

**Draft Annexes I, II, III, IV, V, VI and VII
to draft Commission Regulation (EU) .../...**

amending

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

and

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

ANNEX I

Amendments to Annex I (Part-FCL) to Commission Regulation (EU) No 1178/2011

(1) In point FCL.015, point (e) is replaced by the following:

‘(e) The holder of a licence that has been issued in accordance with this Annex (Part-FCL) may apply to the competent authority designated by another Member State for a change of competent authority relating to all licences held, as specified in point (d). Holders of an aero-medical certificate issued in accordance with Annex IV (Part-MED) who do not yet hold a pilot licence shall be entitled to make such an application for a change of competent authority relating to all medical records kept by the competent authority.’;

Rationale

RMT.0287

Point FCL.015(e) is proposed to be amended for consistency with the amendment proposed for point ARA.GEN.360, as regards the need to allow holders of medical certificates who do not yet hold a pilot licence to change their competent authority. See the rationale for proposed amendments to point ARA.GEN.360 for more information.

(2) in point FCL.020, point (a) is replaced by the following:

‘(a) A student pilot shall not fly solo unless he or she:

- (1) is authorised to do so and supervised by a flight instructor; and
- (2) prior to receiving the authorisation specified in point (1), has acquired the competence to safely operate the relevant aircraft during the intended solo flight.’;

Rationale

RMT.0678

See NPA 2020-14, page 22.

(3) point FCL.025 is amended as follows:

(a) in point (b), points (4) and (5) are replaced by the following:

‘(4) If applicants for the issue of a light aircraft pilot licence (LAPL), a private pilot licence (PPL), or a basic instrument rating (BIR) have failed to pass one of the theoretical knowledge examination papers within four attempts or have failed to pass all papers within the period mentioned in point (b)(2), they shall retake the complete set of theoretical knowledge examination papers.

(5) Before retaking the complete set of theoretical knowledge examination papers, applicants shall undertake further training at a DTO or an ATO. The extent and scope of the training needed shall be determined by the DTO or the ATO, based on the needs of the applicants.’;

(b) in point (c)(1), point (ii) is replaced by the following:

‘(ii) for the issue of a commercial pilot licence, a multi-crew pilot licence or an instrument rating (IR), for a period of 36 months;’;

Rationale

RMT.0587, RMT.0678

RMT.0587

In point (b)(4), a reference to the basic instrument rating (BIR) has to be inserted in order to clarify the procedure for retaking BIR theoretical knowledge examinations. The procedure specified in point (b)(4) was identified to be appropriate in the context of the BIR (instead of the one specified in point (b)(3) for the instrument rating (IR) and, before its deletion, the en-route instrument rating (EIR)).

In point (c)(1)(ii), after related written queries to EASA and discussions in EASA Advisory Body meetings had revealed the need to clarify the applicability of this provision, also in the context of theoretical knowledge examinations completed for the issuance of a multi-crew pilot licence (MPL) a reference to the MPL is added.

RMT.0678

As regards the rationale for the amendment to point (b)(5), see NPA 2020-14, page 22.

- (4) in point (b) of point FCL.035, the following point (6) is added:
- ‘(6) When Appendix 1 includes a credit for the subject Communications, all of the following shall apply:
- (i) Such credit shall only be granted for training and examination for that subject if applicants, during previous theoretical knowledge examinations in accordance with point ARA.FCL.300 of Annex VI, have completed either the subject Communications or both subjects VFR communications and IFR communications.
 - (ii) Applicants who have completed either only the subject VFR communications or only the subject IFR communications shall complete theoretical knowledge instruction in the subject Communications, the duration of which may be reduced based on an assessment of the applicants by the ATO. For applicants who have completed the subject VFR communications, aspects purely related to VFR communication may be reduced. For applicants who have completed the subject IFR communications, aspects purely related to IFR communication may be reduced. In any case, applicants shall complete the theoretical knowledge examination in the subject Communications.’;

Rationale

RMT.0587

The new point (6) is added to clarify that a full credit for the subject Communications is only possible if applicants have indeed completed either the new subject Communications (as introduced with Regulation (EU) 2018/1974 and applicable from 31 January 2022) or have completed both the subject VFR communications and the subject IFR communications, when these separate subjects were still available.

When applicants have only completed the subject VFR communications, a full credit for the subject Communications is not possible. They need to complete theoretical knowledge instruction and examination in the new subject Communications. However, the duration of the theoretical knowledge instruction may be reduced by the ATO, based on the individual needs of an applicant (credits for previous experience in VFR communications).

In reaction to comments received during the focused consultation with the EASA Advisory Bodies in June 2022, the text in point (6)(ii) was slightly complemented to address both scenarios where

applicants have already completed the ECQB-based examinations for either VFR communications or IFR communications.

- (5) in point FCL.045, point (d) is replaced by the following:

‘(d) A student pilot shall carry on all solo cross-country flights evidence of the authorisation required by FCL.020(a)(1).’;

Rationale

RMT.0678

In line with the proposed amendment to point FCL.020 (see above), the reference to that point in point FCL.045(d) needs to be updated.

- (6) in point (b) of point FCL.060, point (3) is replaced by the following:

‘(3) as cruise relief co-pilot unless he or she has completed, within the preceding 90 days, either of the following:

- (i) at least three sectors as cruise relief co-pilot in the relevant type;
- (ii) training the content of which is determined by the operator and that comprises at least three sectors as cruise relief co-pilot in an FSTD representing the relevant type;
- (iii) recurrent training in accordance with Annex III (Part-ORO) Subpart FC (ORO.FC) of Regulation (EU) No 965/2012;
- (iv) a proficiency check for cruise relief co-pilots in accordance with Appendix 9 to this Annex.’;

Rationale

RMT.0190

See NPA 2014-25, page 12.

In response to comments received, the text in point (b)(3) was revised to set out more options in relation to the maintenance of recent experience for cruise relief co-pilots (CRCPs), to provide more flexibility for the pilots concerned.

- (7) point (a) of FCL.065 is replaced by the following:

‘(a) Age 60–64. Aeroplanes and helicopters. The holder of a pilot licence who has attained the age of 60 years shall not act as a pilot of an aircraft engaged in commercial air transport except as a member of a multi-pilot crew. By way of derogation, such holders shall be entitled to act as pilots of an aircraft engaged in single-pilot helicopter emergency medical service operations in accordance with Regulation (EU) No 965/2012, provided that they comply with the applicable requirements specified for that purpose in that Regulation and in Annex IV (Part-MED).’;

Rationale

RMT.0287

As a result of the operational need identified by the Member States, and in accordance with the results of the research project on age limitations for commercial air transport pilots and the development and consultation of the dedicated best intervention strategy document, EASA has decided to enable the

extension of pilot age limit for pilots involved in single-pilot helicopter emergency medical services (HEMS) operations.

(8) point FCL.115 is replaced by the following:

‘FCL.115 LAPL – Training course

- (a) Applicants for an LAPL shall complete a training course at a DTO or an ATO. That training course shall include:
- (1) theoretical knowledge and flight instruction appropriate to the privileges of the LAPL applied for; and
 - (2) for the LAPL(H), the mandatory training elements for the relevant helicopter type as defined in the operational suitability data established in accordance with Annex I (Part 21) to Commission Regulation (EU) No 748/2012.
- (b) Theoretical knowledge instruction and flight instruction may be completed at a DTO or at an ATO different from the one where applicants have commenced their training.
- (c) For the training for the SEP aeroplanes-sea class privilege, the elements of Appendix 9 to this Annex, point 7 (Class ratings — sea) of Section B (Specific requirements for the aeroplane category) shall be considered.
- (d) Applicants for an LAPL may receive credits for previous PPL training they have undergone in accordance with Subpart C of this Annex (Part-FCL) in the same aircraft category, based on an assessment of the applicant by the ATO or the DTO that is responsible for the LAPL training course. In any case, applicants shall comply with the experience requirements set out in points FCL.110.A(a) or FCL.110.H(a), as applicable.’;

Rationale

RMT.0678

See NPA 2020-14, page 22.

In reaction to a comment received for NPA 2020-14, an additional new point (d) is added to allow applicants to change from private pilot licence (PPL) training to light aircraft pilot licence (LAPL) training during an ongoing course (in addition to the vice-versa option to change from LAPL to PPL, as proposed with the revised points FCL.210.A(b) and FCL.210.H(b)). For this ‘downgrading route’, the amount of credit is completely up to the training organisation, as long as the applicable LAPL experience requirements are met by the applicants.

After a short discussion during the focused consultation with the EASA Advisory Bodies (22 June 2022), in point (d) a reference to Subpart C of Part-FCL was inserted, in order to clarify that this provision is not to be understood as a basis for providing credits for PPL instruction completed in accordance with third-country requirements.

(9) in point FCL.105.A, point (a) is replaced by the following:

‘(a) Privileges

The privileges of the holder of an LAPL for aeroplanes are to act as PIC on SEP aeroplanes-land (SEP(land)), SEP aeroplanes-sea (SEP(sea)) or TMG with a maximum

certified take-off mass of 2 000 kg or less, carrying a maximum of three passengers, such that there is always a maximum of four persons on board the aircraft.’;

Rationale

RMT.0678

See NPA 2020-14, page 22.

(10) in point FCL.110.A, point (c) is replaced by the following:

- ‘(c) Crediting. Applicants with prior experience as PIC may be credited towards the requirements of point (a) under the following conditions:
- (1) the amount of credit shall be decided by the DTO or the ATO where the pilot undergoes the training course, on the basis of a pre-entry flight assessment, but shall in any case:
 - (i) not exceed the total flight time as PIC;
 - (ii) not exceed 50 % of the hours required in point (a);
 - (iii) not include the requirements of point (a)(2);
 - (2) previous experience as PIC in aircraft that are subject to a decision of a Member State taken in accordance with points (a) or (c) of Article 2(8) of Regulation (EU) 2018/1139 or that fall within the scope of Annex I to that Regulation may be considered, provided that the aircraft match the definition of the respective Part-FCL aircraft category.’;

Rationale

RMT.0678

See NPA 2020-14, page 22.

In reaction to a comment received for the NPA, in point (c)(2) the phrase ‘and criteria’ was removed after the word ‘definition’, since it was identified to be not necessary and confusing.

(11) point FCL.135.A is amended as follows:

- (a) point (a) is replaced by the following:
- ‘(a) Applicants for an LAPL(A) shall be issued with privileges for the class of aeroplanes or TMGs in which the skill test was taken. In order to extend their privileges to another class, holders of an LAPL(A) shall complete, in that other class, all of the following:
- (1) 3 hours of flight instruction, including:
 - (i) 10 dual take-offs and landings; and
 - (ii) 10 supervised solo take-offs and landings.
 - (2) a skill test to demonstrate an adequate level of practical skill in the new class. During this skill test, the applicant shall also demonstrate to the examiner an

adequate level of theoretical knowledge for the other class in the following subjects:

- (i) Operational procedures;
- (ii) Flight performance and planning;
- (iii) Aircraft general knowledge.’;

(b) point (b) is replaced by the following:

‘(b) In order to extend the privileges to another variant within a class, the pilot shall either undergo differences training or do familiarisation. The differences training shall be entered in the pilot’s logbook or in an equivalent record and shall be signed by the instructor. When extending the privileges for an SEP aeroplane class to a variant with another type of engine, as specified in Article 2(8a) of this Regulation, the differences training shall consist of dual flight instruction and theoretical knowledge instruction which shall include, with regard to that other type of engine and related aircraft systems, at least all of the following subjects:

- (1) Operational procedures;
- (2) Flight performance and planning;
- (3) Aircraft general knowledge.’;

Rationale

RMT.0678

See NPA 2020-14, page 23.

(12) point FCL.140.A is amended as follows:

(a) in point (a), point (1) is replaced by the following:

‘(1) they have completed at least 12 hours of flight time as PIC or flying dual or solo under the supervision of an instructor, including:

- (i) 12 take-offs and landings;
- (ii) refresher training of at least 1 hour of total flight time with and to the satisfaction of an instructor who shall select those flight exercises that allow the applicant to refresh their competence in safely operating the aircraft and applying normal, abnormal and emergency procedures;’;

(b) after point (b), the following points (c) and (d) are added:

‘(c) Holders of an LAPL(A) with privileges for SEP aeroplanes who, in accordance with point FCL.135.A(b), have extended their privileges to a variant with a different type of engine as specified in Article 2(8a) of this Regulation shall, if they have not flown that variant within the preceding 2 years, complete any of the following in that variant, before exercising their privileges in that variant:

- (1) further differences training in accordance with point FCL.135.A(b);
- (2) a proficiency check;
- (3) refresher training in accordance with point (a)(1)(ii).

