



Notice of Proposed Amendment 2017-XX

Evidence-based and competency-based training

RMT.0599 — ISSUE 1 - DD/MM/2017

EXECUTIVE SUMMARY

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Applicability

Affected regulations and decisions: ED Decision 2014/017/R

Affected stakeholders: Air operators; approved training organisations (ATOs) for aircrew; national aviation authorities (NAAs); pilots; instructors; examiners

Driver/origin: Safety (recommendations)

Reference: FRAN-2013-017; FRAN-2013-018; FRAN-2013-022; FRAN-2013-033; FRAN-2013-035; FRAN-2014-005; FRAN-2015-062; NETH-2014-005; SWED-2012-006; UNKG-2007-062; FRAN-2009-007; FRAN-2013-52; GERF-2009-025; IRLD-2014-003; SPAN-2004-030; SPAN-2012-066; SWED-2011-004; UNKG-2006-102

Process map

Concept Paper:	Yes for EBT/No
Terms of Reference:	05 FEB 2016
Rulemaking group:	Yes
RIA type:	Light
Technical consultation during NPA drafting:	Yes/No
Duration of NPA consultation:	1 months
Review group:	Yes/No
Focussed consultation:	Yes/No
Publication date of the NPA:	[Year/Quarter]



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1. Explanatory Note

The explanatory note will be further develop after the workshop. This document is an early draft to illustrate the presentations given in the workshop. Proper Notice of proposed amendment will be publish 2Q2017. This document is not an official proposal .

1.1. Overview of the issues to be addressed (do not complete)

A Lack of AMC and GM material was reported by CAA Belgium and many Operators of non-commercial complex motor-powered aircrafts. For Section 1 of ORO.FC which applies to Annex 6 (NCC), AMC(s) and GM(s) are partly missing for relevant sections.

Existing AMC(s) and GM(s) for Annex 4 (CAT) according to Section 2 of ORO.FC are not fully applicable to Annex 6 (NCC). For that reason only applicable parts of the AMC(s) and/or GM(s) of Section 2 ORO.FC are used to develop new AMC(s) and/or GM(s) focusing on the need of Annex 6 (NCC).

This AMC(s) and GM(s) Material was developed by the industrial let NCC-workgroup under the umbrella of combined GA NAA-Group & GA- subSSCC.

The Agency and the RMG will evaluate the possibility to extend this NPA to SPO (Annex VIII regulation 965/2012). Please comment the NPA

1.2. Objectives

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

The specific objective of this proposal are to

1. Contribute to uniform implementation of ORO.FC requirements for Non-commercial operations with complex motor-powered aircrafts by developing AMC and GM.
2. Improve the safety levels by providing guidance to the competent authorities and operators on conducting training for Non-commercial operations with complex motor-powered aircrafts.

1.3. Summary of the Regulatory Impact Assessment (RIA)

The RIA considers the impact analysis of the below options

Option 0: Baseline option (no change in rules; risks remain as outlined in the issue analysis).

Option 1: Develop new AMC and GM for non commercial operations of complex motor power aircraft.

Option 2: Use existing Section 2 of ORO.FC. (CAT) for non-commercial operations for motor-powered aircraft.



1.4. Overview of the proposed new AMC and GM Material for part ORO.FC for operations other than commercial air transport

AMC/GM to Annex III (Part-ORO)

The following changes are proposed:

Development of a New AMC1 ORO.FC.105 (b) 2) Designation as pilot-in-command to clarify the requirements of Route/Area and aerodrome knowledge for operations other than commercial air transport.

