



Explanatory Note to Decision 2020/018/R

Amendment to the Acceptable Means of Compliance and Guidance Material to Part-FCL and Part-ARA of Commission Regulation (EU) No 1178/2011 ‘Basic instrument rating’

RELATED NPA/CRD: 2016-14 — OPINION No 01/2019 — RMT.0677

EXECUTIVE SUMMARY

The objective of this Decision is to address the objective established by the General Aviation (GA) Road Map, which is to work towards simpler, lighter and better rules for GA.

The key principles for the basic instrument rating (BIR) are that the training is entirely competency-based and flexible, and focuses on the practical needs of GA pilots, and that the practical training and testing standards are similar to those of the current Part-FCL CB-IR. The competency-based training is conducted through a modular training system. There are four modules: Module 1 is completed first, but the order in which Modules 2 and 3, and — if applicable — Module 4, are completed, is up to the applicant. The new AMC1 FCL.835 ‘Basic instrument rating (BIR)’ provides the competency criteria required for the relevant training modules of the BIR. Each module contains the required individual competencies. It will be up to the training organisation or instructor to determine whether the competencies have been assimilated to the required standard before allowing the candidate to progress to the next module or skill test. This will allow that the difference in learning speed of candidates can be taken into account for their progress.

In the existing AMC1 ARA.FCL.300(b) ‘Examination procedures’, new columns are added in relation to the exam length, the total number of questions, and the distribution of questions per the BIR modules.

Action area:	Systemic safety & competence of personnel		
Related rules:	Acceptable Means of Compliance (AMC) & Guidance Material (GM) to Part-FCL; Acceptable Means of Compliance (AMC) & Guidance Material (GM) to Part-ARA		
Affected stakeholders:	GA community; GA pilots; instructors; examiners; approved training organisations (ATOs); operators; competent authorities (CAs); student pilots; providers of textbooks and training material; European Central Question Bank (ECQB)		
Driver:	Efficiency/proportionality	Rulemaking group:	No, task force
Impact assessment:	Yes	Rulemaking Procedure:	Standard

● EASA rulemaking process

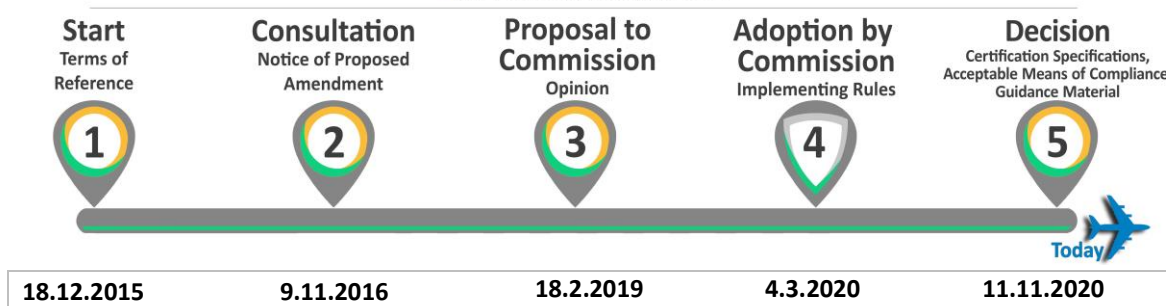


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1. About this Decision

The European Union Aviation Safety Agency (EASA) developed ED Decision 2020/018/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).0677. The scope and timescales of the task were defined in the related Terms of Reference (ToR), Issue 2. The ToR were published together with the Concept Paper 'Easier access for General Aviation (GA) pilots to instrument flight rules (IFR) flying' on the EASA website on 18 December 2015³.

The draft text of this Decision has been developed by EASA with the support of the 'GA IFR flying Task Force' (TF). The TF comprised experts from national aviation authorities (NAAs) (the French DGAC, the UK CAA, the Swedish CAA, the Austrian CAA (Austro Control)) and the GA community (Europe Air Sports (EAS), European Regional Aerodromes Community (ERAC) and International Aircraft Owners and Pilots Association (Europe) (IAOPA Europe)). All the interested parties were consulted through NPA 2016-14 'Easier access for general aviation pilots to instrument flight rules flying'⁴. 435 comments were received from 59 interested parties, including industry, NAAs and the GA community.

