



# Opinion No 06/2024

in accordance with Article 76(1) of Regulation (EU) 2018/1139

## Training the next generation of ATCOs

Setting performance standards for the initial training output based on the principles of competency-based training and assessment, enabling the virtualisation of training and the acceptance of ATCO licences issued by third countries

RMT.0668 — SUBTASKS 3 & 4

### EXECUTIVE SUMMARY

This Opinion proposes to amend Commission Regulation (EU) 2015/340, as well as to establish a new delegated act, with a view to setting European-wide performance standards concerning the output level of air traffic controllers' (ATCOs) initial training in order to maintain a high and uniform level of safety and enhance efficiency and flexibility as regards both the training and availability of ATCOs.

The proposed amendments to Commission Regulation (EU) 2015/340 are the result of RMT.0668 Subtask 4 and aim to:

- harmonise the initial training output for ATCOs to be able to handle complex and dense traffic situations;
- enhance the regulatory framework for instructors and assessors by setting the required performance standards using the principles of competency-based training and assessment (CBTA), which is also the ICAO preferred route to all aviation personnel licensing;
- enable the utilisation of virtual training proposals stemming from the COVID-19 RNO project.

In addition, through the proposal for a new delegated act developed under RMT.0668 Subtask 3, Member States will be able to accept ATCO certificates issued by third countries by crediting prior training towards the issue of EU student ATCO licences, as well as accept ICAO-compliant licence holders to act as instructors and assessors at EU ATCO training organisations.

The proposed regulatory material is expected to provide for a more flexible use of the available ATCO resources and thus to a better management of the air traffic capacity across Europe.

#### REGULATION(S) TO BE AMENDED/ISSUED

- [Regulation \(EU\) 2015/340 \(ATCO\)](#)
- Draft Commission Delegated Regulation (EU) .../... laying down detailed rules and procedures on the acceptance of air traffic controller licences issued by third countries

#### ED DECISION(S) TO BE AMENDED

- [ED Decision 2015/010/R 'AMC & GM to Commission Regulation \(EU\) 2015/340'](#)

#### AFFECTED STAKEHOLDERS

ATCOs; ATCO training organisations; ATM/ANS service providers; national competent authorities; holders of third-country ATCO licences

#### WORKING METHODS

Development	Impact assessment(s)	Consultation
Subtask 3: by EASA Subtask 4: by EASA with external support	Light	Focused (Advisory Bodies) — NPA

#### RELATED DOCUMENTS / INFORMATION

- [ToR RMT.0668 - Regular update of the air traffic controller licencing rules \(IRs, AMC, GM\) | EASA \(europa.eu\)](#)
- [NPA 2023-02 - Training the next generation of ATCOs | EASA \(europa.eu\)](#)
- [Training for Success – Leading the way with CBTA - On-site event | EASA \(europa.eu\)](#)
- CRD 2023-02 ([Comment Response Documents | EASA \(europa.eu\)](#))

**PLANNING MILESTONES:** Refer to the latest edition of EPAS *Volume II*.



## Table of contents

<b>1.</b>	<b>About this Opinion .....</b>	<b>3</b>
1.1	How this regulatory material was developed .....	3
1.2	The next steps .....	4
<b>2.</b>	<b>In summary — why and what .....</b>	<b>4</b>
2.1	Why we need to act.....	4
2.2	What we want to achieve — objectives.....	4
2.3	How we want to achieve it — overview of the proposed amendments .....	5
2.3.1	Different performance levels of student ATCOs .....	5
2.3.2	Instructors and assessors .....	5
2.3.3	Virtual training .....	6
2.3.4	Acceptance of licences issued by third countries .....	6
2.4	What are the stakeholders' views.....	6
2.4.1	Regulatory means .....	8
2.4.2	Competency-based training requirements for rating training.....	9
2.4.3	Competency requirements for practical instructors and assessors.....	10
2.4.4	Inter-rater reliability.....	11
2.4.5	Shortening the period applicable for counting the minimum number of hours to maintain competence .....	11
2.4.6	Acceptance of ATCO licences issued by third countries .....	11
2.4.7	Target applicability of the proposed regulatory material.....	12
2.5	Other relevant information .....	12
2.5.1	ICAO and the CBTA.....	12
2.5.2	Stakeholders' views on unit endorsements for the provision of remote aerodrome air traffic services .....	13
<b>3.</b>	<b>What are the expected benefits and drawbacks of the proposed regulatory material .....</b>	<b>15</b>
<b>4.</b>	<b>Proposed regulatory material .....</b>	<b>16</b>
<b>5.</b>	<b>Monitoring and evaluation .....</b>	<b>17</b>
<b>6.</b>	<b>Proposed actions to support implementation .....</b>	<b>18</b>
<b>7.</b>	<b>References.....</b>	<b>19</b>