- (1) Development of new AMC1 ORO.FC.105 (b)(2) Designation as pilot-in-command to specify the requirements and content of the "Operator's Command Course " for operations other than commercial air transport
- (2) A new GM2 ORO.FC.105 (b)(2) Designation as pilot-in-command has been inserted to provide guidance for the operator with the aerodrome categorization.
- (3) A new AMC1 ORO.FC.105 (b)(3) Designation as pilot-in-command has been inserted to provide guidance for the content of the command course.
- (4) A new GM1 ORO.FC.105 (b)(3) Designation as pilot-in-command has been inserted to provide guidance for the conduct of a demonstration or competence within the command course.
- (5) Development of new AMC1 ORO.FC.120 Operator conversion training to clarify the requirements of the training. As stated in the Implementing rule the operator conversion training shall include emergency and safety equipment training.
- (6) Development of new AMC1 ORO.FC.130 Recurrent training and checking for operations other than commercial air transport. Annual recurrent flight and ground training shall be completed to ensure competence of each flight crew member in carrying out normal, abnormal and emergency procedures.
- (7) Add new GM1 ORO.FC.130 recurrent training and checking to provide guidance for the use of aircraft/FSTD for training programme
- (8) Develop new AMC2 ORO.FC.145 Provision of training to introduce the possibility of operators developing a policy for the crediting of training delivered by other persons or organisations. This provision will remove the need for elements of training to be repeated provided the operator has evidence that the training has already taken place.
- (9) New AMC3 ORO.FC.145 Provision of training to provide guidance to operators in developing the policy required by item (8).



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1.5. Detailed explanatory Note

The detailed explanatory note is only applicable those AMC/GM for which the rulemaking group consired there was the need for further explanation. This section will be review after the workshop

GM2 ORO.FC.105 (b)(2):

The Aerodrome categorization according to AMC1 ORO.FC.105(b)(2);(c)) may used as a guidance to categorise the aerodromes by the operator. Any other appropriate method specified in the operators manual may be used.

AMC1 ORO.FC.105 (b)(3):

Command responsibilities training shall be defined by the Operator. Classroom training is not necessary, familiarization may be achived by a leaflet or similar issued by the operator.

AMC1 OFO.FC.120

According to ORO.GEN.200 the operator shall establish, implement and maintain a management system that includes maintaining personnel trained and competent to perform their tasks. Since ORO.FC.120 do not required a check for a Pilot joining the operator nor when changing to an aircraft for which a new type or class rating is required, the Rulemaking group decided to recomend at least one flight under the supervision and to the satisfaction of a suitably qualified pilot-in-command nominated by the operator to ensure that he is able to perform his tasks as required by the operators. *This item is still under discussion, therefore stakeholders are invited to provide their view on this matter.*

AMC1 OFO.FC.120(a)(1)(i):

Ground training is not required by the IR. Aircraft systems, normal, abnormal and emergency procedures are part of the TR course and are covered by the AFM. There are no operator specific items. If the operator uses different procedures this will be covered under (a)(3).

GM1 ORO.FC.130 Recurrent training and checking (4)(i)(A)

If an FSTD is not available, the operator needs to perform training and checking on the aircraft. Compared to Aircraft types used in Commercial Air Transport FSTD availability and slots in corporate aviation are rare since there are only 2 main Fligth Training providers. This GM may help operators to set up a training program if the aircraft is used instead of FSTD.

GM1 ORO.FC.140

Some implementation issues were reviewed and there was the need to clarify the use of "variant". Currently it is not clear weather the word "variant" use in the implementing rule should be used for class rating or only for type rating.. Non commercial complex motor power aircraft (NCC) are impacted by the class rating:, some aircrafts are classified as NCC in the Air ops regulation and as a class rating in the FCL regulations (eg. Air tractor).



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2. Proposed amendments

The text of the amendment is arranged to show deleted text, new or amended text as shown below:

- (a) deleted text is marked with ~~strike through~~;
- (b) new or amended text is highlighted in grey;
- (c) an ellipsis (...) indicates that the remaining text is unchanged in front of or following the reflected amendment.

