



Explanatory Note to ED Decision 2025/002/R

issued in accordance with Article 4(2) of MB Decision No 01-2022

Requirements for relief pilots (RMT.0190)

Regular update of Part-MED, of Part-ARA Subpart ARA.AeMC and ARA.MED, and of Part-ORA Subpart ORA.AeMC, as well as of the related AMC and GM (RMT.0287)

Regular update of regulations regarding pilot training, testing and checking and the related oversight (RMT.0587)

Simpler, lighter and better flight crew licensing requirements for general aviation (RMT.0678)

EXECUTIVE SUMMARY

This Decision encompasses amendments to the acceptable means of compliance (AMC) and guidance material (GM) to Regulations (EU) No 1178/2011 and (EU) No 965/2012, as developed through the rulemaking tasks referred to in the title of this explanatory note, including all the following:

- amendments to ensure that cruise relief co-pilots (CRCPs) are adequately trained to safely operate an aeroplane in the cruise segment of a flight, and that appropriate operating procedures are established for the transfer of authority from the commander to the CRCP;
- amendments aiming to improve the level of safety and clarify already existing text, in order to make the regulatory framework more precise and effective, to fill the gaps identified through the implementation experience and to remove unnecessary burden for competent authorities, aero-medical examiners (AMEs) and aero-medical centres (AeMCs);
- amendments aiming to safely increase the pilot age limit for pilots involved in single-pilot helicopter emergency medical services (HEMS) operations, which are expected to have a positive social impact on the patients in need of helicopter emergency intervention, by increasing the coverage of HEMS operations, and on the pilots who will have the possibility to retire at an age closer to the legal retirement age;
- amendments concerning updates, improvements and clarifications on miscellaneous topics, such as helicopter training topics (vortex ring stage), PBN training, multi-pilot operation in single-pilot aircraft, TRI training, and licence endorsements;
- amendments to provide updates, improvements and clarifications on miscellaneous topics in the field of flight crew licensing (FCL) for general aviation, such as pilot privileges for electrically powered aeroplanes, credits for private pilot licence (PPL) applicants who have started light aircraft pilot licence (LAPL) training, LAPL and PPL training, and non-complex helicopter type rating revalidation via refresher training.

These amendments are expected to improve the regulatory framework as regards the above-listed areas through updates, clarifications, and through addressing proportionality issues, while maintaining a high level of safety.

ED DECISIONS TO BE AMENDED

- ED Decision 2011/016/R 'AMC & GM to Part-FCL'
- ED Decision 2012/006/R 'AMC & GM to Part-ARA'
- ED Decision 2012/007/R 'AMC & GM to Part-ORA'
- ED Decision 2018/009/R 'AMC & GM to Part-DTO'
- ED Decision 2014/017/R 'AMC & GM to Part-ORO'
- ED Decision 2012/019/R 'AMC & GM to Part-SPA'
- ED Decision 2011/015/R 'AMC & GM to Part-MED'

AFFECTED STAKEHOLDERS

Pilots; instructors; examiners; ATOs; DTOs; operators; AeMCs; NCAs

WORKING METHODS

Development	Impact assessment(s)	Consultation
RMT.0190, RMT.0287: by EASA with external support RMT.0587, RMT.0678: by EASA	RMT.0190: Detailed RMT.0587, RMT.0678: Light RMT.0287: Light (Subtask 2a); Detailed (Subtask 2b)	RMT.0190: NPA — Public and focused RMT.0287: NPA — Public (Subtask 2a); NPA — Focused (Subtask 2b) RMT.0587: NPA — Focused RMT.0678: NPA — Public and focused

RELATED DOCUMENTS / INFORMATION

- RMT.0190: [ToR RMT.0190](#), [NPA 2014-25](#); RMT.0287: [ToR RMT.0287](#), [NPA 2017-22](#); RMT.0587: [ToR RMT.0587](#), [NPA 2023-104](#); RMT.0678: [ToR RMT.0678](#); [NPA 2017-22](#)
- [Opinion No 05/2023](#)

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



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1. About this Decision

The European Union Aviation Safety Agency (EASA) identified the need to address the issues described in Chapter 2, and after having assessed the impacts of the possible intervention actions, identified rulemaking as the necessary intervention action.