- (d) The dual flights, flights under supervision as specified in the introductory phrase of point (a)(1), the refresher training as per points (a)(1)(ii) and (c)(3) and the proficiency check as per point (a)(2) and (c)(2) shall be entered in the pilot's logbook or equivalent record and shall be signed by the instructor or examiner, as applicable.';

Rationale

RMT.0678

See NPA 2020-14, page 23.

In reaction to comments received for NPA 2020-14, the following changes were applied.

- In point (a)(1)(ii), the phrase 'of at least 1 hour of total flight time' is kept. Many comments called for keeping this requirement in order to ensure a proper conduct of refresher training, which cannot be done in less than 1 hour. Please also refer to the explanations in the rationale for point FCL.740.A below.
- Point (c) was revised in line with the revision of point FCL.710 and the related deletion of draft point FCL.741.A (see explanations below).
- A new point (d) was added to clarify the need to record compliance with this point FCL.140.A in the pilot's logbook.

- (13) in point FCL.110.H, point (b) is replaced by the following:

- '(b) Crediting. Applicants with prior experience as PIC may be credited towards the requirements of point (a) under the following conditions:
- (1) the amount of credit shall be decided by the DTO or the ATO where the pilot undergoes the training course, on the basis of a pre-entry flight assessment, but shall in any case:
 - (i) not exceed the total flight time as PIC;
 - (ii) not exceed 50 % of the hours required in point (a);
 - (iii) not include the requirements of point (a)(2);
 - (2) previous experience as PIC in aircraft that are subject to a decision of a Member State taken in accordance with point (b) of Article 2(8) of Regulation (EU) 2018/1139 or that fall within the scope of Annex I to that Regulation may be considered, provided that the aircraft match the definition of the Part-FCL helicopter category of aircraft.';

Rationale

RMT.0678

See NPA 2020-14, page 23. In reaction to a comment received for NPA 2020-14, in point (b)(2) the phrase 'and criteria' was removed after the word 'definition', since it was identified to be not necessary and confusing.

- (14) point FCL.135.H is amended as follows:

- (a) point (a) is replaced by the following:
- '(a) Applicants for an LAPL(H) shall be issued with privileges for the specific type of helicopter in which the skill test was taken. In order to extend their privileges to

another type of helicopter, holders of an LAPL(H) shall complete, in that other type, all of the following:

- (1) unless specified otherwise in the operational suitability data established in accordance with Annex I (Part 21) to Commission Regulation (EU) No 748/2012, at least 5 hours of flight instruction, including:
 - (i) 15 dual take-offs, approaches and landings;
 - (ii) 15 supervised solo take-offs, approaches and landings;
 - (2) a skill test to demonstrate an adequate level of practical skill in the new type. During this skill test, the applicant shall also demonstrate to the examiner an adequate level of theoretical knowledge for the other type in the following subjects:
 - (i) Operational procedures,
 - (ii) Flight performance and planning,
 - (iii) Aircraft general knowledge.’;
- (b) point (b) is replaced by the following:
- ‘(b) Before the holder of an LAPL(H) can exercise the privileges of the licence in another variant of helicopter than the one used for the skill test, the pilot shall undergo differences training or do familiarisation, as determined in the operational suitability data established in accordance with Annex I (Part 21) to Commission Regulation (EU) No 748/2012. The differences training shall be entered in the pilot’s logbook or equivalent record and shall be signed by the instructor.’;

Rationale

RMT.0678

See NPA 2020-14, page 23.

(15) point FCL.140.H is replaced by the following:

‘FCL.140.H LAPL(H) – Recency requirements

- (a) Holders of an LAPL(H) shall exercise the privileges of their licence on a specific type only if in the last 12 months they have, in the relevant type, either:
 - (1) completed:
 - (i) at least 6 hours of flight time on helicopters of that type as PIC, or flying dual or solo under the supervision of an instructor, including six take-offs, approaches and landings; and
 - (ii) a refresher training of at least 1 hour of total flight time with and to the satisfaction of an instructor who shall select those flight exercises that allow the applicant to refresh their competence in safely operating the aircraft and applying normal, abnormal and emergency procedures; or
 - (2) passed a proficiency check with an examiner on the specific type before resuming the exercise of the privileges of their licence. That proficiency check programme shall be based on the skill test for the LAPL(H).

- (b) Applicants may choose to complete the refresher training as per point (a)(1)(ii) in the aircraft or an FSTD representing the relevant type, or in a combination of both.
- (c) The dual flights, flights under supervision as per point (a)(1)(i), the refresher training as per point (a)(1)(ii) and the proficiency check as per point (a)(2) shall be entered in the pilot's logbook or equivalent record and shall be signed by the instructor or examiner, as applicable.';

Rationale

RMT.0678

See NPA 2020-14, page 24.

In reaction to comments received for NPA 2020-14:

- in point (a)(1)(ii), the phrase 'of at least 1 hour of total flight time' is kept (many comments called for keeping this requirement in order to ensure a proper conduct of refresher training which cannot be done in less than 1 hour);
- text was added to point (a)(1)(ii) to clarify that the refresher training needs to be completed 'to the satisfaction of' the instructor;
- a new point (c) was added to clarify the need to record compliance with this point FCL.140.A in the pilot's logbook.

For consistency with point FCL.740.H(a)(2)(ii)(B), a new point (b) was inserted to allow the refresher training to be completed in the aircraft, or in an FSTD representing that aircraft, or a combination of both. Point (b), as presented in NPA 2020-14, was changed into point (a)(2), in the context of restructuring the whole point FCL.140.H, since otherwise the introductory sentence (now point (a)) would not have fit with the new points (b) and (c).

- (16) in point (b) of point FCL.205.A, points (2) and (3) are replaced by the following:
- '(2) the conduct of skill tests and proficiency checks for the licences specified in point (1);
- (3) the training, testing and checking for the ratings or certificates associated with the instructor's or examiner's licence, as applicable.';

Rationale

RMT.0587

During an EASA Advisory Body meeting (Aircrew TeB, 1 December 2021), it was concluded that point FCL.205.A(b) is not entirely clear on the scope of privileges for which an instructor holding a PPL can provide instruction against remuneration. In line with the discussion outcome during that meeting, the text of point FCL.205.A(b) is proposed to be clarified.

- (17) in point FCL.210.A, points (a) and (b) are replaced by the following:
- '(a) Applicants for a PPL(A) shall have completed at least 45 hours of flight instruction in aeroplanes or TMGs, of which 5 hours may have been completed in an FSTD, including at least:
- (1) 25 hours of dual flight instruction; and

- (2) 10 hours of supervised solo flight time, including at least 5 hours of solo cross-country flight time with at least one cross-country flight of at least 270 km (150 NM), during which full-stop landings at two aerodromes different from the aerodrome of departure shall be made.

Applicants may complete the flight time of a night rating training course in accordance with point FCL.810(a)(1)(ii) as part of the 45 hours of flight instruction, provided that, before commencing night rating training, they have completed basic instrument flight training.

- (b) Specific requirements for applicants that have undergone LAPL(A) training. Applicants for a PPL(A) shall receive credits for previous LAPL(A) training they have undergone and shall be issued with a PPL(A), provided that the LAPL(A) training and the PPL(A) training that they completed in total complies with the experience requirements in point (a). However, in such a case all of the following shall apply:
- (1) If applicants already hold an LAPL(A), all of the following shall apply, provided that applicants have completed at least 45 hours of total flight time in aeroplanes or TMGs:
- (i) the requirement in the introductory sentence of point (a) is reduced to 40 hours of flight instruction;
 - (ii) the requirement in point (a)(1) is reduced to 21 hours of dual flight instruction.
- (2) Applicants shall have completed at least all of the following with an instructor that is qualified to instruct for a PPL(A):
- (i) 5 hours of dual flight instruction;
 - (ii) solo flight time as specified in point (a)(2).';

Rationale

RMT.0678

See NPA 2020-14, page 24.

Following comments received for NPA 2020-14, the following changes have been made.

- Considering a comment received and the results of a further internal review, it was considered that, while it is appropriate to complete the night rating training within the 45-hour PPL training course (combination of **training** events), the flight time of the skill test (**testing** event) should not be included, in order to ensure sufficient minimum time during which an applicant is under **training**, before being issued with a PPL(A). For this reason, point (a) will continue to refer to 45 hours of flight 'instruction'. At the same time, at the end of point FCL.210.A(a), a new sentence is added to clarify that the 5-hour night rating training course can take place within the 45-hour PPL(A) training course. After these changes, GMI FCL.210.A(a), as presented in NPA 2020-14, is no longer necessary and is removed from the final proposal.
- Comments were received that asked for simplification of the training path of students who wish to change their ongoing LAPL into PPL training, mainly by proposing to combine requirements for any scenario of crediting for previous LAPL training into point FCL.210.A(b) and deleting the proposed point FCL.210(d). Also, it was proposed that it should be entirely left to the ATO or DTO to determine the amount of PPL training that a former LAPL student still needs to complete,

while additional AMC should illustrate the necessary content of such bridge training, based on a comparison of the flight training syllabi for LAPL and PPL.

Inspired by these comments, and after a further review of the subject matter, the following changes to the proposed amendments are made.

- Point FCL.210(d) is deleted, and the revised point FCL.210.A(b) in general sets out credits for previously completed LAPL training, thereby addressing both scenarios: LAPL holders who wish to 'upgrade' to a PPL, and LAPL students who wish to change their ongoing LAPL training into PPL training. In essence, whatever path students choose (LAPL issue and subsequent PPL training, or changing ongoing LAPL training into PPL training), the only essential requirement is to finally comply with the experience requirements for the issue of a PPL(A).

However, while point FCL.210.A(a) requires at least **45 hours of instruction** and **25 hours of dual instruction** for the issue of a PPL, under today's point FCL.210.A(b) it is possible for LAPL holders with flight experience after licence issue to obtain a PPL with:

- a total **flight instruction time of only 40 hours** (30 hours as per point FCL.110.A and 10 hours as per point FCL.210.A(b)); and
- **dual instruction time of only 21 hours** (15 hours in accordance with point FCL.110.A(a)(1) and 6 hours (10 hours minus 4 hours of solo flight) in accordance with point FCL.210.A(b)).

This possibility is kept (point FCL.210.A(b)(1)), as proposed.

- An additional AMC1 FCL.210.A(b) is proposed to illustrate the areas that should be covered during LAPL → PPL bridge training (see below). The items listed in this AMC constitute gaps between the LAPL and PPL flying training syllabi and should be covered in any case, apart from any further training needs as identified by the responsible ATO or DTO.
- Point FCL.210.A(b)(2) is proposed to ensure compliance with ICAO, Annex 1, which requires applicants for a PPL to complete, under the supervision of an 'authorised instructor' (= ICAO-compliant instructor ≠ 'LAPL-only' instructor without CPL theory), at least 10 hours of supervised solo flight time (ICAO Annex 1, Chapter 2, point 2.3.3.1.2) and dual instruction in the relevant class (ICAO Annex 1, Chapter 2, point 2.3.3.2, first sentence). In cases where applicants completed previous LAPL training with a 'PPL instructor', this point FCL.210.A(b)(2) will be irrelevant, and LAPL training and PPL training can simply be added up. However, in cases where applicants complete (parts of) LAPL training with 'LAPL-only instructors', this point FCL.210.A(b)(2) will need to be monitored, in order to ensure that eventually a PPL can be issued in alignment with ICAO standards.

Eventually, following an internal review before the publication of the Opinion, the new sentence after point (a)(2) (45-PPL training time may include night rating training time) is complemented by the prerequisite to have completed the PPL basic instrument flight training (AMC1 FCL.210 point (c)(2)(xxv) (Exercise 19)), to ensure a safe conduct of the night rating training and for consistency with point FCL.810(a)(2).

(18) in point (b) of point FCL.205.H, points (2) and (3) are replaced by the following:

- '(2) the conduct of skill tests and proficiency checks for the licences specified in point (1);

- (3) the training, testing and checking for the ratings or certificates associated with the instructor's or examiner's licence, as applicable.';

Rationale

RMT.0587

This amendment is proposed for consistency with the amendment proposed for point FCL.205.A(b) (see above).