## 1. About this Opinion

### 1.1 How this regulatory material was developed

The European Union Aviation Safety Agency (EASA) developed this Opinion in line with Regulation (EU) 2018/1139<sup>1</sup> (the Basic Regulation) and the Rulemaking Procedure<sup>2</sup>. Rulemaking Task RMT.0668 is included in *Volume II* of the European Plan for Aviation Safety (EPAS) for 2023–2025<sup>3</sup>. The scope and timescales of the RMT were defined in the related Terms of Reference (ToR)<sup>4</sup>.

This Opinion groups Subtasks 3 and 4 of RMT.0668.

The proposal relevant to Subtask 3, namely, to introduce a regulatory framework for the recognition of third-country ATCO licences under Commission Regulation (EU) 2015/340<sup>5</sup> (the ATCO Regulation), has been developed by EASA.

The proposal relevant to Subtask 4, whose aim is to harmonise the initial training qualification output for ATCOs to be able to handle complex and dense traffic situations and to enhance the qualification requirements for instructors and assessors by setting the required performance standards using the principles of CBTA, as well as to enable the utilisation of virtual training proposals stemming from the COVID-19 RNO project, have been developed with the contribution of a rulemaking group composed of experts with experience in the field of ATCO training and assessment. EUROCONTROL experts have prepared the proposals for the adapted competency models that were discussed by the rulemaking group. In addition, experts from six different training organisations with experience in training for procedural ratings contributed to the definition of conditions for approach control procedural and area control procedural ratings.

The draft regulatory material was publicly consulted with NPA 2023-02<sup>6</sup> between 2 May and 1 September 2023 in accordance with Article 115 of the Basic Regulation, Article 6 of the Rulemaking Procedure, and in accordance with the ToR for this RMT.

<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 01-2022 of 2 May 2022 on the procedure to be applied by EASA for the issuing of opinions, certification specifications and other detailed specifications, acceptable means of compliance and guidance material ('Rulemaking Procedure'), and repealing Management Board Decision No 18-2015 (<https://www.easa.europa.eu/the-agency/management-board/decisions/easa-mb-decision-01-2022-rulemaking-procedure-repealing-mb>).

<sup>3</sup> [European Plan for Aviation Safety \(EPAS\) 2023-2025 | EASA \(europa.eu\)](#)

<sup>4</sup> [ToR RMT.0668 - Regular update of the air traffic controller licencing rules \(implementing rules, acceptable means of compliance, guidance material\) | EASA \(europa.eu\)](#)

<sup>5</sup> Commission Regulation (EU) 2015/340 of 20 February 2015 laying down technical requirements and administrative procedures relating to air traffic controllers' licences and certificates pursuant to Regulation (EC) No 216/2008 of the European Parliament and of the Council, amending Commission Implementing Regulation (EU) No 923/2012 and repealing Commission Regulation (EU) No 805/2011 (OJ L 63, 6.3.2015, p. 1) (<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32015R0340&qid=1620633155104>).

<sup>6</sup> [NPA 2023-02 - Training the next generation of ATCOs | EASA \(europa.eu\)](#)



Moreover, the expected benefits of the transition to the CBTA methodology have been discussed with affected stakeholders during the workshop organised by EASA and EUROCONTROL under the theme 'Training for Success – Leading the way with CBTA' that took place in Luxembourg between 20 and 21 November 2023.

EASA reviewed the comments received and duly considered them in the preparation of the subject draft regulatory material.

EASA publishes also, for information purposes only, the draft AMC & GM which shall be issued to support the application of the draft implementing act proposed in this Opinion, once the final implementing act is published in the *Official Journal of the European Union*.

## 1.2 The next steps

The Opinion is submitted to the European Commission which shall decide, after consulting the EASA committee and the Air Safety Expert Group according to the applicable legislative procedure, whether to adopt the proposed amendments to Commission Regulation (EU) 2015/340 and the proposed delegated act.

Following the adoption and issuance of the final legislative acts, EASA will issue a Decision with the related AMC & GM to support their implementation. When issuing the Decision, EASA will also provide feedback to the commentators and information to the public on who engaged in the process and/or provided comments on the draft AMC & GM during the consultation, which comments were received, how such engagement and/or consultation was used in rulemaking, and how the comments were considered.