EASA has developed this Decision as a result of the following rulemaking tasks (RMTs), which are included in Volume II of the European Plan for Aviation Safety (*EPAS Actions 2025 Edition*)¹:

RMT.0190 Requirements for relief pilots

RMT.0287 Update of pilot age limits for HEMS pilots, including mitigating measures in Part-MED and Regulation (EU) No 965/2012, regular update of Part-ARA Subparts ARA.AeMC and ARA.MED, and of Part-ORA Subpart ORA.AeMC, as well as of the related acceptable means of compliance (AMC) and guidance material (GM).

RMT.0587 Regular update of regulations regarding pilot training, testing and checking, and related oversight

Note: The deliverables of RMT.0587 also include some AMC and GM elements originally developed with EASA RMT.0196 (implementing rules and associated AMC and GM related to extended recurrent evaluation periods for FSTDs), since in the interest of an early implementation those elements were decided to be processed with RMT.0587 and the related rule changes are already included in amending Regulation (EU) 2024/2076².

RMT.0678: Simpler, lighter and better flight crew licensing requirements for general aviation

Although all of the above-listed RMTs address different issues, which are largely not interrelated, they all propose amendments to AMC and GM related to the same regulation (Regulation (EU) No 1178/2011³ and, in the case of RMT.0190, Regulation (EU) No 965/2012⁴).

EASA developed the regulatory material in question in line with Regulation (EU) 2018/1139⁵ (the Basic Regulation) and the Rulemaking Procedure⁶, as well as in accordance with the objectives and working

¹ [European Plan for Aviation Safety \(EPAS\) 2025 - 14th edition | EASA](#)

² Commission Implementing Regulation (EU) 2024/2076 of 24 July 2024 amending Regulations (EU) No 1178/2011 and (EU) No 965/2012 as regards the clarification of requirements for cruise relief co-pilots, updates of requirements for flight crew licensing and medical certification, and improvements for general aviation (OJ L, 2024/2076, 25.7.2024) (http://data.europa.eu/eli/reg_impl/2024/2076/oj).

³ 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) (<http://data.europa.eu/eli/reg/2011/1178/oj>).

⁴ Commission Regulation (EU) No 965/2012 of 5 October 2012 laying down technical requirements and administrative procedures related to air operations pursuant to Regulation (EC) No 216/2008 of the European Parliament and of the Council (OJ L 296, 25.10.2012, p. 1) (<http://data.europa.eu/eli/reg/2012/965/oj>).

⁵ 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) (<http://data.europa.eu/eli/reg/2018/1139/oj>).

⁶ 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,



methods described in the Terms of Reference (ToR) for these RMTs^{7,8,9,10}. In the case of RMT.0190, EASA was supported by a rulemaking group (RMG) that included experts from both national competent authorities (NCAs) and industry.

The draft regulatory material was consulted in accordance with the ToR for these RMTs, as detailed below:

RMT.0190

NPA 2014-25¹¹, followed by a focused consultation meeting with the EASA Advisory Bodies in June 2022

RMT.0287

Subtask 2a: NPA 2017-22¹²

Subtask 2b: Focused consultation workshop with the EASA Advisory Bodies on 5 May 2022

RMT.0587

Focused consultation with the EASA Advisory Bodies (consultation meeting in June 2022), followed by a written consultation with the EASA Advisory Bodies (NPA 2024-104¹³)

RMT.0678 NPA 2020-14¹⁴, followed by a focused consultation meeting with the EASA Advisory Bodies in June 2022

Additionally, certain draft GM (GM1 Appendix 9 Section A point 1c) for contextual reasons was already included for consultation with the Advisory Bodies in NPA 2023-104¹⁵ (re-consultation of selected draft Regulation text prior to the publication of Opinion No 05/2023¹⁶).

EASA reviewed the comments received and duly considered them for the preparation of the regulatory material presented here.

EASA published Opinion No 05/2023 on 13 October 2023, proposing amendments to Regulations (EU) No 1178/2011 and (EU) No 965/2012, based on which the European Commission adopted Implementing Regulation (EU) 2024/2076 on 24 July 2024 amending those Regulations.

certification specifications and other detailed specifications, acceptable means of compliance and guidance material ('Rulemaking Procedure'), and repealing Management Board Decision No 18-2015 ([EASA MB Decision No 01-2022 on the Rulemaking Procedure, repealing MB Decision 18-2015 \(by written procedure\) | EASA \(europa.eu\)](#)).