- (19) point FCL.210.H is amended as follows:

- (a) the introductory phrase of point (a) is replaced by the following:

'(a) Applicants for a PPL(H) shall have completed at least 45 hours of flight instruction on helicopters, of which 5 hours may have been completed in an FSTD, including at least:';

- (b) point (b) is replaced by the following:

'(b) Specific requirements for applicants that have undergone LAPL(H) training. Applicants for a PPL(H) shall receive credits for previous LAPL(H) training they have undergone and shall be issued with a PPL(H), provided that the LAPL(H) training and the PPL(H) training that they completed in total complies with the experience requirements in point (a).';

Rationale

RMT.0587, RMT.0678

RMT.0587

In reaction to comments received during the focused consultation with the EASA Advisory Bodies in June 2022, the phrase 'FNPT or FFS' is replaced by the generic term 'FSTD', for more flexibility and also consistency with point FCL.210.A(a).

RMT.0678

As regards the amendments to point (b), see NPA 2020-14, page 25.

Additionally, please refer to the explanations given for the amendments to point FCL.210.A above – the proposals for amendments to point FCL.210.H have been updated for consistency with the proposed amendments for point FCL.210.A.

- *Also, point FCL.210.H(a) will continue to refer to flight 'instruction'.*
- *After the deletion of draft point FCL.210(d), the updated point FCL.210.H(b) in general sets out credits for previously completed LAPL training, thereby addressing both scenarios: LAPL holders who wish to 'upgrade' to a PPL, and LAPL students who wish to change their ongoing LAPL training into PPL training. Additional requirements (see point FCL.210.A(b)(1) and (2)) were not necessary: today's bridge course arrangements (LAPL(H) → PPL(H)) in point FCL.210.H(b) do not encompass reduced (dual) instruction time. Also, since every FI(H) is entitled to provide training for PPL(H) – there is no LAPL-only FI(H), as the case is for FI(A) – there is no need to mandate certain training elements to be completed with a 'PPL instructor' (as done in point FCL.210.A(b)(2)).*
- *An additional AMC1 FCL.210.H(b) will be proposed to illustrate the areas that should be covered during LAPL → PPL bridge training (see below).*

(20) in point (b) of point FCL.205.As, points (2) and (3) are replaced by the following:

- ‘(2) the conduct of skill tests and proficiency checks for the licence specified in point (1);
- (3) the training, testing and checking for the ratings or certificates attached to the instructor’s or examiner’s licence, as applicable.’;

Rationale

RMT.0587

This amendment is proposed for consistency with the amendment proposed for point FCL.205.A(b) (see above).

(21) point FCL.325.A is replaced by the following:

‘FCL.325.A CPL(A) – Specific requirements for applicants who hold an MPL

(a) Applicants for a CPL(A) who hold an MPL shall have completed in aeroplanes:

- (1) 70 hours of flight time:
 - (i) as PIC; or
 - (ii) made up of at least 10 hours as PIC and the additional flight time as PIC under supervision (PICUS).

Of these 70 hours, 20 hours shall be of VFR cross-country flight time as PIC, or cross-country flight time made up of at least 10 hours as PIC and 10 hours as PICUS. This shall include a VFR cross-country flight of at least 540 km (300 NM) in the course of which full-stop landings at two different aerodromes shall be flown as PIC;

- (2) the elements of the CPL(A) modular course as specified in points 10(a) and 11 of Appendix 3, E to this Part; and
 - (3) the CPL(A) skill test, in accordance with point FCL.320.
- (b) When being issued with a CPL in accordance with point (a), applicants shall:
- (1) comply with the requirements of point FCL.405.A(c) in order to have the privileges of their IR(A) extended to single-pilot operations in aeroplanes; and
 - (2) have the privileges of their type ratings restricted to exercise the privileges of a co-pilot only. This restriction shall be removed when applicants complete a proficiency check for the relevant type in accordance with Appendix 9 to this Annex in the role of the PIC.’;

Rationale

RMT.0587

During a discussion at an EASA Advisory Body meeting (Aircrew TeB meeting, 1 December 2021), Member States reported that the current regulatory option to include CPL privileges on an MPL is not appreciated by industry. Operators apparently prefer ‘full’ CPLs over such ‘CPL endorsements’ on an MPL. For this reason, it was concluded that the rule, instead of providing for such ‘CPL endorsements’ on MPLs, should offer the possibility to replace an MPL with a CPL, once the applicable requirements are met. During the discussion, it was also highlighted that, when replacing an MPL by a CPL, it must be ensured that the MPL-related restrictions to IR(A) and type rating privileges are removed only after

applicants demonstrate the required relevant PIC competence. Hence, point FCL.325.A and point FCL.405.A (see below) are amended accordingly.

(22) in point FCL.405.A, point (b) is replaced by the following:

‘(b) Holders of an MPL shall, upon application:

- (1) be issued with additional privileges of the holder of a PPL(A), provided that they comply with the requirements for the PPL(A) specified in Subpart C;
- (2) have their MPL replaced by a CPL(A), provided that they comply with the requirements specified in point FCL.325.A.’;

Rationale

RMT.0587

See the explanations provided for the amendments to point FCL.325.A above. The possibility to endorse PPL privileges on an MPL is kept.

(23) in point (c) of point FCL.510.A, the following point (3) is added:

‘(3) Holders of a restricted type rating issued in accordance with point FCL.720.A(c) shall receive credits for their flight time completed while exercising the privileges of that type rating up to a maximum of 250 hours.’;

Rationale

RMT.0190

See NPA 2014-25, page 12.

Based on comments received and a subsequent discussion in the RMT.0190 review group, it was decided to limit the crediting of flight time flown as CRCP to 250 hours towards the crediting of flight time prescribed in point FCL.510.A. This limit was not further reduced, for consistency with point (c)(2) of point FCL.510.A.

(24) point FCL.710 is amended as follows:

(a) point (a) is replaced by the following:

‘(a) Pilots shall complete differences training or familiarisation in order to extend their privileges to another variant of aircraft within a class or type rating, or, in the case of point (d)(1), in order to maintain these privileges. In the case of variants within a class or type rating, the differences training or familiarisation shall include the relevant elements defined in the operational suitability data established in accordance with Annex I (Part 21) to Commission Regulation (EU) No 748/2012, where applicable. When extending the privileges of an SEP aeroplane class rating to a variant with another type of engine as specified in Article 2(8a) of this Regulation, the differences training shall consist of dual flight instruction and theoretical knowledge instruction which shall include, with regard to that other type of engine and related aircraft systems, at least all of the following:

- (1) aircraft general knowledge;

- (2) operational procedures;
- (3) flight performance and planning.’;
- (b) points (c) and (d) are replaced by the following:
 - ‘(c) Notwithstanding the requirement in point (b), differences training for the following aircraft may be conducted by an appropriately qualified instructor unless otherwise provided in the operational suitability data established in accordance with Annex I (Part 21) to Commission Regulation (EU) No 748/2012:
 - (1) aeroplanes requiring a class rating:
 - (i) TMGs;
 - (ii) SEP aeroplanes;
 - (iii) MEP aeroplanes;
 - (iv) SET aeroplanes, except for complex SET aeroplanes;
 - (2) single-engine helicopters with a maximum take-off mass not exceeding 3 175 kg.
 - (d) Pilots who, after having extended their privileges to another variant within a class or type rating in accordance with this point, have not flown that variant within the preceding 2 years shall, before exercising their privileges in that variant, complete any of the following in that variant:
 - (1) further differences training in accordance with points (a) and (b) or, if applicable, (c);
 - (2) a proficiency check;
 - (3) in the case of a variant within the SEP class rating with a particular engine type, as specified in Article 2(8a) of this Regulation, refresher training in accordance with point FCL.740.A(b)(1)(ii)(C).’;
- (c) after point (d), the following point (da) is inserted:
 - ‘(da) Point (d) shall not apply in the case of variants within the TMG class rating and variants within the SEP class rating that have the same type of engine, as specified in Article 2(8a) of this Regulation.’;

Rationale

RMT.0678

See NPA 2020-14, page 25.

In reaction to comments received for NPA 2020-14, point (d) is amended, and a new point (da) is added, for the following reasons.

- Point (d) is restructured to clarify that the 2-year period applies not only after the initial differences training but after any (further) differences training that is completed in order to maintain privileges for a particular variant. In this context, in point (a) the phrase ‘or, in the case of point (d)(1), in order to maintain these privileges’ is inserted.
- NPA 2020-14 contained a draft point FCL.741.A, which was intended to set out arrangements for SEP class rating holders to maintain, within their SEP class rating, privileges for SEP variants with different engine types, as defined in Article 2(8a). Several comments were received

that criticised the hourly arrangements or even inconsistencies of that point with the regular SEP class rating revalidation requirements in point FCL.740.A(b)(1). In general, a lighter approach for recent experience in SEP class variants with different engine types (for both LAPL(A) (point FCL.140.A(c)) and PPL(A) (point FCL.741.A)) was requested in many comments. After analysing and considering these comments, draft point FCL.741.A was deleted and point FCL.710 was amended to set out the arrangements that SEP class rating holders need to follow, in order to maintain their privileges for variants with different engines.

- In general, holders of an SEP class rating (any variant) will only need to comply with the regular SEP class rating revalidation requirements of point FCL.740.A(b)(1).
- Additionally, if holders of an SEP class rating have not flown in an SEP aircraft with a particular engine type within the preceding 2 years (no minimum hours established), they shall undergo: (a) differences training; OR (b) a proficiency check; OR (c) refresher training. The result is that SEP class rating holders can maintain their privileges for different SEP engine types simply by flying them at least once in 2 years. If they do not meet this minimum requirement, the aforementioned actions are available to restore the relevant privileges.
- After the respective amendments to point (d), the additional text to exempt variants of TMG class ratings and SEP class ratings with the same engine type from the arrangements in point (d) was moved to a new point (da), for easier reading purposes.

Additionally, based on an internal review:

- the references to OSD in points (a) and (c) were updated for consistency with other OSD references in Part-FCL; and
- point (c) was amended to require differences training for SEP aeroplane variants with different engine types (piston engines / electric engines) to take place at a training organisation (DTO or ATO), to ensure a controlled environment for training on the new engine type.

Subsequently, in reaction to comments received during the focused consultation with the EASA Advisory Bodies in June 2022, point (c)(1)(ii) was amended in order to not require an ATO or a DTO for differences training between SEP aeroplane variants with different engine types (the phrase 'except for differences training to extend privileges to variants with another type of engine as specified in Article 2(8a) of this Regulation' was deleted). Differences training also between those SEP variants will be possible outside an ATO or a DTO with an instructor. This is consistent with point FCL.135.A (differences training for LAPL(A) where a reference to an ATO or a DTO was not included in the draft text so far).

Finally, based on a discussion that took place in the Aircrew TeB meeting in May 2023, in the draft point (c)(1)(iv) text is added to exclude complex single-engine turbine (SET) aeroplane classes for which differences training shall take place only at an ATO. This addendum was consulted in writing (e-mail) with the Aircrew TeB after the Aircrew TeB meeting in May 2023, and resulted in unanimous support from the Aircrew TeB members.

(25) point FCL.725 is amended as follows:

(a) point (a) is replaced by the following:

- ‘(a) Training course. An applicant for a class or type rating shall complete a training course at an ATO. An applicant for a non-high-performance SEP aeroplane class rating, a TMG class rating or a single-engine type rating for helicopters referred to in point DTO.GEN.110(a)(2)(c) of Annex VIII (Part-DTO) may complete the

training course at a DTO. The type rating training course shall include the mandatory training elements for the relevant type as defined in the operational suitability data established in accordance with Annex I (Part 21) to Commission Regulation (EU) No 748/2012.’;

(b) point (d) is replaced by the following:

‘(d) Single- and multi-pilot operation in single-pilot aircraft – type ratings

(1) The privileges of holders of a type rating for a single-pilot aircraft include the privileges to fly the aircraft in single-pilot operation and multi-pilot operation. However, such holders shall exercise those privileges for a particular form of operation only if they comply with all of the following:

(i) They have successfully completed flight training for the relevant form of operation in the relevant aircraft type in accordance with Appendix 9 to this Annex, unless specified otherwise in the operational suitability data established in accordance with Annex I (Part 21) to Commission Regulation (EU) No 748/2012. That flight training for a particular form of operation shall either be included in the initial type rating training course at an ATO or, following the initial issuance of the type rating, be completed in the form of additional training at either of the following:

(A) an ATO;

(B) an organisation that is subject to Annex III (Part-ORO) to Regulation (EU) No 965/2012 applies and that is entitled to provide such training on the basis of either an approval or a declaration.

(ii) They have completed a skill test or a proficiency check:

(A) for single-pilot operation:

(1) in single-pilot operation; or

(2) in multi-pilot operation with additional elements for single-pilot operation as specified in Appendix 9 to this Annex;

(B) for multi-pilot operation, in multi-pilot operation.