EASA reviewed the comments received during the public consultation with the support of the TF. The comments received and the EASA responses to them are presented in Comment-Response Document (CRD) 2016-14⁵. Based on the comments received, EASA published Opinion No 01/2019 (A) on 19 February 2019 which was addressed to the European Commission. The related EU regulation (Commission Implementing Regulation (EU) 2020/359) was adopted on 4 March 2020⁶.

The final text of this Decision, with the AMC and guidance material, has been developed by EASA based on the input of the TF.

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 [http://www.easa.europa.eu/system/files/dfu/ToR%20\(%2B%20Concept%20Paper\)%20RMT.0677%20Issue%202.pdf](http://www.easa.europa.eu/system/files/dfu/ToR%20(%2B%20Concept%20Paper)%20RMT.0677%20Issue%202.pdf)

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

⁵ <http://easa.europa.eu/document-library/comment-response-documents>

⁶ Commission Implementing Regulation (EU) 2020/359 of 4 March 2020 amending Regulation (EU) No 1178/2011 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 67, 5.3.2020, p. 82) (<https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1598611764272&uri=CELEX:32020R0359>).

2. In summary — why and what

2.1. Why we need to amend the AMC & GM — issue/rationale

The goal of the EASA General Aviation Road Map⁷ is to work towards simpler, lighter and better rules for GA. During the 2014 EASA Safety Conference on GA, the topic of ‘easier access of GA pilots to IFR flying’ was identified by the GA community as an important initiative to improve the safety and utility of GA flying. This was in response to the safety concerns and the views of the GA community that the current regulatory regime for many aspects of IFR flying should be made more proportionate.

Historically, the level of GA IFR flying activity in Europe has been low compared to that in the USA. While this disparity can to some extent be explained by factors unrelated to the regulatory regime, there is some evidence suggesting that amending the relevant European regulations may facilitate growth in this area.

With better and easier access to IFR flying, GA pilots would be able to plan A-B flights with more confidence of safe completion. They would be less vulnerable to changing weather conditions and the associated risk of continuous visual flight rules (VFR) flights into instrument meteorological conditions (IMC). As well as increasing the safety and resilience of GA flying, better and easier access to IFR flying will also reduce the complexity of longer flights, which often require extensive planning and contingency provisions to be executed under VFR. Instrument flight rules (IFR) flight planning for longer A-B flights is often more straightforward — thus encouraging pilots to conduct flights that they might otherwise have not attempted. This will bring safety and economic benefits.

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 the amendments introduced is to establish a more proportionate training path for GA pilots to gain an instrument flying qualification by introducing the BIR. The amendments reflect on the principles of a proportionate and competency-based approach throughout the different regulatory domains, so as to address the needs of GA pilots as much as possible.

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

2.3.1 Scope of the basic instrument rating (BIR)

The target audience for the BIR are GA pilots that fly single-pilot GA aeroplanes under their class rating for non-commercial operations. The BIR is intended to encourage GA pilots to conduct A-B flights under IFR.

2.3.2 Key principles for the BIR

The key principles for the BIR are as follows:

- Training that is entirely competency-based. There will be no minimum hours requirement set for the BIR. Instead, the required competencies that a GA pilot needs for an IFR flight are

⁷ <https://www.easa.europa.eu/easa-and-you/general-aviation/general-aviation-road-map>

grouped into three modules of training, with an optional fourth module. Candidates will progress to the next module or skill test when ready to do so.

- Training that is flexible. The core module of instrument flying skills must always be completed first, and after having done so, the candidate may choose which further module to tackle next, within a timescale that suits them. This takes into account the fact that GA pilots may often not have the time or financial resources to commit to a more conventional continuous course of training towards the IR.
- Focus on the practical needs of GA pilots. Holders of the BIR should feel confident to use it to the full extent of its privileges. While IFR flights have many safety advantages, it is central to the BIR philosophy to assess the risks of a particular flight in a more systematic way. To this end, the training will be focused on the real-world instrument flying needs of GA pilots, with particular emphasis on practical application of threat and error management. This will ensure that the full safety and utility benefits of IFR flight are reaped.
- High standards of training and testing. Despite the focus on GA needs, practical training and testing standards will be similar to those of the current Part-FCL CB-IR and EIR (which is removed with Regulation (EU) 2020/359), particularly with regard to interaction with other airspace users. It is very important that GA pilots who fly under IFR have the required competencies for this.