⁷ [ToR RMT.0190 & RMT.0191 \(FCL.004\(a\)&\(b\)\) - Requirements for relief pilots | EASA](#)

⁸ [ToR RMT.0287 \(MED.001\) - Regular update of Part-MED, Subparts ARA.AeMC and ARA.MED of Part-ARA, and Subpart ORA.AeMC of Part ORA, as well as of the related AMC and GM | EASA](#)

⁹ [ToR RMT.0587 - Regular update of Regulations \(EU\) Nos 1178/2011 and 965/2012 regarding pilot training and licensing and the related oversight | EASA](#)

¹⁰ [ToR RMT.0678 - Simpler, lighter and better Part-FCL requirements for general aviation | EASA](#)

¹¹ [NPA 2014-25 - Requirements for relief pilots | EASA](#)

¹² [NPA 2017-22 - Updating Part-MED and related AMC and GM \(Subpart ARA.MED \(Annex VI\) and Subpart ORA.AeMC \(Annex VII\) to the Aircrew Regulation\) | EASA](#)

¹³ [NPA 2024-104 - Regular update of regulations regarding pilot training, testing and checking, and the related oversight | EASA](#)

¹⁴ [NPA 2020-14 - Simpler, lighter and better Part-FCL requirements for general aviation | EASA](#)

¹⁵ [NPA 2023-104 - Regular update of regulations regarding pilot training, testing and checking, and the related oversight | EASA](#)

¹⁶ [Opinion No 05/2023 - Cruise relief co-pilots | Regular update of flight crew licensing and medical requirements | Better flight crew licensing requirements for general aviation | EASA](#)



2. In summary — why and what

2.1. Why we need to act

Please refer to Section 2.1 of Opinion No 05/2023.

AMC and GM to Regulation (EU) No 1178/2011 and Regulation (EU) No 965 /2012 need to be updated and complemented to support amendments to implementing rules (Regulation (EU) 2024/2076, adopted on the basis of Opinion No 05/2023), and to address further issues within the scope of RMT.0190, RMT.0287, RMT.0587, and RMT.0678.

2.2. What we want to achieve — objectives

The overall objectives of the EASA system are defined in Article 1 of the Basic Regulation.

More specifically, with the regulatory material presented here, EASA intends to support the application of the amendments to Regulations (EU) No 1178/2011 and (EU) No 965/2012, the detailed objectives of which are explained in Section 2.2 of EASA Opinion No 05/2023.

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

The table in Chapter 6 provides a short overview of all the AMC and GM to Regulation (EU) No 1178/2011 and Regulation (EU) No 965/2012 that are amended or, in some cases, newly introduced. For a detailed description of and the rationale behind all amendments, please refer to the rationale text boxes which can be found after each amendment in Appendices 1 to 8 to this Explanatory Note.

2.4. What are the stakeholders' views

During the consultations of the draft regulatory material as specified in Section 1.1, comments were received from interested parties, including industry, NCAs and stakeholder organisations. EASA reviewed the comments received and duly considered them.

With regard to comments received during the consultations specified in Section 1.1 on proposed amendments to implementing rules as well as associated AMC and GM, please refer to Section 2.4 of Opinion No 05/2023 for an overview of these comments as well as for information on how these comments were addressed.

Additionally, taking into consideration the reconsultation through NPA 2024-104 and the discussions held in the EASA Committee on Opinion No 05/2023, the following essential comments and changes to the final AMC & GM text are highlighted:

RMT.0587

- Based on one comment received, the text in AMC1 to Appendix 3, Section E, point (c)(3) is further amended to clarify that engine shutdown and restart should be carried out at a safe altitude unless carried out in an FSTD, for consistency with other places in that AMC related to the same exercise.
- One commentator proposed to further amend AMC1 FCL.930.IRI to include in-aircraft training if the applicant for an IRI certificate intends to exercise the privileges of the IRI certificate in the aircraft. EASA has noted down the need to comprehensively clarify the IRI training



arrangements in this regard with RMT.0194. For this AMC amendment however, that comment cannot be accepted, since it would result in the AMC continuing to be not in line with the rule (which allows the IRI training course to be completed entirely in an FSTD). No further change to AMC1 FCL.930.IRI is made.

- One commentator proposed to add text to draft point (a)(3) of AMC2 ORA.FSTD.225(b), for the FSTD operator to provide the competent authority with a confirmation of the independence of the persons assigned in accordance with point ORA.FSTD.225(b). The commentator argued that it is not sufficient to refer to such independence of assigned persons solely at GM level. The comment cannot be accepted, since point ORA.FSTD.225(b) does not contain a requirement for independence of the assigned persons, hence the confirmation for such independence cannot be provided for at AMC level. Although at GM level such independence is identified to be beneficial (see the new GM1 ORA.FSTD.225(b)), there was no intention for the implementing rules to establish a related requirement, especially with a view to smaller FSTD operators with a low number of employees, where such ‘absolute’ independence of individual employees may not be possible. No further change to AMC2 ORA.FSTD.225(b) is made.

