



Explanatory Note to Decision 2020/005/R

Amendments to acceptable means of compliance and guidance material to Regulation (EU) No 1178/2011

RELATED NPAs/CRDs 2014-29(A) & (B) — OPINION NO 05/2017 — RMT.0188 (FCL.002(A))

EXECUTIVE SUMMARY

The objective of this Decision is to maintain a high level of safety for flight crews, to ensure harmonised implementation of Regulation (EU) No 1178/2011 ('Aircrew Regulation'), and to consider at all levels the importance of General Aviation (GA) issues.

This Decision amends acceptable means of compliance (AMC) and guidance material (GM) to Annex I (Part-FCL), Annex VI (Part-ORA), Annex VII (Part-ARA), and Annex VIII (Part-DTO) to the Aircrew Regulation related to flight crew licensing.

The amendments are expected to increase safety, reduce the regulatory burden on EASA Member States (MSs), improve harmonisation of Aircrew rules among the EASA MSs, ensure harmonisation with ICAO, and increase proportionality of the rules for GA by applying the principles of 'The EASA GA Roadmap'.

Action area:	Human factors and competence of personnel		
Affected rules:	AMC/GM to the Aircrew Regulation		
Affected stakeholders:	Examiners, instructors, pilots, approved training organisations (ATOs), declared training organisations (DTOs), competent authorities (CAs)		
Driver:	Safety	Rulemaking group:	Yes
Impact assessment:	None	Rulemaking Procedure:	Standard

EASA rulemaking process



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1. About this Decision

The European Union Aviation Safety Agency (EASA) developed ED Decision 2020/005/R in line with Regulation (EU) 2018/1139¹ ('Basic Regulation') and the Rulemaking Procedure².

This rulemaking activity is included in the European Plan for Aviation Safety (EPAS) [2020-2024](#) under rulemaking task (RMT).0188 (FCL.002(A)). The scope and timescales of the task were defined in the related Terms of Reference³.

The draft text of this Decision has been developed by EASA based on the input of Rulemaking Group (RMG) RMT.0188 (FCL.002). All interested parties were consulted through Notices of Proposed Amendment (NPA) 2014-29(A) and 2014-29(B)⁴. In total, 807 comments on NPA 2014-29(A) and 87 comments on NPA 2014-29(B) were received from all interested parties, including industry and national aviation authorities (NAAs).

EASA reviewed the comments received during the public consultation. The comments received and EASA's responses to them are presented in Comment-Response Documents (CRDs) [2014-29\(A\)](#) and 2014-29(B). Based on the comments received, EASA published [Opinion No 05/2017](#) on 29 June 2017, which was submitted to the European Commission. The related Regulation (EU) 2019/1747 was adopted on 15 October 2019⁵.

The final text of this Decision, with the acceptable means of compliance (AMC) and guidance material (GM) has been developed by EASA based on the input of RMG RMT.0188 (FCL.002) as well as of a focused consultation with the affected EASA's Advisory Bodies (ABs) (Air Crew Technical Body (Aircrew TeB) and Flight Standards Stakeholder Advisory Body (SAB FS.TEC)) on 12 and 13 September 2019.

The major milestones of this rulemaking activity are presented on the title page.

¹ Regulation (EU) 2018/1139 of the European Parliament and of the Council of 4 July 2018 on common rules in the field of civil aviation and establishing a European Union Aviation Safety Agency, and amending Regulations (EC) No 2111/2005, (EC) No 1008/2008, (EU) No 996/2010, (EU) No 376/2014 and Directives 2014/30/EU and 2014/53/EU of the European Parliament and of the Council, and repealing Regulations (EC) No 552/2004 and (EC) No 216/2008 of the European Parliament and of the Council and Council Regulation (EEC) No 3922/91 (OJ L 212, 22.8.2018, p. 1) (<https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1535612134845&uri=CELEX:32018R1139>).

² EASA is bound to follow a structured rulemaking process as required by Article 115(1) of Regulation (EU) 2018/1139. Such a process has been adopted by the EASA Management Board (MB) and is referred to as the 'Rulemaking Procedure'. See MB Decision No 18-2015 of 15 December 2015 replacing Decision 01/2012 concerning the procedure to be applied by EASA for the issuing of opinions, certification specifications and guidance material (<http://www.easa.europa.eu/the-agency/management-board/decisions/easa-mb-decision-18-2015-rulemaking-procedure>).