2.3.3 Training structure

The competency-based training is conducted through a modular training system. There are four modules: Module 1 is completed first, but the order in which Modules 2 and 3, and — if applicable — Module 4, are completed is up to the applicant (see point FCL.835).

- Module 1 provides the foundation of instrument flying competencies: the core flying training module of flight handling skills by sole reference to instruments. A course completion certificate will be issued after an acceptable standard has been reached and before the pilot is allowed to commence further training modules.
- Module 2 introduces 2D and 3D instrument approach procedures such as non-directional radio beacon (NDB), instrument landing system (ILS), performance-based navigation (PBN) (for example, global navigation satellite system (GNSS), etc.), standard instrument arrival (STAR), and standard instrument departure (SID).
- Module 3 includes en route flight under IFR.
- Module 4 — with one engine inoperative, if a multi-engine BIR is sought, this module includes asymmetric instrument approach and go-around procedures.

Each module contains the required individual competencies. It will be up to the training organisation or instructor to determine whether the competencies have been assimilated to the required standard before allowing the candidate to progress to the next module or skill test. This will allow that the difference in learning speed of candidates can be taken into account for their progress.

2.3.4 Theoretical knowledge (TK) and examination procedures

To ensure a better fit to the BIR course structure (compared to the CB-IR), training Modules 1 to 3 are supported by theoretical knowledge examinations incorporating the relevant learning objectives



(LOs), resulting in a total of three focused theoretical knowledge (TK) examinations. Each TK examination consists of a ‘paper’ addressing parts of three or more TK subjects, so the exams cut across the traditional seven subjects required to be covered for this rating.

The TK syllabus has been reviewed to remove topics that should already have been examined with the private pilot licence (PPL), and focuses on LOs that are appropriate for the safe operation of GA aircraft in IMC or under IFR.

EASA wishes to make the theoretical examination process as straightforward as possible. The questions will be taken from the relevant areas of the European Central Question Bank (ECQB), otherwise the BIR would require entirely new questions, and a delayed introduction of the BIR in the ECQB. It is intended that EASA Member States will adopt a secure process that would allow the exams to be conducted at exam venues, including training organisations, that are equipped with the appropriate technology and resources to meet the ECQB requirements as set out in point ARA.FCL.300.

2.3.5 Amendments to the AMC & GM to Part-FCL

GM1 FCL.010 Abbreviations

In GM1 FCL.010 Abbreviations the definition of BIR has been added.

AMC1 FCL.310; FCL.515(b); FCL.615(b); FCL.835(d) Theoretical knowledge examinations

AMC1 FCL.310; FCL.515(b); FCL.615(b) Theoretical knowledge examinations has been replaced by AMC1 FCL.310; FCL.515(b); FCL.615(b); FCL.835(d) Theoretical knowledge examinations.

This replaced AMC is in fact the consolidated *AMC1 FCL.310; FCL.515(b); FCL.615(b) Theoretical knowledge examinations* (as amended through ED Decision 2018/001/R of 8 February 2018; ED Decision 2018/011/R of 6 November 2018; and ED Decision 2019/017/R of 28 August 2019) together with the amendments related to the BIR and the removal of the EIR. It also incorporates a very small number of editorial corrections to the LOs.

Regarding the amendments related to the BIR:

- The reference to point FCL.835(d) has been included in the title of the AMC.
- References to the EIR have been deleted and references to the BIR have been made in the introductory text. In this introduction, it is explained that the applicable LOs for each airline transport pilot licence (ATPL), commercial pilot licence (CPL), IR, CB-IR(A) are marked with an ‘X’, and those for the BIR exam and BIR basic knowledge (BK) with the numbers 1, 2 or 3 (corresponding to the modules as mentioned in point FCL.835 ‘Basic instrument rating (BIR)’).
- The detailed theoretical knowledge syllabus, which is covered in the appendices to this AMC, outlines the topics that should be taught and examined in order to meet the theoretical knowledge requirements appropriate to the ATPL, MPL, CPL, IR, CB-IR(A) and BIR. All the tables in these appendices have now two additional columns, one for the BIR exam and one for the BIR BK. In compliance with point FCL.615(b), as per point FCL.835(d), only in Subjects 010 (air law), 022 (aircraft general knowledge — instrumentation), 033 (flight planning and monitoring), 040 (human performance), 050 (meteorology), 062 (radio navigation), and 090 (communications), a corresponding module number is found.