(iii) Additionally, in the case of multi-pilot operation in single-pilot aircraft:

(A) they meet the requirements that are specified in:

(1) point FCL.720.A(b)(4) or point FCL.720.H(a)(2), as applicable; and

(2) point FCL.720.A(b)(5), for single-pilot aeroplanes, before starting flight training for multi-pilot operation in accordance with point (d)(1)(i);

(B) they exercise their privileges only at an organisation that is subject to Annex III (Part-ORO) to Regulation (EU) No 965/2012.

- (2) When applicants for the initial issue of a type rating for a single-pilot aircraft complete the flight training and the skill test in multi-pilot operations only, the type rating shall be issued with a restriction to multi-pilot operation. That restriction shall be removed when applicants complete, in accordance with Appendix 9 to this Annex, additional training and a proficiency check that include the necessary elements for single-pilot operation.

In all other cases, the form of operation shall not be entered onto the licence.’;

- (c) after point (d), the following points (da) and (db) are inserted:

‘(da) Single- and multi-pilot operation – aeroplane class ratings

The privileges of holders of a class rating for a single-pilot aeroplane include the privileges to fly the aeroplane in multi-pilot operation, provided that such holders:

- (1) comply with the following requirements of point FCL.720.A:
 - (i) point (b)(4); and
 - (ii) point (b)(5), before starting flight training for multi-pilot operation in accordance with point (da)(2);
- (2) have completed flight training and passed a proficiency check for multi-pilot operations in the relevant aeroplane class in accordance with point 5(g) of Section B of Appendix 9 to this Annex at an organisation that is specified in point (d)(1)(i); and
- (3) exercise their privileges only at an organisation that is subject to Part-ORO.

Additional privileges for multi-pilot operation in a single-pilot aeroplane class shall not be entered onto the licence.

- (db) If a skill test or proficiency check for a single-pilot aircraft class or type rating is conducted in either of the following, the form or forms of operation in which that skill test or a proficiency check is conducted shall be entered in the logbook of the applicants and signed by the examiner:
- (1) multi-pilot operation;
 - (2) single-pilot and multi-pilot operation.’;

Rationale

RMT.0587, RMT.0678

RMT.0678

As regards the rationale for amendments to point (a), see NPA 2020-14, page 25.

RMT.0587

Triggered by a request from Member States on the applicability of point FCL.725 for multi-pilot operation in single-pilot aeroplane classes, EASA developed a proposal for an amendment to point FCL.725 to provide clarifications on that topic (see draft point (da)). During the focused consultation of June 2022 with the EASA Advisory Bodies, this proposal was supported, while at the same time several participants proposed a general revision of the requirements for licence endorsement related to single-pilot operation and multi-pilot operation in single-pilot aircraft. In reaction to these comments, the following changes are made to the initial proposed amendments, comprehensively

revising and clarifying the documentation of privileges for single-pilot operation and multi-pilot operation in single-pilot aircraft, for both aeroplane class ratings as well as aeroplane and helicopter type ratings.

— **Point (d)** is completely revised to introduce a new comprehensive approach as regards the licensing arrangements for single-pilot operation and multi-pilot operation in single-pilot aircraft, inspired by the principles that were introduced for helicopter type ratings by Regulation (EU) 2021/2227 amending the Aircrew Regulation. The amended point (d) provides for the following.

- Type rating endorsements automatically include the privileges for single-pilot operation and multi-pilot operation. In principle, no additional endorsements for limitations or extensions of privileges are necessary, except for one particular case (see explanation further down). Privileges for multi-pilot operation can however only be exercised under an operator that is subject to Part-ORO, Subpart FC, and that operator will need to monitor and record that pilots exercise their privileges in accordance with the training and checking that they have completed for the different forms of operation.
- Pilots can exercise the privileges of their type rating in the form (or forms) of operation included in the initial type rating training and skill test. If applicable, pilots can subsequently 'activate' and exercise their privileges for the other form of operation by complying with the relevant requirements the technical content of which has not been changed (i.e. additional training and checking, additional multi-crew cooperation training for multi-pilot operation, and advanced upset prevention and recovery training (UPRT) for aeroplanes). The additional training can take place at an ATO or an organisation to which Part-ORO, Subpart FC applies.
- Skill tests and proficiency checks can include both single-pilot operation and multi-pilot operation elements, which means that both single-pilot operation and multi-pilot operation privileges remain active.
- Only in one particular scenario is a licence endorsement for the specific form of operation necessary: an initial type rating training course for a single-pilot aircraft can be deemed fully completed only if applicants are trained to fly the aircraft as a single pilot. If an applicant completes an initial type rating training course for a single-pilot aircraft in multi-pilot operation only, that type rating training has to be considered not fully completed, thus that type of rating needs to be endorsed with a limitation to multi-pilot operation, to demonstrate that the pilot did not complete the full type rating training and obtained only single-pilot operation and multi-pilot operation privileges. To remove that limitation, the pilot needs to complete the additional necessary training and pass the proficiency check for single-pilot operation, in accordance with Appendix 9 to Part-FCL. When Regulation (EU) 2021/2227 introduced the revised point (d) in the context of helicopter type ratings, the need for such a 'multi-pilot operation limitation' after initial multi-pilot operation type rating training was limited to non-complex helicopters, for the reasons explained in EASA Opinion No 02/2021. However, based on feedback received from Member States and an additional internal review at EASA, it is proposed to generally require such a limiting endorsement in all cases of initial type rating training that is completed in multi-pilot operation only, since full visibility of the limited qualification on the licence is deemed necessary in that specific scenario.
- Once pilots have obtained single-pilot operation privileges, a subsequent proficiency check in MPO only will entitle the pilot to continue to exercise their privileges only in multi-pilot operation; however, it will no longer be necessary to endorse a restriction in the type rating. The operator will be responsible for ensuring that pilots exercise only those privileges for which they have been checked.

— *A new point (da) is proposed that, in combination with the proposed amendments to Appendix 9 to Part-FCL, clarifies the conditions under which the privileges of an aeroplane class rating can be exercised in multi-pilot operation. In principle, training as already required by Appendix 9 to Part-FCL is necessary. The main difference is that, while type ratings for single-pilot aeroplanes can be obtained with privileges either for single-pilot operation or multi-pilot operation that can subsequently be extended to the other forms of operation, class ratings cannot be obtained or maintained in multi-pilot operation only, due to the nature of class ratings encompassing a group of different products. Class rating privileges constitute, per se, single-pilot privileges. Additionally, if the conditions as set out in this new point (da) are met, multi-pilot operation privileges are included in the aeroplane class privileges and holders of a single-pilot aeroplane class rating can operate aeroplanes of that class also in multi-pilot operation, with no need for an additional licence endorsement. The responsibility for keeping records of compliance of pilots with point (da) lies with the operator for which those pilots are flying.*

The content of point (3) from the initial proposed amendment for the new point (da) is deleted, since the relevant content (maintaining single-pilot operation and multi-pilot operation privileges) is now fully covered by the proposed amendments to Part-FCL, Appendix 9, Section B, point (5)(i). Point (da)(3) now requires holders of class ratings to exercise their privileges in multi-pilot operation only in accordance with the requirements of Part-ORO (for consistency with point (d)(1)(iii)(B) in the case of type ratings).

Based on an internal review, at the end of point (da), a sentence is introduced to clarify that additional multi-pilot operation privileges do not need to be entered onto a single-pilot aeroplane class rating, for consistency with the last sentence of point FCL.725(d)(2).

— *Finally, in reaction to comments received for NPA 2023-104 and discussions with the Aircrew TeB, an additional point (db) is proposed to be inserted, to ensure that, in particular scenarios, the form(s) of operation of a skill test or proficiency check in a single-pilot aircraft are entered in the pilot's logbook and signed by the examiner. If a skill test or proficiency check in a single-pilot aircraft is conducted solely in single-pilot operation, there is no need for an additional remark on the form of operation (e.g. a private pilot's proficiency check in an SEP aeroplane), since this is the 'standard scenario' for a single-pilot aircraft. However, if a skill test or proficiency check in a single-pilot aircraft does not follow this 'standard scenario' and is done either in a combination of single-pilot operation and multi-pilot operation, or is done in multi-pilot operation only, it should be entered in the logbook. An amendment to AMC1 FCL.050 is planned to illustrate how these logbook entries should be done.*

(26) in point (b)(1) of point FCL.740, points (ii) and (iii) are replaced by the following:

- '(ii) at a DTO or at an ATO, if the expired rating concerned a non-high-performance SEP aeroplane class rating, a TMG class rating or a single-engine type rating for helicopters referred to in point DTO.GEN.110(a)(2)(c) of Annex VIII;
- (iii) at a DTO, at an ATO or with an instructor, if the rating expired no more than 3 years ago and the rating concerned a non-high-performance SEP aeroplane class rating or a TMG class rating;';

Rationale

RMT.0678

See NPA 2020-14, page 25.

The text was updated to reflect the latest amendments with Regulation (EU) 2020/2193.

(27) point FCL.720.A is amended as follows:

- (a) in point (a), the text between ‘(a) Single-pilot aeroplanes’ and ‘(1) Single-pilot multi-pilot aeroplanes’ is deleted;
- (b) in point (b)(5), point (i) is replaced by the following:
 - ‘(i) they completed, within the preceding 3 years, the training and checking in accordance with points ORO.FC.220 or ORO.FC.230 of Annex III (Part-ORO) to Regulation (EU) No 965/2012;’;
- (c) point (c) is replaced by the following:
 - ‘(c) Notwithstanding point (b), applicants who comply with point 6(i) of Section B of Appendix 9 to this Annex shall be issued with a type rating with restricted privileges for a multi-pilot aeroplane that allows holders of such a rating to act as cruise relief co-pilots above Flight Level 200, provided that two other members of the crew have a type rating in accordance with point (b).

To remove the restriction, applicants shall comply with all of the following:

- (1) undergo an assessment at an ATO which shall determine the training needs of an individual applicant to remove the restriction;
- (2) based on the assessment specified in point (1), complete, at that ATO, training which shall allow the applicant to reach the level of proficiency to safely operate the aircraft;
- (3) after the completion of the training specified in point (2), complete a skill test in accordance with Appendix 9 to this Annex;
- (4) after the completion of the skill test specified in point (3), either:
 - (i) comply with point ORO.FC.220(e) of Annex III (Part-ORO) to Regulation (EU) No 965/2012, provided that they meet the experience requirements specified in point FCL.730.A; or
 - (ii) complete flight training in the aircraft which includes manoeuvres on take-off, landing and go-around.’;

Rationale

RMT.0190, RMT.0587

RMT.0587 (point (b)(5))

Point FCL.720.A(b)(5) was amended with Regulation (EU) 2020/2193 to provide a full credit for the advanced UPRT course to pilots who have already undergone UPRT training in accordance with Regulation (EU) No 965/2012. Point (b)(5)(i) is now further revised in order to clarify the original intention of the amendment introduced with Regulation (EU) 2020/2193: to also allow such full credit for the advanced UPRT course in cases where pilots have completed an initial operator conversion course more than 3 years before, but have also within the preceding 3 years completed operator recurrent training.

In reaction to comments received during the focused consultation with the EASA Advisory Bodies in June 2022, point FCL.725(d) was comprehensively revised to set out the requirements for licensing with regard to single-pilot operation and multi-pilot operation in single-pilot aircraft. By doing so, the prerequisites so far included in the introductory phrase of point FCL.720.A(a) were introduced in the new point FCL.725(d)(1)(iii)(A). Hence, that text can be removed from point FCL.720.A(a).

RMT.0190 (point (c))

See NPA 2014-25, page 13.

Based on comments received, the RMT.0190 review group further redrafted the text to clarify how the CRCP restriction on a type rating can be removed: it will be necessary to complete dedicated training and an assessment at an ATO, followed by practical take-off and landing exercises in the relevant aeroplane type. The skills shall be assessed in accordance with the provisions of Appendix 9 to Part-FCL. Applicants with at least 750 hours of experience shall be deemed eligible for ZFTT course in accordance with point FCL.730.A (see below the amendments proposed for that point).

In reaction to comments received during the focused consultation with the EASA Advisory Bodies in June 2022, in point (c)(4)(i) the term 'prerequisites' is replaced by the term 'experience requirements', for clarity with regard to the content of point FCL.730.A.

Finally, after a final internal review, the introductory phrase of point FCL.720.A(c) was slightly revised to refer to the applicants for such a type rating instead of Member States, since Part-FCL requirements should always address the applicants for or holders of a licence, while Member States / competent authorities should be addressed in the Cover Regulation / Part-ARA. Also, a link to the relevant part of Appendix 9 to Part-FCL was inserted.