## 2. In summary — why and what

### 2.1 Why we need to act

The issues leading to the subject regulatory proposal, including their rationales and potential impacts, were explained in Section 2.1 of NPA 2023-02.

### 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 proposal will contribute to achieving the overall objectives by addressing the issues described in Section 2.1.

The general objective of RMT.0668 is to ensure a high and uniform level of safety as regards air traffic management (ATM) / air navigation services (ANS), and more specifically as regards the provision of air traffic services (ATS), by ensuring EU-wide alignment of the qualification scheme of ATCOs stipulated in the ATCO Regulation with the evolution of the applicable regulatory framework, the state of the art, and recognised best practices in aviation.

The specific objectives of this proposal regarding the ATCO Regulation are to:

- harmonise the initial training performance standards for ATCOs to be able to handle complex and dense traffic situations;
- enhance the qualification requirements for instructors and assessors by setting the required performance standards using the CBTA principles; and



- enable the utilisation of virtual training proposals stemming from the COVID-19 RNO project.

The draft delegated act proposed with this Opinion will, in addition, complete the legal framework established by the Basic Regulation regarding the acceptance of third-country ATCO licences. This new instrument aims to enable national competent authorities (NCAs) to handle licence conversion requests coming from third-country ATCOs in a harmonised and controlled manner, ensuring an equivalent level of safety to that provided for in the Basic Regulation.

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

### 2.3.1 Different performance levels of student ATCOs

EASA proposes to introduce a new, harmonised initial training performance standard that will effectively define what is required by student ATCOs to demonstrate that they are able to handle 'complex and dense traffic situations'. This performance standard uses the ICAO principles of CBTA and a subset of the ICAO ATCO Competency Framework. This also takes into consideration the work started by the ICAO Personnel Training and Licensing Panel on future ICAO standards for ATCO training and licensing, with the necessary adaptations to the European environment with common rules.

The proposed solution to define performance standards using the ICAO competency-based approach to training and assessment (in ICAO terms, to create an adapted competency model) is limited at this stage to initial training, as this is a controlled and synthetic environment where all conditions and standards can be designed into the training. The ICAO method for creating adapted competency models enables the performance standards to be defined in such a way that it would allow a variety of systems, technologies, procedures and airspace to be used. Any advancements in any of these areas will not be constrained by the performance standards.

Sufficiently high ATCO performance standards achieved at the end of the initial training are likely to lead to the successful completion of unit training and thus improve the pass rate. High and common initial training performance standards may also reduce the duration of the unit training.

In unit training, the conditions and standards become specific to the local operational environment, and competency models should be adapted accordingly by the training organisations.

### 2.3.2 Instructors and assessors

The implementation of the CBTA concept to the ATCO training needs has also been extended to instructors and assessors. Practical instructors and assessors are provided with a framework of the adapted competency model to enable achieving the performance standards required for these categories of qualified ATCOs.

Assessor privileges are revised to allow experienced assessors to act without the valid synthetic training device instructor (STDI) and on-the-job training instructor (OJTI) endorsement for the purposes of issuing and renewing STDI and OJTI endorsements. It is envisaged that this will facilitate the planning and availability of such staff within the training and assessment processes.

Additionally, linked with virtual training, it is proposed that theoretical instructors have skills in the area where the delivery of the training could be ensured in a virtual environment.

The availability of practical instructors and assessors without a valid unit endorsement would create a more flexible scheme of resources to be used by ATC units.



### 2.3.3 Virtual training

During the COVID-19 outbreak, it was necessary to introduce different ways of learning and communicating to successfully enable the continuation of the required training. As a result of this experience, it became evident that remote learning, if appropriately arranged to meet the intended objectives of ATCO training, may become a suitable and, in some cases, an advantageous practice.

To support achieving this evolution, European aviation training providers need to shift more their theoretical knowledge instruction footprint to a remote/virtual environment to enable continuity of the planned training. Aviation authorities will play a key role to facilitate this evolution in a safe and efficient manner.

For this purpose, the proposal to define remote learning and virtual classroom will be accompanied by new AMC and GM concerning:

- means of compliance for instructors involved in virtual training;
- guidance on the remote delivery of training courses and training plans;
- guidance on the methods for remote evaluation;
- reclassification of synthetic training device (STD) tools and improved guidelines for best use of simulators.