2.1. Draft Regulation (Draft EASA Opinion)

Subpart FC - Flight Crew

Section 1

(1) Development of a New AMC1 ORO.FC.105 (b)(2) Designation as pilot-in-command to clarify the requirements of Route/Area and aerodrome knowledge for operations other than commercial air transport

AMC2 ORO.FC.105 (b)(2) Designation as pilot-in-command/commander

ROUTE, AREA AND AERODROME KNOWLEDGE FOR NON-COMMERCIAL OPERATIONS WITH COMPLEX MOTOR-POWER AIRCRAFT (NCC) AEROPLANES

The operator should comply with the national qualification requirements which should be published in the Aeronautical Information Publication. The knowledge of the route, area to be flown and of the aerodrome facilities and procedures to be used should include the following:

(a) Area and route knowledge

(1) Area and route familiarization should include knowledge of:

- (i) Terrain and minimum safe altitudes;
- (ii) Seasonal meteorological conditions;
- (iii) Meteorological, communication and air traffic facilities, services and procedures;
- (iv) Search and rescue procedures where available; and
- (v) Navigational facilities associated with the area or route along which the flight is to take place.

(2) The operations manual should describe appropriate method of familiarisation depending on the complexity of the area or route and the experience of the pilot-in-command.

(b) Aerodrome knowledge

(1) Aerodrome familiarization should include knowledge of obstructions, physical layout, lighting, approach aids and arrival, departure, holding and instrument approach procedures, applicable operating minima and ground movement considerations.



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(2) The operator's manual should describe appropriate method of familiarisation depending on the complexity of the aerodrome.

(3) If the competent authority of the aerodrome or area requires specific training or familiarisation the operator should maintain all records of this training or familiarisation in accordance with ORO.GEN.220.

(2)Add New GM2 ORO.FC.105 (b)(2)to support operator's to define "complexity of aerodromes".

GM2 ORO.FC.105 (b) (2) Designation as pilot-in-command/commander

AERODROME KNOWLEDGE FOR NON-COMMERCIAL OPERATIONS COMPLEX MOTOR POWER AIRCRAFT (NCC) AEROPLANES

The Operator may, based on complexity, categorise all aerodromes in one of these three categories:

(1) category A — an aerodrome that meets all of the following requirements:

(A) an approved instrument approach procedure;

(B) at least one runway with no performance limited procedure for take-off and/or landing;

(C) published circling minima not higher than 1 500 ft above aerodrome level; and

(D) night operations capability.

(2) category B — an aerodrome that does not meet the category A requirements or which requires extra considerations such as:

(A) non-standard approach aids and/or approach patterns;

(B) unusual local weather conditions;

(C) unusual characteristics or performance limitations; or

(D) any other relevant considerations, including obstructions, physical layout, lighting, etc.

(3) category C — an aerodrome that requires additional considerations to a category B aerodrome;



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(3) Development of new AMC1 ORO.FC.105 (b)(3) Designation as pilot-in-command to specify the requirements and contents "Operator's command course" for non-commercial operations.

AMC1 ORO.FC.105 (b) (3) Designation as pilot-in-command/commander

OPERATOR'S COMMAND COURSE FOR NON-COMMERCIAL OPERATIONS COMPLEX MOTOR
POWER AIRCRAFT (NCC) AEROPLANES

(a) For aeroplane and helicopter operations, the operator's command course-should include at least the following elements:

(1) command responsibilities training;

(2) demonstration of competence operating as pilot-in-command.

(4) Add new GM1 ORO.FC.105(a)(2)(3) Designation as pilot-in-command to support operator's with the contents of "Operator's command course for non commercial operations".

GM1 ORO.FC.105 (b) (3) Designation as pilot-in-command/commander

OPERATOR'S COMMAND COURSE NON-COMMERCIAL OPERATIONS COMPLEX MOTOR
POWER AIRCRAFT (NCC) AEROPLANES

Demonstration of competence operating as pilot-in-command may be achieved by:

(a) Completing a proficiency check in the role of pilot-in-command; or

(b) Operating at least one flight under the supervision and to the satisfaction of a suitably qualified pilot-in-command nominated by the operator.