³ [ToR FCL.002., Issue 1](#)

⁴ In accordance with Article 115 of Regulation (EU) 2018/1139 and Articles 6(3) and 7 of the Rulemaking Procedure.

⁵ Commission Implementing Regulation (EU) 2019/1747 of 15 October 2019 amending Regulation (EU) No 1178/2011 as regards requirements for certain flight crew licences and certificates, rules on training organisations and competent authorities (OJ L 268, 22.10.2019, p. 23) (<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32019R1747>).

2. In summary — why and what

2.1. Why we need to change the AMC & GM

This Decision addresses a safety and regulatory coordination issue related to flight crew licensing (FCL). The objective of FCL.001⁶ was to benefit from the proposed new scope of the Basic Regulation⁷ at the time, which was extended for the first time to flight crew licensing. However, during the work performed on that RMT, it became clear that it was not feasible to address all issues encountered. This was mainly because part of the implementing rules (IRs) and AMC/GM text was taken over from the Joint Aviation Authorities (JAA) material. Those documents contained references to Joint Aviation Regulations-Operations (JAR-OPS) that were not yet transposed to EU rules. Furthermore, it was clear from the beginning that the regulatory framework did not provide for the correct implementation of an entirely new set of requirements. That issue, along with editorial and formatting errors in the IRs and related AMC/GM text, needed to be addressed and led to RMT FCL.002, which later became RMT.0188.

Various safety recommendations (SRs) that were addressed to EASA were also considered during the development of this RMT.

2.2. What we want to achieve — objectives

The overall objectives of the EASA system are defined in Article 1 of the Basic Regulation. This Decision will contribute to the achievement of the overall objectives by addressing the issues outlined in Section 2.1.

The specific objective of this Decision is, therefore, to amend AMC and GM to the Aircrew Regulation with regard to:

- the review of some definitions;
- the flight-time credit on Annex-I aircraft⁸;
- the recency requirements for the light aircraft pilot licence (LAPL);
- the development of a night rating syllabus for a private pilot licence (PPL(A));
- the class and type rating list and licence endorsement list;
- the content of the training flight for the revalidation of class ratings;
- the harmonisation of night rating requirements for aeroplanes and helicopters;
- the review of the type rating instructor (TRI) training course;
- the review of Appendix 3 to Part-FCL;
- the change of the competent-authority process; and

⁶ [ToR FCL.001](#).

⁷ Regulation (EU) No 1592/2002 (<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:32002R1592>) was the Basic Regulation in force at the time. It was repealed by Regulation (EC) No 216/2008 (<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:32008R0216>) that was also repealed by the current Basic Regulation (Regulation (EU) 2018/1139 (<https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1535612134845&uri=CELEX:32018R1139>)).

⁸ Aircraft regulated in accordance with Annex I to the Basic Regulation.

- editorial and clarification changes.

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

This decision amends the AMC & GM to Part-FCL, Part-ARA, Part-ORA, and Part-DTO to remove existing inconsistencies and editorial errors, improve the quality of the existing AMC & GM, and support their uniform and harmonised interpretation by the EASA Member States (MSs).

Responses with detailed explanations to all comments received on NPA 2014-29(B) are provided in the related CRD 2014-29(B), which is published as an appendix to this Decision.

The amended NPA text, following the comments received and the EASA responses to them, was additionally consulted during a focused consultation with stakeholder groups and NAA representatives. Based on the input of the focused consultation, the NPA text was further amended as follows:

- GM1 FCL.010: the definition of VOLMET is changed to read ‘Meteorological information for aircraft in-flight’.
- New GM5 FCL.010: the format of the text is changed to reflect the difference between ‘availability’ and ‘accessibility’ of a flight simulation training device (FSTD). The FSTD should also be accessible to train and examine candidates that are outside the scope of the FSTD operator, e.g. for candidates that receive training in an approved training organisation (ATO) or for own purposes. The FSTD must also be accessible to the instructor that is assigned by the ATO or to the designated examiner to be able to instruct or examine the candidate, respectively.