### 2.3.4 Acceptance of licences issued by third countries

Building on Article 68(3) of the Basic Regulation to adopt delegated acts regarding the acceptance of certificates and other documentation attesting compliance with civil aviation rules issued in accordance with the laws of a third country, this Opinion proposes to enable the acceptance of third-country ATCO licences without prejudice to international agreements concluded between the Union and a third country in accordance with point (a) of Article 68(1) of the Basic Regulation.

Compared to the NPA proposal, the Opinion proposes a distinction between the issue of student ATCO licences and the acceptance of ATCO licences based on certificates issued in accordance with the laws of a third country to also enable third-country licence holders to act as instructors or assessors.

## 2.4 What are the stakeholders' views

During the consultation of the draft regulatory material, EASA received 610 comments from 34 affected and interested parties, including industry, national competent authorities (NCAs), social partners and international organisations. Comments have also shown synergies and a coordinated approach between service providers and their national competent authorities. In addition, 30 comments were placed on the quality of the proposal, which are not included in the CRD (they are assessed for internal quality assurance purposes). The distribution of comments amongst the various types of stakeholders is illustrated in the corresponding CRD.

In the context of the public consultation, 297 comments have been accepted or partially accepted, while 115 comments have not been accepted. All 610 comments are individually responded to in CRD 2023-02<sup>7</sup>, while the explanatory note part of this Opinion highlights the comments which were repetitive or which requested EASA to further clarify and explain the proposed solutions.

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<sup>7</sup> [Comment Response Documents | EASA \(europa.eu\)](#)



The main areas commented concerned the chosen regulatory means, the equivalence and/or scalability of the adapted competency models, the suitability of the instructor and assessor competency frameworks, and the implementation time frame. Further, the concept of inter-rater reliability, the shortening of the period applicable for counting the minimum number of hours to maintain competence, and the acceptance of third-country licences received more attention from stakeholders.

In addition to the public consultation, EASA and EUROCONTROL organised a 2-day workshop on 20–21 November 2023 at the EUROCONTROL Aviation Learning Centre in Luxembourg about the introduction of CBTA in ATCO training<sup>8</sup>.

CBTA is the preferred ICAO method for designing and implementing training and assessment programmes for the licensing of aviation personnel, and is considered the most effective approach to enhancing performance and enabling reliable and mutual recognition of licences. On the regulatory front, Europe is leading the way with the introduction of CBTA into ATCO training.

122 aviation experts representing 65 organisations from 32 countries had the opportunity to:

- learn from those who have already implemented CBTA;
- find out how other aviation professionals approach CBTA;
- get informed about the EASA regulatory proposal on the matter; and
- shed light on the challenges of implementing CBTA.

The workshop concluded that the ATM training community will support the regulatory initiative with collaborative actions and that there is confidence as regards the benefits of harmonised CBTA implementation. The identified main beneficiaries of the CBTA concept are ATCO students. Additionally, operational units are likely to achieve improved pass rates and performance levels supporting the delivery of the required level of airspace capacity. The ATM training community also agreed on the benefits of voluntary collaborative data sharing and analysis to be brought forward via the D4S project.

The workshop also reinforced the need to revise the proposed regulatory material related to the implementation of ‘adapted competency models’ for rating training, and the competency requirements for practical instructors and assessors. In order to address those concerns with the involvement of stakeholders, EASA reached out to the EUROCONTROL ATM Training Team (ATT), which established two task forces to develop amendments to the regulatory solutions proposed via NPA 2023-02 and further guidance material to facilitate implementation.

The outcome of this additional work stream is partially embedded in this Opinion, as well as in the related draft AMC and GM material which is published for information purposes. The considerations leading to the final proposals are detailed below.

EASA has sought MAB advice on remaining, substantially divergent views on the draft final Opinion in accordance with Article 6(9) of MB Decision 01-2022 and received the following the feedback.

In total, six Member States reacted to the draft Opinion, which leads to the conclusion that most of the Member States were satisfied with the proposal. Some expressly declared their support to the importance and relevance of the new approach to ATCO training. Moreover, they confirmed that in

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<sup>8</sup> [Training for Success – Leading the way with CBTA - On-site event | EASA \(europa.eu\)](#)



the light of the proposed amendments, particularly regarding the extension of the implementation deadlines, they are ready to support the proposal.

Regarding the proposed delegated act Germany has pointed to the fact that for administrative reasons medical certificates issued by third countries shall not be accepted. Also, they are not required when exercising instructor or assessor privileges in a synthetic training device environment. Hence, the references to the potential acceptance of medical certificates are deleted. In this context and following the request of Spain, also the text of Article 5 has been simplified to clarify that the acceptance is a formal administrative decision not requiring the issue of a new licence or certificate.