(28) in point FCL.725.A, point (c) is replaced by the following:

- ‘(c) for single-pilot non-high-performance complex aeroplanes, single-pilot high-performance complex aeroplanes and multi-pilot aeroplanes, the training courses shall include UPRT theoretical knowledge and flight instruction related to the specificities of the relevant class or type. For the flight instruction, FSTDs can be used in accordance with point 18 of Section A of Appendix 9 to this Annex (Part-FCL).’;

Rationale

RMT.0587

Based on input received from a Member State, point (c) of this point is complemented by an additional sentence that clarifies the applicability of Part-FCL, Appendix 9, Section A, point 18. Although the intention of this point 18 is to apply in general, its position after the headline following point 12 (‘Specific requirements for the skill test/proficiency check for type ratings for multi-pilot aircraft, for single-pilot aircraft when operated in multi-pilot operations, for MPL and for ATPL’) could lead to reading it in such a way that it would not apply in the case of single-pilot complex aeroplanes operated in single-pilot operation. Hence, the additional sentence is proposed to clarify the link between type-specific UPRT for all types specified in point FCL.725.A(c) and the FSTD arrangements set out in Part-FCL, Appendix 9, Section A, point 18.

(29) in point (a) of point FCL.730.A, points (1) and (2) are replaced by the following:

- ‘(1) if an FFS qualified to level CG, C or interim C is used during the course:
- (i) in the case of cruise relief co-pilots, 1 500 hours of flight time;
 - (ii) in all other cases, 1 500 hours of flight time or 250 route sectors;
- (2) if an FFS qualified to level DG or D is used during the course:
- (i) in the case of cruise relief co-pilots, 750 hours of flight time;

- (ii) in all other cases, 500 hours of flight time or 100 route sectors.’;

Rationale

RMT.0190

See NPA 2014-25, page 13.

Based on comments received, and after extensive discussions within the RMT.0190 review group, it was decided to allow the ZFTT course route also for CRCPs, as the mandatory recurrent training and checking by operators in an FFS creates a significant safety margin, and may even include the performance of take-off, landing and go-around manoeuvres.

- (30) point (b) of point FCL.740.A is amended as follows:

- (a) the title and the introductory phrase of point (1) are replaced by the following:
- ‘(b) Revalidation of single-pilot single-engine class ratings
- (1) SEP aeroplane class ratings and TMG class ratings. For the revalidation of SEP aeroplane class ratings or TMG class ratings, applicants shall.’;
- (b) in point (1), point (ii) is replaced by the following:
- ‘(ii) within the 12 months preceding the expiry date of the rating, complete 12 hours of flight time in the relevant class, including:
- (A) 6 hours as PIC,
- (B) 12 take-offs and 12 landings, and
- (C) refresher training of at least 1 hour of total flight time with and to the satisfaction of a flight instructor (FI) or a class rating instructor (CRI) who shall select those flight exercises that allow the applicant to refresh their competence in safely operating the aircraft and applying normal, abnormal and emergency procedures. Applicants shall be exempted from this refresher training if they have passed any of the following, in any class or type of aeroplane:
- (1) a class or type rating proficiency check;
- (2) a skill test;
- (3) an EBT practical assessment;
- (4) an assessment of competence.’;
- (c) point (2) is replaced by the following:
- ‘(2) When applicants hold both an SEP aeroplane-land class rating and a TMG class rating, they may complete the requirements of point (1) in either class or a combination of these classes, and achieve revalidation of both ratings.’;
- (d) point (4) is replaced by the following:
- ‘(4) When applicants hold both an SEP aeroplane-land class rating and an SEP aeroplane-sea class rating, they may complete the requirements of point (1)(ii) in either class or a combination of these classes, and achieve the fulfilment of these requirements for both ratings. At least 1 hour of the required PIC time and 6 of the required 12 take-offs and landings shall be completed in each class.’;

Rationale

RMT.0678

See NPA 2020-14, page 26.

In reaction to comments received for NPA 2020-14, the following changes were applied.

- In point (b)(1)(ii)(C), the requirement for the refresher flight training to have a duration of at least 1 hour is kept, since many comments objected to its deletion, arguing that a minimum standard should be kept in order to ensure a proper conduct of such training flights. Consequently, refresher training in electrically powered aeroplanes with an endurance of less than 1 hour will need to consist of more than one flight, in order to recharge the battery. However, also considering the comments received, it is concluded that the need to ensure the proper conduct of refresher training via the 1-hour requirement outweighs the need to accommodate the endurance of current electrically powered aeroplanes. Additionally, with the increasing endurance of such aeroplanes this issue will be less relevant in the future.
- Text was added to point (b)(1)(ii)(C) to clarify that the refresher training needs to be completed 'to the satisfaction of' the instructor.
- An editorial error was corrected in point (b)(4): in the phrase '6 of the required 12 take-offs and landings', the word 'hours' after '6' was deleted.

In reaction to a comment received during the focused consultation with the EASA Advisory Bodies in June 2022, in the last sentence of point (b)(1)(ii)(C) the word 'other' is deleted, in order to allow pilots to receive that credit for an SEP(A) class rating revalidation also in cases where they, as an instructor, have completed an assessment of competence in an SEP(A) aeroplane (which is the same but no 'other' class of aeroplane). Additionally, inspired by questions received by a Member State and after a further internal review, EASA proposes to rearrange the text into a list that also refers to an evidence-based training (EBT) practical assessment, since those assessments also in other places in Part-FCL are made equal to a conventional proficiency check for a class or type rating.

(31) in point (a) of point FCL.745.A, point (3) is replaced by the following:

- '(3) 3 hours of dual flight instruction with a flight instructor for aeroplanes FI(A) qualified in accordance with point FCL.915(e) and consisting of advanced UPRT in an aeroplane qualified for the training task. Flight time that does not include advanced UPRT but serves to go to or return from the UPRT training area shall not count towards these 3 hours.';

Rationale

RMT.0587

During the focused consultation with the EASA Advisory Bodies in June 2022, several Member States reported issues with the application of point (a)(3), since for industry it seems to not be clear that the 3 hours need to be 'pure' UPRT and that 'positioning flight time' (flight time to fly from the aerodrome to the airspace where UPRT can be performed and subsequently to return to the aerodrome) will not count. For this reason, an additional sentence is added to clarify that such positioning flight time shall not count and that applicants need to complete 3 hours of UPRT flight time.

(32) point FCL.740.H is replaced by the following:

FCL.740.H Revalidation of type ratings – helicopters

(a) Revalidation. For the revalidation of type ratings for helicopters, applicants shall comply with one of the following, as applicable:

(1) they shall:

(i) within the validity period of the type rating, complete at least 2 hours as pilot in the relevant helicopter type; and

(ii) within the 3 months immediately preceding the expiry date of the type rating, pass a proficiency check:

(A) which is conducted in accordance with Appendix 9 to this Part in the relevant type of helicopter or an FSTD representing that type; and

(B) the duration of which may be counted towards the flight time specified in point (i);

(2) for type ratings for single-engine helicopters up to a maximum take-off mass of 3 175 kg, they shall:

(i) comply with point (a)(1); or

(ii) complete, in the relevant type of helicopter:

(A) within the validity period of the type rating, at least 6 hours as PIC; and

(B) within the 3 months immediately preceding the expiry date of the rating, a refresher training of at least 1 hour of total flight time with and to the satisfaction of an instructor who shall select those flight exercises that allow the applicant to refresh their competence in safely operating the aircraft and applying normal, abnormal and emergency procedures. Applicants may choose to complete the refresher training in the aircraft or an FSTD representing the relevant type, or in a combination of both.

(b) When applicants hold more than one type rating for SEP helicopters, they may achieve revalidation of all the relevant type ratings by passing the proficiency check in accordance with point (a)(1)(ii) or completing the refresher training in accordance with point (a)(2)(ii)(B) in only one of the relevant types held, provided that they have completed the following flight time as PIC in each of the other relevant types during the validity period:

(1) if they completed a proficiency check in accordance with point (a)(1)(ii), at least 2 hours; or

(2) if they completed a refresher training in accordance with point (a)(2)(ii)(B), at least 6 hours.

The proficiency check or the refresher training, as applicable, shall be performed each time on a different type. The new validity period of all type ratings revalidated in accordance with this point shall commence together with the validity period of the type rating for which the proficiency check or the refresher training is performed.

(c) When applicants hold more than one type rating for SET helicopters with a maximum certified take-off mass up to 3 175 kg, they may achieve revalidation of all the relevant

type ratings by passing the proficiency check in accordance with point (a)(1)(ii) or completing the refresher training in accordance with point (a)(2)(ii)(B) in only one of the relevant types held, provided that they have completed:

- (1) 300 hours as PIC on helicopters;
- (2) 15 hours on each of the types held; and
- (3) the following flight time as PIC in each of the other relevant types during the validity period:
 - (i) if they completed a proficiency check in accordance with point (a)(1)(ii), at least 2 hours; or
 - (ii) if they completed a refresher training in accordance with point (a)(2)(ii)(B), at least 6 hours.

The proficiency check shall be performed each time on a different type. The new validity period of all type ratings revalidated in accordance with this point shall commence together with the validity period of the type rating for which the proficiency check or the refresher training is completed.

- (d) Applicants who successfully complete a skill test for the issue of an additional type rating or a proficiency check for the renewal of a type rating shall achieve revalidation for the relevant type ratings already held in the common groups, as specified in points (b) and (c).

The new validity period of all type ratings revalidated in accordance with this point shall commence together with the validity period of the type rating for which the skill test or proficiency check is completed.

- (e) The revalidation of an IR(H), if held, may be combined with a proficiency check for a type rating.
- (f) Applicants who fail to achieve a pass in all sections of a proficiency check before the expiry date of a type rating shall not exercise the privileges of that rating until a pass in the proficiency check has been achieved. In the case of points (b) and (c), applicants shall not exercise their privileges in any of the types.;

Rationale

RMT.0678

See NPA 2020-14, page 26.

In reaction to comments received for NPA 2020-14:

- the introductory phrase of point (a)(2) was amended to include any single-engine helicopter up to a MTOM of 3 175 kg (thereby also including smaller SET helicopters) in the new refresher training option for type rating revalidation;
- text was added to point (a)(2)(ii)(B) to clarify that:
 - the refresher training needs to have a total duration of at least 1 hour of flight time, for consistency with aeroplane refresher training requirements (see point FCL.740.A(b)(1)),
 - the refresher training needs to be completed 'to the satisfaction of' the instructor;
- in point (b), the entire structure was slightly updated for consistency with the structure of the subsequent point (c), and in a new point (b)(2) it is now clarified that in cases where pilots wish

to achieve revalidation via the refresher training, their experience on all relevant types (combined revalidation) shall be 6 hours (consistency with point (a)(2)(ii));

- *in point (b), in the additional paragraph following point (b)(2), the phrase ‘or the refresher training’ was added for consistency;*
- *in point (c), the inclusion of SET helicopters in the refresher training flight option was reflected (references to the refresher training flight and related minimum PIC flight time requirement on each type);*
- *in the first sentence of point (d), text was added to make this requirement also applicable in the case of proficiency checks for the purpose of renewal of a type rating.*

In reaction to comments received during the focused consultation with the EASA Advisory Bodies in June 2022, an additional sentence was added to point (a)(2)(ii)(B) to allow the completion of the refresher training in the aircraft, an FSTD representing that aircraft, or in a combination of both.

(33) in point (a) of point FCL.810, point (3) is replaced by the following:

‘(3) When applicants hold both an SEP aeroplane (land) and a TMG class rating, they may meet the requirements in point (1) above in either class or in both classes.’;

Rationale

RMT.0678

See NPA 2020-14, page 27.

(34) point FCL.815 is amended as follows:

‘(a) point (d) is replaced by the following:

(d) In order to exercise the privileges of the mountain rating, the holder of the rating shall, during the last 2 years:

- (1) have completed at least six landings on a surface designated to require a mountain rating; or
- (2) have passed a proficiency check that complies with the requirements in point (c). The completion of the proficiency check shall be entered in the logbook of the pilot and signed by the responsible examiner.’;

(b) points (e) and (f) are deleted.

Rationale

RMT.0678

See NPA 2020-14, page 27.

Additionally, in response to a comment received for NPA 2020-14, in point FCL.815(d)(2) an additional sentence is added to address the recording of the proficiency check.

