencies within an approved EBT programme is equivalent to a proficiency check.	Shall the TRE AoC cover both days if planned during an EBT event? Or shall it be considered under the AMC1 ORO.FC.145(a)(3)(e) framework? EASA should clarify in FCL.1020
GM1 FCL.1025 (b)(1)	...the EBT programme uses two practical assessments in competencies to complete the proficiency check, therefore the examiner under EBT revalidates with four practical assessments of competencies, which complete two proficiency checks. The practical assessment in competencies within an approved EBT programme is equivalent to a proficiency check.	Shall the TRE AoC cover both days if planned during an EBT event? Or shall it be considered under the AMC1 ORO.FC.145(a)(3)(e) framework? EASA should clarify in FCL.1020			



response Partially accepted
FCL.1020 has been amended.

comment 329 comment by: CAA-NL
GM1 FCL.1025(b)(1)
The last sentence is a duplication of the first part of the second sentence and can be deleted.

response Accepted

comment 548 comment by: British Airways
This is not clear at all. The sentence 'A practical assessment in competencies is equivalent to a proficiency check' is stated twice. However the text also says 'the EBT programme uses two practical assessments in competencies to complete the proficiency check'. So they are not equivalent! You need to conduct four practical assessments of competencies as part of examiner revalidation, instead of two proficiency checks. Therefore a practical assessment of competencies is equivalent to only half a proficiency check. It's very confusing to say they're equivalent, and we don't believe it's necessary.

Suggest the whole GM can be simplified to something like: 'Within an approved EBT programme, enrolled flight crew members are assessed on their competencies twice in every 12 month period. Therefore, for the revalidation of an examiner certificate within an approved EBT programme, the holder shall, within the validity period of the certificate, conduct at least four practical assessments of competencies every year.'

response Partially accepted.
The text has been amended to improve clarity.

comment 600 comment by: AUA EBT
Question – are 4 practical assessments 4 EBT modules or an assessment of 4 pilots (2 modules with 2 pilots each)?

(for info only: *Opinion of EASA was that 4 assessments are done with 4 pilots in 2 modules*)

response Noted
The provision has been modified to improve clarity.

comment 682 comment by: IATA
This text is difficult to understand. The last phrase contradicts the previous text.



REVALIDATION OF EXAMINERS UNDER AN APPROVED EBT PROGRAMME

FCL.1025 requires for the revalidation of the examiner certificate at least two proficiency checks or assessments of competence every year. A practical assessment in competencies is equivalent to a proficiency check; however, the EBT programme uses two practical assessments in competencies to complete the proficiency check, therefore the examiner under EBT revalidates with four practical assessments of competencies, which complete two proficiency checks. The practical assessment in competencies within an approved EBT programme is equivalent to a proficiency check.

As explained in the explanatory notes « practical assessment » the practical assessment in competencies in EBT is done by completing a full EBT module where a part of the Annex 10 items are dispatched an other presentation could be :

REVALIDATION OF EXAMINERS UNDER AN APPROVED EBT PROGRAMME

FCL.1025 requires for the revalidation of the examiner certificate at least two proficiency checks or assessments of competence every year. Generally a practical assessment in competencies is equivalent to a proficiency check ; however, as in an approved EBT programme, it is requested the practical assessment in competencies of two EBT modules, to validate the proficiency check, therefore the examiner under EBT revalidates with the practical assessments in competencies of four EBT modules.

These four EBT modules are the equivalent of the two proficiency checks requested for the revalidation of the examiner certificate.

Question – are 4 practical assessments 4 EBT modules or an assessment of 4 pilots (2 modules with 2 pilots each)?

response

Noted

The provision has been modified to improve clarity.

GM1 FCL.1030(b)(3)(ii) Revalidation of class and type ratings — aeroplane

p. 209

comment

17

comment by: *Michel Lacombe AF Training department and AF ATO*

This text is difficult to be understood. The last phrase contradicts the previous text.

REVALIDATION OF EXAMINERS UNDER AN APPROVED EBT PROGRAMME

FCL.1025 requires for the revalidation of the examiner certificate at least two proficiency checks or assessments of competence every year. A practical assessment in competencies is equivalent to a proficiency check; however, the EBT programme uses two practical assessments in competencies to complete the proficiency check, therefore the examiner under EBT revalidates with four practical assessments of



competencies, which complete two proficiency checks. The practical assessment in competencies within an approved EBT programme is equivalent to a proficiency check.

As explained in the explanatory notes « practical assessment » the practical assessment in competencies in EBT is done by completing a full EBT module where a part of the Annex 10 items are dispatched an other presentation could be :

REVALIDATION OF EXAMINERS UNDER AN APPROVED EBT PROGRAMME

FCL.1025 requires for the revalidation of the examiner certificate at least two proficiency checks or assessments of competence every year. Generally a practical assessment in competencies is equivalent to a proficiency check ; however, as in an approved EBT programme, it is requested the practical assessment in competencies of two EBT modules, to validate the proficiency check, therefore the examiner under EBT revalidates with the practical assessments in competencies of four EBT modules.

These four EBT modules are the equivalent of the two proficiency checks requested for the revalidation of the examiner certificate.

response

Noted

The provision has been modified to improve clarity.

comment

123

comment by: *FNAM*

ISSUE

FNAM agrees that, the main challenge for EBT implementation is the modification of training, roles and responsibilities for instructors and examiners. Responsibilities and roles of instructors and examiners would be modified to implement EBT principle. These points should be clearly identified and described in the EASA's proposed disposals which modify AirOps but also in Aircrew. It seems that examiners responsibilities would not fit with its means of assessment. Examiners would have to assess and validate license solely on the basis of instructors' declarations. FNAM wonders what is EASA's level of apprehension of this issue and its associated risk.

Plus, instructors and examiners could be SFI, TRI, SFE, TRE, CRI, CRE, etc. EASA's proposed disposals should clearly differentiate each type of instructors and examiners for EBT since they don't benefit of equal trainings and activities. Currently, they don't have the same responsibilities; it is therefore necessary to present adapted disposals for trainings and requirements for each type of instructors and examiners. For example, compared to TRI and TRE, SFI and SFE should demonstrate additional conditions in order to ensure their competences to provide EBT trainings or validate EBT licenses.

Moreover, in NPA 2018-07 (A) we can read: 'Although the amount of training in EBT remains unchanged, the role of the trainer will be now performed under the privileges of type rating instructor (TRI) license, instead of type rating examiner (TRE) license.'

Why in NPA 2018-07 (B) the same wording is not used? This lack of precision allow all type of instructors to be acceptable for EBT, even if they have no experience of line operations and of the operator's context (SFI, CRI).



Additionally, ICAO Doc 9995 defines EBT instructors such as: 'A person who has undergone a screening and selection process, successfully completed an approved course in delivering competency-based training, and is subsequently authorized to conduct recurrent assessment and training within an approved EBT programme.'

Current AMC1 ORO.FC.230 disposals require that instructors demonstrate sufficient experience and knowledge to instruct:

'Part OPS

AMC1 ORO.FC.230 Recurrent training and checking

Personnel providing training and checking

Training and checking should be provided by the following personnel:

- (1) ground and refresher training by suitably qualified personnel;
- (2) flight training by a flight instructor (FI), type rating instructor (TRI) or class rating instructor (CRI) or, in the case of the FSTD content, a synthetic flight instructor (SFI), providing that the FI, TRI, CRI or SFI satisfies the operator's experience and knowledge requirements sufficient to instruct on the items specified in paragraphs (a)(1)(i)(A) and (B);'

FNAM suggests that instructors should demonstrate that they benefit of complete recent experiences of instructors and examiners before providing trainings or validating EBT licenses. Indeed, if trainings are based unexpected events on line, how instructors with no experience (or very old experience) on line operations will be able to train and assess properly. Pilots losing their license could therefore be used as SFI only for the first two years as being EBT enrolled, after 2 years as SFI they will be restricted to the TR training and no more on the recurrent. Instructors without proper competences may have significant impacts on flight safety since the EASA's proposed disposals would allow license validation solely based on declarations and would allow EBT trainings by instructors and examiners with inhomogeneous competences.