Regarding GM1 ATCO.D.070 and the proposal made by France, the Agency wishes to recall that according to point (c) of ATCO.D.070, which still applies, a synthetic training device may be used during a unit endorsement assessment to demonstrate the application of trained procedures not encountered in the operational environment during the assessment. There is no intention to suggest that the use of synthetic training device would be accepted in situations other than situations where an applicant's performance cannot be observed at the time of the assessment. The Agency does not see a need to cover e.g. possible pandemic situations in the regulation as these can be addressed by an exemption. A possible runway closure for several weeks and other similar situations could be well covered by point (c) of ATCO.D.070.

Following the comments from Belgium, the provisions in points ATCO.C.020, ATCO.C.040 and ATCO.C.060 have been modified to better illustrate that an appropriate assessment is indeed required also for revalidation, as it is the case currently with the use of the term 'successfully completed'. The key here is finding the *appropriate* assessment that may potentially be different for revalidation and renewal. In addition, the Agency wishes to clarify that in the context of points ATCO.D.085(c) and ATCO.B.025 (a)(10), the purpose is that within the unit competence scheme the ATS provider defines the processes for both the examination of theoretical knowledge and the assessment of practical skills acquired during conversion training, i.e. how an examination or assessment is performed. When developing a conversion training course, the training organisation will then select which of the processes defined in the UCS to use; it could be either theoretical examination or practical assessment, or both.

Lastly, regarding the question of the Netherlands, the Agency recalls that the observable behaviours defined for basic and rating training already recognise that some behaviours will not be present in all assessment exercises because the conditions do not provoke those behaviours. These observable behaviours include the words 'if necessary' or 'when applicable' and may be scored as such if they are not observed. Note also that the requirement to demonstrate these behaviours is applicable to the assessment. During earlier training phases, it is likely that not all observable behaviours will be required to be demonstrated.

#### 2.4.1 Regulatory means

When choosing the appropriate regulatory means, careful consideration had to be given to achieving a balance between standardisation through CBTA and enabling the benefits of CBTA localisation. While, on the one hand, there is a need for standardisation because European licences are mutually recognisable, privileges included, EASA recognises that any standardisation, CBTA or otherwise, inevitably builds in some training excess that may be unnecessary in some units. This has always been the case, even with the current training objectives for initial training. Inevitably, some of these training





objectives, which are required for the issue of student ATCO licences, will not be necessarily applicable at some units. On the other hand, to realise the benefits of CBTA through localisation, the flexibility CBTA offers is built into the requirements at unit training level.

One of the misconceptions that has risen from the ICAO's CBTA model, as detailed in its Doc 9868 'Procedures for Air Navigation Services — Training', is that CBTA cannot have any form of regulation or standardisation because it is exclusively aimed for localisation. However, Doc 9868 contains both principles and methodologies. The methodologies make it clear that the design of any adapted competency model must take into account applicable regulatory requirements. So, a set of regulatory requirements has been established for the purpose of standardisation within the EU.

Nowadays, in the context of initial training, the definition of the final performance standard for a rating is left at the discretion of initial training organisations with the only general objective being that the student ATCO should be able to 'handle complex and dense traffic situations'. This is a requirement that may be, and has been, interpreted in a variety of ways and has led to very different levels of performance for student ATCOs completing initial training. This outcome is neither ideal from the perspective of the mutual recognition of ATCO licences, including related privileges, nor from the perspective of performance. For this purpose, it is necessary to further harmonise the applicable requirements.

Therefore, the basic and rating training competencies and associated observable behaviours (OBs), conditions and competency standards are intended as the minimum.

Initial training organisations (ITOs) will have the flexibility to add competencies, OBs and conditions to the set minimum. This will ensure that ITOs are able to meet any requirements that are generated from the local environment and that are not defined in that minimum.

The proposed unit training requirements are also amended to clarify that the ATC Competency Framework (based on ICAO Doc 9868 'Procedures for Air Navigation Services — Training') is the basis for units to develop their own adapted competency model that is specific to their local environment taking into account regulatory, operational, organisational and technical requirements. This is in line with the procedures described in Part 1 Chapters 1 and 2 of ICAO Doc 9868.

