



# Explanatory Note to Decision 2020/003/R

## Acceptable Means of Compliance and Guidance Material to Annex III (Part-BFCL) to Regulation (EU) 2018/395

RELATED OPINION NO 01/2019 (B) — RMT.0654

### EXECUTIVE SUMMARY

This Decision issues the Acceptable Means of Compliance (AMC) and Guidance Material (GM) to Annex III (Part-BFCL) to Commission Regulation (EU) 2018/395 (the Balloon Regulation).

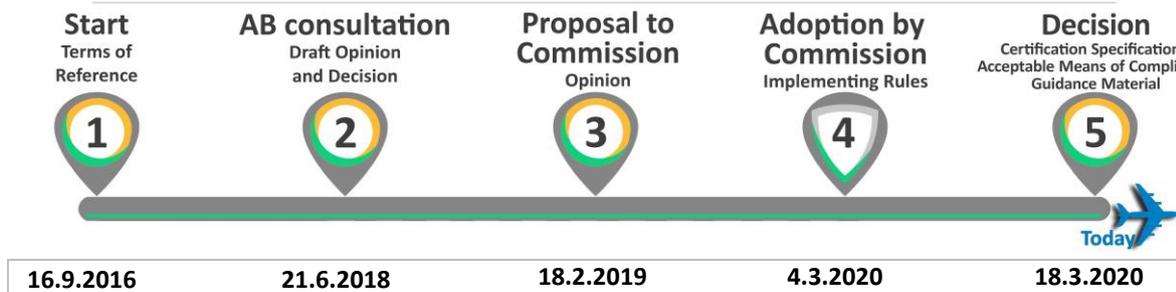
Part-BFCL has been developed to introduce a simple and more proportionate regulatory framework for balloon flight crew licensing and to replace the so far existing requirements for this domain in Annex I (Part-FCL) to Regulation (EU) No 1178/2011. In this context, AMC and GM to Part-BFCL have been developed, mainly by revising and adjusting existing AMC and GM to Part-FCL for balloons in order to fit with the new Part-BFCL requirements.

The balloon-specific AMC and GM to Part-FCL will be deleted with a separate Decision.

Together with Part-BFCL, the AMC and GM to Part-BFCL are expected to maintain safety while reducing the regulatory burden for both balloon pilots and balloon training organisations as well as competent authorities.

<b>Action area:</b>	Systemic safety & competence of personnel		
<b>Affected rules:</b>	N/A		
<b>Affected stakeholders:</b>	Balloon operators, pilots, instructors and examiners; training organisations; competent authorities		
<b>Driver:</b>	Efficiency/proportionality	<b>Rulemaking group:</b>	No (external expert group)
<b>Impact assessment:</b>	Light	<b>Rulemaking Procedure:</b>	Article 16: Accelerated procedure

### EASA special rulemaking procedure milestones



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## 1. About this Decision

The European Union Aviation Safety Agency (EASA) developed ED Decision 2020/003/R in line with Regulation (EU) 2018/1139<sup>1</sup> ('Basic Regulation') and the Rulemaking Procedure<sup>2</sup>.

This rulemaking activity is included in the European Plan for Aviation Safety (EPAS) [2020-2024](#) under rulemaking task (RMT).0654. The scope and timescales of the task were defined in the related Terms of Reference<sup>3</sup>.

In the context of the activities of RMT.0654, EASA with the support of an external expert group (RMT.0654 expert group) developed Opinion No 01/2019 (B)<sup>4</sup> on new flight crew licensing requirements for balloons. The draft text of this Opinion was presented to interested parties during a focused consultation workshop held on 21 June 2018 at EASA. The comments received during this workshop were taken into consideration in the final text of Opinion No 01/2019 (B) which was addressed to the European Commission and resulted into the adoption of Regulation (EU) 2020/357<sup>5</sup>, amending Regulation (EU) 2018/395<sup>6</sup>.

The final text of this Decision has been developed by EASA with the support of the RMT.0654 expert group, taking into consideration the comments received during both the focused consultation workshop on 21 June 2018 (for the draft Opinion No 01/2019 (B)) as well as a focused consultation workshop held with the relevant EASA Advisory Bodies<sup>7</sup> on 7 January 2020.

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

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<sup>1</sup> 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>).

<sup>2</sup> 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>).