PROPOSAL

Ensure that SFI and SFE can demonstrate complete recent experiences of instructors and examiners before providing trainings or validating licenses; and

Define clearly the concept of assessment for examiners and instructors; and

Ensure examiners responsibilities correspond to examiners assessment means

response

Not accepted

However, the review group took into account the safety objective of this comment, and they decided to modify the requirement in point (a) of AMC2 ORO.FC.231(h)(3) to ensure during the EBT modules the trainee maintains a regular exposure to an instructor with valid line experience.

comment

210

comment by: *Lufthansa CityLine GmbH*

REVALIDATION OF EXAMINERS UNDER AN APPROVED EBT PROGRAMME

FCL.1025 requires for the revalidation of the examiner certificate at least two proficiency checks or assessments of competence every year. A practical assessment in competencies is equivalent to a proficiency check; however, the EBT programme uses two practical assessments in competencies to complete the proficiency check, therefore the examiner under EBT **revalidates with four practical assessments** of competencies, which complete two proficiency checks. The practical assessment in



	<p>competencies within an approved EBT programme is equivalent to a proficiency check.</p> <p>Question – are 4 practical assessments 4 EBT modules or an assessment of 4 pilots (2 modules with 2 pilots each)?</p> <p>(for info only: <i>Opinion of EASA was that 4 assessments are done with 4 pilots in 2 modules</i>)</p>
response	<p>Noted</p> <p>The provision has been modified to improve clarity.</p>

Appendix 10 to Annex I (Part-FCL) to Regulation (EU) No 1178/2011

p. 210-212

comment	<p>124 comment by: <i>FNAM</i></p> <p>ISSUE – Safety Promotion</p> <p>EASA’s proposed disposals present guidance <i>via</i> a new vector : the ‘safety promotions’. FNAM wonders what is the legal status of these guidance. Is it a FAQ? Is it a hard law or is it a soft law? ‘Safety promotions’ are not GM nor AMC: they could be proposed without any stakeholders consultation. If these guidance are necessary, FNAM suggests to regroup all guidance in European regulations by integrating ‘safety promotions’ into GM; if not, to suppress ‘safety promotions’.</p> <p>PROPOSAL</p> <p>Regroup all guidance in this regulation by integrating ‘safety promotions’ into GM</p>
response	<p>Not accepted</p> <p>Safety promotion actions will be compiled into an EASA EBT manual.</p>
comment	<p>125 comment by: <i>FNAM</i></p> <p>ISSUE</p> <p>This EASA’s proposed disposal describes the minimum experience to be allowed to substitute ORO.FC.230 with ORO.FC.231. FNAM fears that the restriction of a minimum of 2 years of mixed EBT programme would be a burden for most of operators. Indeed, some operators should be allowed to start EBT programme with ATQP experiences if they can demonstrate that their ATQP is compliant with mixed-EBT programme. FNAM suggests therefore to plan conditions also on ATQP experiences to be allowed to substitute ORO.FC.230 with ORO.FC.231.</p> <p>PROPOSAL</p> <p>Allow ATQP experiences to substitute ORO.FC.230 with ORO.FC.231 if operator can demonstrate that this ATQP id compliant with mixed-EBT programme</p>
response	<p>Not accepted</p> <p>EASA published ED Decision 2015/027/R in December 2015 to provide guidance on EBT mixed implementation under ATQP programmes. Therefore, to ensure level playing field, the ATQP operators should demonstrate an experience of 2 years in EBT mixed.</p>



comment	<p>126 comment by: FNAM</p> <p>ISSUE – 2(a)(2)</p> <p>The EASA’s proposed disposals describe some requirement for the approved EBT programme, in particular the nominated person for crew training. It is required that examiners should be competent on each of the type ratings. Due to the large scope of rating and the heavy competencies needed for one ratings, the requirement of competences on each type rating would be a serious burden for all operators. They would not be able to provide sufficiently trained examiners according to this EASA’s proposed disposal, and would therefore not implement EBT. FNAM suggests to replace ‘each of’ by ‘the dedicated’ in order to ensure the efficient EBT implementation. It would be even a safer measure because examiners would be focus and therefore more competent on this rating.</p> <p>PROPOSAL</p> <p>Replace ‘each of’ by ‘the dedicated’</p>
response	<p>Not accepted.</p> <p>An explanatory note explains the intended meaning of paragraph A. 2. (a)(2).</p>
comment	<p>162 comment by: Olaf Birgels (DLH)</p> <p>Appendix 10 — Proficiency check type ratings, and proficiency check for IRs when combined with type rating — Practical assessment in competencies A — General</p> <p>1. The practical assessment in competencies within an approved EBT programme is equivalent to a proficiency check.</p> <p>2. Appendix 10 only applies to:</p> <p>(a) an operator with an approved EBT programme that has:</p> <p>(1) an experience of at least 2 years conducting an EBT programme which may include mixed EBT; and</p> <p>(2) a nominated person for crew training (or the deputy(ies)) who is a current examiner in each of the type ratings for which Appendix 10 is applicable; or</p> <p>Question:</p> <p>2.(a)(2)Do we need a nominated person for crewtraining and his deputies according to ORO.AOC.135?</p>
response	<p>Noted.</p> <p>The nomination should be to the nominated person for crew training and when using deputies in each fleet to revalidate licence, then the deputies should be nominated (e.g. one per fleet).</p>
comment	<p>189 comment by: M.Held / Lufthansa Airlines</p> <p>Appendix 10 — Proficiency check type ratings, and proficiency check for IRs when combined with type rating — Practical assessment in competencies A — General</p> <p>1. The practical assessment in competencies within an approved EBT programme is equivalent to a proficiency check.</p> <p>2. Appendix 10 only applies to:</p> <p>(a) an operator with an approved EBT programme that has:</p>

	<p>(1) an experience of at least 2 years conducting an EBT programme which may include mixed EBT; and (2) a nominated person for crew training (or the deputy(ies)) who is a current examiner in each of the type ratings for which Appendix 10 is applicable; or</p> <p>Do we need a nominated person for crew training and his deputies according to ORO.AOC.135?</p>
response	<p>Noted. The nomination should be to the nominated person for crew training and when using deputies in each fleet to revalidate licence, then the deputies should be nominated (e.g. one per fleet).</p>
comment	<p>211 comment by: <i>Lufthansa CityLine GmbH</i></p> <p>Appendix 10 — Proficiency check type ratings, and proficiency check for IRs when combined with type rating — Practical assessment in competencies A — General</p> <p>1. The practical assessment in competencies within an approved EBT programme is equivalent to a proficiency check. 2. Appendix 10 only applies to: (a) an operator with an approved EBT programme that has: (1) an experience of at least 2 years conducting an EBT programme which may include mixed EBT; and (2) a nominated person for crew training (or the deputy(ies)) who is a current examiner in each of the type ratings for which Appendix 10 is applicable; or</p> <p>Question – 2.(a)(2) Do we need a nominated person for crew training and his deputies according to ORO.AOC.135?</p>
response	<p>Noted. The nomination should be to the nominated person for crew training and when using deputies in each fleet to revalidate licence, then the deputies should be nominated (e.g. one per fleet).</p>
comment	<p>253 comment by: <i>HEAD OF TRAINING PROGRAMS AZ FLEET</i></p> <ul style="list-style-type: none"> • Page 212 NPA 2018-07 B <ul style="list-style-type: none"> ○ Up to now revalidation of a license is done by the examiner at the end of the proficiency check (this can happen out base – usually at FSTD location) ○ In the EBT program an applicant has to present himself with his license at headquarters to have the license endorsed. Two problems might arise: <ul style="list-style-type: none"> ▪ the applicant cannot be employed in line flying until he has the license revalidated, which can be tricky in case that the FSTD is in another country or in case the person has his transfer back to a different base than where the license endorsement takes place