RMT.0287

- Following the discussions in the EASA Committee, a few changes have been made in the wording of the proposed AMC and GM especially those related to the operational mitigation measures regarding the increase of the pilot age limit for pilots involved in single-pilot HEMS operations in order to clarify the intent of these provisions.



3. Expected benefits and drawbacks of the regulatory material

3.1. RMT.0190

Please refer to the impact assessment included in NPA 2014-25, which, after review, is considered to be still valid for this ED Decision.

3.2. RMT.0287

The amendments proposed with Subtask 2a (regular updates) comprise corrections, clarifications, updates and alleviations, and therefore by nature do not constitute major changes. For more details, please refer to Chapter 4 'Impact assessment' of NPA 2017-22.

As regards Subtask 2b (pilot age), the potential impact was assessed and consulted with the EASA Advisory Bodies. As a result, the Agency decided to limit the scope of this task to the pilots involved in single-pilot HEMS operations. This decision was based on the potential negative impact on the possibility to conduct all the needed life-saving HEMS missions due to the insufficient number of HEMS pilots expected in the near future, and on the fact that some specificities of the HEMS operations may act as mitigating measures to ensure that the level of safety is maintained. The BIS identified that the updates proposed with Subtask 2b would provide multiple benefits, which are summarised below.

- Positive social impact on the general population by allowing more HEMS missions to be conducted, and, consequently, more people in need of emergency medical care to benefit from them.
- Positive social impact on pilots by allowing the existing population of HEMS pilots to have the opportunity to work until the age of 65.
- Elimination of the need for exemptions and related workload for HEMS operators, NCAs and the Agency.
- Collection of aggregated anonymised data to analyse health trends to facilitate the safety assessment for alleviation of pilot age limits for other categories of commercial pilots.

3.3. RMT.0587

The amendments proposed with RMT.0587 (regular updates) comprise corrections, clarifications, updates and alleviations that are expected to provide minor benefits and are not expected to result in any drawbacks.

3.4. RMT.0678

Please refer to the impact assessment included in NPA 2020-14 which, after review, is considered to be still valid for this ED Decision. Further changes that were applied to the draft AMC and GM constitute further improvements, clarifications and alleviations.



4. Monitoring and evaluation

The regulatory material presented here will support the application of the amendments to Commission Regulation (EU) No 1178/2011 and Commission Regulation (EU) No 965/2012. EASA will monitor whether the objectives of it will be achieved as part of the monitoring and evaluation actions described in Chapter 5 of EASA Opinion No 05/2023.



5. Proposed actions to support implementation

The regulatory material presented here will support the application of the amendments to Commission Regulation (EU) No 1178/2011 and Commission Regulation (EU) No 965/2012. EASA will support the implementation of it as part of the actions proposed in Chapter 6 of EASA Opinion No 05/2023.



6. List of all amended AMC and GM

Reference	Topic	Status	RMT
Regulation (EU) No 1178/2011			
GM1 Article 2(8c)	Definitions (SEP aeroplanes with different engine types)	New	RMT.0678
Annex I (Part-FCL) to Regulation (EU) No 1178/2011			
GM1 FCL.010	Definitions (SEP aeroplanes with different engine types)	Amended	RMT.0678
AMC1 FCL.015	Application and report forms	Amended	RMT.0678
GM1 FCL.020(a)	Use of SEP aeroplanes with different engine types during a training course	New	RMT.0678
AMC1 FCL.025(a)	Issuance of the recommendation for theoretical knowledge examination	New	RMT.0587
GM1 FCL.025	Terminology	Amended	RMT.0587
GM1 FCL.035(b)(6)(ii)	Cases of credits for VFR communications or IFR communications	New	RMT.0587
AMC1 FCL.050	Recording of flight time	Amended	RMT.0190 RMT.0678
GM1 FCL.060(b)(1)	Recent experience	Amended	RMT.0678
AMC1 FCL.060(b)(5)	Recent experience	Amended	RMT.0678
AMC1 FCL.115	Flight instruction for the LAPL(A)	Amended	RMT.0678
AMC2 FCL.115	Flight instruction for the LAPL(H)	Amended	RMT.0587 RMT.0678
AMC1 FCL.115(c)	LAPL training course — Change of training organisation	Amended	RMT.0678
AMC1 FCL.115; FCL.120	Syllabus of theoretical knowledge for the LAPL	Amended	RMT.0678