#### **2.4.2 Competency-based training requirements for rating training**

This Opinion proposes rating courses to become competency based. It is required that training courses be designed in such a way to enable a specified set of competencies to be assessed for the issue of the ATCO student licence and Rating (point ATCO.D.035(c)). For an applicant to pass an assessment, they are required to demonstrate that they meet the minimum level of performance for the required competencies (point ATCO.D.035 (e)). To ensure compliance with the two requirements above, a set of AMC material has been developed that details the following:

- The minimum number of OBs associated with each competency for all ratings; and
- A set of conditions and standards that would need to be manifested in the training airspace / exercises / practical assessment exercises to allow for an appropriate level of performance to be demonstrated. The conditions for each rating include a description of the simulated environment, and the required traffic levels and complexity in relation to an example airspace.

The AMC are referred to as 'adapted competency models' (ACMs). An ACM comprises competencies, their description, OBs associated with each competency, conditions, and a competency standard (level of performance).



ITOs raised concerns about the impact of implementing ACMs' conditions in their own training environments. Comments indicated that conditions have been understood in such a way that, for ITOs to align their training with the conditions of the ACMs, they would have to redesign significant parts of their practical training for rating courses.

Examples of the changes that may need to be made include:

- airspace lateral and vertical dimensions;
- reconfiguration of the route network structure;
- revised flight profiles/trajectories in all exercises/assessments.

Furthermore, ITOs with complex training airspace have expressed concerns that they would need to 'downgrade' their airspace to align with the relevant ACM. This would have a significant impact on their ability to prepare their students adequately.

Therefore, the proposal for point ATCO.D.035 'Rating training examinations and assessments' has been amended to provide clarity on what the minimum required level of performance is. Furthermore, the amended proposal clarifies how a current training airspace, exercises and practical assessments relate to the minimum required levels of performance, especially in relation to the conditions.

Effectively, the regulatory proposal enables ITOs to answer the following questions:

- Is my current training airspace and my exercises / practical assessment exercises equivalent to what is defined in the ACMs (i.e. respecting the conditions)?
- If the training airspace / exercises / assessments are not aligned with the conditions of the relevant ACM, what should be modified?
- If my airspace is of a different size to the example airspace provided in the conditions of the ACM, how can I demonstrate through scalability that my exercises / practical assessment exercises are equivalent?

Another set of comments addressed specific details of the conditions and OBs. These comments can be categorised into requests for clarification of particular conditions (e.g. more details on the configuration of taxiways, single instrument runway, complexity of surrounding airspace, etc.) or OBs, and requests for revising the particular conditions (e.g. airspace classification, VFR versus IFR weighting in exercises, inclusion of non-RVSM, etc.). The corresponding AMC and GM are amended to provide further clarification in this regard.

### 2.4.3 Competency requirements for practical instructors and assessors

To assist the establishment of instructor and assessor courses (points ATCO.D.090 and ATCO.D.095), both the Instructor and the Assessor Competency Frameworks have been revised to ensure that OBs are trainable (in a course), and subsequently observable in the operational context.

The review of the practical instructors' competencies and associated OBs resulted in the reduced list of competencies (from 9 to 7) and the considerable reduction of associated OBs (from 70 to 34). The agreement was to create a minimum requirement that would be trainable in a 'short course'. The main rationale, however, for the reduction of the OBs was the recognition that those OBs would be difficult (if not impossible) to achieve (to observe) in the artificial environment of the Practical Instructor course (courses in Europe range from 2 to 10 days).



The review of the assessor competencies and associated OBs resulted in a considerably reduced list of competences (from 10 to 4) and associated OBs (from 56 to 23). Similarly to instructors, the reduced assessor framework should be used in assessing whether assessors have gained the required competence in the approved assessor course.

#### 2.4.4 Inter-rater reliability

Several comments were received indicating that stakeholders had understood the principles of achieving inter-rater reliability and evidence of valid and reliable performance in the sense of requiring statistical validity and reliability, possibly through methods such as Cohen's Kappa or Intraclass Correlation Coefficient. While these methods are not excluded, it was not the intent to require them. Instead, the intention was to ensure that there is consistency between the judgements made by OJTIs and Assessors when observing the same performance and assessing that performance against the same adapted competency model.

Further guidance material will, therefore, be provided at a later stage on the methods to ensure that OJTIs/Assessors reach broad agreement in their assessments. Such guidance material will consider that it would be necessary for both large and small training organisations.

#### 2.4.5 Shortening the period applicable for counting the minimum number of hours to maintain competence

Several comments were received on the shortening of the period for which the minimum number of hours shall be established in the unit competence scheme. Commentators claimed, for example, that the proposal would mean that up to 4 times the minimum hours shall be accomplished in a 12-month period and that this change would generate major administrative difficulties. EASA is of the opinion that it is just a matter of changed calculation basis, as the number of required hours is, and remains to be, defined by the ATSP, so for example the minimum number of 150 hours within 12 months would become 75 hours within 6 months.