	<ul style="list-style-type: none"> the person delegated to sign must be always available in the office. What happens when simulator sessions are performed during weekends and holidays? There should be the possibility that the EBT TRI can sign the license on the occasion of the last simulator session that completes the EBT cycle.
response	<p>Noted</p> <p>GM has been developed to clarify that the instructor on the last day of the module may have a signature delegation to be able to sign the licence.</p>
comment	<p>270 comment by: <i>SWISS Intl. Air Lines</i></p> <p>2. (a)(2):</p> <p>Do we need a nominated person for crewtraining and his deputies acc. ORO.AOC.135?</p>
response	<p>Noted.</p> <p>The nomination should be to the nominated person for crew training and when using deputies in each fleet to revalidate licence, then the deputies should be nominated (e.g. one per fleet).</p>
comment	<p>437 comment by: <i>European Cockpit Association</i></p> <p>ECA proposes the deletion of the provision for renewal in Appendix 10:</p> <p>Appendix 10 to Annex I (Part-FCL) to Regulation (EU) No 1178/2011 Appendix 10 — Proficiency check type ratings, and proficiency check for IRs when combined with type rating — Practical assessment in competencies A — General 5. The revalidation or renewal in accordance with Appendix 10 shall comprise:</p> <p>Comment: ECA is opposed to the possibility of renewal of type rating within an EBT programme. As EBT is a new way of training for recurrent training, it is not entitled to deliver or renew a licence, class or type rating.</p> <p>Rationale: To be enrolled in an EBT programme, a pilot must have a valid licence and the appropriate type rating. In case of any disruption in the EBT, the pilot should renew its licence and possibly class or type rating under appendix 9 with a proficiency check. This organisation is in line with the existing system which has proven to be safe, and simplify the EBT rules: a pilot is enrolled with valid type rating and stays in as long his type rating is valid or when the operator “is no longer responsible for the administrative action for the flight crew’s licence revalidation” as per AMC1 ORO.FC23(a)(3)(i) (b).. This also implies the licence to remain under the scope of national authorities fulfilling ICAO rules, and easing article 30 of ICAO convention.</p>



response	<p>Not accepted</p> <p>Before the introduction of Regulation (EU) No 1178/2011, the renewals could be made at a type rating training organisation (TRTO). These organisations were not a school for the issue of licences. The TRTOs were normally at operator level. No safety concern was raised due to this fact.</p> <p>There is a strong regulatory oversight of operators; the same as for approved training organisations.</p>
comment	<p>438 comment by: <i>European Cockpit Association</i></p> <p>ECA proposes the following change to paragraph A 5 (c):</p> <p>Appendix 10 to Annex I (Part-FCL) to Regulation (EU) No 1178/2011 Appendix 10 — Proficiency check type ratings, and proficiency check for IRs when combined with type rating — Practical assessment in competencies A — General 5. The revalidation or renewal in accordance with Appendix 10 shall comprise: ... (c) the administrative action of licence revalidation (1) The nominated person for crew training (or the deputy(ies)) The TRE EBT who has performed the full module, after review of the relevant module assessment shall endorse the applicant's licence or certificate with the new expiry date of the rating, if specifically authorised for that purpose by the competent authority responsible for the applicant's licence. Delegation of the TRE EBT nominated person's for crew training (or the deputy(ies)) signature in order for the applicant's licence to be signed, may be possible only if the operator has an approved procedure for such case. (2) The nominated person for crew training (or the deputy(ies)) shall ensure that the requirements in FCL.1030 'Conduct of skill tests, proficiency checks and assessments of competence' are met.</p> <p>Comment: Replacing the nominated person by the TRE in para (c)(1)(c) and the paragraphe (c)(2) should be cancelled as already in force in paragraph A 3.</p> <p>Rationale: This will keep the TRE's responsibility when endorsing a licence and will continue to ensure the authority's involvement in the validity of the licences revalidation process. There is no need to suppress the TRE in the licence revalidation process under Appendix 10, we must keep the current FCL 1030 procedure. This will be a much more legally robust means to ensure the international validity of a licence by the same mutual recognition scheme that is in practice today.</p>
response	<p>Partially accepted.</p> <p>The examiner is the person revalidating licences and doing the administrative action of licence revalidation including compliance with FCL.1030. In addition, the examiner must be the nominated person for crew training or the deputy(ies). This concept does</p>

not prevent the operator from allowing instructors to conduct the EBT modules, which should provide the necessary data for the examiner to revalidate licences. Point (c)(2) has been deleted.

comment

549

comment by: *British Airways*

To improve the language throughout, suggest amend '(or the deputy(ies))' to '(or deputy(ies)).

A 2. (a)(2) '...who is a current examiner in each of the type ratings for which Appendix 10 is applicable'. What if the operator has three or more types? The nominated person for crew training can't be a examiner on all those types. Suggest amend to '...nominated person for crew training and deputy(ies) who are current examiners...'

A 3. For clarity and consistency, suggest add '(or deputy(ies))'.

A 5. (a) What does 'continuous' mean in the context of 'practical assessments in competencies'? We have commented in GM2 to Appendix 10 that more clarity is needed about the practical assessment in competencies. This is the only place where the word 'continuous' is used and adds more confusion. Suggest delete 'continuous'.

A 5. (c)(1) The second sentence is not clear. Is this the rule that enables the nominated person for crew training to delegate the signing of the Appendix 10 to another examiner? If yes, then we believe it needs to be more explicit. Suggest amend to something like: 'Delegation of the endorsement of the applicant's licence or certificate to another examiner may be possible if the operator has a procedure that is approved by the competent authority.'

EASA has invited comments on whether further guidance is needed on the procedure to delegate the signature. We believe some additional guidance is necessary. For example, if an operator has more than one aircraft type, the nominated person for crew training may only have a valid type rating on only one of those types (or none!), but will have the authority to sign licences for pilots on all types. Can the signature be delegated to any other examiner? Does the examiner have to be an EBT instructor within the same EBT programme? (The answer is probably Yes). Can an examiner with a valid type rating on one type sign the licence for a pilot on another type? (The answer is probably Yes, because they are the deputy for the nominated person for crew training, who can do it, and also because Appendix 10 is primarily 'administrative action', and so no type-specific knowledge is required). These are examples of the points for which further guidance is required.

response

Partially accepted

Regarding the comment on further guidance, GM1 to Appendix 10 has been developed to clarify the issue.

comment

586

comment by: *SNPL FRANCE ALPA technical committee*

SNPL FRANCE ALPA proposes the deletion of the provision for renewal in appendix 10

Appendix 10 to Annex I (Part-FCL) to Regulation (EU) No 1178/2011



Appendix 10 — Proficiency check type ratings, and proficiency check for IRs when combined with type rating — Practical assessment in competencies

A — General

5. The revalidation ~~or renewal~~ in accordance with Appendix 10 shall comprise:

Comment : SNPL is opposed to the possibility of renewal of type rating within an EBT programme. As EBT is a new way of training for recurrent training, it is not entitled to deliver or renew a licence, class or type rating.