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(5) Development of new AMC1 ORO.FC.120 Operator conversion training to clarify the requirements of the training. As stated in the Implementing rule the operator conversion training shall include emergency and safety equipment training.

AMC1 ORO.FC.120 Operator conversion training

OPERATOR CONVERSION TRAINING FOR NON-COMMERCIAL OPERATIONS WITH COMPLEX MOTOR POWER AIRCRAFT (NCC) AEROPLANES

(a) General

(1) The operator conversion training should include

- (i) emergency and safety equipment training and checking including survival equipment training (completed before operating on any passenger-carrying flight);**
- (ii) passenger handling for operations where no cabin crew is carried.**
- (iii) a minimum of one sector under the supervision of a flight crew member nominated by the operator, to demonstrate the standard of qualification specified in the operator manual.**

(2) The operator's conversion course may be combined with a new type rating as required by Commission Regulation (EU) No 1178/2011.

(3) The conversion training should ensure that each flight crew member:

- (i) has been trained on the emergency and safety equipment installed on the aircraft he/she is to operate and**
- (ii) is familiar with the operating procedures used by the operator.**

(b) Emergency and safety equipment training

(1) Emergency and safety equipment training should, as far as practical, take place in conjunction with cabin/technical crew and emphasis should be placed on the importance of effective coordination and two-way communication between crew members in various emergency situations.

(2) The operational procedures of rescue and emergency services should be addressed And;;

(3) the items covered in AMC1 ORO.FC.130(a)(2).

(c) For specific operations, such as steep approaches, short landings, operation with increased bank angles or operations based on QFE, additional training should be carried out, based on any additional elements of training defined for the aircraft type in the operational suitability data in accordance with Regulation (EC) No 748/2012, where they exist.



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(6) Development of new AMC1 ORO.FC.130 Recurrent training and checking operations other than commercial air transport to specify the requirements for non-commercial operators. An annual recurrent flight and ground training shall be completed to ensure competence of each flight crew member in carrying out normal, abnormal and emergency procedures.

AMC1 ORO.FC.130 Recurrent training and checking

RECURRENT TRAINING AND CHECKING TO DEMONSTRATE COMPETENCE FOR NON COMERCIAL OPERATIONS WITH COMPLEX MOTO POWER AIRCRAFT (NCC) AEROPLANES.

(a) Recurrent training

Recurrent training should comprise the following

(1) Ground training

(i) The ground training programme should include:

(A) aircraft systems;

(B) operational procedures and requirements, including ground de-icing/anti-icing and pilot incapacitation; and

(C) accident/incident and occurrence review.

(iii) When the ground training is conducted within 3 calendar months prior to the expiry of the 12 month period, the next ground recurrent training should be completed within 12 calendar months of the original expiry of the previous training.

(2) Emergency and safety equipment training

(i) Emergency and safety equipment training may be combined with emergency and safety equipment checking and should be conducted in an aircraft or a suitable alternative training device.

(ii) Every year the emergency and safety equipment training programme should include the following:

(A) Actual donning of a life-jacket, where fitted;

(B) Actual donning of protective breathing equipment where fitted;

(C) Actual handling of fire extinguishers of the type used;

(D) Instruction on the location and use of all emergency and safety equipment carried on the aircraft.

(F) Instruction on the location and use of all types of exits;

(iii) When the emergency and safety equipment training is conducted within 3 calendar months prior to the expiry of the 12 month period, the next emergency and safety equipment training should be completed within 12 calendar months of the original expiry of the previous training.

(3) Elements of CRM, as specified in table 1 of ORO.FC.115 should be integrated into all appropriate phases of recurrent training.



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(4) Aircraft/FSTD training

(i) General

(A) The aircraft/ FSTD training programme should be established in such a way that all the major failures of aircraft systems and associated procedures will have been covered in the preceding 3 year period.