The meaning of ‘irrespective of any time considerations’ is clarified in the sense that the FSTD can be used 24/7 hours. Point (d) is added to the new GM5 FCL.010 to explain that an operator, ATO or examiner can suggest the mitigating measures that need to be agreed with the competent authority if no FSTD is available.

- AMC1 FCL.025 is changed into GM1 FCL.025 as it explains the meaning of the terms used in the corresponding IRs. The explanation for the ‘examination paper’ is amended to clarify that one ‘examination paper’ refers to the examination on one subject.
- In AMC1 FCL.050, the word ‘computerised’ is replaced by ‘electronic’ to make the AMC up-to-date; further similar amendments are made for consistency. As hours are manually logged in indelible ink without the use of an electronic device for the purpose of traceability, a similar concept is introduced for electronic logging. Although modern technology allows for full traceability of electronic data, that technology is not available on the market. Therefore, all data should always be readily available at the request of a competent authority, including a pilot’s certification that confirms the truthfulness of all entries. The format of the electronic records should be acceptable to the competent authority to be able to share the information between all parties without undue delay.
- AMC1 FCL.055 is amended to harmonise its wording with the IR.
- The title and reference of AMC1 FCL.110.A LAPL(A) is amended to better reflect the content of the related IR, which is training, and to harmonise it with the changes made to its counterpart for a private pilot licence for aeroplanes (PPL(A)), AMC1 FCL.210.A PPL(A). It introduces radio-telephony (R/T) communication to allow the applicant to undertake the first solo flight as



stated in the syllabus for flight instruction for a private pilot licence for helicopters PPL(H). The same logic is applied to light aircraft pilot licences for helicopters (LAPLs(H)), PPLs(A), and light aircraft pilot licences for aeroplanes (LAPLs(A)).

- AMC2 FCL.110.A is changed into AMC1 FCL.110.A. The reference within the AMC is also adapted for consistency.
- New AMC1 FCL.105.A(b)(2) is inserted to specify that in the case of a multi-crew pilot licence (MPL), the exemption from the requirement to have completed 10 hours of flight time as a pilot-in-command (PIC) after the issuance of the licence to carry passengers, can only be applied if the MPL holder extended his MPL privileges to include private pilot licence (PPL) or commercial pilot licence (CPL) privileges.
- New AMC1 FCL.140.A; FCL.140.S; FCL.740.A(b)(1)(ii) is inserted:
 - to update the references to the new Basic Regulation;
 - to clarify that the requirements for use of Annex-I aircraft only apply to sailplane, single-engine piston (SEP) aeroplane, and touring motor glider (TMG) class ratings;
 - to specify that refresher training with instructors, in the context of revalidating the class rating or of the recency of the privileges, is also allowed on Annex-I aircraft and is considered part of the definition of ‘hourly requirements’;
 - to specify that when that refresher training with instructors is performed as indicated above, the aircraft must be subject to an authorisation in accordance with points ORA.ATO.135 or DTO.GEN.240. The draft rule that was presented to stakeholders during the focused consultation allowed also for other Annex-I aircraft to be used for refresher training, if accepted by the instructor. However, this last option was removed for legal consistency with the IR;
 - to specify that the scope of Annex-I aircraft is not limited to historical, experimental/scientific, homebuilt, and military aircraft⁹ only. The flight time as PIC to revalidate the rating or keep recent the privilege may be performed on all Annex-I aircraft;
 - to include the use of ultralight aircraft to revalidate or maintain the privileges for LAPL(A), LAPL for sailplanes (LAPL(S)), and single-pilot single-engine aeroplane class ratings;
 - to include the use of aircraft that are subject to an MS decision as per Article 2(8) of the Basic Regulation for revalidation and recency purposes; and
 - to clarify that the hours flown on Annex-I aircraft or aircraft that are subject to an MS decision as per Article 2(8) of the Basic Regulation cannot be used to obtain a new rating.
- New AMC1 FCL.140.A(b)(1) is inserted to replace the changes to AMC1 FCL.125, AMC2 FCL.125, AMC1 FCL.125;FCL.235, and AMC2 FCL.125; FCL.235 that were proposed in NPA 2014-29(B). Those AMC establish the content of the proficiency checks for an LAPL(A), LAPL(H), LAPL(S),

⁹ Historical aircraft, as defined in point 1(a) of Annex I to the Basic Regulation; experimental/scientific aircraft, as defined in point 1(b) of Annex I to the Basic Regulation; homebuilt aircraft, as defined in point 1(c) of Annex I to the Basic Regulation; and military aircraft, as defined in point 1(d) of Annex I to the Basic Regulation.



sailplane pilot licence (SPL), light aircraft pilot licence for balloons LAPL(B) and balloon pilot licence (BPL).