<sup>3</sup> <https://www.easa.europa.eu/sites/default/files/dfu/ToR-RMT.0654.pdf>

<sup>4</sup> <https://www.easa.europa.eu/sites/default/files/dfu/Opinion%20No%2001-2019%20%28B%29.pdf>

<sup>5</sup> Commission Implementing Regulation (EU) 2020/357 of 4 March 2020 amending Regulation (EU) 2018/395 as regards balloon pilot licences (OJ L 67, 5.3.2020, p. 34) (<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32020R0357>).

<sup>6</sup> Commission Regulation (EU) 2018/395 of 13 March 2018 laying down detailed rules for the operation of balloons pursuant to Regulation (EC) No 216/2008 of the European Parliament and of the Council (OJ L 71, 14.3.2018, p. 10) (<https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1579604180123&uri=CELEX:32018R0395>).

<sup>7</sup> Aircrew TeB & FS.TEC, GA TeB & GA COM.

## 2. In summary — why and what

### 2.1. Why we need to change the AMC & GM

As explained in detail in Section 2.1. of Opinion No 01/2019 (B), the objectives of RMT.0654 were to extract the existing balloon flight crew licensing requirements from Annex I (Part-FCL) to Regulation (EU) No 1178/2011<sup>8</sup> and to introduce them, in a revised form, as a new Annex III (Part-BFCL – balloon flight crew licensing) to Commission Regulation (EU) 2018/395.

As a consequence, existing AMC and GM related to balloon flight crew licensing requirements of Part-FCL need to be extracted from ED Decision 2011/016/R and, after being revised in order to fit with the new Part-BFCL requirements, issued as AMC and GM to Part-BFCL.

### 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 establish AMC and GM for the new balloon flight crew licensing requirements (Part-BFCL) that are proportionate to the nature and the complexity as well as the risks of balloon activities.

### 2.3. How we want to achieve it — overview of AMC and GM to Part-BFCL

As explained in detail in Opinion No 01/2019 (B), Part-BFCL has been developed on the basis of the existing balloon flight crew licensing requirements in Part-FCL. Consequently, existing AMC and GM to Part-FCL (ED Decision 2011/016/R) were revised in order to fit with the new Part-BFCL requirements and are now issued as AMC and GM to Part-BFCL.

As, especially with regard to training syllabi, the new AMC and GM to Part-BFCL largely match the existing balloon-specific AMC and GM to Part-FCL, a detailed description of the entire new AMC and GM is not deemed necessary. All differences between the existing AMC and GM to Part-FCL and the new AMC to Part-BFCL are described in detail in the comparison table provided in Chapter 5 of this Explanatory Note (Appendix).

### 2.4. What are the stakeholders' views

The draft ED Decision on AMC & GM to Part-BFCL was consulted with the EASA Advisory Bodies during a focused consultation meeting held at EASA on 7 January 2020. In general, the draft ED Decision was well received and supported. Discussion and agreement on specific topics as well as a post-meeting review led to the following final changes to the AMC & GM:

**Please note:** After the focused consultation meeting, the structure (paragraph numbering system, not the content) of some AMC & GM was revised and thereby improved. This, in some cases, led to

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<sup>8</sup> 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) (<https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1579604606759&uri=CELEX:32011R1178>).

renumbering of listed points. The references in the following overview relate to the final structure and listed points, unless specified otherwise.

#### **AMC1 BFCL.045(a)(4) (post-meeting-note)**

For consistency with AMC1 SFCL.045(a)(4) (sailplanes), the phrase '(in paper or electronic format)' was inserted in order to clarify that sufficient logbook data can be presented in different formats.

#### **AMC1 BFCL.135**

Following a post-meeting-review, in the note that offers the possibility to combine the four specific subjects into one examination paper, an additional sentence was added to explain that even in case of such a combined examination paper, the pass rate of 75 % needs to be achieved for each subject (clarification).

#### **GM1 BFCL.135**

It was agreed to delete point (e) of this GM, as the term 'sitting' is not used in point BFCL.135.

#### **AMC1 BFCL.160 (post-meeting-note)**

This draft AMC had been developed in coordination with RMT.0188 (updates to AMC & GM to Part-FCL). After further legal review, that Part-FCL AMC had to be amended in such way that training flights with an instructor (revalidation / recency) can take place on aircraft as per Annex I to the Basic Regulation only when that aircraft is subject to an authorisation process in accordance with point ORA.ATO.135 or point DTO.GEN.240. Additionally, for the crediting of completed flight time (revalidation / recency), the text of that Part-FCL AMC has been clarified to include flight time in aircraft that are subject to a decision as per Article 2(8) of the Basic Regulation. For consistency with that Part-FCL AMC, this parallel Part-BFCL AMC has been revised accordingly.