Rationale : To be enrolled in an EBT programme, a pilot must have a valid licence and the appropriate type rating. In case of any disruption in the EBT, the pilot should renew its licence and possibly class or type rating under appendix 9 with a proficiency check. This organisation is in line with the existing system which has proven to be safe, and simplify the EBT rules : a pilot is enrolled with valid type rating and stays in as long his type rating is valid or when the operator “is no longer responsible for the administrative action for the flight crew’s licence revalidation” as per AMC1 ORO.FC23(a)(3)(i) (b).. This also implies the licence to remain under the scope of national authorities fulfilling ICAO rules, and easing article 30 of ICAO convention.

response

Not accepted

Before the introduction of Regulation (EU) No 1178/2011, the renewals could be made at a type rating training organisation (TRTO). These organisations were not a school for the issue of licences. The TRTOs were normally at operator level. No safety concern was raised due to this fact.

There is a strong regulatory oversight of operators; the same as for approved training organisations.

comment

587

comment by: SNPL FRANCE ALPA technical committee

SNPL FRANCE ALPA proposes the following change to paragraph A 5 (c)

Appendix 10 to Annex I (Part-FCL) to Regulation (EU) No 1178/2011

Appendix 10 — Proficiency check type ratings, and proficiency check for IRs when combined with type rating — Practical assessment in competencies

A — General

5. The revalidation or renewal in accordance with Appendix 10 shall comprise:

...

(c) the administrative action of licence revalidation

~~(1) The nominated person for crew training (or the deputy(ies))~~ The TRE EBT who has performed the full module, after review of the relevant module assessment shall endorse the applicant’s licence or certificate with the new expiry date of the rating. ~~if specifically authorised for that purpose by the competent authority responsible for the applicant’s licence.~~

Delegation of the ~~TRE EBT nominated person’s for crew training (or the deputy(ies))~~ signature in order for the applicant’s licence to be signed, may be possible only if the operator has an approved procedure for such case.

~~(2) The nominated person for crew training (or the deputy(ies)) shall ensure that the requirements in FCL.1030 ‘Conduct of skill tests, proficiency checks and assessments of competence’ are met.~~



	<p>Comment : replace the nominated person by the TRE in para (c)(1)(c) and the paragraphe (c)(2) should be cancelled as already in force in paragraph A 3.</p> <p>Rationale : this will keep the TRE's responsibility when endorsing a licence and will continue to ensure the authority's involvement in the validity of the licences revalidation process. There is no need to suppress the TRE in the licence revalidation process under appendix 10, we must keep the current FCL 1030 procedure. This will be a much more legally robust means to ensure the international validity of a licence by the same mutual recognition scheme that is in practice today.</p>
response	<p>Partially accepted</p> <p>The examiner is the person revalidating licences and doing the administrative action of licence revalidation including compliance with FCL.1030. In addition, the examiner must be the nominated person for crew training or the deputy(ies). This concept does not prevent the operator from allowing instructors to conduct the EBT modules, which should provide the necessary data for the examiner to revalidate licences. Point (c)(2) has been deleted.</p>
comment	<p>601 comment by: AUA EBT</p> <p>Question – 2.(a)(2)Do we need a nominated person for crewtraining and his deputies according to ORO.AOC.135?</p>
response	<p>Noted</p> <p>The nomination should be to the nominated person for crew training and when using deputies in each fleet to revalidate licence, then the deputies should be nominated (e.g. one per fleet).</p>
comment	<p>640 comment by: Vereinigung Cockpit</p> <p>VC proposes the deletion of the provision for renewal in Appendix 10:</p> <p>Appendix 10 to Annex I (Part-FCL) to Regulation (EU) No 1178/2011 Appendix 10 — Proficiency check type ratings, and proficiency check for IRs when combined with type rating — Practical assessment in competencies A — General 5. The revalidation or renewal in accordance with Appendix 10 shall comprise:</p> <p>Comment: <i>ECA is opposed to the possibility of renewal of type rating within an EBT programme. As EBT is a new way of training for recurrent training, it is not entitled to deliver or renew a licence, class or type rating.</i></p> <p>Rationale: <i>To be enrolled in an EBT programme, a pilot must have a valid licence and the appropriate type rating. In case of any disruption in the EBT, the pilot should renew its licence and possibly class or type rating under appendix 9 with a proficiency check. This organisation is in line with the existing system which has proven to be safe, and simplify the EBT rules: a pilot is enrolled with valid type rating and stays in as long his type rating is valid or when the operator "is no longer responsible for the</i></p>

administrative action for the flight crew's licence revalidation" as per AMC1 ORO.FC23(a)(3)(i) (b).. This also implies the licence to remain under the scope of national authorities fulfilling ICAO rules, and easing article 30 of ICAO convention.

...

(c) the administrative action of licence revalidation

~~(1) The nominated person for crew training (or the deputy(ies)) The TRE EBT who has performed the full module, after review of the relevant module assessment shall endorse the applicant's licence or certificate with the new expiry date of the rating. if specifically authorised for that purpose by the competent authority responsible for the applicant's licence.~~

~~Delegation of the TRE EBT nominated person's for crew training (or the deputy(ies)) signature in order for the applicant's licence to be signed, may be possible only if the operator has an approved procedure for such case.~~

~~(2) The nominated person for crew training (or the deputy(ies)) shall ensure that the requirements in FCL.1030 'Conduct of skill tests, proficiency checks and assessments of competence' are met.~~

Comment:

Replacing the nominated person by the TRE in para (c)(1)(c) and the paragraphe (c)(2) should be cancelled as already in force in paragraph A 3.

Rationale:

This will keep the **TRE's responsibility when endorsing a licence and will continue to ensure the authority's involvement in the validity of the licences revalidation process.**

There is no need to suppress the TRE in the licence revalidation process under Appendix 10, we must keep the current FCL 1030 procedure.

This will be a much **more legally robust means to ensure the international validity of a licence by the same mutual recognition scheme that is in practice today.**

response

Not accepted

Before the introduction of Regulation (EU) No 1178/2011, the renewals could be made at a type rating training organisation (TRTO). These organisations were not a school for the issue of licences. The TRTOs were normally at operator level. No safety concern was raised due to this fact.

There is a strong regulatory oversight of operators; the same as for approved training organisations.

The examiner is the person revalidating licences and doing the administrative action of licence revalidation including compliance with FCL.1030. In addition, the examiner must be the nominated person for crew training or the deputy(ies). This concept does not prevent the operator from allowing instructors to conduct the EBT modules, which should provide the necessary data for the examiner to revalidate licences.

comment

683

comment by: IATA

Question – Why has the medical become a part of the revalidation form?



Question - Do we need a nominated person for crewtraining and his deputies according to ORO.AOC.135 to sign the form?

Question - The process have to allow a revalidation of the rating after the last module (in debriefing) even 1 hr before the rating expires. Every other process where an NPCT has to crosscheck the completion of the modules or any other delay in revalidating the rating is not acceptable. Is an electronic tool to check the completion of the modules allowed?

Question – “Delegation of signature for licence endorsement:” Who delegates to whom? NPCT to TRE? TRE to TRI?

response

Noted

Medical has been removed from the form.