- The title and reference of AMC1 FCL.110.H LAPL(H) is amended to better reflect the content of the related IR, which is training, and to harmonise it with the changes made to its counterpart for a PPL(H), AMC1 FCL.210.H (new reference AMC2 FCL.210 PPL(H)). It introduces R/T communication to allow the applicant to undertake the first solo flight as stated in the syllabus for flight instruction for a PPL(H). The same logic is applied to LAPLs(H), PPLs(A) and LAPLs(A).
- AMC2 FCL.110.H is changed into AMC1 FCL.110.H. A reference in the AMC (AMC1 FCL.110.H.) is also changed to AMC1 FCL.110.H for consistency.
- New AMC1 FCL.140.H(b)(1), AMC1 FCL.140.S(c)(1), AMC1 FCL.140.B(b)(1), and AMC1 FCL.230.B(c)(1) are inserted to replace the changes to AMC1 FCL.125, AMC2 FCL.125, AMC1 FCL.125;FCL.235, and AMC2 FCL.125; FCL.235 that were proposed in NPA 2014-29(B). These new AMC establish the content of the proficiency checks for an LAPL(A), LAPL(H), LAPL(S), SPL, LAPL(B) and BPL.
- In AMC3 FCL.210; FCL.215, the old reference (AMC1 FCL.115 and FCL.120) is changed to the new reference (AMC1 FCL.115; FCL.120) for consistency.
- AMC1 FCL.210.A and AMC1 FCL.210.H are amended for consistency. The applicant should be able to operate the required systems and equipment before a first solo flight, as stated in the syllabus for flight instruction for an LAPL(A). The same logic is applied to LAPL(H), PPL(A) and PPL(H).

The topic related to the degraded visual environment (DVE) is deleted as the concept is already included in exercises 18b and 18c of the PPL(A) flight instruction syllabus and covered in the theoretical knowledge instruction.

- AMC1 FCL.225.B is amended to change the sequence of the references to DTO.
- AMC1 FCL.510.A(b)(1) is deleted, as proposed in NPA 2014-29(B). The AMC does not restrict the applicant to obtain the 500 multi-pilot hours in accordance with an Air-OPS-Regulation-approved operations manual (OM).
- AMC1 FCL.625(c) is not changed as proposed in NPA 2014-29(B) as it was amended by ED Decision 2017/022/R.
- New AMC1 FCL.700 is inserted to clarify the class and type rating endorsements on the licence and to specify in which cases difference training and familiarisation training apply.
- AMC1 FCL.725(a) is amended to harmonise the theoretical knowledge syllabus for class or type ratings for aeroplanes with the one for helicopters and to be consistent with the related RMT.0379 'All-weather operations' (AWO), which led to the recommendations included in the ['Weather Information to Pilots Strategy Paper'](#).
- AMC1 FCL.735.A; FCL.735.H; FCL.735.As is amended for consistency with the change to the related IR regarding the prerequisites for multi-crew cooperation (MCC) training. The certificate of completion of the training should reflect the replacement of the prerequisite of holding a multi-engine instrument rating (ME IR) rating by the prerequisite of the ME IR competence that can be achieved through training.