#### **GM1 BFCL.200**

It was decided to add this new GM in order to explain that it is not possible to get credits for the initial issue of a tethered flight rating or for complying with related recency requirements based on a tethered activity where the balloon will not take off but remains on the ground (e.g. demonstrations during air shows).

#### **AMC1 BFCL.215(d)(2)(i)**

In point (b), the text was changed to include a reference to 'abnormal procedures', since, in accordance with the Basic Regulation, both abnormal and emergency procedures are not allowed to be performed with passengers on board.

#### **AMC1 BFCL.215(d)(2)(i); BFCL.215(h)**

In the context of this AMC, the meeting participants agreed that AMC to Part-BOP should be amended to refer to point BFCL.215 in order to clarify that a Part-BOP proficiency check should include at least the content of a Part-BFCL commercial operation proficiency check. Since the proficiency check as per point BFCL.215(d)(2)(i) is applicable only for commercial passenger ballooning and such a link between point BFCL.215 and point BOP.ADD.315 can therefore only be established for proficiency checks related to commercial passenger ballooning, the text of this ED decision was amended to include the following:

- In AMC1 BFCL.215(d)(2)(i); BFCL.215(h), the text was amended to clarify that the credit established in this AMC can apply only in cases where the operator proficiency check included procedures for commercial passenger ballooning.
- AMC1 BOP.ADD.315(b);(c) was amended to clarify that an operator proficiency check for commercial passenger ballooning (CPB) should include the content of the proficiency check for the commercial operation rating. At this opportunity, the title of that AMC was amended to solely refer to point (b) of point BOP.ADD.315, which addresses content and conduct of an operator proficiency check, while point (c) of point BOP.ADD.315 only contains provisions for the validity of the check (not relevant for the AMC at hand).

#### **AMC1 BFCL.215(d)(2)(ii)**

In point (b)(3), the text was revised to be in consistency with point (b) of AMC1 BFCL.215(d)(2)(i) (reference to CPB flights).

#### **AMC1 BFCL.300(a)(1)(i) (post-meeting-note)**

This draft AMC had been developed in coordination with RMT.0188 (updates to AMC & GM to Part-FCL). After further review, it was concluded for both Part-BFCL and Part-FCL that the general instructor requirements already include the obligation for an instructor to be competent with regard to the training aircraft. Hence, this additional AMC was considered to be superfluous and has been therefore deleted.

#### **AMC1 BFCL.315(a)(5)(ii)**

The AMC was renamed into AMC1 BFCL.315(a)(4)(ii) to contain the correct reference to the relevant part of point BFCL.315 (after final rewording of that point). Additionally, in point (b) of that AMC, the term ‘aerial work’ was replaced by the phrase ‘a selection of flight exercises’ in order to avoid a possible confusion with (commercial) air work.

#### **AMC1 BFCL.330(a)**

The phrase ‘being in the role of an instructor’ at the end of the text of this AMC was deleted, since the main focus of that pre-course assessment is not to test instructor competencies of a candidate who is not an instructor yet.

#### **AMC3 BFCL.345**

In Section 7 of the report form, the term ‘protocol’ was replaced by ‘report’, since the term ‘protocol’ was identified to be confusing in this context.

#### **AMC1 BFCL.400(a)(1)(i) (post-meeting-note)**

This draft AMC had been developed in coordination with RMT.0188 (updates to AMC & GM to Part-FCL). After further review, it was concluded for both Part-BFCL and Part-FCL that the general examiner requirements already include the obligation for an examiner to be competent with regard to the aircraft to be used for a skill test, proficiency check or assessment of competence. Hence, this additional AMC was considered to be superfluous and has been therefore deleted.

#### **AMC1 BFCL.410(b)(3)**

In Section 7 of the report form, the term ‘protocol’ was replaced by ‘report’, since the term ‘protocol’ was identified to be confusing in this context.



**AMC1 BFCL.415(b)**

In point (b)(2), the phrase ‘theoretical knowledge necessary for the’ was inserted in order to clarify that point (b)(2) refers to theoretical training while point (b)(3) refers to a practical exercise.