ORO.AOC.135: The nomination should be to the nominated person crew training and when using deputies in each fleet to revalidate licence, then the deputies should be nominated (e.g. one per fleet).

More guidance is provided to clarify the revalidation 1 hr before the rating expired. More guidance is provided to clarify who delegates to whom.

AMC1 to Appendix 10 — Proficiency check type ratings, and proficiency check for IRs when combined with type rating — Practical assessment in competen p. 212-213

comment

163

comment by: *Olaf Birgels (DLH)*

APPLICATION AND REPORT FORM Minimum information provided in the form for Appendix 10.

Question:

Why has the medical become a part of the revalidation form?

response

Noted

Medical has been removed from the form.

comment

165

comment by: *Olaf Birgels (DLH)*

APPLICATION AND REPORT FORM Minimum information provided in the form for Appendix 10.

Question:

Do we need a nominated person for crewtraining and his deputies according to ORO.AOC.135 to sign the form?

response

Noted

ORO.AOC.135: The nomination should be to the nominated person crew training and when using deputies in each fleet to revalidate licence, then the deputies should be nominated (e.g. one per fleet).



comment	166	comment by: <i>Olaf Birgels (DLH)</i>
	APPLICATION AND REPORT FORM Minimum information provided in the form for Appendix 10.	
	Question: The process have to allow a revalidation of the rating after the last module (in debriefing) even 1 hr before the rating expires. Every other process where an NPCT has to crosscheck the completion of the modules or any other delay in revalidating the rating is not acceptable. Is an electronic tool to check the completion of the modules allowed?	
response	Noted More guidance is provided to clarify the revalidation 1 hr before the rating expired.	
comment	167	comment by: <i>Olaf Birgels (DLH)</i>
	APPLICATION AND REPORT FORM Minimum information provided in the form for Appendix 10.	
	Question: “Delegation of signature for licence endorsement:” Who delegates to whom? NPCT to TRE? TRE to TRI?	
response	Noted More guidance is provided to clarify who delegates to whom.	
comment	190	comment by: <i>M.Held / Lufthansa Airlines</i>
	APPLICATION AND REPORT FORM Minimum information provided in the form for Appendix 10.	
	Why has the medical become a part of the revalidation form?	
response	Accepted Medical has been removed from the form.	
comment	191	comment by: <i>M.Held / Lufthansa Airlines</i>
	The process have to allow a revalidation of the rating after the last module (in debriefing) even 1 hr before the rating expires. Every other process where an NPCT has to crosscheck the completion of the modules or any other delay in revalidating the rating is not acceptable. Is an electronic tool to check the completion of the modules allowed?	
response	Noted More guidance has been provided to clarify the revalidation 1 hr before the rating expired.	

comment	192	comment by: <i>M.Held / Lufthansa Airlines</i>
	“Delegation of signature for licence endorsement:” Who delegates to whom? NPCT to TRE? TRE to TRI?	
response	Noted More guidance has been provided to clarify who delegates to whom.	
comment	196	comment by: <i>Swedish Transport Agency, Civil Aviation Department (Transportstyrelsen, Luftfartsavdelningen)</i>
	Attachment #3 We have different proposal that we see as more functional and which includes all necessary information. All other information should be under the scope of oversight made by the competent authority of the operator. See our proposal.	
response	Partially accepted The form has been simplified; however, not to the point proposed.	
comment	212	comment by: <i>Lufthansa CityLine GmbH</i>
	APPLICATION AND REPORT FORM Minimum information provided in the form for Appendix 10. Question – Why has the medical become a part of the revalidation form?	
response	Accepted Noted Medical has been removed from the form.	
comment	213	comment by: <i>Lufthansa CityLine GmbH</i>
	Question - Do we need a nominated person for crewtraining and his deputies according to ORO.AOC.135 to sign the form?	
response	Noted ORO.AOC.135: The nomination should be to the nominated person crew training and when using deputies in each fleet to revalidate licence, then the deputies should be nominated (e.g. one per fleet).	

comment	214	comment by: <i>Lufthansa CityLine GmbH</i>
	Question - The process have to allow a revalidation of the rating after the last module (in debriefing) even 1 hr before the rating expires. Every other process where an NPCT has to crosscheck the completion of the modules or any other delay in revalidating the rating is not acceptable. Is an electronic tool to check the completion of the modules allowed?	
response	Noted More guidance is provided to clarify the revalidation 1 hr before the rating expired. More guidance is provided to clarify who delegates to whom.	
comment	215	comment by: <i>Lufthansa CityLine GmbH</i>
	Question: "Delegation of signature for licence endorsement:" Who delegates to whom? NPCT to TRE? TRE to TRI?	
response	Noted More guidance is provided to clarify who delegates to whom.	
comment	271	comment by: <i>SWISS Intl. Air Lines</i>
	Why is the medical part of the revalidation form?	
response	Accepted Medical has been removed from the form.	
comment	272	comment by: <i>SWISS Intl. Air Lines</i>
	Do we need a nominated person for crewtraining and his deputies acc. ORO.AOC.135 to sign the form?	
response	Noted ORO.AOC.135: The nomination should be to the nominated person crew training and when using deputies in each fleet to revalidate licence, then the deputies should be nominated (e.g. one per fleet).	
comment	273	comment by: <i>SWISS Intl. Air Lines</i>
	The process has to allow a revalidation of the rating after the last module (in debriefing) even 1 hr before the rating expires. Every other process where an NPCT has to crosscheck the completion of the modules or any other delay in revalidating the rating is not acceptable. Is an electronic tool to check the completion of the modules allowed?	
response	Noted More guidance is provided to clarify the revalidation 1 hr before the rating expired. More guidance is provided to clarify who delegates to whom.	
comment	274	comment by: <i>SWISS Intl. Air Lines</i>

response	<p>“Delegation of signature for licence endorsement: Who delegates to whom? NPCT to TRE? TRE to TRI?”</p> <p>Noted More guidance is provided to clarify who delegates to whom.</p>
comment	<p>416 comment by: <i>Lufthansa Cargo AG</i></p> <p>APPLICATION AND REPORT FORM Minimum information provided in the form for Appendix 10.</p> <p>Detailed Specification needed: Is the medical part of the revalidation form to allow revalidations w/o a valid medical?</p>
response	<p>Accepted Medical has been removed from the form.</p>
comment	<p>550 comment by: <i>British Airways</i></p> <p>Why is there a box for ‘Valid medical, yes/no’ on the Appendix 10 form? Details of a valid medical are not on the Appendix 9 form. Suggest delete from the Appendix 10 form.</p>
response	<p>Accepted Medical has been removed from the form.</p>