- The use of ‘BK’ for the BIR is different than that for the other exam categories and therefore it has its own dedicated column. The range of LOs to be covered in the BIR training modules is significantly more extensive than the range to be addressed in the TK exams. All LOs associated with a training module in the ‘BIR’ column must be included in the training course and will also be relevant for a BIR TK exam. All LOs that are indicated as ‘BK’ for the BIR must be included in the training course but will not be specifically addressed in a BIR TK exam. For some LOs, the topic is relevant to more than one training module, and therefore it will be associated both with the ‘BIR’ and ‘BIR BK’ columns. Such LOs will only be examined under one TK module exam, in order to ensure the integrity of the examination system.
- The BIR makes use of the same syllabus as the other exam categories, where LOs grouped in the same part of the syllabus ‘belong’ together. Although the modular structure of the BIR cuts across the seven subjects, for exam purposes it does this at the level of syllabus topic (e.g. 010 05 00 00 Rules of the Air according to ICAO Annex 2 and SERA). For example, LOs in 010 05 00 00 are relevant to Modules 1-3 for training purposes but will only be examined in the paper for Module 3. Again, this supports exam integrity by ensuring that the LO and associated questions will only be used for one of the exam papers. The exam blueprints are set out in AMC1 ARA.FCL.300(b).

Regarding the editorial amendments to the LOs in general:

- Subjects 010, 032, 050 and 070: Detailed references have been removed from the LOs and are available via a separate Source document on the ECQB webpage of the EASA website. The preamble of AMC1 FCL.310; FCL.515(b); FCL.615(b); FCL.835(d) still contains information on the references. It is important that the syllabus and LOs remain current, and stay aligned with any amendments made to those regulatory documents. In some cases, amendments have been made that do not affect the content of the rule/standard, but only change its number/title. In other cases, the amendments do not require a re-wording of the Part-FCL LO. As updating EASA AMC & GM must be performed in accordance with the Rulemaking Procedure, there is a risk that the syllabus and LOs become misaligned with the relevant legal material, without frequent updates. In order to reduce the need for frequent amendments to AMC1 FCL.310; FCL.515(b); FCL.615(b); FCL.835(d), EASA has removed the detailed source references directly within the LOs; it instead provides them in a separate document made available on the EASA website⁸. This is a gradual process and has been applied in the first instance to Subjects 010, 032 and 070.
- Subject 010: LOs 010 13 03 01 (03), (04), (05) and (06) have been edited to remove the explicit reference to articles of Regulation (EU) No 376/2014⁹, as the information has been transferred along with the source reference to the source document mentioned above.
- Subject 021: LO 021 04 01 02 (03) has been edited to refer to ‘a diagram’ Stakeholders are encouraged to look at the ECQB page on the EASA website, where sample annexes are provided for students to consult.

⁸ See <https://www.easa.europa.eu/domains/aircrew-and-medical/european-central-question-bank-ecqb>

⁹ Regulation (EU) No 376/2014 of the European Parliament and of the Council of 3 April 2014 on the reporting, analysis and follow-up of occurrences in civil aviation, amending Regulation (EU) No 996/2010 of the European Parliament and of the Council and repealing Directive 2003/42/EC of the European Parliament and of the Council and Commission Regulations (EC) No 1321/2007 and (EC) No 1330/2007 (OJ L 122, 24.4.2014, p. 18) (<https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1598616156077&uri=CELEX:32014R0376>).



