



Draft Notice of Proposed Amendment 2017-XX

Evidence-based and competency-based training

RMT.0599 — ISSUE 1 - DD/MM/2017

EXECUTIVE SUMMARY AERODROME QUALIFICATION

This Notice of Proposed Amendment (NPA) addresses an issue related to lack of clarity regarding route, area and aerodrome knowledge. The present IR and accompanying AMC is phrased in such a way that it appears the evaluation and assessment of route, area and aerodrome complexity is left entirely to the operator.

The specific objective is to clarify the AMC with regard to including official information and requirements as promulgated through AIP, when operators are performing such evaluations. There have been several examples of operators unknowingly having missed crucial information regarding route, area and aerodrome requirements as a result of the present regulatory description.

This NPA proposes a minor change to AMC1 ORO.FC.105 (b)(2);(c) where the necessity of complying with AIP restrictions are included.

The proposed changes are expected to clarify the necessity of including all available information and requirements when evaluating area, route and aerodrome complexity, and the need for additional training.

EARLY DRAFT FOR THE EBT WORKSHOP.

THIS DOCUMENT IS NOT THE FINAL NPA. PROOF READING NOT PERFORMED.

EXECUTIVE SUMMARY EDITORIAL UPDATE FOR COMBINING OPC/LPC.

This Notice of Proposed Amendment (NPA) addresses an issue related to an unintended editorial change when Rulemaking task OPS 001 transposed EU-OPS Regulation (EC) No 1899/2006 into the current Air Ops Regulation, the editorial change involves the AMC1 ORO.FC.230 paragraph (b) subparagraph (1) and it is related with the combine check of a Licence proficiency check (LPC) and an Operator proficiency check (OPC).

Applicability		Process map	
Affected regulations and decisions:	Annex III of Regulation (EU) No 965/2012, AMC1 ORO.FC.105 (b)(2);(c)	Concept Paper:	No
Affected stakeholders:	CAT Air operators; national aviation authorities (NAAs); flight crew	Terms of Reference:	05 FEB 2016
Driver/origin:	NAA experience with current legislation	Rulemaking group:	Yes
Reference:		RIA type:	Light
		Technical consultation during NPA drafting:	No
		Duration of NPA consultation:	1 months
		Review group:	Yes/No
		Focussed consultation:	Yes/No
		Publication date of the NPA:	[16/Q4]



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1. Explanatory Note for the aerodrome qualification.

EU MS have identified a shortcoming in the requirement for special airport operations. Under current AMC, the guidance for qualification and experience is too generic and can lead to operators unknowingly not complying with National regulations and AIP instructions.

As an example, operations into the Norwegian category B and C airports have led to safety deviations, incidents and accidents. Enforcement by the NCAA has been made difficult by the lack of reference to National requirements and AIP information.

To address this issue, the amendment to the AMC as indicated below is proposed.

The suggested change does not deviate from current requirements nor introduce anything new, but leaves a clear “hook” to national legislation, which is completely absent today.

2. Explanatory Note for the editorial update for combining OPC/LPC.

The AMC1 ORO.FC.230 (b)(1) wording raised as an uneven implementation issue across members states because of a tabulation error which introduces a confusion for combined LPC/OPC content . Moreover AMC1 ORO.FC.230 (b)(1) do not clearly mention the possibility to combine LST with OPC.

2.1. Objectives

The objective of this proposal is to clarify that the OPC content can also be combined with the LST (Licence Skill Test) for ATPL and initial issue of a type rating.

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3. 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.

3.1. Draft Regulation (Draft EASA ED Decision)

AMC1 ORO.FC.105(b)(2);(c) Designation as pilot-in-command/commander

ROUTE/AREA AND AERODROME KNOWLEDGE FOR COMMERCIAL OPERATIONS

~~For commercial operations,~~ The operator should comply with the national qualification requirements published in the Aeronautical Information Publication. ~~The experience of the route or 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 training 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) Depending on the complexity of the area or route, as assessed by the operator, the following methods of familiarisation should be used:

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3.2. Draft Regulation (Draft EASA ED Decision)

AMC1 ORO.FC.230 Recurrent training and checking

RECURRENT TRAINING SYLLABUS

(...)

(b) Recurrent checking

Recurrent checking should comprise the following:

(1) Operator proficiency checks

(...)