- New AMC1 FCL.810(a) is inserted:
 - to amend the reference to the corresponding IR; therefore, the AMC1 FCL.810(b) text that was proposed in NPA 2014-29(B) is transposed into AMC1 FCL.810(a);
 - to introduce DTO;
 - to allow not only PPL(A) holders but also LAPL(A) holders to exercise privileges at night and thus be consistent with the IR;
 - to allow also sailplane licence holders with TMG privileges to follow a night rating course, and thus be consistent with the IR;
 - to correct an editorial mistake to confirm that also exercise 7 (cross-country flight) should be performed in an aeroplane; and
 - to exclude the possibility to fly cross country at night as student pilot-in-command (SPIC); as the 'SPIC' concept is to be used only during IR training, it is replaced by an optionally supervised solo flight.
- The above changes triggered similar changes to AMC1 FCL.810(b) regarding the title and aim of the training course. In addition, for consistency with the respective aeroplanes AMC, exercises 4 to 6 should be performed in the helicopter in flight, and the alternative of a supervised solo flight for the cross-country flight is introduced also for helicopters.
- An editorial mistake is corrected in AMC1 FCL.820 as it is not possible for a candidate to make a self-assessment.
- The reference of GM2 FCL.900(c)(1) is changed to GM1 FCL.900(c)(1) as there is no other GM on this topic.
- New GM FCL.900(c); FCL.1000(c) is inserted to explain which exactly are the ATOs concerned for instruction or examination outside the territory of the MSs.
- AMC1 FCL.935 is amended to correct an editorial mistake. 'Skill test' is replaced by 'assessment of competence' to better reflect the content of the AMC.
- New GM FCL.915(b) is inserted to clarify that when a candidate instructor wishes to provide flight instruction in an aircraft, the assessment of competence of this candidate instructor can only be made in an aircraft and not in an FSTD.
- AMC1 FCL.940.FI(a)(2) is amended:
 - to introduce a reference to ATO and DTO;
 - to point out that the seminar and renewal training can be given by an ATO, DTO or competent authority to be consistent with the change to the related IR;
 - to clarify that a seminar day lasts 6 hours and that consequently, a seminar should last at least 12 hours;
 - to clarify that the speaker at the seminar should have appropriate experience;
 - to delete the mandatory time limits for presentations and questions to allow for more flexibility depending on the topic;



- to clarify that the proposal to equate the routine instructor standardisation training with the seminar is rejected, as the objective of said training is to focus on operational elements;
- to clarify that the proposal to extend the responsibility for giving the seminar to organisations or persons under the umbrella of a competent authority is rejected as this would contradict the IR;
- to remove the 3-year time frame that was proposed in NPA 2014-29(B) from point (b) of AMC1 FCL.940.FI(a)(2); the seminar is focused on theoretical knowledge and would therefore not always be sufficient for lapsed instructor ratings, even within 3 years after the date of validity of the instructor certificate, as an instructor might not have been active for a long time within the validity period of the certificate; however, to provide for instructors who have been active within the validity period and missed the deadline for revalidation or renewal (for only a few days, for example), the possibility to decide that a seminar only is sufficient to renew an instructor rating is kept; and
- to harmonise as much as possible the procedures for renewal among different types of instructors, and to include the course completion certificate and related specificities.
- New GM FCL.910.TRI is inserted to clarify the endorsements to be annotated on the licence following recent changes to the restriction or extension of privileges for all TRI's.
- New GM FCL.910.TRI(b)(2) is inserted to explain the meaning of 'the relevant parts of the technical training'.
- AMC1 FCL.930.TRI is replaced:
 - to reflect the changes to the IR, e.g. the definition of TRI certificate extensions;
 - to clearly and consistently structure and formulate the text on TRI training;
 - to detail the line flying under supervision (LIFUS) training and landing training to clearly distinguish between training in an FSTD and training in an aeroplane;
 - to clarify that also co-pilots may perform the TRI training: the LIFUS training exercises in the FSTD should be performed on one or both seats, whichever is the most applicable to the situation and experience of the candidate;
 - to update the LIFUS training exercises in the FSTD with the 'emergency evacuation' exercise and the 'task sharing and decision-making' element;
 - to remove the touch-and-go references from the aeroplane training techniques of the LIFUS training as they are not applicable to LIFUS training;
 - to reorganise, for clarity and consistency, the structure of the topics related to intervention strategies;
 - to allow for LIFUS and landing training in flight to be provided to the satisfaction of the TRI for aeroplanes (TRI(A)) that is nominated for that purpose, and not anymore to the satisfaction of the head of training (HT);