(ii) When engine-out manoeuvres are carried out in an aircraft, the engine failure should be simulated.

(iii) When the aircraft/FSTD training is conducted within 3 calendar months prior to the expiry of the 12 calendar months period, the next aircraft/FSTD training should be completed within 12 calendar months of the original expiry date of the previous training.

(b) Periodic check to demonstrate competence

(i) Periodic demonstrations of competence should be conducted every 12 months and may be combined with the proficiency check required by Regulation (EU) No 1178/2011.

(ii) When the demonstration of competence is conducted within 3 calendar months prior to the expiry of the 12 calendar months period, the next check to demonstrate competence should be completed within 12 calendar months of the original expiry date of the previous check to demonstrate competence.

(c) Personnel providing training and checking

Training and checking should be provided by the following personnel;

(1) ground training by suitably qualified personnel;

(2) flight training by a type rating instructor (TRI), class rating instructor (CRI), flight instructor (FI) or, in the case of the FSTD content, a synthetic flight instructor (SFI).

(3) emergency and safety equipment training by suitably qualified personnel as specified in the operator's manual;

(4) recurrent demonstrations of competence by a type rating examiner (TRE), class rating examiner (CRE) or, if the check is conducted in an FFS a TRE, CRE or synthetic flight examiner (SFE) who is familiar with the operating procedures used by the operator;

(d) When the training or checks required above are undertaken within the last three months of the validity period, the new validity period should be counted from the original expiry date. The validity period may be counted from the end of the month when the check was taken.



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(7) Add a new GM1 ORO.FC.130 Recurrent training and checking to clarify the use of aircraft/FSTD for training programme.

GM1 to ORO.FC.130 Recurrent training and checking

RECURRENT TRAINING AND CHECKING TO DEMONSTRATE COMPETENCE FOR NON COMERCIAL OPERATIONS WITH COMPLEX MOTOR POWER AIRCRAFT (NCC) AEROPLANES - USE OF AIRCRAFT/FSTD FOR TRAINING PROGRAMME

When an FSTD is not available, the operator should establish mitigating measures to ensure that the level of safety is maintained when conducting the training or checking in an aircraft. If one or more of the major failures cannot be practiced in the aircraft because of their associated risks or because of environmental considerations, the failure(s) may be partially replicated for crew training purposes using pre-briefed, risk-assessed measures that avoid degrading the aircrafts performance below a pre-determined level, and which permit immediate reversion to normal operating conditions.

(8) Add a new GM 1 ORO.FC.140 (b) Operation on more than one type or variant to clarify the meaning of type or variant.

GM1 ORO.FC.140 (B) OPERATION ON MORE THAN ONE TYPE OR VARIANT

TYPE or VARIANT

Variant may be applicable for a type rating or for a class rating

(9) Add a new AMC2 ORO.FC.145 Provision of training to clarify the requirements for crediting training delivered by other persons or organisations.

AMC2 ORO.FC.145 Provision of training

ACCEPTANCE OF PREVIOUS TRAINING FOR OPERATIONS OTHER THAN COMMERCIAL AIR TRANSPORT (NCC) AEROPLANES.

- (a) Operators may develop a policy for the crediting of previous training. Details of any such policy should be included in the operations manual.
- (b) The policy should as a minimum include measures to ascertain:
 - (1) The content of the training;
 - (2) whether the training was delivered by suitably qualified personnel or organisations;
 - (3) whether the aircraft, FSTD or other equipment used for the training was sufficiently similar to the aircraft and equipment the crew member will operate;
 - (4) whether the operating procedures used during such training were representative of the procedures used by the new operator.
- (c) Where previous training delivered by other suitably qualified personel or organisations is found to satisfy all or some of the requirements in ORO.FC.120 the training may be credited and an abbreviated conversion course may be used. Such an abbreviated course should cover all items not credited from previous training.