(iii) ~~Once every 12 months~~ the checks prescribed in (b)(1) (ii)(A) (i) may be combined with the skill test or proficiency check required for the issue, the revalidation or renewal of the ATPL and the aircraft type rating.

4. Regulatory Impact Assessment (RIA) for Aerodrome qualification

NOT completed. Work in progress.

5. Regulatory Impact Assessment (RIA) for editorial update for combining OPC/LPC.

5.1. Issued to be addressed

The possibility to combine Licence proficiency check (LPC) and the operator proficiency check (OPC) is a well established european practice existing since the 90's under the Joint Aviation Requirements (JAR). The provision applicable to commercial air transport concerning combined LPC/OPC were based on JAR-OPS 1.965 and have been transferred into EU OPS 1.965. Besides the changes in the legal value of the texts the the EU-OPS has introduced the possibility to combine the License Skill Test (LST) with the OPC.

In 2012, regulation 965/2012 (AIR OPERATIONS) entered into force and the wording related to the combined LPC/OPC went back to JAR-OPS initial wording with an error in the tabulation contained today in AMC 1 ORO.FC.230 (b)(1) . To be noted that CRD 2009 02.c Organisation Requirements preceeding publication of AIR OPERATIONS does not contain any comments on this issue.

The AMC1 ORO.FC.230 (b)(1) wording introduces first a confusion for combined LPC/OPC content due to the tabulation error. Secondly, AMC1 ORO.FC.230 (b)(1) is more restrive compared to EU-OPS because it is not clearly mentioned that it is possible to combine LST with OPC.

AMC1 ORO.FC.230 (b)(1) wording raised as an uneven implementation issue across members states and should be reviewed due to is binding impact on operators without safety justification. In particular, the combined LST/OPC is done by operators on a regular basis during conversion courses and less often when First Officers perform their ATPL upgrade. There is an industry need to get a clarification on this issue.



5.2. Safety risk assessment

Concerning the tabulation error:

The fact to reword the AMC1 ORO.FC.230 (b)(1) as it was under JAR-OPS and EU-OPS would formalized a checking exercises content which has never raised any safety issues within Europe aviation community for more than 20 years.

Concerning the combined LST/OPC:

Taking into account that:

1. The content of the combined part of LST/OPC is exactly the same compared to the combined part of LPC/OPC (based on engine out manual flying skills).
2. The combined LPC/OPC permits the renewal or revalidation of the applicant's type rating which is an equivalent demonstration of proficiency compared to the initial type rating licence endorsement following a successful combined LST/OPC.

Points 1. And 2. Above demonstrate the equivalency of combined LST/OPC and LPC/OPC in regards of the pilot proficiency to deal with engine out manual flying skill.

Moreover the EU-OPS wording has permitted during at least six years to combined LST/OPC and has never raised any safety issues.

The rationale above concerning the tabulation error and the combined LST/OPC demonstrates that there is no risk identified behind AMC1 ORO.FC.230 (b)(1) rewording.

5.2.1. Who is affected ?

AMC1 ORO.FC.230 (b)(1) rewording would benefit mainly to pilots and operators. The clarification concerning the possibility to combine LST and OPC has major impact during the conversion course and permits:

The pilot to get at the same time the type rating license endorsement as well as the OPC which is mandatory to continue the line training.

The operator to better use the FFS (Full Flight Simulator) because of no duplication of the same engine out exercises. Then, operators could allocate more time to train and enhance the pilot competencies under other scenarios.

The consequences for National Aviation Authorities are minor because of segregation between the license endorsement procedures and the operator oversight in regards of pilots proficiency checks.

5.2.2. How could the issue evolve?

AMC1 ORO.FC.230 (b)(1) rewording is needed to clarify OPC content and to permit to combine LST and LPC with OPC.

6. References

Work in progress

6.1. Affected regulations

NONE

6.2. Affected AMC and GM

[ED Decision 2014/017/R](#) AMC1 ORO.FC.230 (b)(1)

6.3. Reference documents

JAR-OPS1

EU-OPS Regulation (EC) No 1899/2006

RMT OPS 001 – Coment and respond document (CRD) 2009 02.c Organisation Requirements

Regulation (EU) 965/2012 – Air ops regulation.

Regulation (EU) 1178/2011 – Air crew regulation.