The results of standardisation inspections show that in some cases the distribution of hours to exercise the privileges of the licence can be distributed very unevenly throughout a 12-month period, which bears a possibility for the ongoing competence not being maintained. There is a need to mitigate situations where an ATCO exercises the privileges of the licence, for example, for 1 or 2 hours within 3 consecutive periods of 90 days and is still considered competent, without any additional training, to provide services when the following fourth 90-day period starts. Therefore, EASA proposes to keep the proposed 6-month calculation basis but, to highlight the purpose of the requirement, it changes the wording such that it now refers to competence maintenance rather than to the revalidation of the unit endorsement.

#### 2.4.6 Acceptance of ATCO licences issued by third countries

Although the relevant part of the proposal received only a few comments, EASA considered that those were correct in suggesting reconsidering the role of the NCAs and of the ATCO training organisations in relation to individual applicants.

Also, stakeholders draw EASA's attention to the need of engaging third-country licence holders as synthetic training device (STD) instructors or assessors, which, with a conversion into a student ATCO licence and subsequent unit training would not only be a cumbersome and time-consuming process, but also sometimes impossible due, for example, to medical unfitness.



Therefore, by taking these comments into consideration, EASA proposes a new approach with a distinction between the issue of student ATCO licences and the acceptance of ATCO licences based on certificates issued in accordance with the applicable laws of third countries.

For the issue of student ATCO licences, the proposed delegated act imposes the obligation on the applicant to obtain a recommendation from a training organisation that is certified to provide initial training for the purpose of issuing student ATCO licences in accordance with Commission Regulation (EU) 2015/340. That Regulation also describes the required elements of such recommendation, based on which NCAs may grant credits to the applicant with regard to already accomplished training.

In addition, for the purpose of providing instruction and assessment, NCAs may decide to accept certificates issued in accordance with the applicable laws of third countries, provided that the applicant holds an ICAO-compliant licence issued by a third country, with a rating and, if applicable, rating endorsement corresponding to the one for which they are authorised to instruct or assess and demonstrates to have received training and successfully passed examinations and assessments equivalent to those required by Commission Regulation (EU) 2015/340. In such case, the privileges shall be limited to the provision of instruction and assessment at initial training organisations.

#### **2.4.7 Target applicability of the proposed regulatory material**

Numerous comments focused on the need for a longer transitional period for various reasons. EASA agrees that the time required for the successful implementation, especially for the transition to CBTA, largely depends on the maturity of training organisations, as well as on the extent to which the CBTA methodology is already being applied.

However, EASA finds it important that other relevant and long-awaited amendments to the currently applicable regulatory framework related, for example, to the introduction of virtual training may become applicable as soon as possible.

Therefore, it is proposed to render certain requirements applicable already 6 months after the date of entry into force of the amending Regulation, while for updating the unit competence schemes and for adapting the training plans and courses, EASA proposes a transition period until 31 December 2028.

Regarding the acceptance of ATCO licences issued by third countries, EASA proposes immediate applicability as of the date of entry into force of the delegated act.

The legal basis is Regulation (EU) 2018/1139, and in particular its Article 50(1)(b) and (c), Article 53(1) and Article 68(3).

## **2.5 Other relevant information**

### **2.5.1 ICAO and the CBTA**

ICAO has established a Personnel Training and Licensing Panel with the task of introducing the CBTA as a route to licensing for all aviation personnel, including ATCOs. The current licensing route (i.e. based on knowledge, skills and time-based experience) will also remain in place for States that have not yet reached a level of training maturity that would enable the introduction of CBTA. EU Member States are considered not to be part of this latter group.



The standards for licensing through CBTA will be associated with the ICAO ATC Competency Framework<sup>9</sup>. The proposed requirements for establishing a performance standard for initial training are fully in line with the ICAO concept of adaptability — there are examples of successful implementation of ab initio competency models at State level (Australia) and at ANSP level (NavCanada, Airways New Zealand) that apply to all students irrespective of the unit they will ultimately go to following the completion of initial training.

The introduction of CBTA in ATCO initial training is a step forward given the maturity of the European training and assessment system. Building on available examples of successful implementation, EU ATCO training organisations will benefit from the experience gained, thus ensuring smooth CBTA implementation.