(35) point (b) of point FCL.820 is amended as follows:

(a) the introductory phrase is replaced by the following:

- ‘(b) The obligation to hold a flight test rating established in point (a) shall only apply to flight tests conducted on:’;
- (b) in point (2), point (ii) is replaced by the following:
- ‘(ii) the standards of CS-23 or equivalent airworthiness codes, except for aeroplanes with a maximum take-off mass of 2 000 kg or less.’;

Rationale

RMT.0587

After an internal review, it was concluded that point FCL.820(b)(2)(ii), as written today, covers aeroplanes up to a MTOM of 1 999 kg (less than 2 000 kg) and does not include aeroplanes with a MTOM of exactly 2 000 kg. On the contrary, point (2)(j)(i) of Article 1 of Regulation (EU) No 748/2012 defines ELA 2 aeroplanes as aeroplanes having a MTOM up to 2 000 kg (thereby including aeroplanes having a MTOM of exactly 2 000 kg). Point FCL.820(b)(2)(ii) is therefore proposed to be reworded to include aeroplanes up to 2 000 kg MTOM, for consistency with Regulation (EU) No 748/2012.

- (36) in point (a) of point FCL.835, point (1) is replaced by the following:
- ‘(1) The privileges of a BIR holder are to conduct flights under IFR on single-pilot aeroplanes for which class ratings are held, with the exception of:
- (i) high-performance aeroplanes; and
- (ii) aeroplane variants if operational suitability data has determined that an IR is required.’;

Rationale

RMT.0678

See NPA 2020-14, page 28.

- (37) point (b) of point FCL.915 is amended as follows:
- (a) the title of point (b) is replaced by the following:
- ‘(b) Additional requirements for instructors that provide flight instruction in aircraft.’;
- (b) in point (3), point (ii) is replaced by the following:
- ‘(ii) passed an assessment of competence for the relevant category of instructor on that class or type of aircraft.’;
- (c) point (4) is replaced by the following:
- ‘(4) be entitled to act as PIC in the aircraft during such flight instruction; and’;
- (d) after point (4), the following point (5) is added as follows:
- ‘(5) when providing flight instruction in a variant of the SEP aeroplane class with a particular type of engine as specified in Article 2(8a) of this Regulation:
- (i) have completed at least 5 hours of flight time as pilots in that variant; or
- (ii) have passed an assessment of competence for the relevant category of instructor in that variant.’;

Rationale

RMT.0678

See NPA 2020-14, page 28.

As regards point (b)(5), some comments were received that asked for a reduction or even an entire deletion of the experience requirements with particular engine types within the SEP class. After careful consideration of these comments, it was decided not to change the text and to keep this experience requirement, which is deemed appropriate in the context of significantly different engine types within the new redefined SEP class. In this context, it needs to be highlighted that 10 hours of 'total time' (not PIC time) are required. Hence, the flight time of the differences training for the holder of the instructor certificate would already count towards these 10 hours.

In reaction to comments received during the focused consultation with the EASA Advisory Bodies in June 2022, and as agreed during that focused consultation meeting, draft point (b)(5) was revised to also allow the completion of an instructor assessment of competence for obtaining instructional privileges in a particular SEP variant ((b)(5)(ii)), and to reduce the required experience from 10 to 5 hours ((b)(5)(i)).

(38) in point FCL.930, point (a) is replaced by the following:

'(a) An applicant for an instructor certificate shall have completed a course of theoretical knowledge and flight instruction at an ATO.';

Rationale

RMT.0678

When deleting all references to sailplane and balloon licensing from Part-FCL with Regulation (EU) 2020/359, the second sentence of point FCL.930(a) was obviously overlooked. Hence, the deletion of this sentence is proposed with this amendment. Sailplane and balloon flight crew licensing requirements are now to be found in Regulation (EU) 2018/395 (balloons) and Regulation (EU) 2018/1976 (sailplanes).

(39) point FCL.945 is replaced by the following:

FCL.945 Obligations for instructors

Upon completion of the training flight for the revalidation of an SEP aeroplane or TMG class rating in accordance with point FCL.740.A(b)(1)(ii)(C) or for the revalidation of a single-engine helicopter type rating in accordance with point FCL.740.H(a)(2)(ii)(B), and only in the event of fulfilment of all the other revalidation criteria required by point FCL.740.A(b)(1)(ii) or point FCL.740.H(a)(2)(ii), as applicable, the instructor shall endorse the applicant's licence with the new expiry date of the rating, if specifically authorised for that purpose by the competent authority responsible for the applicant's licence.';

Rationale

RMT.0678

See NPA 2020-14, page 28.

In reaction to comments received for NPA 2020-14, text was added to allow instructors to also apply this point in the case of single-engine helicopter type rating revalidation via the new refresher training flight option.

Additionally, during an internal review, the phrase ‘or certificate’ was deleted, as it is not relevant in the context of this point.

(40) point (b) of point FCL.915.FI is amended as follows:

(a) in point (2), the introductory phrase and its point (i) are replaced by the following:

‘(2) hold at least a PPL(A), or hold an MPL with additional PPL privileges in accordance with point FCL.405.A(b)(1), and have:

(i) except for an FI(A) providing training for the LAPL(A) only, passed the CPL theoretical knowledge examination, which may be taken without completing a CPL theoretical knowledge training course and which in this case shall not be valid for any of the following:

(A) the issue of a CPL;

(B) receiving credits for CPL theoretical knowledge in accordance with point FCL.035 and Appendix 1;’;

(b) point (3) is replaced by the following:

‘(3) have completed at least 30 hours in the class or type of aeroplane used for the FI(A) training course, of which at least 5 hours shall have been completed during the 6 months preceding the pre-entry flight assessment set out in point FCL.930.FI(a);’;

Rationale

RMT.0678

As regards the amendments to point (b)(3), see NPA 2020-14, page 28.

After further internal review, point (b)(2)(i) is proposed to be further clarified by better expressing that a CPL theoretical knowledge examination taken solely for the purpose of obtaining an FI certificate, without prior CPL theoretical knowledge instruction, is valid exclusively for demonstrating compliance with FI prerequisites.

In reaction to comments received during the focused consultation with the EASA Advisory Bodies in June 2022, the introductory phrase of point (b)(2) was amended to clarify that holders of an MPL with PPL privileges can obtain an FI certificate.

(41) in point FCL.930.FI, point (a) is replaced by the following:

‘(a) Applicants for the FI certificate shall, at an ATO, have passed a specific pre-entry flight assessment with an FI qualified in accordance with point FCL.905.FI(j) within the 6 months preceding the start of the course, to assess their ability to undertake the course. This pre-entry flight assessment shall be based on the proficiency check for the class and type ratings as set out in Appendix 9 to this Annex.’;

Rationale

RMT.0678

See NPA 2020-14, page 28.

Additionally, based on comments received for NPA 2020-14:

- the phrase ‘at an ATO’ was inserted to clarify that the pre-entry flight assessment shall take place at an ATO; and
- the reference to point FCL.905.FI had to be corrected after the revision of that point with amending Regulation (EU) 2019/1747.

(42) point FCL.940.FI is amended as follows:

(a) in point (a)(1), point (ii) is replaced by the following:

‘(ii) they have completed instructor refresher training as an FI at an ATO or at the competent authority;’;

(b) point (b) is replaced by the following:

‘(b) Renewal

If the FI certificate has expired, applicants shall, within a period of 12 months before the application date for the renewal, complete instructor refresher training as an FI at an ATO or at a competent authority and complete an assessment of competence in accordance with point FCL.935.’;

Rationale

RMT.0587

In point FCL.940.FI, points (a)(1)(ii) and (b) still contained references to FI certificates for balloons and sailplanes. Since these instructor certificates are no longer covered by Part-FCL, the related text elements need to be deleted.

(43) in point FCL.905.TRI(a)(2), point (ii) is replaced by the following:

‘(ii) has conducted the flight instruction syllabus of the relevant part of the TRI training course in accordance with point FCL.930.TRI(aa)(3) to the satisfaction of the head of training of an ATO;’;

Rationale

RMT.0587

The reference to point FCL.930.TRI has to be updated, after the revision of that point.

(44) point FCL.910.TRI is amended as follows:

(a) after the introductory phrase of point (a), points (1) and (2) are replaced by the following:

‘(1) LIFUS, provided that the TRI training course has included the training specified in point FCL.930.TRI(aa)(4)(i);

(2) landing training, provided that the TRI training course has included the training specified in point FCL.930.TRI(aa)(4)(ii); or’;

(b) in point (b), the paragraph following point (3) is replaced by the following:

‘The privileges of TRIs shall be extended to further variants, provided that they comply with point FCL.710 in those other variants and, where applicable, the elements set out in

the operational suitability data established in accordance with Annex I (Part 21) to Commission Regulation (EU) No 748/2012 for those variants.’;

Rationale

RMT.0587

In reaction to comments received during the focused consultation with the EASA Advisory Bodies in June 2022, the last sentence in point FCL.910.TRI(b) (paragraph following point (3)) is proposed to be amended for clarification. The current wording is ambiguous and could be read in a way that suggests that TRIs always need additional training in order to extend their privileges to a new variant of a type for which they already hold TRI privileges. In fact, additional training is only necessary if so determined by OSD. Otherwise, in such cases it is sufficient for TRIs to extend their pilot privileges to the new variant by completing the relevant differences training.

Additionally, points (a)(1) and (a)(2) need to be amended to update the references to point FCL.930.TRI (after the revision of that point).

(45) in point FCL.930.TRI, point (a) is replaced by the following points (a) and (aa):

‘(a) The TRI training course shall be conducted:

- (1) in the case of MPA, in an FFS or a combination of FSTD(s) and FFS;
- (2) in the case of type ratings for SPA and helicopters, in:
 - (i) an available and accessible FFS; or
 - (ii) a combination of FSTD(s) and the aircraft if an FFS is not available or accessible; or
 - (iii) the aircraft if no FSTD is available or accessible.

However, the TRI training course for non-complex helicopters may be conducted in a combination of FSTD(s) and the aircraft even if an FFS is available and accessible.

(aa) The training course shall include:

- (1) 25 hours of teaching and learning;
- (2) 10 hours of technical training, including revision of technical knowledge, the preparation of lesson plans and the development of classroom/simulator instructional skills;
- (3) 5 hours of flight instruction on the appropriate aircraft or an FSTD representing that aircraft for single-pilot aircraft and 10 hours for multi-pilot aircraft or an FSTD representing that aircraft;
- (4) the following training, as applicable:
 - (i) additional specific training before conducting LIFUS;
 - (ii) additional specific training before conducting landing training. That training in the FSTD shall include training for emergency procedures related to the aircraft.’;

Rationale

RMT.0587

While Part-FCL, Appendix 9, Section A, point 1, when prescribing training platforms to be used for class and type rating training, differentiates between FFS and (other) FSTDs, point FCL.930.TRI(a) simply refers to FSTD. During an internal review, it was concluded that the terminology of Part-FCL Appendix 9 and point FCL.930.TRI needs to be aligned, to clarify and ensure trained and qualified TRIs for all types of rating training arrangements as per Part-FCL, Appendix 9, Section A, point 1 (as proposed to be amended, see further down, with alleviations for training related to non-complex aircraft type ratings). Hence, point (a) of point FCL.930.TRI is proposed to be revised by adding text for this purpose. The list with the necessary components of TRI training remains unchanged but is moved to a separate new point (aa), to avoid an overloaded new point (a).

In reaction to comments received during the focused consultation with the EASA Advisory Bodies in June 2022, EASA will develop additional AMC to illustrate TRI training elements for the purpose of extending the privileges of an 'FSTD-only' – TRI(H) to conduct landing training in a helicopter.

(46) in point FCL.905.CRI(a), point (2) is replaced by the following:

'(2) a towing or aerobatic rating for the aeroplane category, provided that the CRI holds the relevant rating and has demonstrated the ability to instruct for that rating to an FI qualified in accordance with point FCL.905.FI(j);';

Rationale

RMT.0678

Based on comments received for NPA 2020-14, the reference to point FCL.905.FI had to be corrected after the revision of that point with amending Regulation (EU) 2019/1747.

(47) in point FCL.905.IRI(b), point (3) is replaced by the following:

'(3) In the case of IRI already qualified to instruct on ATP(A) or CPL(A)/IR integrated courses, the requirement of (b)(2) may be replaced by the completion of the course provided for in point FCL.905.FI(k)(3).';

Rationale

RMT.0587

The reference to point FCL.905.FI had to be corrected after the revision of that point with amending Regulation (EU) 2019/1747.

(48) in point FCL.930.IRI, point (b) is replaced by the following:

'(b) Flight instruction shall be given by an FI qualified in accordance with point FCL.905.FI(j).';

Rationale

RMT.0678

Based on comments received for NPA 2020-14, the reference to point FCL.905.FI had to be corrected after the revision of that point with amending Regulation (EU) 2019/1747.