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- (d) Where a pilot flies for more than one operator and training delivered by that other operator is found to satisfy some of the requirements of ORO.FC.130 then such training may be credited and an abbreviated recurrent training programme may be used. Such an abbreviated recurrent training programme should cover all items not credited from training conducted by the other operator.
- (e) An aircraft operator remains responsible for all training and checking required by this part regardless of whether training is conducted by the operator, a certificated organisation or another sub-contractor.
- (f) An operator accepting any previous training and checking should be satisfied that the flight crew member is competent to operate in accordance with that operator's procedures and to use the specific equipment installed on the aircraft to be operated.
- (g) Previous training needs to be formally documented.

(10) New GM1 ORO.FC.145 Provision of training to clarify the acceptance policy of previous training and checking.

GM1 ORO.FC.145 Provision of training

**POLICY FOR ACCEPTANCE OF PREVIOUS TRAINING AND CHECKING FOR OTHER THAN
COMMERCIAL AIR TRANSPORT OPERATIONS (NCC) AEROPLANES**

- (a) Where training and checking has been provided by an organisation holding an approval in accordance with Commission Regulation (EU) 1178/2011 (i.e. an approved training organisation) or Commission Regulation (EU) 965/2012 (i.e. a Commercial Air Transport Operator) and that training was within the scope of the organisation's approvals then a confirmation provided by the approved/certificated organisation may be considered sufficient evidence for an operator to accept the training.
- (b) Training and checking provided by persons or organisations other than those referred to in (c) above should only be accepted on the basis that the training or checking is a contracted activity in accordance with ORO.GEN.205.
- (c) Operators may wish to enter into 'audit pooling' arrangements in order to satisfy the requirements of ORO.GEN.205 in relation to contracted training providers or other aircraft operators



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3. Regulatory Impact Assessment (RIA)

3.1. Issues to be addressed

Following the requirements of the Regulation (EU) 965/2012¹, non-commercial operators with complex motor-powered aircrafts need to comply with the requirement according to ORO.FC.

There are currently no supporting AMC and GMs to establish compliance with the Basic Regulation, its Implementing Rules and the Regulation (EU) 965/2012. As a result, the competent authorities and operators requested their development. The establishment of AMC and GM will provide a legal certainty and will contribute to uniform implementation across all EASA Member States competent authorities and stakeholders.

Left unaddressed, this deficiency will lead to different implementation of ORO.FC section 1 by NCC operators and member states. Therefore a level playing field as described in Art 2 of the Basic regulation may not be ensured.

Before August 2016 national regulations provided a mature framework of implementation.

3.1.1. Safety risk assessment

This task is not safety driven. However, ensuring a safe level playing field and a better harmonization of the European rules would benefit from a safety point of view.

Harmonization will assist in a standardised implementation of the implementing rules and therethrough contribute to the principal objective of Basic Regulation: 'to establish and maintain a high uniform level of civil aviation safety in Europe'.

3.1.2. Who is affected?

This NPA will affect the following stakeholders:

- Air operators involved in non-commercial operations with complex-motor-powered aircrafts
- Authorities;
- Pilots.

3.1.3. How could the issue/problem evolve?

Lack of AMC or GM material might lead to inconsistencies in implementation of the rules, triggering erroneous implementation, potential safety problems and tilted playing field.

¹ Commission Regulation (EU) No 965/2012 of 5 October 2012 laying down technical requirements and administrative procedures related to air operations pursuant to Regulation (EC) No 216/2008 of the European Parliament and of the Council



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3.2. Objectives

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

The specific objective of this proposal is to:

1. Contribute to uniform implementation of ORO.FC requirements for non-commercial operations with complex motor-powered aircrafts (NCC) by developing AMC and GM.
2. Improve safety level by providing guidance to the competent authorities and operators on how to conduct training for NCC operators.