- to enlarge the scope of the training, i.e. by replacing the exercises in minimum altitudes with the aspects of performance and associated risks in the landing training part of the LIFUS training;
 - to update parts of the training considered outdated, e.g. the air speed indicator (ASI) colour coding;
 - to clarify the course of action if no FSTD exists;
 - to introduce TRI training for two candidates at the same time, without specifying the amount of hours required; more candidates may participate as observers during such a training to learn from each other; this parallel training is a more time-efficient, and thus cost-efficient, training as there is only one instructor needed for several candidates; and
 - to clarify that the long briefings described in this AMC are for single-pilot multi-engine turboprop aeroplanes.
- New AMC1 FCL.940.TRI(a)(1)(ii), (a)(2)(ii), (b)(1)(ii), (b)(2)(ii); FCL.940.SFI(a)(2), (e)(1) is inserted to include a reference to the synthetic flight instructor (SFI) renewal training, harmonise as much as possible the procedures for renewal among different types of instructors, and include the course completion certificate and related specificities.
 - AMC FCL.930.CRI is amended for clarity and simplification, and to remove the inconsistency between the IR and the AMC regarding the time frame for a technical theoretical multi-engine (ME) training. In accordance with FCL.930.CRI, the technical course followed on single-engine (SE) or ME aeroplanes consists of 10 hours at least. If both SE training and ME training are combined or one of those is received at a later stage in the CRI's career, the candidate needs to follow an additional 10-hour technical training. The graph representing the theoretical knowledge instruction syllabus is deleted as it referred to 25 hours, but the description of the content of the training is kept under the general subjects.
 - New AMC1 FCL.940.CRI makes a reference to the competent authority as in the related IR, harmonises as much as possible the procedures for renewal among different type of instructors, and includes the course completion certificate and related specificities.
 - GM1 FCL.1000 is amended for consistency with the IR.
 - New GM2 FCL.1000 is inserted to clarify the meaning of having an equivalent licence, rating, or certificate.
 - AMC2 FCL.1015 is amended to clarify that some Annex-I aircraft (historical, experimental/scientific, homebuilt, and military) are allowed for taking skill tests, proficiency checks, and assessments of competences. The aircraft must be subject to an authorisation in accordance with points ORA.ATO.135 or DTO.GEN.240. Annex-I aircraft that are not historical, experimental/scientific, homebuilt, and military cannot be used. During the focused consultation, the draft rule that was presented to stakeholders allowed also for the use of Annex-I aircraft that were not submitted with the authorisation, if accepted by the examiner. However, this last option was removed for legal consistency with the IR. This topic, which was originally included in Part-ORA and Part-DTO during the consultation phase, is moved to point FCL.1015, which is considered a more suitable place to specify the aircraft to be used for checks and tests by examiners.



- The time frames in GM1 FCL.1015 are amended for consistency with Appendix 4 to Part-FCL, AMC3 FCL.235 and AMC1 FCL.205.B(b).
- AMC1 to Appendix 3 specifies that the flight instruction syllabus should take into account the principles of threat and error management (TEM). It clarifies that solo night flying should be performed only after the basic instrument flight rules (IFR) training module is completed, and that no multiple credit is possible if applicants hold more than one other licence.
- GM1 to Appendix 3; Appendix 6; FCL.735.H is amended for consistency. The changes proposed in NPA 2014-29(B) are also reflected in the table concerning the CPL(H)/IR.
- New AMC & GM to ARA.GEN.360 on the procedure of change of competent authority are inserted.
 - Those new AMC & GM specify the medical documents that should be transferred, including a mental health assessment for class 1 medical certificates, if such assessment is available.
 - They introduce a form that allows EASA MSs to exchange information on all the licences that a pilot possesses, including data on licences, certificates or ratings that are not valid anymore. They also include the information that is needed if the pilot has not yet obtained the licence but already successfully completed a theoretical examination or skill test. They incorporate a topic related to the current investigation into a pilot, or to a situation where the licence of the pilot is limited, suspended or revoked. A stamp or a seal is accepted as authentication mark as long as the authentication is accepted by both the receiving and the transferring competent authorities.
 - The new AMC and GM introduce a form to exchange all the information on the medical history of a pilot.
 - They also introduce an application form for pilots to be sent to the competent authority of their choice. If the pilots sign this form, it means that they agree that the form, including their data and medical history, can be sent. If the competent authority needs to insert in the general application form some text on the General Data Protection Regulation (GDPR), the competent authority is free to do so as the application form is guidance material. Compliance with the related IR (a change of competent authority is only possible when the pilot is reissued or surrendered the licence) is shown either through the exchange of licences/medical certificates at the counter of the competent authority or through the pilot receiving the new licence and sending back the old one. In that context, the purpose of the form is also to empower pilots to return the old licences and medical certificate asap to their previous competent authority as soon as they receive the new licences and/or medical certificate(s). The intent of the form is to point out to pilots that as soon as they receive the licence and/or medical certificate(s), the change of competent authority is concluded, and they cannot return to their previous authority without submitting a new form for a change of competent authority. The form also allows an SFI or synthetic training instructor (STI) without a licence to request a change of competent authority.