**AMC1 BFCL.430**

In the list in point (b)(1)(i), an additional point on ‘human performance and limitations’ (point (d)(1)(viii) in the version from the focused consultation meeting) was deleted, since it was redundant given the content of point (b)(1)(i)(E). In the original Part-FCL AMC1 FCL.1015, the related point (d)(1)(viii) puts human performance and limitations in the context of multi-crew cooperation (MCC), which is not relevant for balloons. In the first draft for this AMC1 BFCL.430 (as shown during the focused consultation meeting), this point (d)(1)(viii) was kept, but without a reference to MCC, thereby leading to the redundancy with point (b)(1)(i)(E) in the final version of AMC1 BFCL.430.

**AMC2 BFCL.430 (post-meeting-note)**

For consistency with the ongoing update to AMC2 FCL.1015 of Part-FCL (RMT.0188), additional text has been added to point (g)(1) of AMC2 BFCL.430 in order to illustrate possibilities for aircraft as per Annex I to the Basic Regulation to be used for a test or check.

**AMC1 BFCL.445**

In point (b)(3), the text was amended to refer to both an inspector from the competent authority or a senior examiner, for consistency with point (b)(1) of this AMC. Additionally, in point (d)(2)(v) of this AMC, the term ‘go-around’ was replaced by the term ‘aborted landing’ (more appropriate for ballooning).

**2.5. What are the benefits and drawbacks**

Please refer to the impact assessment performed with EASA Opinion No 01/2019 (B). The AMC & GM to Part-BFCL reflect so far existing Part-FCL AMC & GM with revisions and updates that are consistent with the innovations of Part-BFCL (see Appendix).



### 3. How do we monitor and evaluate the rules

EASA will monitor and evaluate the implementation of the AMC & GM to Part-BFCL through exchange of information with the EASA Advisory Bodies as well as through Standardisation activities.



## 4. References

### 4.1. Related regulations

- Commission Regulation (EU) 2018/395 of 13 March 2018 laying down detailed rules for the operation of balloons pursuant to Regulation (EC) No 216/2008 of the European Parliament and the Council (OJ L 71, 14.3.2018, p. 10)

### 4.2. Affected decisions

- Decision 2018/004/R of the Executive Director of the European Aviation Safety Agency of 23 March 2018 issuing Acceptable Means of Compliance and Guidance Material to the Articles and to Part-BOP of Commission Regulation (EU) 2018/395 ('Acceptable means of compliance and guidance material to the operational rules for balloons')

### 4.3. Related 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')



## 5. Appendix: Overview of differences between AMC & GM to Part-FCL and AMC & GM to Part-BFCL

Note 1: The term 'N/A' in the column 'Part-FCL AMC & GM reference' means that in Part-FCL AMC & GM, such text did not exist so far.

Note 2: In some cases, when moving text from Part-FCL AMC & GM to Part-BFCL AMC & GM, the paragraph numbering system of an AMC or GM has been revised. Unless specified otherwise, the references in the column 'Differences/remarks' relate to this updated numbering system.

Part-BFCL AMC & GM reference	Content	Part-FCL AMC & GM reference	Differences/remarks
AMC1 BFCL.015	Application and report forms	AMC1 FCL.015	References updated
GM1 BFCL.015(c)	Licence endorsements and recency for hot-air balloon group	N/A	New GM to explain that privileges that were already obtained for a higher hot-air balloon group do not need to be deleted from the licence after complying with the recency requirements in a lower group. Privileges for higher groups are just 'inactive' and can be reactivated through compliance with the recency requirements in that higher group.
AMC1 BFCL.045(a)(4)	Sufficient logbook data	N/A	New AMC to indicate what is acceptable as 'sufficient logbook data'
AMC1 BFCL.050	Recording of flight time (logbook)	AMC1 FCL.050	Clarifications: <ul style="list-style-type: none"> <li>- An applicant can log pilot-in-command (PIC) time for the flight time during a skill test or a proficiency check.</li> <li>- Solo flight hours should be countersigned by the supervising instructor.</li> </ul>
GM1 BFCL.065	Applicability of age rule	N/A	New GM to explain that any flight with fare-paying passengers on board is considered to be a CPB flight.