3.3. Policy options

Table 1: Selected policy options

Option No	Short title	Description
0	No policy change	No AMC and GM for the non-commercial operations with complex motor-powered aircrafts (NCC). Risks remain as outlined in the issue analysis.
1	Proposed new AMC and GM for NCC	Develop new AMC and GM for non-commercial operations with complex motor-powered aircraft (NCC) to support operators and authorities in implementation of ORO.FC. Section 1 to Regulation (EU) 965/2012.
2	Extend the use of the existing AMC and GM of ORO.FC section 2 (CAT) to NCC	Extend the existing AMC and GM Section 2 of ORO.FC. Regulation (EU) 965/2012 (CAT) to NCC. This option provides a direct transposition of the existing requirements in Sections 2 to the NCC, and therefore no adjustment will be made in this option to encompass the NCC specificities.



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3.4 Analysis of impacts

3.4.1. Safety impact

Option 0 – No policy change

This options may not benefit from the possible improvements of harmonization, as the implementation of the rules may divert between operations and Member States. No improvement of the safety levels is envisaged.

Option 1 – New AMC and GM for NCC

It is expected to have a positive safety impact, because the authorities and operators will follow harmonized detailed training procedures in with regard to recurrent training, as well as harmonized qualification requirements. This would simplify standardisation across EASA Member States.

Option 2 - Extend the use of the existing AMC and GM of ORO.FC section 2 (CAT) to NCC

Same as Option 1.

Table 1 – Safety impacts

<i>Type of impacts</i>	<i>Option 0</i>	<i>Option 1</i>	<i>Option 2</i>
Safety impact	0	+	+

3.4.2. Social impact

Option 0 – No policy change

There is no social impact, because the current requirements continue to apply.

Option 1 – New AMC and GM for NCC

Slightly positive social impact is expected, because the new training and qualification requirements in the AMC and GM for NCO might lead to improved level of competency framework of the pilots.

Option 2 - Extend the use of the existing AMC and GM of ORO.FC section 2 (CAT) to NCC

There would be a negative social impact as the NCC operators will need to follows more stringents and complex rules. There would be more training and qualification requirments for NCC than required by the Implementing Regulation 965/2012 (ORO.FC. Section 1). This might lead to risk of discontinuing the NCC activities including possible negative impacts for the NCC pilots and NCC owners.

Table 2 – Social implact

<i>Type of impacts</i>	<i>Option 0</i>	<i>Option 1</i>	<i>Option 2</i>
Safety impact	0	0/+	-

3.4.3. Economic impact

Option 0 – No policy change



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There is no economic impact for operators and NAAs, because the current requirements continue to apply.

Option 1 – New AMC and GM for NCC

Developing new AMC /GM for the specific needs of Part-NCC operators may help operators and authorities to conduct training as required in the IR without excessive increase of resources, especially for non-complex organizations (which could be a single person). In terms of compliance costs, this option is expected to have a marginal negative effect, as the authorities and the opeartors would need only to prepare new procedures/documents to follow the AMC and GM. However, these costs are expected to be marginal because the AMC/GM reflect the best practice of the industry. The overall negative economic impact is very low.

Option 2 - Extend the use of the existing AMC and GM of ORO.FC section 2 (CAT) to NCC

This Option would lead to a higher negative impact due to excessive increase in resource requirements for NCC (especially for non-commercial operations with non-complex motor-powered aircrafts) to enable compliance with the existing requirements. The resources needed for training and qualification would be disproportionate to the size and complexity of the NCC.

Table 3 – Economic impacts

<i>Type of impacts</i>	<i>Option 0</i>	<i>Option 1</i>	<i>Option 2</i>
Economic impact	0	0/-	-

3.4.4. General aviation and proportionality issues

The current task does not affect the General aviation. The assessment is made with with regard to the NCC.