GM1 to Appendix 10 — Proficiency check type ratings, and proficiency check for IRs when combined with type rating — Practical assessment in competen

p. 213

comment	<p>439 comment by: <i>European Cockpit Association</i></p> <p>ECA proposes to delete GM1 to Appendix 10:</p> <p>GM1 to Appendix 10 — Proficiency check type ratings, and proficiency check for IRs when combined with type rating — Practical assessment in competencies REVALIDATION OF LICENCES — ADMINISTRATIVE PROCEDURES For the purpose of revalidation, the Examiner Differences Document applies to the nominated person for crew training or the deputy(ies).</p> <p>Rationale: GM1 is only relevant to the previous 5(c) of Appendix 10 (delegated licence revalidation process to the nominated person for crew training) that ECA proposes to delete.</p> <p>Comment to be seen in conjunction with the comment above.</p>
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response	Not accepted The examiner is the person revalidating licences; in addition, the examiner must be the nominated person crew for training or the deputy.
comment	588 comment by: SNPL FRANCE ALPA technical committee SNPL FRANCE ALPA proposes to delete GM1 to appendix 10 GM1 to Appendix 10 — Proficiency check type ratings, and proficiency check for IRs when combined with type rating — Practical assessment in competencies REVALIDATION OF LICENCES — ADMINISTRATIVE PROCEDURES For the purpose of revalidation, the Examiner Differences Document applies to the nominated person for crew training or the deputy(ies). Rationale : GM1 is only relevant to the previous 5(c) of appendix 10 (delegated licence revalidation process to the nominated person for crew training) that SNPL proposes to suppress.
response	Not accepted
comment	641 comment by: Vereinigung Cockpit VC proposes to delete GM1 to Appendix 10: GM1 to Appendix 10 — Proficiency check type ratings, and proficiency check for IRs when combined with type rating — Practical assessment in competencies REVALIDATION OF LICENCES — ADMINISTRATIVE PROCEDURES For the purpose of revalidation, the Examiner Differences Document applies to the nominated person for crew training or the deputy(ies). Rationale: <i>GM1 is only relevant to the previous 5(c) of Appendix 10 (delegated licence revalidation process to the nominated person for crew training) that ECA proposes to delete.</i> <i>Comment to be seen in conjunction with the comment above.</i>
response	Not accepted The examiner is the person revalidating licences; in addition, the examiner must be the nominated person crew for training or the deputy.

GM2 to Appendix 10 — Proficiency check type ratings, and proficiency check for IRs when combined with type rating — Practical assessment in competen	p. 213-214
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comment	440 comment by: European Cockpit Association
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ECA proposes the following change to:

GM2 to Appendix 10 — Proficiency check type ratings, and proficiency check for IRs when combined with type rating — Practical assessment in competencies

PRACTICAL ASSESSMENT IN COMPETENCIES — PROFICIENCY CHECK

Practical assessment (or practical assessment in competencies): is the primary method for assessing performance and should serve to verify the integrated performance of competencies. It takes place in either a simulated or an operational environment. The practical assessment in competencies is equivalent to a proficiency check and is performed under the instructor TRI/TRE privilege in the context of proficiency check in accordance with Appendix 10 to Part-FCL. More information can be found in ICAO Doc 9868 'PANS-TRG'.

The demonstration of skills to revalidate ~~or renew~~ referred to in the definition of proficiency check in FCL.010 is equivalent to the several practical assessments in competencies conducted in the EBT programme and the final review of the examiner. In fact, one single practical assessment in competencies demonstrates the necessary skills performed in legacy training; however, EBT goes one step further — to revalidate ~~or renew~~, the pilot performs at least two demonstrations of skills/practical assessments in competencies, corresponding to at least two EBT modules.

Rationale: ECA is opposed to the practical assessment of competencies being made by SFI in the EBT context

response

Not accepted

Traditional recurrent training allows SFIs to perform such training. To ensure level playing field, it is necessary to maintain the approach regarding SFIs. However, EBT has proposed additional requirements for SFIs — they need to attend the EBT instructor course.

In addition, when the validity of the line evaluation of competence (old line check) is extended, an instructor enrolled in the airline (with a valid line evaluation of competence) is necessary to deliver the module once a year.

comment

589

comment by: *SNPL FRANCE ALPA technical committee*

SNPL FRANCE ALPA proposes the following change to :

GM2 to Appendix 10 — Proficiency check type ratings, and proficiency check for IRs when combined with type rating — Practical assessment in competencies

PRACTICAL ASSESSMENT IN COMPETENCIES — PROFICIENCY CHECK

Practical assessment (or practical assessment in competencies): is the primary method for assessing performance and should serve to verify the integrated performance of competencies. It takes place in either a simulated or an operational environment. The practical assessment in competencies is equivalent to a proficiency check and is performed under the instructor **TRI/TRE** privilege in the context of proficiency check in accordance with Appendix 10 to Part-FCL. More information can be found in ICAO Doc 9868 'PANS-TRG'.

The demonstration of skills to revalidate ~~or renew~~ referred to in the definition of proficiency check in FCL.010 is equivalent to the several practical assessments in competencies conducted in the EBT programme and the final review of the examiner.



response	<p>In fact, one single practical assessment in competencies demonstrates the necessary skills performed in legacy training; however, EBT goes one step further — to revalidate or renew, the pilot performs at least two demonstrations of skills/practical assessments in competencies, corresponding to at least two EBT modules.</p> <p>Rationale: SNPL is opposed to the practical assessment of competencies being made by SFI in the EBT context</p>
response	<p>Not accepted</p> <p>Traditional recurrent training allows SFIs to perform such training. To ensure level playing field, it is necessary to maintain the approach regarding SFIs. However, EBT has proposed additional requirements for SFIs — they need to attend the EBT instructor course.</p> <p>In addition, when the validity of the line evaluation of competence (old line check) is extended, an instructor enrolled in the airline (with a valid line evaluation of competence) is necessary to deliver the module once a year.</p>
comment	<p>606 comment by: AUA EBT</p> <p>Question – Why has the medical become a part of the revalidation form?</p> <p>Question - Do we need a nominated person for crewtraining and his deputies according to ORO.AOC.135 to sign the form?</p> <p>Question - The process have to allow a revalidation of the rating after the last module (in debriefing) even 1 hr before the rating expires. Every other process where an NPCT has to crosscheck the completion of the modules or any other delay in revalidating the rating is not acceptable. Is an electronic tool to check the completion of the modules allowed?</p> <p>Question – “ “Delegation of signature for licence endorsement:” Who delegates to whom? NPCT to TRE? TRE to TRI? How many deputies to the NPCT do you recommend for license revalidations? Is there a limit</p>
response	<p>Noted</p> <p>Medical has been removed from the form.</p> <p>ORO.AOC.135: The nomination should be to the nominated person crew training and when using deputies in each fleet to revalidate licence, then the deputies should be nominated (e.g. one per fleet).</p> <p>More guidance is provided to clarify the revalidation 1 hr before the rating expired.</p> <p>More guidance is provided to clarify who delegates to whom.</p>
comment	<p>607 comment by: AUA EBT</p> <p>Question – Why has the medical become a part of the revalidation form?</p> <p>Question - Do we need a nominated person for crewtraining and his deputies according to ORO.AOC.135 to sign the form?</p>