AMC1 FCL.125; FCL.235	Skill test for LAPL(S) and SPL	Deleted	RMT.0678
AMC2 FCL.125; FCL.235	Skill test for LAPL(B) and BPL	Deleted	RMT.0678
AMC1 FCL.115.A	LAPL(A) – Crediting for prior experience as PIC	Amended	RMT.0678
AMC1 FCL.135.A(b)	LAPL(A) – Differences training for variants within the SEP aeroplane class with an electric engine system	New	RMT.0678
GM1 FCL.140.A	LAPL(A) – Safety awareness briefing before refresher training or proficiency checks	New	RMT.0678
AMC1 FCL.140.A; FCL.140.S; FCL.740.A(b)(1)(ii)	Recency and revalidation requirements	Deleted	RMT.0587
AMC1 FCL.140.A; FCL.140.H; FCL.140.S; FCL.140.B	LAPL(A) – Content of the refresher training	Amended	RMT.0678
AMC1 FCL.140.A(b)(1)	LAPL(A) – Recency requirements	Amended	RMT.0587
AMC1 FCL.110.H(b)	LAPL(H) – Crediting for prior experience as PIC	Amended	RMT.0678
AMC1 FCL.140.H(b)(1)	LAPL(H) – Recency requirements	Amended	RMT.0678
GM1 FCL.140.H	LAPL(H) – Safety awareness briefing before refresher training or proficiency checks	New	RMT.0587
AMC1 FCL.140.H(a)(1)(ii)	LAPL(H) – Content of the refresher training	New	RMT.0678
AMC1 FCL.110.S	LAPL(S) – Experience requirements and crediting	Deleted	RMT.0678
AMC1 FCL.110.S; FCL.210.S	<i>No title</i>	Deleted	RMT.0678
AMC1 FCL.135.S; FCL.205.S(a)	<i>No title</i>	Deleted	RMT.0678



AMC1 FCL.140.S(c)(1)	LAPL(S) – Recency requirements	Deleted	RMT.0678
AMC1 FCL.110.B	LAPL(B) – Experience requirements and crediting	Deleted	RMT.0678
AMC1 FCL.110.B; FCL.210.B	<i>No title</i>	Deleted	RMT.0678
AMC1 FCL.130.B; FCL.220.B	<i>No title</i>	Deleted	RMT.0678
AMC1 FCL.135.B; FCL.225.B	<i>No title</i>	Deleted	RMT.0678
AMC2 FCL.135.B; FCL.225.B	<i>No title</i>	Deleted	RMT.0678
AMC3 FCL.135.B; FCL.225.B	<i>No title</i>	Deleted	RMT.0678
AMC1 FCL.140.B(b)(1)	LAPL(B) – Recency requirements	Deleted	RMT.0678
AMC1 FCL.210	Flight instruction for the PPL(A)	Amended	RMT.0678
AMC2 FCL.210	Flight instruction for the PPL(H)	Amended	RMT.0587 RMT.0678
AMC3 FCL.210; FCL.215	Training course and theoretical knowledge examination (BPL, SPL)	Deleted	RMT.0678
GM1 FCL.205.A(a); FCL.205(H)(a); FCL.305(a)(1); FCL.505(a)(1)	Exercising LAPL privileges when holding a PPL, CPL or an ATPL	New	RMT.0587
AMC1 FCL.210.A(b)	PPL(A) training for applicants who hold an LAPL(A) or who have undergone LAPL(A) training	New	RMT.0678
AMC1 FCL.210.H(b)	PPL(H) training for applicants who hold an LAPL(H) or who have undergone LAPL(H) training	New	RMT.0678
AMC1 FCL.205.S(b)	SPL – Privileges and conditions	Deleted	RMT.0678