Option 0 – No policy change

No change

Option 1 – New AMC and GM for NCC

The overall impact is favourable for the NCC, as the new provisions are proportionate to the the needs and size and complexity of the NCC operators. The proposed AMC and GM will be provide clarification to the operators to apply the Implementing rules while pursuing the proportionality of the requirements.

Option 2 - Extend the use of the existing AMC and GM of ORO.FC section 2 (CAT) to NCC

The overall impat of the option is unfavourable, because it would create an unwarranted burden to NCC operators and especially small ones. Extending the use of the existing AMC/GM for CAT to the NCC would result in disproportionate issues for the NCC.



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Table 4 – Proportionality issues

<i>Type of impacts</i>	<i>Option 0</i>	<i>Option 1</i>	<i>Option 2</i>
GA and proportionality issues	0	+	-

3.5. Comparison and conclusion

3.5.1. Comparison of options

Table 5 – Overall summary of impacts

<i>Type of impacts</i>	<i>Option 0</i>	<i>Option 1</i>	<i>Option 2</i>
Safety impact	0	+	+
Social impact	0	0/+	-
Economic impact	0	0/-	-
GA and proportionality issues	0	+	-
Overall	0	+	-

Comparing the options clearly demonstrates that option 1 is the preferred option. It would ensure the most cost-effective framework for NCC operators while contributing to safety improvement through setting out harmonized detailed training procedures in delivering recurrent training, as well as harmonized qualification requirements. With regard to national authorities, this option would result in a marginal increase of the NAA's workload as a one-off cost to comply with the AMC and GM. It would however provide clear and harmonized guidance for NAA's which will ease the standardisation across EASA Member States.

Question to authorities and stakeholders

Stakeholders are also invited to comment on the Regulatory impact assessment and to provide any other quantitative/qualitative information they may find necessary to bring to the attention of the Agency. As a result, the relevant parts of the RIA might be adjusted on a case-by-case basis.

3.5.2. Monitoring and ex post evaluation

Monitoring is a continuous and systematic process of data collection and analysis about the implementation/application of a rule/activity. It generates factual information for future possible evaluation and impact assessments and helps identify actual implementation problems. The monitoring will occur in terms of collecting and analysing data from different available sources through several tools e.g. feedback loops, standardisation activities, EASA continuous monitoring, etc. The responsible actors



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for collecting and providing data (e.g. Member States, national authorities, operators, etc) will be further specified in the implementation phase.

Indicators to support monitoring:

<i>Indicator</i>	<i>When it will be monitored</i>	<i>How it will be monitored</i>	<i>Who will be in charge of the monitoring</i>
Number of questions and answers with regard to implementation of AMC GM ORO FC Part NCC	Regularly	Queries to EASA from the operators and NAA	EASA
Number of fundings with regard to the implementation of AMC GM ORO FC Part NCC	In compliance with the standartisaiton inspection planning	EASA standartisation	EASA

The proposal might be subject to interim/ongoing/ex-post evaluation which will judge how well the adopted rules have performed (or are working), taking into account earlier predictions made in this impact assessment. The evaluation will provide an evidence-based judgement of the extent to which the proposal has been, relevant given the needs and its objectives, effective and efficient, coherent and has achieved EU added-value.



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538 4. References

539 4.1. Affected regulations

540 None

541 4.2. Affected CS, AMC and GM

542 DECISION 2014/017/R OF THE EXECUTIVE DIRECTOR OF THE AGENCY of 24 April 2014 adopting
543 Acceptable Means of Compliance and Guidance Material to Part-ORO of Regulation (EU) No 965/2012
544 and repealing Decision 2012/017/R of the Executive Director of the Agency of 24 October 2012 'AMC
545 and GM to Part-ORO — Issue 2'

546 4.3. Reference documents

547 International Standards and Recommended Practices Annex 6 to the Convention on International Civil
548 Aviation Operation of Aircraft Part II International General Aviation – Aeroplanes. Eighth Edition July
549 2014.

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