AMC1 BFCL.130	Syllabus for the BPL theoretical knowledge instruction	AMC1 FCL.115; FCL.120	<ul style="list-style-type: none"> <li>- Human performance: 'Use of oxygen' added</li> <li>- Communications: Clarification on the need to cover visual flight rules (VFR) communication on controlled and uncontrolled airfields as well as for en-route ATS liaison</li> <li>- Subjects 'Principles of flight', 'Operational procedures', 'Flight performance and planning' and 'Aircraft general knowledge (...)' revised and updated in order to be fully tailored to hot-air and gas balloons only</li> <li>- Navigation: 'Use of ATS' added to include respective navigation procedures.</li> </ul>
AMC2 BFCL.130	Syllabus for the BPL flight instruction	AMC1 FCL.110.B; FCL.210.B	Hot-air balloon syllabus: Note added at the end of exercise 17 regarding the training exercises that need to be completed before the first solo flight
AMC1 BFCL.135	BPL theoretical knowledge examination	AMC3 FCL.210; FCL.215 AMC1 FCL.115; FCL.120 AMC1 FCL.120; FCL.125 AMC1 FCL.215; FCL.235	<ul style="list-style-type: none"> <li>- Theoretical knowledge examination syllabus: Reference to AMC1 BFCL.130</li> <li>- Further text inspired by AMC1 FCL.120; FCL.125 (number of questions, info on examination languages) and AMC1 FCL.215; FCL.235 (counting of the 18-month period)</li> <li>- Arrangements for distribution of questions across the subjects and the duration of the exams</li> <li>- Possibility to combine the specific subjects (principles of flight, operational procedures, flight performance and planning, aircraft general knowledge) into one combined examination paper</li> </ul>



GM1 BFCL.135	Terminology for theoretical knowledge examinations	AMC1 FCL.025	<ul style="list-style-type: none"> <li>- Changed from AMC into GM (more appropriate with regard to the content)</li> <li>- Clarification: Examination paper = examination in one subject</li> <li>- Definition for the term 'sitting' deleted (not used in point BFCL.135)</li> </ul>
AMC1 BFCL.145	BPL skill test	AMC2 FCL.125; FCL.235	<ul style="list-style-type: none"> <li>- Paragraph numbering system revised</li> <li>- Minimum duration (flight time): 30 minutes</li> <li>- Pre-flight documentation and post-flight actions: Details given in brackets</li> <li>- Emergency procedures: New item on simulated passenger health problems</li> </ul>
AMC1 BFCL.150(b)	Extension of hot-air balloon privileges to another hot-air balloon group	AMC1 FCL.225.B	<ul style="list-style-type: none"> <li>- Definition of different groups deleted (moved to rule level; see point BFCL.010 where subdivision of a class into groups applies only for hot-air balloons)</li> <li>- Course completion certificate replaced by logbook entry by the instructor upon completion of the training</li> </ul>
GM1 BFCL.150(b)	Extension of hot-air balloon privileges to another hot-air balloon group	N/A	New GM to explain that two training flights are the minimum – the instructor may conduct additional training flights, as necessary
AMC1 BFCL.150(c)(1)	Extension to other classes (hot-air airship – flight instruction)	AMC2 BFCL.135.B; FCL.225.B	Prerequisite of holding hot-air balloon privileges deleted (too prescriptive AMC) and replaced by the need to emphasise engine handling and emergencies in cases where a candidate does not hold hot-air balloon privileges



AMC2 BFCL.150(c)(1)	Extension to other classes (gas balloons – flight instruction)	N/A	New AMC on flight instruction for extending balloon pilot licence (BPL) privileges to the gas balloon class (reference to the initial BPL flight training syllabus for gas balloons)
AMC3 BFCL.150(c)(1)	Extension to other classes (hot-air balloons – flight instruction)	N/A	New AMC on flight instruction for extending BPL privileges to the hot-air balloon class (reference to the initial BPL flight training syllabus for hot-air balloons)
AMC1 BFCL.150(c)(2)	Extension to other classes (hot-air airships – skill test)	AMC3 FCL.135.B; FCL.225.B	<ul style="list-style-type: none"> <li>- Paragraph numbering system revised</li> <li>- Content of the skill test slightly revised: <ul style="list-style-type: none"> <li>- Section 2: New exercises (turns, stationary flight)</li> <li>- Section 3: New exercise (pressure and engine parameter checks)</li> <li>- Section 5: New exercise (simulated passenger health problems)</li> </ul> </li> <li>- New: Skill test duration of at least 30 min (point (a)(3))</li> </ul>
AMC2 BFCL.150(c)(2)	Extension to other classes (gas balloons – skill test)	N/A	New AMC on the skill test for extending BPL privileges to the gas balloon class (reference to the initial BPL skill test for gas balloons)
AMC3 BFCL.150(c)(2)	Extension to other classes (hot-air balloons – skill test)	N/A	New AMC on the skill test for extending BPL privileges to the hot-air balloon class (reference to the initial BPL skill test for hot-air balloons)
AMC4 BFCL.150(c)(2)	Extension to other classes (theoretical knowledge)	AMC1 FCL.135.B; FCL.225.B	<ul style="list-style-type: none"> <li>- Definitions of different balloon classes moved to the rule (see point BFCL.010)</li> </ul>