AMC1 FCL.205.B(b)	BPL – Privileges and conditions	Deleted	RMT.0678
AMC1 FCL.225.B	BPL – Extension of privileges to another balloon class	Deleted	RMT.0678
AMC1 FCL.230.B(c)(1)	BPL – Recency requirements	Deleted	RMT.0678
AMC1 FCL.615(a)	Training on PBN operations as part of IR training courses	New	RMT0587
AMC1 FCL.615(b)	IR syllabus (CB-IR)	Amended	RMT.0587
GM1 FCL.700	List of class ratings (electric aeroplanes)	Amended	RMT.0678
GM1 FCL.710	Class and type ratings – variants	Amended	RMT.0587
AMC1 FCL.710(a)	Differences training for variants within the SEP aeroplane class with an electric engine system	New	RMT.0678
AMC1 FCL.725(a)	Syllabus of the theoretical knowledge for class and type ratings (elements for electric aeroplanes added)	Amended	RMT.0678
AMC2 FCL.725(a)	Flight instruction for type ratings: helicopters	Amended	RMT.0587 RMT.0678
GM1 FCL.725(d)(4)(ii)(B) (2)	Multi-pilot operation in single-pilot aircraft	Amended	RMT.0587
AMC1 FCL.740(b)	Validity and renewal of class and type ratings	Amended	RMT.0587
AMC1 FCL.720.A(b)(2)(i)	Additional theoretical knowledge for a class or type rating for HPA SP	Amended	RMT.0587
AMC2 FCL.720.A(b)(2)(i)	Additional theoretical knowledge for a class or type rating for HPA SP	Amended	RMT.0587
AMC1 FCL.720.A(c)(4)(ii)	Training on take-offs, landings and go-arounds (applicants for a type rating already holding a cruise relief co-pilot type rating)	New	RMT.0190
AMC1 FCL.740.A(b)(1)(ii)	Content of the refresher training – SEP aeroplanes	Amended	RMT.0678
GM2 FCL.740.A	Safety awareness briefing before refresher training or proficiency checks – aeroplanes	New	RMT.0587



GM1 FCL.740.H	Safety awareness briefing before refresher training or proficiency checks – helicopters	New	RMT.0587
AMC1 FCL.740.H(a)(2)(ii) (B)	Content of the refresher training – single-engine helicopters up to a maximum take-off mass of 3 175 kg	New	RMT.0678
AMC1 FCL.740.H(a)(3)	Revalidation of type ratings – helicopters	Amended	RMT.0678
AMC1 FCL.800	Theoretical knowledge and flying training for the aerobatic rating	Amended	RMT.0678
GM1 FCL.810	Solo flights during night rating training courses	New	RMT.0678
AMC1 FCL.810(a)	Theoretical knowledge and flying training for the night rating	Amended	RMT.0678
GM1 FCL.810	Night rating training – solo flights	New	RMT.0678
AMC1 FCL.830	Sailplane cloud flying rating	Deleted	RMT.0678
AMC2 FCL.830	Sailplane cloud flying rating	Deleted	RMT.0678
AMC1 FCL.835	Basic instrument rating (BIR) competencies	Amended	RMT.0587
GM1 FCL.900	Instructor certificates	Amended	RMT.0678
AMC1 FCL.935	Assessment of competence	Amended	RMT.0678
AMC5 FCL.935	Assessment of competence (report forms for the instructor certificates)	Amended	RMT.0678
GM1 FCL.905.FI(h)(3)	FI privileges and conditions (consequences of an intervention by an instructor qualified in accordance with point FCL.905.FI(h)(3) during an SPIC training flight)	New	RMT.0678
AMC2 FCL.930.FI	FI training course	Deleted	RMT.0678
AMC1 FCL.940.FI; FCL.940.IRI	FI revalidation and renewal	Amended	RMT.0678
AMC1 FCL.930.TRI	TRI(A) training course	Amended	RMT.0587
AMC2 FCL.930.TRI	TRI(H) training course	Amended	RMT.0587



AMC1 FCL.930.CRI	CRI training course	Amended	RMT.0587
AMC1 FCL.930.IRI	IRI training course	Amended	RMT.0587
AMC1 FCL.1015	Examiner standardisation	Amended	RMT.0587 RMT.0678
GM1 FCL.1015	Examiner standardisation	Amended	RMT.0678
GM1 FCL.1015(a); FCL.1025(b)(2)	Examiner standardisation courses at an ATO or at a DTO (examiners for balloons and sailplane pilot licences)	Deleted	RMT.0678
AMC1 FCL.1030(b)(3)	Obligations for examiners' application and report forms	Amended	RMT.0678
GM1 FCL.1010.SFE(a) (1)(i)	Prerequisite for an SFE(A) to hold a type rating	New	RMT.0587
AMC1 to Appendix 1	Crediting of theoretical knowledge — cross-credits for the subject Area 100 KSA	New	RMT.0587
AMC1 to Appendix 3	Training courses for the issue of a CPL and an ATPL	Amended	RMT.0587
AMC5 to Appendix 6	Modular training courses for the IR	Amended	RMT.0587
AMC1 to Appendix 7	IR skill test	Amended	RMT.0587
GM1 to Appendix 9 Section A point 1c	Use of FFS and FSTD	New	RMT.0587
GM1 to Appendix 9 Section B point 5(l); Section B point 6(j)	PBN privileges without RNP APCH privileges	New	RMT.0587
Annex IV (Part-MED) to Regulation (EU) No 1178/2011			
AMC1 MED.B.010	Cardiovascular system	Amended	RMT.0287
AMC2 MED.B.010	Cardiovascular system	Amended	RMT.0287