- Subject 032: LO 032 04 01 07 (02) has been edited to remove the reference to rime, reflecting amendments in the SNOWTAM format of ICAO Doc 10066.
- Subject 033: LO 033 03 01 01 (05) on the fuel policy for VFR and IFR flights has been split into two separate LOs, one on VFR flights (05) and a new one on IFR flights (08).
- Subject 050: LO 050 02 02 01 (06) applicability has been removed for the CB-IR.
- Subject 070: LO 071 02 12 03 (03) has been made applicable to the ATPL(A), CPL(A), ATPL(H)/IR, ATPL(H)/VFR and CPL(H), as indicated in NPA 2016-03(E) but by error not included in previously published EASA Executive Director Decisions. LO 071 01 02 06 (02) is applicable only to the ATPL(A) and CPL(A) exams, and the crosses against the ATPL(H)/IR, ATPL(H)/VFR and CPL(H) have been removed as there are no applicable OPS requirements.

Edits to LOs on the North Atlantic High Level Airspace have been made considering the 2020 version of NAT Doc 007. Minor edits have been made to LOs 071 01 03 03 (10), (24), (25), (27), (28), (29), (39), (40). LO 071 01 03 03 (17) has been deleted as the recommendation no longer exists in NAT Doc 007. LO 071 01 03 03 (20) has been edited to focus on in-flight equipment failure. In LOs 071 01 03 03 (49) and (51), the offset/deviation is 5 NM.

GM1 FCL.310; FCL.515(b); FCL.615(b); FCL.835(d) Theoretical knowledge examinations

The reference to point FCL.835(d) has been included in the title of this GM.

AMC1 FCL.615(b) IR – Theoretical knowledge and flight instruction

References to the EIR have been deleted and references to the BIR have been added.

AMC1 FCL.720.A(b)(2)(i) Experience requirements and prerequisites for the issue of class or type ratings – aeroplanes

References to the EIR and point FCL.825 have been deleted.

AMC2 FCL.720.A(b)(2)(i) Experience requirements and prerequisites for the issue of class or type ratings – aeroplanes

References to the EIR and point FCL.825 have been deleted.

AMC & GM to FCL.825

All the AMC and GM to point FCL.825 En Route instrument rating (EIR) have been deleted.

AMC1 FCL.835 Basic instrument rating (BIR)

The new AMC1 FCL.835 Basic instrument rating (BIR) has been added which provides the competency criteria required for the relevant training modules of the BIR as explained in 2.3.3.

2.3.6 Amendments to the AMC & GM to Part-ARA

AMC1 ARA.GEN.300(a);(b);(c) Oversight

In *AMC1 ARA.GEN.300(a);(b);(c) Oversight*, there was an editorial omission with regard to the numbering of the points of the AMC. This has now been corrected.

AMC1 ARA.FCL.300(b) Examination procedures

In *AMC1 ARA.FCL.300(b) Examination procedures*, the references to the EIR have been deleted and replaced by those to the BIR.

In the tables for the different subjects of the theoretical knowledge examination, three new columns have been added regarding the BIR.

The theoretical knowledge examination tables show the exam length, the total number of questions, and the distribution of questions. This was already the case for the tables related to ATPL(A), CPL(A), ATPL(H)/IR, ATPL(H), CPL(H), IR(A), IR(H), and CB-IR(A) (and EIR which is now deleted). This is now also the case for the following three BIR modules: BIR M01; BIR M02 and BIR M03.

Regarding the exam length (time allowed (hours) in the first row of each subject) of the three BIR modules: BIR M01; BIR M02 and BIR M03, as the BIR exams combine multiple subjects, the exam length is set out in the new AMC2 ARA.FCL.300(b).

Regarding the distribution of questions with regard to the topics of the syllabus, there is 'XX' when there are no questions, or a number indicating the amount of questions allocated to this subject.

AMC2 ARA.FCL.300(b)

In the new added AMC2 ARA.FCL.300(b), the total time allowed and the total number of questions for the BIR examinations are specified.

The BIR examinations have to comply with point FCL.615(b), as per point FCL.835(d), so the BIR module exams can only cover Subjects 010 (air law), 022 (aircraft general knowledge — instrumentation), 033 (flight planning and monitoring), 040 (human performance), 050 (meteorology), 062 (radio navigation), and 090 (communications).



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. 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’
- 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’

3.3. Other reference documents

- 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)
- General Aviation Road Map (<http://easa.europa.eu/easa-and-you/general-aviation>)



4. Related document

CRD 2016-14