			- Course completion certificate replaced by logbook entry by the instructor or the ATO/DTO upon completion of the training (at rule level, see point BFCL.150(d))
AMC1 BFCL.160	Crediting of flight time completed on balloons as per Article 2(8) of as well as Annex I to Regulation (EU) 2018/1139	N/A	New AMC to illustrate possible crediting of flight time completed on balloons as per Article 2(8) of as well as Annex I to Regulation (EU) 2018/1139 (modelled on AMC developed in the context of the activities of RMT.0188 for Part-FCL)
AMC1 BFCL.160(a)(1)(ii)	Recency requirements (training flight)	N/A	New AMC to illustrate the necessary arrangements for the training flights required to meet the recency requirements
AMC2 BFCL.160(a)(2)	Recency requirements (proficiency check)	N/A	New AMC to illustrate the arrangements for the recency proficiency check (reference to the initial BPL skill test)
GM1 BFCL.200	Tethered activity without taking off	N/A	New GM to clarify that it is not possible to get credits for the initial issue of a tethered flight rating or for complying with related recency requirements based on a tethered activity where the balloon will not take off but remains on the ground
AMC1 BFCL.200(b)(2)	Tethered flight rating	AMC1 FCL.130; FCL.220.B	- Clarification for the tether rope to be at least a three-point-system tether rope - New exercise: Passenger exchange procedures
AMC1 BFCL.210(b)	Night rating	N/A	New AMC to illustrate the training syllabus for the night rating
GM1 BFCL.210(c)	Night rating	N/A	New GM to explain that two training flights are the minimum – the instructor may conduct additional training flights, as necessary



AMC1 BFCL.215(b)(4)	Commercial operation rating (skill test)	N/A	New AMC to illustrate the arrangements for, as well as the content of, the skill test for the commercial operation rating on hot-air balloons, gas balloons and hot-air airships
AMC1 BFCL.215(d)(1)(i)	Commercial operation rating (recency flights as PIC)	N/A	New AMC to illustrate the criteria for a flight in order to be counted as a flight for complying with the recency requirements for the commercial operation rating
AMC1 BFCL.215(d)(2)(i)	Commercial operation rating (recency proficiency check)	N/A	New AMC to illustrate the arrangements for, as well as the content of, the skill test for the commercial operation rating (reference to the skill test for the commercial operation rating)
AMC1 BFCL.215(d)(2)(i); BFCL.215(h)	Commercial operation rating (Credits for proficiency checks as per Part-BOP)	N/A	New AMC to explain that a Part-BOP proficiency check constitutes compliance with point BFCL.215(d)(2)(i) as long as that Part-BOP proficiency check is valid. In accordance with point (c) of point BOP.ADD.315 of Part-BOP, the latest operator proficiency check can have taken place more than 24 months ago.
AMC1 BFCL.215(d)(2)(ii)	Commercial operation rating (refresher course)	N/A	New AMC to illustrate the arrangements for, as well as the content of, the refresher course for the commercial operation rating
AMC1 BFCL.315(a)(4)(ii)	FI(B) instructor privileges (1-hour training flight)	N/A	New AMC to illustrate the content of the 1-hour training flight that is necessary for obtaining flight instructor (FI) privileges to instruct other FIs
AMC1 BFCL.325	FI(B) competencies and assessment	AMC1 FCL.920	<ul style="list-style-type: none"> <li>- Column 'Knowledge' renamed into 'Knowledge (understanding of)' (clarification)</li> <li>- Items irrelevant to balloons deleted (UPRT, CRM)</li> </ul>