- (49) in point FCL.910.SFI, the second subparagraph (introductory phrase of points (a) to (c)) is replaced by the following:

‘Unless otherwise specified in the operational suitability data established in accordance with Annex I (Part 21) to Commission Regulation (EU) No 748/2012, to extend the privileges of SFIs to other FSTDs representing further types of the same category of aircraft, SFIs shall have:’;

Rationale

RMT.0587

Based on input from industry, EASA concluded that there is a difference between the requirements for type extension for TRIs (point FCL.910.TRI) and SFIs (point FCL.910.SFI). While point FCL.910.TRI, in the context of type extension, contains a reference to OSD, point FCL.910.SFI does not. EASA concluded that this is an unintentional gap that should be closed, since SFI type extension OSD should also have the possibility to determine specific arrangements for a particular type. For this reason, the above amendment is proposed.

- (50) in point FCL.930.SFI, point (b) is replaced by the following:

‘(b) An applicant for an SFI certificate who:

- (1) holds a TRI certificate for the relevant type shall be fully credited towards the requirements of point (a);
- (2) holds or has held an instructor certificate shall be fully credited towards the requirement of point (a)(3).’;

Rationale

RMT.0587

In reaction to comments received during the focused consultation with the EASA Advisory Bodies in June 2022, point FCL.930.SFI(b) is complemented with additional text (modelled on point FCL.930.TRI(b)) to allow crediting of the teaching and learning part if applicants hold or have held another instructor certificate (the general requirement in point FCL.915(c)(1)(i) only refers to instructor certificates held).

- (51) Appendix 1 is amended as follows:

(a) points 1.3 and 1.4 are replaced by the following:

‘1.3. For the issue of a PPL, the holder of an LAPL in the same category of aircraft shall be fully credited towards the requirements of theoretical knowledge instruction and examination. This credit shall also apply to applicants for a PPL who have already successfully completed the theoretical knowledge examination for the LAPL in the same aircraft category, as long as it is within the validity period specified in point FCL.025(c).

1.4. By way of derogation from point 1.2, for the issue of an LAPL(A), the holder of an SPL issued in accordance with Annex III (Part-SFCL) to Commission Implementing Regulation (EU) 2018/1976 with privileges to fly TMGs shall demonstrate an adequate level of theoretical knowledge for the SEP aeroplane-land class in accordance with point FCL.135.A(a)(2).’;

(b) point 2.2 is replaced by the following:

- ‘2.2. Applicants shall pass theoretical knowledge examinations as defined in this Annex (Part-FCL) for the following subjects in the appropriate aircraft category:
- 021 — Aircraft general knowledge: airframe and systems, electrics, power plant and emergency equipment;
 - 022 — Aircraft general knowledge: instrumentation;
 - 032/034 — Performance aeroplanes or helicopters, as applicable;
 - 070 — Operational procedures; and
 - 081/082 — Principles of flight for aeroplanes or helicopters, as applicable.’;
- (c) point 2.4 is replaced by the following:
- ‘2.4. Applicants for a CPL that have passed the relevant theoretical knowledge examinations for an IR in the same category of aircraft are credited towards the theoretical knowledge requirements in the communications subject.’;
- (d) point 3.2 is replaced by the following:
- ‘3.2 Applicants shall pass theoretical knowledge examinations as defined in this Annex (Part-FCL) for the following subjects in the appropriate aircraft category:
- 021 — Aircraft general knowledge: airframe and systems, electrics, power plant and emergency equipment;
 - 022 — Aircraft general knowledge: instrumentation;
 - 032/034 — Performance aeroplanes or helicopters, as applicable;
 - 070 — Operational procedures; and
 - 081/082 — Principles of flight for aeroplanes or helicopters, as applicable.’;

Rationale

RMT.0587, RMT.0678

RMT.0678

As regards the rationale for the amendments to points 1.3 and 1.4, please refer to NPA 2020-14, page 28.

After further revision of the ‘LAPL → PPL’ training route (see above the proposed amendments and rationale for point FCL.210.A), the condition to complete the LAPL(A) theoretical knowledge instruction before ‘additional PPL training’ is deleted, as it no longer fits with the updated ‘LAPL → PPL training route’, also considering that same syllabus (AMCI FCL.115; FCL.120 point (b) referring to AMCI FCL.210; FCL.215) is supposed to be followed for both LAPL and PPL theoretical knowledge training.

RMT.0587

Points 2.2 and 3.2: Since the subject ‘Principles of flight’ exists in two versions, one for aeroplanes (081) and one for helicopters (082), the rule text has to be corrected accordingly for consistency.

Point 2.4: After the deletion of the EIR with amending Regulation (EU) 2020/359, the reference to the EIR needs to be deleted (no credit is foreseen for BIR holders).

(52) Section B of Appendix 4 is amended as follows:

(a) the first paragraph of point 5 is replaced by the following:

‘5. Items in Section 2(c) and (e)(iv), Section 3(g), and the whole of Sections 5 and 6 may be performed in an FNPT II or an FFS. The examiner may decide not to perform item 6(d).’;

(b) in Section 3 of the table following point 5, the row (g) is replaced by the following, and an additional row (h) is inserted as follows:

‘

g	Tracking, positioning (NDB, VOR, or track between waypoints), identification of facilities (instrument flight).
h	Implementation of diversion plan to alternate aerodrome (visual flight)

’;

(c) in Section 6 of the table following point 5, the row (d) is replaced by the following:

‘

d	Engine shut-down and restart (if selected by the examiner)
---	------------------------------------------------------------

’;

Rationale

RMT.0587

The proposed amendment to the first paragraph of point 5 (adding Section 3(g) to the list of items that may be performed in FSTD) stems from an issue that was highlighted by a Member State, which is related to the transitional arrangements of Regulation (EU) 2018/1048 (the ‘Airspace Usage Requirements (PBN) Regulation’) and the decreasing numbers of VHF omnidirectional radio ranges (VORs) and non-directional beacons (NDBs). In that context, it becomes more difficult to comply with the Part-FCL requirements (and use the related AMC) on conventional navigation aids. The related skill test exercise may therefore be conducted in an FSTD.

In reaction to comments that were received during the focused consultation of June 2022 with the EASA Advisory Bodies, in Section B, point 5, an additional sentence is introduced to allow examiners to decide whether to include item 6(d) (engine shut-down and restart) in the skill test. That high-risk manoeuvre should primarily be conducted in a safe training environment, while during a skill test, the examiner should decide whether to include it or not.

Finally, in reaction to comments received for NPA 2023-104, the following changes are applied to the draft text.

- *In item (g) of Section 3 the phrase ‘(VOR or NDB)’ is amended to also refer to ‘tracks between waypoints’, for consistency with the content of the IR skill test (Appendix 7 to Part-FCL, Section 3(a)).*
- *The element ‘Implementation of diversion plan to alternate aerodrome (visual flight)’ was moved from item (g) (which, according to the proposed amendment, may be performed in FSTD) to a separate new item (h), to clarify that this element needs to be performed in the aircraft.*
- *The phrase ‘(if selected by the examiner)’ is added to item 6(d), for consistency with the amended first paragraph of point 5 of Section B of Appendix 4.*

(53) Appendix 8 is amended as follows:

(a) the title is replaced by the following:

‘Appendix 8

Cross-crediting of the IR part of a class or type rating proficiency check or EBT practical assessment’;

(b) in Section A, after the introductory sentence, the first two rows of the table are replaced by the following:

‘If a skill test, proficiency check or EBT practical assessment including IR is performed, and holders have a valid:	Credit is valid towards the IR part in proficiency check for:
MPA type rating; single-pilot high-performance complex aeroplane type rating	SE class rating (*), and SE type rating (*), and SP ME class or type rating except for high-performance complex type ratings, only credits for Section 3B of the proficiency check in point B.5 of Appendix 9(*)’

Rationale

RMT.0587

Even in the case of SP ME class or type ratings, a skill test or proficiency check (including IR) in an MPA or SP HP complex aeroplane would only lead to IR cross credits if applicants comply with the additional conditions as per the asterisk at the end of the table. For consistency, the asterisk had to be inserted as shown above.

In reaction to comments received during the focused consultation with the EASA Advisory Bodies in June 2022, text was added to the title of Appendix 8 and to the title of the first column in the table in Section A, to clarify that the credits can be given also based on the IR element of an EBT practical assessment.

(54) Appendix 9 is amended as follows:

(a) the title is amended as follows:

‘Appendix 9

Training, skill test and proficiency check for the MPL, and the ATPL, and for type and class ratings, and proficiency checks for the BIR and the IR’;

(b) Section A is amended as follows:

(1) point 1 is replaced by the following:

‘1. Applicants for a skill test shall have received instruction in the same class or type of aircraft to be used in the test.

-
- 1a. Training in FFS in accordance with points 1b and 1c of this point shall be complemented with take-off and landing training in a single-pilot aircraft operated in single-pilot or multi-pilot operation, or in a multi-pilot aircraft, as applicable, in accordance with point 17, unless the training is completed in accordance with point FCL.730.A or constitutes training for cruise relief co-pilots in accordance with point 6(i) of Section B of this Appendix.
 - 1b. The training for MPA and PL type ratings shall be conducted in an FFS or in a combination of FSTD(s) and FFS. The skill test or proficiency check for MPA and PL type ratings and the issue of an ATPL and an MPL, shall be conducted in an FFS, if available.
 - 1c. The training, skill test or proficiency check for class or type ratings for SPA and helicopters shall be conducted in:
 - (a) an available and accessible FFS; or
 - (b) a combination of FSTD(s) and the aircraft if an FFS is not available or accessible; or
 - (c) the aircraft if no FSTD is available or accessible.
 - 1d. By way of derogation from point 1c, the training, skill test or proficiency check for class or type ratings for non-complex SPA and for non-complex helicopters may be conducted in a combination of FSTD(s) and the aircraft even if an FFS is available and accessible.
 - 1e. If FSTDs are used during training, testing or checking, the suitability of the FSTDs used shall be verified against the applicable ‘Table of functions and subjective tests’ and the applicable ‘Table of FSTD validation tests’ contained in the primary reference document applicable for the device used. All restrictions and limitations indicated on the device’s qualification certificate shall be considered.’;
- (2) the heading before point 13 is replaced by the following:
‘SPECIFIC REQUIREMENTS FOR THE TRAINING, SKILL TEST AND PROFICIENCY CHECK FOR TYPE RATINGS FOR MULTI-PILOT AIRCRAFT, FOR SINGLE-PILOT AIRCRAFT WHEN OPERATED IN MULTI-PILOT OPERATIONS, FOR THE MPL AND FOR THE ATPL’;
- (3) in point 17, the first two paragraphs before point (a) are replaced by the following:
‘17. When their type rating course has included less than 2 hours of flight training in the aircraft, applicants shall, before or after the skill test, complete flight training in the aircraft.

Such approved flight training shall include take-off and landing manoeuvres and shall be performed by a qualified instructor under the responsibility of:’;
- (c) point 5 of Section B is amended as follows:
 - (1) points (g), (h), (i) and (j) are replaced by the following:
-

- ‘(g) To exercise the privileges of a class or type rating in multi-pilot operation in accordance with point FCL.725(d) or (da), pilots that are already entitled to operate the relevant class or type of aeroplane in single-pilot operation shall:
- (1) complete a bridge course containing manoeuvres and procedures including MCC as well as the exercises of Section 7 using threat and error management (TEM), CRM and human factors at an organisation that is specified in point FCL.725(d)(1)(i); and
 - (2) pass a proficiency check in multi-pilot operation.
- (h) To exercise the privileges of a type rating in single-pilot operation in accordance with point FCL.725(d), pilots that are already entitled to operate the relevant type of aeroplane in multi-pilot operation shall be trained at an organisation that is specified in point FCL.725(d)(1)(i) and checked for the following additional manoeuvres and procedures in single-pilot operation:
- (i) for SE aeroplanes, 1.6, 4.5, 4.6, 5.2 and, if applicable, one approach from Section 3.B; and
 - (ii) for ME aeroplanes, 1.6, Section 6 and, if applicable, one approach from Section 3.B.
- (i) Pilots that are entitled to exercise the privileges of a class or type rating in both single-pilot and multi-pilot operations in accordance with points (g) and (h) may maintain privileges for both forms of operation by completing either of the following:
- (i) two proficiency checks, one in single-pilot operation and one in multi-pilot operation;
 - (ii) a proficiency check in multi-pilot operations in addition to the exercises referred to in points (h)(i) or (h)(ii), as applicable, in single-pilot operation.