GM1 MED.B.010(b)	Cardiovascular system	New	RMT.0287
AMC1 MED.B.015	Respiratory system	Amended	RMT.0287
GM1 MED.B.015	Respiratory system	New	RMT.0287
AMC1 MED.B.055	Mental health	Amended	RMT.0287
AMC1 MED.B.070	Visual system	Amended	RMT.0287
AMC2 MED.B.070	Visual system	Amended	RMT.0287
Annex VI (Part-ARA) to Regulation (EU) No 1178/2011			
GM1 ARA.FCL.200	Licence endorsements	New	RMT.0587
AMC1 ARA.FCL.200(a)(1)	Remark on the licence	Amended	RMT.0587
AMC1 ARA.FCL.200(a)(2)	ICAO automatic validation attachment	Amended	RMT.0587
AMC1 ARA.FCL.300(b)	Examination procedures	Amended	RMT.0587
GM1 ARA.FCL.300(b)	Examination procedures (BIR)	New	RMT.0587
GM2 ARA.FCL.300(b)	Examination procedures (BIR)	New	RMT.0587
AMC3 ARA.FSTD.120	Continuation of an FSTD qualification	New	RMT.0587 (ex – RMT.0196)
AMC1 ARA.MED.120	Medical assessors — experience and knowledge	Amended	RMT.0287
AMC2 ARA.MED.120	Medical assessors — tasks	Amended	RMT.0287
AMC3 ARA.MED.120	Medical assessors — delegation of medical assessor tasks	New	RMT.0287
GM1 ARA.MED.120	Medical assessors — delegation of medical assessor tasks	New	RMT.0287



AMC1 ARA.MED.125	Referral to the licensing authority	Amended	RMT.0287
AMC1 ARA.MED.128	Consultation procedure	New	RMT.0287
AMC1 ARA.MED.130	Medical certificate format	Amended	RMT.0287
AMC1 ARA.MED.135(a)	Aero-medical forms	Amended	RMT.0287
AMC1 ARA.MED.135(b); (c)	Aero-medical forms	Amended	RMT.0287
GM1 ARA.MED.135(b); (c)	Aero-medical forms	Amended	RMT.0287
AMC1 ARA.MED.150(f)	Record-keeping	New	RMT.0287
AMC1 ARA.MED.200	Procedure for the issue, revalidation, renewal or change of an AME certificate	Amended	RMT.0287
AMC2 ARA.MED.200	Procedure for the issue, revalidation, renewal or change of an AME certificate	Amended	RMT.0287
AMC1 ARA.MED.246	Cooperative oversight of AMEs and AeMCs	New	RMT.0287
AMC1 ARA.MED.250(a)	Limitation, suspension or revocation of an AME certificate	New	RMT.0287
AMC1 ARA.MED.315(a)	Review of examination reports	Amended	RMT.0287
AMC1 ARA.MED.325	Secondary review procedure	New	RMT.0287
AMC1 ARA.MED.330	Special medical circumstances	Deleted	RMT.0287
AMC1 ARA.MED.330(b) (c)	Special medical circumstances	Deleted	RMT.0287



GM1 ARA.MED.330	Special medical circumstances	Deleted	RMT.0287
Annex VII (Part-ORA) to Regulation (EU) No 1178/2011			
AMC1 ORA.GEN.160	Occurrence reporting system	Amended	RMT.0587
AMC1 ORA.GEN.200(a) (5)	SMS manual	Amended	RMT.0587
GM1 ORA.ATO.110)(d)	Instructors supervising SPIC flights during IR training courses	New	RMT.0678
AMC2 ORA.ATO.125	Type rating training programme (aeroplanes)	Amended	RMT.0587
AMC1 ORA.ATO.135	Training aircraft	Amended	RMT.0587
AMC1 ORA.ATO.210	Personnel requirements	Amended	RMT.0587
AMC1 ORA.ATO.230(b)	Training manual and operations manual	Amended	RMT.0587
AMC1 ORA.ATO.300	Distance learning – General	Amended	RMT.0587
AMC1 ORA.FSTD.225(b)(4)	Duration and continued validity – experience of the assigned person(s)	Amended	RMT.0587 (ex – RMT.0196)
AMC2 ORA.FSTD.225(b)	Duration and continued validity – extended FSTD recurrent evaluation period organisation’s documentation	New	RMT.0587 (ex – RMT.0196)
GM1 ORA.FSTD.225(b)	Duration and continued validity – independence of the assigned persons	New	RMT.0587 (ex – RMT.0196)
GM2 ORA.FSTD.225	Duration and continued validity – extended FSTD recurrent evaluation period process to conduct functions and subjective tests	New	RMT.0587 (ex – RMT.0196)
GM1 ORA.AeMC.105	Scope	New	RMT.0287