AMC1 BFCL.330(a)	FI(B) training course (pre-course assessment)	N/A	New AMC to illustrate the arrangements of the pre-course assessment, including an explanation that it is up to the approved training organisation (ATO)/declared training organisation (DTO) to decide whether an in-flight assessment will be included
AMC1 BFCL.330(b)	FI(B) training course	AMC2 FCL.930.FI	<p>Overall structure and paragraph numbering system revised, including the following changes:</p> <ul style="list-style-type: none"> <li>- Point (a)(2)(ii): Revised to contain a list that, in point (B), contains additional text ('and how to access all related sources of information') to illustrate that student FIs should also receive training on how to teach student pilots to access necessary information for a particular flight (e.g. weather briefing, notices to airmen (NOTAMs), etc.)</li> <li>- New point (b)(2)(ii)(C) on the conduct of a debriefing after each flight training session &amp; 'debriefing' added as an additional item to every flight exercise</li> <li>- Syllabus items slightly revised in exercises 1, 2, 3, 12b, 16, 17, 18 and 19</li> <li>- Exercise 15: low height defined as 1 to 20 metres</li> <li>- Point (f) of AMC2 FCL.930.FI not transferred to this new AMC (covered already by the rule text (point BFCL.320))</li> </ul>
AMC1 BFCL.345	FI(B) assessment of competence (general)	AMC1 FCL.935	<ul style="list-style-type: none"> <li>- Text adapted to be fit for balloons only.</li> <li>- Point (e) from AMC1 to FCL.935 not transferred to this new AMC, as that point (e) refers to additional exercises as relevant for the 'applicable flight instructor certificate',</li> </ul>



			<p>which is irrelevant due to the fact that there is only one instructor certificate (FI(B)) in Part-BFCL</p> <ul style="list-style-type: none"> <li>- Point (d): Clarification that the assessment of competence can take place during a real training session with a real student</li> <li>- Point (e) (Part-FCL point (f)): No recommendation to complete all exercises in one day but in a time frame which is as short as possible (more realistic for a balloon flight)</li> <li>- New point (f): Minimum duration of the assessment of competence (in return for deletion of figures in GM1 BFCL.430).</li> </ul>
AMC2 BFCL.345	FI(B) assessment of competence (content)	AMC3 FCL.935	<ul style="list-style-type: none"> <li>- Text adapted to be fit for balloons only</li> <li>- Section 1: additional items (1.10 and 1.11) for special knowledge on how to release a student for first solo (in return for not keeping the concept of an FI with initially restricted privileges (as the case is in point FCL.910.FI of Part-FCL)</li> <li>- Section 4 on multi-engine exercises deleted</li> </ul>
AMC3 BFCL.345	FI(B) assessment of competence (report form)	AMC5 FCL.935 point (c)	<ul style="list-style-type: none"> <li>- Slight updates and improvements</li> <li>- Section 1: Telephone number (home) and telephone number (work) replaced by telephone and email</li> <li>- Section 5 in AMC5 FCL.935 (declaration by the applicant) not transferred to this new AMC: Applicants just need to sign the report form, and the ATO/DTO needs to confirm the training completion</li> </ul>



			<ul style="list-style-type: none"> <li>- Section 5 (Section 6 in AMC5 FCL.935): Field on ‘Balloons, hot-air ships used’ deleted (information not necessarily required in the context of the applicable requirements)</li> <li>- Section 6 (Section 7 in AMC5 FCL.935 regarding the result of the assessment of competence) completely revised to be consistent with the BPL skill test form, where appropriate</li> </ul>
AMC1 BFCL.360(a)(1)(i)	FI(B) refresher training	AMC1 FCL.940.FI(a)(2)	<ul style="list-style-type: none"> <li>- Text revised to be fit for balloons (FI(B), references to instrument rating instructors (IRIs) deleted)</li> <li>- Minimum duration: 1 day instead of 2, with minimum of 6 hours of teaching</li> <li>- Point (e)(11) (instrument flying) deleted — not relevant for balloons</li> <li>- Point (b): Deletion of sentence ‘Different aspects, such as inclusion of participants holding certificates in other categories of aircraft should be considered.’ as the intention is not to combine balloon seminars with other seminars for FI for other aircraft categories</li> </ul>
GM1 BFCL.360(a)(1)(i)	FI(B) refresher training	N/A	New GM to explain that ATOs/DTOs may conduct internal training more frequently than what is stipulated in the requirement (see point BFCL.360(a)(1)(i) - once every 3 years)
AMC1 BFCL.360(a)(2)	FI(B) recency (demonstration flight)	N/A	New AMC to illustrate the arrangements for, as well as the content of, the recency instruction flight under supervision for FI(B)