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- The new AMC and GM further introduce the exchange of all medical information, including medical history, when available, as well as the use of electronic records for all exchanges.
 - They point out that the dates of validity on the newly issued medical certificate cannot be changed.
 - They clarify that an application for a change of competent authority cannot be refused, but it is the duty of the new competent authority to refuse the application if it identifies some inconsistency with the Basic and Aircrew Regulations.
 - A new point to AMC1 ORA.GEN.200(b) is inserted to clarify which organisations are defined as complex.
 - AMC2 ORA.ATO.125 is amended for clarification.
 - New AMC2 ORA.ATO.135 and AMC2 DTO.GEN.240 are inserted to specify the evaluation process for the use of Annex-I aircraft in training organisations and to clarify the sequence of the actions needed for the competent authority to perform this evaluation.
 - AMC1 ORA.ATO.210 is amended to specify that if an organisation does not provide theoretical knowledge training, there is no need for a chief theoretical-knowledge instructor (CTKI). Briefings and/or debriefing are not considered as theory for that purpose. A similar approach is followed for organisations that do not provide practical training: if an organisation does not provide practical training, there is no need to have a chief flying instructor (CFI) function.



3. References

3.1. Related regulations

Commission Regulation (EU) No 1178/2011 of 3 November 2011 laying down technical requirements and administrative procedures related to civil aviation aircrew pursuant to Regulation (EC) No 216/2008 of the European Parliament and of the Council (OJ L 311, 25.11.2011, p. 1).

3.2. Affected decisions

- Decision No 2011/016/R of the Executive Director of the European Aviation Safety Agency of 15 December 2011 on Acceptable Means of Compliance and Guidance Material to Commission Regulation (EU) No 1178/2011 of 3 November 2011 laying down technical requirements and administrative procedures related to civil aviation aircrew pursuant to Regulation (EC) No 216/2008 of the European Parliament and of the Council 'Acceptable Means of Compliance and Guidance Material to Part-FCL';
- Decision No 2012/006/Directorate R of the Executive Director of the Agency of 19th April 2012 on Acceptable Means of Compliance and Guidance Material to Commission Regulation (EU) No 1178/2011 of 3 November 2011 laying down technical requirements and administrative procedures related to civil aviation aircrew pursuant to Regulation (EC) No 216/2008 of the European Parliament and of the Council 'Acceptable Means of Compliance and Guidance Material to Part-ARA';
- Decision No 2012/007/Directorate R of the Executive Director of the Agency of 19th April 2012 on Acceptable Means of Compliance and Guidance Material to Commission Regulation (EU) No 1178/2011 of 3 November 2011 laying down technical requirements and administrative procedures related to civil aviation aircrew pursuant to Regulation (EC) No 216/2008 of the European Parliament and of the Council 'Acceptable Means of Compliance and Guidance Material to Part-ORA';
- Executive Director Decision 2018/009/R of 14 September 2018 issuing the Acceptable Means of Compliance and Guidance Material to Regulation (EU) No 1178/2011 and to its Annex VIII (Part-DTO) 'AMC/GM to Regulation (EU) No 1178/2011 — Initial issue, AMC/GM to Part-DTO — Initial issue' and amending the Acceptable Means of Compliance and Guidance Material to Annex I (Part-FCL) and to Annex VI (Part-ARA) to Regulation (EU) No 1178/2011 'AMC/GM to Part-FCL — Amendment 5, AMC/GM to Part-ARA — Amendment 5'.

3.3. Other reference documents

N/A



4. Related documents

- CRD 2014-29(A) 'Appendix to EASA [Opinion No 05/2017](#);
- CRD 2014-29(B).