	<p>Question - The process have to allow a revalidation of the rating after the last module (in debriefing) even 1 hr before the rating expires. Every other process where an NPCT has to crosscheck the completion of the modules or any other delay in revalidating the rating is not acceptable. Is an electronic tool to check the completion of the modules allowed?</p> <p>Question – “ “Delegation of signature for licence endorsement:” Who delegates to whom? NPCT to TRE? TRE to TRI? How many deputies to the NPCT do you recommend for license revalidations? Is there a limit</p>
response	<p>Noted</p> <p>Medical has been removed from the form.</p> <p>ORO.AOC.135: The nomination should be to the nominated person crew training and when using deputies in each fleet to revalidate licence, then the deputies should be nominated (e.g. one per fleet).</p> <p>More guidance is provided to clarify the revalidation 1 hr before the rating expired.</p> <p>More guidance is provided to clarify who delegates to whom.</p>
comment	<p>623 comment by: <i>British Airways</i></p> <p>‘Practical assessment in competencies’ is the phrase chosen to be equivalent to a proficiency check. However, this is not good English. In Part-FCL there is already the concept of ‘Assessment of competence’. The word ‘of’ is a much better and more natural word to use than ‘in’. Suggest ‘Practical assessment of competencies’ is used throughout the NPA. The correct plural phrase is then ‘Practical assessments of competencies’.</p> <p>The first paragraph of this GM just repeats the definition on page 18. Suggest delete.</p> <p>This second paragraph adds to the confusion about when a ‘Practical assessment of competencies’ is carried out in an EBT programme. The first paragraph states that ‘The practical assessment of competencies is equivalent to the proficiency check’. However, the second paragraph states that the ‘proficiency check in FCL.010 is equivalent to several practical assessments in competencies conducted in the EBT programme.’ Which is it? Is the proficiency check equivalent to one, or to several practical assessments in competencies?</p> <p>The second paragraph goes on to say ‘the pilot performs two demonstrations of skills/practical assessments in competencies, corresponding to at least two EBT modules’. So is there only one practical assessments in competencies in each module? And if so, when?</p> <p>It is critical that everyone agrees what ‘Practical assessment of competencies’ means in the context of EBT in order to understand the requirements of Appendix 10. This GM does not make it clear. When is a ‘Practical assessment of competencies’ carried out in an EBT module? Is it during the Eval? Is it at the end of the module? Or is it both? There is no clarity.</p>

response	<p>In the Remarks column in the tables in the Explanatory Note on pages 215-218 there are several references to ‘manoeuvres validation phase’. There is no manoeuvres validation phase in the EBT programme.</p> <p>Accepted</p> <p>‘Practical assessment in competencies’ has been replaced by ‘EBT practical assessment’, and the GM has been redrafted to improve clarity.</p>
comment	<p>642 comment by: <i>Vereinigung Cockpit</i></p> <p>GM2 to Appendix 10 — Proficiency check type ratings, and proficiency check for IRs when combined with type rating — Practical assessment in competencies PRACTICAL ASSESSMENT IN COMPETENCIES — PROFICIENCY CHECK</p> <p>Practical assessment (or practical assessment in competencies): is the primary method for assessing performance and should serve to verify the integrated performance of competencies. It takes place in either a simulated or an operational environment. The practical assessment in competencies is equivalent to a proficiency check and is performed under the instructor TRI/TRE privilege in the context of proficiency check in accordance with Appendix 10 to Part-FCL. More information can be found in ICAO Doc 9868 ‘PANS-TRG’.</p> <p>The demonstration of skills to revalidate or renew referred to in the definition of proficiency check in FCL.010 is equivalent to the several practical assessments in competencies conducted in the EBT programme and the final review of the examiner. In fact, one single practical assessment in competencies demonstrates the necessary skills performed in legacy training; however, EBT goes one step further — to revalidate or renew, the pilot performs at least two demonstrations of skills/practical assessments in competencies, corresponding to at least two EBT modules.</p> <p>Rationale: <i>ECA is opposed to the practical assessment of competencies being made by SFI in the EBT context</i></p>
response	<p>Not accepted</p> <p>Traditional recurrent training allows SFIs to perform such training. To ensure level playing field, it is necessary to maintain the approach regarding SFIs. However, EBT has proposed additional requirements for SFIs — they need to attend the EBT instructor course.</p> <p>In addition, when the validity of the line evaluation of competence (old line check) is extended, an instructor enrolled in the airline (with a valid line evaluation of competence) is necessary to deliver the module once a year.</p>

AMC2 ARA.GEN.315(a) Procedure for issue, revalidation, renewal or change of licences, rating or certificates — perso

p. 219

comment

195

comment by: *Swedish Transport Agency, Civil Aviation Department (Transportstyrelsen, Luftfartsavdelningen)*

AMC2 ARA.GEN.315(a) & AMC1 to Appendix 10



Sweden supports the implementation of EBT and the possibility for an operator to revalidate a type rating for pilots enrolled in an EBT program. However we would like to reduce unnecessary workload for both the operator and the competent authority of the pilot/license holder.

AMC1 to appendix 10 includes more information than what should be necessary for the competent authority of the pilot/license holder to check compliance with. If an operator is approved for EBT, and under oversight of the competent authority of the operator, it should be sufficient to limit the information in the form submitted to the competent authority of the pilot/license holder.

The proposed form includes several signatures and a lot of information that is already held by the operator. By requesting all that information to be included in the form we see difficulties in establishing functioning digital forms. We do not support a system, in practice, requiring the operator and us to handle all forms manually using printed paper.

We have different proposal that we see as more functional and which includes all necessary information. All other information should be under the scope of oversight made by the competent authority of the operator.

See our proposal in AMC1 to Appendix 10.

response

Partially accepted
The form has been simplified; however, not to the point proposed.

comment

441

comment by: *European Cockpit Association*

ECA proposes the following changes to AMC2 ARA.GEN.315:

AMC2 ARA.GEN.315(a) Procedure for issue, revalidation, ~~renewal~~ or change of licences, rating or certificates — persons

VERIFICATION OF COMPLIANCE OF THE EBT PROGRAMME

In order to verify that the applicant meets the requirements for revalidation ~~or renewal~~ of ratings within an approved EBT programme, the competent authority should in addition to the requirements in AMC1 ARA.GEN.315(a) verify that:

- (a) the nominated person for crew training (or the deputy(ies) is a current examiner in the type rating filled in in Appendix 10;
- (b) when the ~~nominated person for crew training (or the deputy(ies))~~ TRE delegates ~~their~~ **its** signature to endorse the licence of the applicant:
 - (1) the delegation of signature should follow the operator's approved procedure for such purpose; and
 - (2) the person signing the licence should be nominated and indicated in Appendix 10;
- (c) the nominated person for crew training of the operator in which the applicant is enrolled ensures that the applicant has completed the EBT programme;



	<p>(d) the nominated person for crew training of the operator in which the applicant is enrolled ensures that instructors that conduct the training to the applicant are standardised;</p> <p>(e) the operator performs a verification of the grading system once every three years; and</p> <p>(f) the nominated person for crew training ensures the integrity of the pilot training data.</p> <p>Rationale: The proposed modification is made to align this AMC 2 with the changes proposed for appendix 10 A 5 (c) on page 12.</p>
response	<p>Not accepted</p> <p>Before the introduction of Regulation (EU) No 1178/2011, the renewals could be made at a type rating training organisation (TRTO). These organisations were not a school for the issue of licences. The TRTOs were normally at operator level. No safety concern was raised due to this fact.</p> <p>There is a strong regulatory oversight of operators; the same as for approved training organisations.</p>
comment	<p>590 comment by: SNPL FRANCE ALPA technical committee</p> <p>SNPL FRANCE ALPA proposes the following changes to AMC2 ARA.GEN.315</p> <p>AMC2 ARA.GEN.315(a) Procedure for issue, revalidation, renewal or change of licences, rating or certificates — persons</p> <p>VERIFICATION OF COMPLIANCE OF THE EBT PROGRAMME</p> <p>In order to verify that the applicant meets the requirements for revalidation or renewal of ratings within an approved EBT programme, the competent authority should in addition to the requirements in AMC1 ARA.GEN.315(a) verify that:</p> <p>(a) the nominated person for crew training (or the deputy(ies) is a current examiner in the type rating filled in in Appendix 10;</p> <p>(b) when the nominated person for crew training (or the deputy(ies)) TRE delegates their its signature to endorse the licence of the applicant:</p> <p>(1) the delegation of signature should follow the operator's approved procedure for such purpose; and</p> <p>(2) the person signing the licence should be nominated and indicated in Appendix 10;</p> <p>(c) the nominated person for crew training of the operator in which the applicant is enrolled ensures that the applicant has completed the EBT programme;</p> <p>(d) the nominated person for crew training of the operator in which the applicant is enrolled ensures that instructors that conduct the training to the applicant are standardised;</p> <p>(e) the operator performs a verification of the grading system once every three years; and</p> <p>(f) the nominated person for crew training ensures the integrity of the pilot training data.</p> <p>Rationale:The proposed modification is made to align this AMC 2 with the changes proposed for appendix 10 A 5 (c) on page 12</p>

response

Not accepted

The examiner is the person revalidating licences; in addition, the examiner must be the nominated person crew training or the deputy.