AMC1 ORA.AeMC.115	Application	Amended	RMT.0287
AMC1 ORA.AeMC.135	Continued validity – Experience	Amended	RMT.0287
AMC1 ORA.AeMC.200	Management system	New	RMT.0287
GM2 ORA.AeMC.200	Management system	New	RMT.0287
AMC1 ORA.AeMC.205(a)	Contracted activities	New	RMT.0287
AMC1 ORA.AeMC.210	Personnel requirements	Amended	RMT.0287
AMC1 ORA.AeMC.215	Facility requirements	Amended	RMT.0287
Annex VIII (Part-DTO) to Regulation (EU) No 1178/2011			
AMC1 DTO.GEN.210(a)(1)(ii)	Personnel requirements	Amended	RMT.0587
GM1 DTO.GEN.210(a)(2)	Personnel requirements	Amended	RMT.0587
GM1 DTO.GEN.210(c)	Personnel requirements	Amended	RMT.0587
AMC1 DTO.GEN.270(a)	Annual review and annual activity report	Amended	RMT.0587
Annex III (Part-ORO) to Regulation (EU) No 965/2012			
GM1 ORO.FC.100(c)	Composition of flight crew	Amended	RMT.0587
AMC3 ORO.GEN.110(f)	Operator responsibilities – Procedures for the relief of flight crew members in CAT operations	New	RMT.0190
GM3 ORO.GEN.110(f)	Operator responsibilities – Briefing between relieving flight crew members	New	RMT.0190



AMC1 ORO.FC.230	Recurrent training and checking – Syllabus	Amended	RMT.0587
AMC1 ORO.FC.A.201(a)(2)(ii)	In-flight relief of flight crew members – Initial CRM training for the pilot relieving the commander	New	RMT.0190
GM1 ORO.FC.A.201(a)(2)(ii)	In-flight relief of flight crew members – Seating position and minimum experience of a pilot who is relieving the commander in flight	New	RMT.0190
GM1 ORO.FC.A.201(a)(2)(ii) and (iii)	In-flight relief of flight crew members – Leadership and decision-making skills of the pilot relieving the commander	New	RMT.0190
GM1 ORO.FC.A201(b)(2)(iii)	In-flight relief of flight crew members – Training and checking of cruise relief co-pilots	New	RMT.0190
Annex V (Part-SPA) to Regulation (EU) No 965/2012			
AMC1 SPA.HEMS.130(g)(1)	Crew requirements	New	RMT.0287
GM1 SPA.HEMS.130(g)(1)	Crew requirements – Best practices for flight crew members above the age of 60 performing single-pilot HEMS operations	New	RMT.0287
AMC1 SPA.HEMS.130(g)(2)	Crew requirements – Recurrent training and checking of pilots above the age of 60 performing single pilot HEMS operations:	New	RMT.0287
GM1 SPA.HEMS.130(g)(2)	Crew requirements	New	RMT.0287
GM2 SPA.HEMS.130(g)(2)	Crew requirements	New	RMT.0287

Note 1: NPA 2020-14 contained the draft GM1 FCL.210.A(a) which explained that, in the context of the proposal to redraft point FCL.210.A to refer to 45 hours of ‘flight time’ instead of ‘flight instruction’, those 45 hours of flight time could encompass both PPL and night rating training. However, since subsequently point FCL.210.A was further redrafted with an explicit reference to night rating training, that GM was no longer necessary and hence is not part of this ED Decision.



Note 2: EASA had drafted the new GM1 ORA.FSTD.225(b)(3) to provide a template for an evaluation report which may be used by the organisation operating an FSTD in an extended evaluation arrangement. The text was consulted with the FSTD focal points from competent authorities on 10 June 2024. However, after a further internal review, the whole GM with the template of the evaluation report was deleted, since it contains content related to the FCS concept which can only be introduced with the ED Decision resulting from RMT.0196.