GM1 BFCL.405	Examiner's interests vested	GM1 FCL.1005	Additional sentence to cater for the fact that, within the ballooning community, examiners and candidates will often know each other (well)
GM1 BFCL.405(a)	Examiner's interests vested	N/A	New GM with a recommendation for training arrangements regarding the involvement of an instructor who will later on be the examiner (in the context of setting the 'vested-interest-barrier' to 50 %)
AMC1 BFCL.410(b)(3)	Report form for skill tests and proficiency checks	AMC1 Appendix 7	<ul style="list-style-type: none"> <li>- Form adapted to be fit for balloons only</li> <li>- Revised to be consistent with application and report form for FI (AMC3 BFCL.345) for the general parts</li> <li>- Reworked to be applicable for the skill test and proficiency checks for both BPL and commercial operation rating</li> </ul>
AMC1 BFCL.415(b)	Specific training for FE(B) privileges for the commercial operation rating	N/A	New AMC to illustrate the additional specific training that needs to be completed in order to obtain flight examiner (FE) privileges related to the commercial operation rating
AMC1 BFCL.415(c)(2)	Specific training for FE(B) privileges for FI(B) assessments of competence	N/A	New AMC to illustrate the additional specific training that needs to be completed in order to obtain FE(B) privileges related to FI(B) assessments of competence
AMC1 BFCL.420(d)	FE(B) background check	AMC1 FCL.1010	Subtitle added
AMC1 BFCL.430	FE(B) standardisation course	AMC1 FCL.1015	<ul style="list-style-type: none"> <li>- Point (a) completely revised in order to better align rule text and AMC</li> </ul>



			<ul style="list-style-type: none"> <li>- Text revised to be fit for balloons only (text parts on IR examiners and TRE type extensions deleted, list of course content updated and adjusted)</li> </ul>
AMC2 BFCL.430	FE(B) standardisation arrangements	AMC2 FCL.1015	<ul style="list-style-type: none"> <li>- Paragraph numbering system revised</li> <li>- Wording improvements/text made fit for balloons only</li> <li>- Point (a): Renamed from 'Limitations' into 'General' (reflects better the content)</li> <li>- Point (a)(1): Deletion of the phrase 'normally not more than 1 hour' (more flexibility)</li> <li>- Point (c)(2): Deletion of the arrangement according to which a failed item does not always mean a failed section (not appropriate for balloon test/checks)</li> <li>- Point (iii) in point (f)(2): 'rough handling' replaced by 'poor control' — more appropriate terminology for balloons</li> <li>- Point (g)(1): Additional text to illustrate possibilities for aircraft as per Annex I to the Basic Regulation to be used for a test or check</li> <li>- New point (C) in point (g)(4)(i): Emphasis on theoretical knowledge in common subjects for 'inactive' licence holders who make use of a theory cross-credit as per point BFCL.140(a)</li> </ul>
GM1 BFCL.430	Planning of tests and checks	GM1 FCL.1015	<ul style="list-style-type: none"> <li>- Subtitle added</li> <li>- Not more than two tests, checks or assessments of competence per day.</li> </ul>



			<ul style="list-style-type: none"> <li>- Particular figures for planning tests and checks not transferred from Part-FCL GM to this GM, as minimum duration for different test/check scenarios already defined in applicable specific AMC</li> </ul>
AMC1 BFCL.445	FE(B) assessment of competence	AMC1 FCL.1020	<ul style="list-style-type: none"> <li>- Paragraph numbering system revised</li> <li>- Text adapted to be fit for balloons only</li> <li>- Slight text improvements</li> <li>- Points (d)(9), (d)(11), (e)(1) and (e)(5) of AMC1 FCL.1020 not transferred to this new AMC (not relevant for balloons)</li> </ul>
AMC1 BFCL.445; BFCL.460	Qualification of senior examiners	AMC1 FCL.1020; FCL.1025	Senior examiner qualification should be valid for a maximum of 5 years (consistent with the 5-year validity period of the FE(B) certificate).
AMC1 BFCL.460(b)(1)	FE(B) refresher course	AMC1 FCL.1025	Wording adjusted to the terminology used in point BFCL.460 (refresher 'course' to be organised as a seminar).