Before the introduction of Regulation (EU) No 1178/2011, the renewals could be made at a type rating training organisation (TRTO). These organisations were not a school for the issue of licences. The TRTOs were normally at operator level. No safety concern was raised due to this fact.

There is a strong regulatory oversight of operators; the same as for approved training organisations.

comment

643

comment by: *Vereinigung Cockpit*

AMC2 ARA.GEN.315(a) Procedure for issue, revalidation, ~~renewal~~ or change of licences, rating or certificates — persons

VERIFICATION OF COMPLIANCE OF THE EBT PROGRAMME

In order to verify that the applicant meets the requirements for revalidation ~~or renewal~~ of ratings within an approved EBT programme, the competent authority should in addition to the requirements in AMC1 ARA.GEN.315(a) verify that:

(a) the nominated person for crew training (or the deputy(ies) is a current examiner in the type rating filled in in Appendix 10;

(b) when the ~~nominated person for crew training (or the deputy(ies))~~ TRE delegates ~~their~~ **its** signature to endorse the licence of the applicant:

(1) the delegation of signature should follow the operator's approved procedure for such purpose; and

(2) the person signing the licence should be nominated and indicated in Appendix 10;

(c) the nominated person for crew training of the operator in which the applicant is enrolled ensures that the applicant has completed the EBT programme;

(d) the nominated person for crew training of the operator in which the applicant is enrolled ensures that instructors that conduct the training to the applicant are standardised;

(e) the operator performs a verification of the grading system once every three years; and

(f) the nominated person for crew training ensures the integrity of the pilot training data.

Rationale:

The proposed modification is made to align this AMC 2 with the changes proposed for appendix 10 A 5 (c) on page 12.

response

Not accepted

The examiner is the person revalidating licences; in addition, the examiner must be the nominated person crew training or the deputy.

Before the introduction of Regulation (EU) No 1178/2011, the renewals could be made at a type rating training organisation (TRTO). These organisations were not a school for the issue of licences. The TRTOs were normally at operator level. No safety concern was raised due to this fact.

There is a strong regulatory oversight of operators; the same as for approved training organisations.



ARA.FCL.200 Procedure for issue, revalidation or renewal of a licence, rating or certificate	p. 221
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comment

442

comment by: *European Cockpit Association*

ECA proposes

ARA.FCL.200 Procedure for issue, revalidation or renewal of a licence, rating or certificate

...

(g) Endorsement of licence by examiners.

(1) Before specifically authorize certain examiners to revalidate or renew ratings or certificates, the competent authority shall develop appropriate procedures.

(2) These appropriate procedures may include endorsement of licence for revalidation purposes only under an approved EBT programme in accordance with Appendix 10. In such case, signature delegation to endorsement of licence may be allowed.**Comment :**

As ECA is opposed to the possibility of renewal of type rating within an EBT programme it proposes to restrict endorsement of licences to revalidation only in proposed paragraph 2.

response

Not accepted

Before the introduction of Regulation (EU) 1178/2011, the renewals could be made at a type rating training organisation (TRTO). These organisations were not a school for the issue of licences. The TRTOs were normally at operator level. No safety concern was raised due to this fact.

There is a strong regulatory oversight of operators; the same as for approved training organisations.

comment

551

comment by: *British Airways*

(g)(2) For consistency with the preceding paragraphs, suggest amend 'endorsement of licence' to 'endorsement of a pilot licence'

(g)(2) For clarity, suggest amend the second sentence to: 'Delegation of the endorsement of a pilot licence to another examiner may be possible under an approved EBT programme.'

response

Partially accepted

comment

591

comment by: *SNPL FRANCE ALPA technical committee*

SNPL FRANCE ALPA proposes

ARA.FCL.200 Procedure for issue, revalidation or renewal of a licence, rating or certificate

...

(g) Endorsement of licence by examiners.



	<p>(1) Before specifically authorize certain examiners to revalidate or renew ratings or certificates, the competent authority shall develop appropriate procedures.</p> <p>(2) These appropriate procedures may include endorsement of licence for revalidation purposes only under an approved EBT programme in accordance with Appendix 10. In such case, signature delegation to endorsement of licence may be allowed.</p> <p>Comment : as SNPL is opposed to the possibility of renewal of type rating within an EBT programme it proposes to restrict endorsement of licences to revalidation only in proposed paragraph 2.</p>
response	<p>Not accepted</p> <p>Traditional recurrent training allows SFIs to perform such training. To ensure level playing field, it is necessary to maintain the approach regarding SFIs. However, EBT has proposed additional requirements for SFIs — they need to attend the EBT instructor course.</p> <p>In addition, when the validity of the line evaluation of competence (old line check) is extended, an instructor enrolled in the airline (with a valid line evaluation of competence) is necessary to deliver the module once a year.</p>
comment	<p>644 comment by: <i>Vereinigung Cockpit</i></p> <p>ARA.FCL.200 Procedure for issue, revalidation or renewal of a licence, rating or certificate</p> <p>...</p> <p>(g) Endorsement of licence by examiners.</p> <p>(1) Before specifically authorize certain examiners to revalidate or renew ratings or certificates, the competent authority shall develop appropriate procedures.</p> <p>(2) These appropriate procedures may include <u>endorsement of licence for revalidation purposes only</u> under an approved EBT programme in accordance with Appendix 10. In such case, signature delegation to endorsement of licence may be allowed.</p> <p>Comment : <i>As ECA is opposed to the possibility of renewal of type rating within an EBT programme it proposes to restrict endorsement of licences to revalidation only in proposed paragraph 2.</i></p>
response	<p>Not accepted</p> <p>Before the introduction of Regulation (EU) 1178/2011, the renewals could be made at a type rating training organisation (TRTO). These organisations were not a school for the issue of licences. The TRTOs were normally at operator level. No safety concern was raised due to this fact.</p> <p>There is a strong regulatory oversight of operators; the same as for approved training organisations.</p>

AMC2 ARA.FCL.205 Monitoring of examiners	p. 221
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comment 552

comment by: *British Airways*

(a) It is not clear what the intent of this rule is. Is it saying the competent authority should monitor the nominated person for crew training? Or is it saying the nominated person for crew training should monitor the examiners certified by other competent authorities. Suggest re-draft to clarify.

(b) Which instructor is being referred to here? Who is 'the EBT instructor' in this case? Does (b) follow on from (a), so is 'the EBT instructor' one of the examiners certified by other competent authorities? This rule is not clear. Suggest re-draft to clarify.

response Partially accepted



3. Attachments

 [What Is Normative versus Criterion referenced Assessment.pdf](#)

Attachment #1 to comment [#556](#)

 [table.png](#)

Attachment #2 to comment [#486](#)

 [Application and report form for the proficiency check type ratings SWEDEN.pdf](#)

Attachment #3 to comment [#196](#)