For the issue of this Opinion, EASA considered the impact of the future ICAO Annex 1 amendment on the introduction of CBTA as a route to licensing. The ICAO proposal for amending Annex 1, including a number of new definitions and standards pertaining to CBTA, is currently at the stage of consultation. The ICAO definitions that, in the context of Annex 1, have been drawn up for all aviation disciplines, were considered and adjusted to the European ATC context.

### 2.5.2 Stakeholders' views on unit endorsements for the provision of remote aerodrome air traffic services

As part of the public consultation of NPA 2023-02<sup>10</sup> (issued in the context of this RMT (RMT.0668) and NPA 2022-02<sup>11</sup> (issued in the context of RMT.0624 'Technical requirements for the provision of remote aerodrome air traffic services'), stakeholders were asked five questions relating to licensing for ATCOs that provide multiple (simultaneous) remote ATS. EASA has considered stakeholder feedback as well as the development of the provision of multiple services within the EU ATM system, and has decided that there is no regulatory amendment relating to the provision of remote aerodrome ATS that needs to be included in this Opinion. Potential regulatory amendments relating to the provision of remote aerodrome ATS will instead be considered for future amendments to the applicable regulatory framework.

The five questions asked were as follows:

1. Should the remote centre location indicator be used in the unit endorsement?
2. Should the privilege to provide services in multiple mode of operation be indicated by the unit endorsement?
3. Should the combination of different aerodromes attended simultaneously from one remote tower module be indicated in the unit endorsement(s)?
4. Should a unit endorsement for the remote service provision in multiple mode of operation for a group of aerodromes authorise the holder to provide air traffic control services for any combination of the aerodromes included in that unit endorsement?

<sup>9</sup> ICAO Doc 9868 'Procedures for Air Navigation Services — Training'.

<sup>10</sup> [NPA 2023-02 - Training the next generation of ATCOs | EASA \(europa.eu\)](#)

<sup>11</sup> [NPA 2022-02 \(A\) and NPA 2022-02 \(B\) - Remote aerodrome air traffic services | EASA \(europa.eu\)](#)



5. Should a unit endorsement for the remote service provision in multiple mode of operation for a group of aerodromes also authorise the holder to provide air traffic control services in single mode for any of the aerodromes included in that unit endorsement?

The replies indicate that stakeholders largely agree on Questions 1, 2 and 5, whereas the answers to Questions 3 and 4 indicate differing opinions among those stakeholders that replied.

Regarding Question 1, there is no legal requirement indicating how a unit endorsement is written in the licence. Currently, some Member States indicate that an endorsement is for remote aerodrome ATS, but some others do not indicate this information in the unit endorsement. This flexibility means that the remote centre location indicator may be included in the unit endorsement, but there is no requirement to do this.

For Question 2, most of the stakeholders indicated that they wish there were an indication in the unit endorsement when multiple services may be provided. EASA considers different ways of indicating this; any decision on regulatory provisions relating to this will be included in future regulatory amendments.

The replies to Question 3 and 4 indicate that different stakeholders have different opinions on these issues, with no clear majority for a single solution.

EASA shall continue to assess the applicable regulatory framework with regard to the provision of multiple remote ATS in the context of future regulatory amendments which will be consulted in accordance with the Rulemaking Procedure.



### 3. What are the expected benefits and drawbacks of the proposed regulatory material

The expected benefits and drawbacks of the proposed regulatory material are explained in Section 2.6 of NPA 2023-02.

Although two comments from social partners questioned the appropriateness of the light impact assessment being part of the NPA, no concrete comment on the content of that assessment has been made. The draft impact assessment as consulted with the NPA is still relevant and the amendments undertaken in the subject regulatory proposal due to the comments received do not affect or alter its validity. Equally, the draft impact assessment does not require revision due to the relatively short time elapsed between the time it was consulted with the NPA and the preparation of the subject Opinion.



## 4. Proposed regulatory material

See related documents.





## 5. Monitoring and evaluation

EASA will monitor the implementation of the proposed regulations through its regular standardisation activities. The decision whether an evaluation will be necessary will be taken based also on monitoring results.



## 6. Proposed actions to support implementation

EASA will support the implementation of this proposal by either of the following actions, as appropriate:

- focused communication for Advisory Body meeting(s) targeting Advisory Body members;
- dedicated thematic meetings or workshop sessions targeting industry stakeholders and NCAs.



## 7. References

- Annex 1 ‘Personnel Licensing’ to the Convention on International Civil Aviation (Chicago Convention)
- ICAO Doc 9868 ‘Procedures for Air Navigation Services — Training’
- ICAO Doc 10056 ‘Manual on Air Traffic Controller Competency-based Training and Assessment’