Proficiency checks for the revalidation or renewal of class ratings shall always include the exercises referred to in points (h)(i) or (h)(ii), as applicable, in single-pilot operations.

- (j) To remove a restriction to multi-pilot operation from a single-pilot aeroplane type rating in accordance with point FCL.725(d)(2), pilots shall comply with point (h).’;

- (2) point (l) is replaced by the following:

- ‘(l) To establish or maintain PBN privileges, one approach shall be an RNP APCH. Where an RNP APCH is not practicable, it shall be performed in an appropriately equipped FSTD.

By way of derogation from the first paragraph above, in cases where a proficiency check for revalidation of PBN privileges is performed in an aircraft or an FSTD representing that aircraft, which are not equipped for RNP APCH manoeuvres, the proficiency check may not include RNP APCH exercises. In such cases, the PBN privileges of the pilot shall not include RNP

APCH. The restriction shall be lifted if the pilot has completed a proficiency check including an RNP APCH exercise for the relevant class or type.’;

(d) point 6 of Section B is amended as follows:

(1) point (h) is replaced by the following:

‘(h) To remove a restriction to multi-pilot operation in accordance with point FCL.725(d)(2) from a single-pilot high-performance complex aeroplane type rating, pilots shall complete the manoeuvres/procedures in 2.5, 3.8.3.4, 4.4, 5.5 and at least one manoeuvre/procedure from Section 3.4 in single-pilot operation.’;

(2) point (i) is replaced by the following:

‘(i) Applicants for and holders of a restricted type rating issued in accordance with point FCL.720.A(c) shall complete training, skill tests and proficiency checks in accordance with this Appendix. However, unless they undergo a skill test in accordance with point FCL.720.A(c)(3), they shall, during a skill test or a proficiency check, perform at least the landing manoeuvres in the role of the pilot monitoring but shall not be required to perform the following:

(i) take-off manoeuvres;

(ii) landing manoeuvres in the role of the pilot flying.’;

(3) point (j) is replaced by the following:

‘(j) To establish or maintain PBN privileges, one approach shall be an RNP APCH. Where an RNP APCH is not practicable, it shall be performed in an appropriately equipped FSTD.

By way of derogation from the first paragraph above, in cases where a proficiency check for revalidation of PBN privileges is performed in an aircraft or an FSTD representing that aircraft, which are not equipped for RNP APCH manoeuvres, the proficiency check may not include RNP APCH exercises. In such cases, the PBN privileges of the pilot shall not include RNP APCH. The restriction shall be lifted if the pilot has completed a proficiency check including an RNP APCH exercise for the relevant class or type.’;

(e) Section C is amended as follows:

(1) in Section 2 of the table following point 12, the row for exercise 2.6.1 is replaced by the following:

<p>‘2.6.1</p>	<p>For single-engine helicopters (SEH):</p> <ul style="list-style-type: none"> — autorotative landing; or — power recovery, provided that applicants, in the preceding year, completed training that included an autorotative landing and that training was entered and signed in the applicants’ logbook by the instructor. <p>For multi-engine helicopters (MEH): power recovery.’;</p>	<p>P</p>	<p>----></p>		<p>M</p>	
---------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------	-----------------	--	----------	--

- (2) in Section 5 of the table following point 12, the rows for exercises 5.4.1 and 5.4.2 are replaced by the following:

<p>‘5.4.1 Manually, without flight director. Note: According to the AFM, RNP APCH procedures may require the use of autopilot or flight director. The procedure to be flown manually shall be chosen taken into account such limitations (for example, choose an ILS for 5.4.1 in the case of such AFM limitation).</p>	<p>P*</p>	<p>---- >*</p>		<p>M* (unless Exercise 5.4.2 is completed)</p>	
<p>5.4.2 Manually, with flight director</p>	<p>P*</p>	<p>---- >*</p>		<p>M* (unless Exercise 5.4.1 is completed)’;</p>	

(3) point 13 is replaced by the following:

‘13. To exercise the privileges of the type rating in accordance with point FCL.725(d), applicants for the issue, revalidation or renewal of a single-pilot helicopter type rating shall:

- (a) for single-pilot operation, complete the skill test or proficiency check in single-pilot operation;
- (b) in multi-pilot operation, complete the skill test or proficiency check in multi-pilot operation;

- (c) for both single-pilot and multi-pilot operation, complete the skill test or proficiency check in multi-pilot operation and, additionally, the following manoeuvres and procedures in single-pilot operation:
- (1) for single-engine helicopters: 2.1 take-off and 2.6 and 2.6.1 autorotative descent and autorotative landing;
 - (2) for multi-engine helicopters: 2.1 take-off and 2.4 and 2.4.1 engine failures shortly before and shortly after reaching TDP; and
 - (3) for IR privileges, in addition to point (1) or (2), as applicable, one approach of Section 5, unless the criteria of Appendix 8 to this Annex are met; and
- (d) in order to remove a restriction to multi-pilot operation from a single-pilot helicopter type rating in accordance with point FCL.725(d)(2), complete a proficiency check that includes the manoeuvres and procedures referred to in points (c)(1) or (c)(2), as applicable.’.

Rationale

RMT.0190, RMT.0587

RMT.0190

See NPA 2014-25, page 14, proposing to add a new point 18 to Appendix 9, Section A (in the document for the focused consultation with the EASA Advisory Bodies in June 2022, it was point 19, since in the meantime a new point 18 had already been inserted in the context of UPRT). After further internal review, the text developed for such a new point is moved from Section A to Section B, point 6, where today point (i) already addresses CRCP training. The text developed by RMT.0190 is now proposed to replace that existing point (i).

As regards the technical content of the new text, after discussions during the focused consultation with the EASA Advisory Bodies (20 June 2022), the wording was revised to clarify that landing manoeuvres in the role of the pilot flying shall also not be required, while full compliance with Appendix 9 is required for a skill test in accordance with point FCL.720.A(c)(3) (lifting CRCP restriction).

RMT.0587

— *Section A, point 1: During the focused consultation of June 2022 with the EASA Advisory Bodies, a redraft for point 1 included the proposal to insert a reference to OSD, allowing OSD to determine training platform arrangements (training in an FSTD or in-aircraft training), which could deviate from the general requirements of that point 1. This was done to address the fact that before the implementation of point 1, OSD for some aircraft types included a mix of FFS training and in-aircraft training; therefore, the proposed reference to alternative OSD arrangements was intended to clarify the legal basis for the continued application of such older OSD training arrangements.*

However, based on a further assessment of the overall situation and the legal and factual consequences of the proposal, EASA proposes not to introduce such a general OSD reference, thereby not allowing OSD to bypass the standard training platform arrangements in Part-FCL, Appendix 9, Section A, point 1. Those arrangements constitute the basic regulatory policy that if simulation training devices are available and accessible, they shall be used, rather than conducting training in the aircraft. The OSD is a ‘type-specific tool’ that shall not be given the possibility to bypass generic safety-driven regulatory policies. The issue of older OSD reports

that include a mix of FFS and in-aircraft training can indeed be addressed within the existing regulatory framework, as explained in the proposed new GM1, Appendix 9, Section A, point 1 (see below). That GM will also explain how to apply the training platform arrangements of Appendix 9, Section A, point 1 to FFSs that are not equipped for serving as a training platform for the entire type rating training course (see below the proposal and related rationale).

Nevertheless, for clarification purposes, point 1 of Section A is proposed to be amended as follows and for the following reasons.

- The different text elements (points) of point 1 are given a structure with listing points, to allow better referring to a particular requirement, and to ease further amendments of particular text elements in the future.
- After today's first point of point 1 (draft point 1), a new point 1a is proposed to be inserted, to clarify the legal basis for landing training after type rating training in an FFS (outside zero flight time training or CRCP training). At the moment, the legal basis for landing training is exclusively located in Appendix 9, Section A, point 17, which due to the headline between points 12 and 13 ('Specific requirements for the skill test / proficiency check for type ratings for **multi-pilot aircraft**, for single-pilot aircraft when operated in **multi-pilot operations**, for MPL and for ATPL'), can be interpreted in such a way that landing training would be necessary solely in cases of multi-pilot aircraft and multi-pilot operation in single-pilot aircraft. Hence, the proposed new point 1a of Section A clarifies the original intention of that requirement: the landing training as per Section A, point 17 applies in any case (of single-pilot or multi-pilot aircraft/operation) where the type rating training is delivered in FSTDs.
- **In reaction to comments that were received during the focused consultation of June 2022 with the EASA Advisory Bodies**, after today's third point of point 1 (draft point 1c), a new point 1d is proposed to be inserted, to allow for training, testing and checking in non-complex SPAs and non-complex helicopters in a combination of FSTDs and the aircraft, even if an FFS is available and accessible. This proposed amendment constitutes a more proportionate solution for training in aircraft that is mainly used in General Aviation.

— **Section A, point 17:** For consistency with the clarifications in Section A, point 1, point 17 is revised to refer to take-off and landing manoeuvres. Additionally, the text is simplified, since the conditions for the use of FFS are comprehensively outlined in Section A.

— **Points (g), (h), (i), (j) of Section B, point 5:** The draft amendment to point (j), as presented during the focused consultation of June 2022, clarified that only in the case of type ratings, it is possible to obtain or maintain a rating in multi-pilot operation only. Class ratings may include, but can never solely consist of, privileges for multi-pilot operation (see proposal for new point FCL.725(da) above).

In reaction to comments that were received during the focused consultation of June 2022 with the EASA Advisory Bodies, and the subsequent comprehensive revision of point FCL.725(d), points (g), (h), (i) and (j) are proposed to be further amended, for consistency with the comprehensively revised point FCL.725(d) and the new point FCL.725(da). The principal need for an MPO restriction after completing a type rating skill test in multi-pilot operation is only now proposed to be comprehensively regulated in point FCL.725(d)(2). In that context, point (j) is proposed to be simplified.

For consistency with the further redrafting of points FCL.725(d) and (da), the wording and terminology of points (g) through to (j) needed to be adjusted.

— **Section B, points 5(l) and 6(j):** In reaction to comments that were received during the focused consultation of June 2022 with the EASA Advisory Bodies, the proposed text is revised to

clarify that a 'partial PBN check' cannot be done voluntarily but only in cases where the aircraft or representing FSTD is not equipped for performing a full PBN check, thereby better expressing the original intention of those requirements (special rule for 'legacy aircraft'). In reaction to a comment received for NPA 2023-104, the phrase 'for the relevant class or type' was added, to clarify that it needs to be a proficiency check for the relevant class or type.

- **Section B, point 6(h):** For the reasons explained in a previous item of this list (related to Section B, points 5(g) through to (j)), it is proposed to revise the text and to adjust the terminology.
- **Section C, exercise 2.6.1:** Following a discussion in the Rotorcraft Advisory Body, exercise 2.6.1 is proposed to be amended to clarify and improve the training/checking needs on autorotative landing and power recovery, specifically in the context of single-engine helicopters. As was the case in an earlier version of this exercise (see initial issue of Regulation (EU) No 1178/2011), the updated text allows a riskier manoeuvre (autorotative landing) to be replaced with a less risky manoeuvre (power recovery), provided that the pilot has completed an autorotative landing during training in the preceding year (e.g. during initial or renewal type rating training or specific autorotation training). This approach considers the advantages of conducting the autorotative landing manoeuvre in a broader training environment rather than in a singular checking event, and it also supports in general the 'more training and less checking philosophy'. Only if the pilot has no experience in the conduct of an autorotative landing during the preceding year, such a manoeuvre shall be part of the check.

During the focused consultation meeting with the EASA Advisory Bodies in June 2022, some participants supported the proposal while others proposed to simply require an autorotative landing during the skill test, and a power recovery during proficiency checks. EASA carefully reviewed these comments but concluded that the initial proposal, as presented during the focused consultation, is the best compromise to achieve the intended outcome: to promote the conduct of autorotation manoeuvres in training rather than in checking scenarios.

- **Section C, exercises 5.4.1 and 5.4.2:** Before amending Regulation (EU) 2018/1974, exercise 5.4.2 contained manual instrument approach with or without flight director as a mandatory exercise, meaning that it was necessary during a test or check to perform a manual instrument approach either with or without a flight director. The amending Regulation (EU) 2018/1974 separated the content of this exercise 5.4.2 into two exercises on manual instrument approaches, one without a flight director (new exercise 5.4.1) and one with a flight director (new exercise 5.4.2). Unintentionally, both of these new exercises were marked as 'mandatory', thereby increasing the minimum number of manual instrument approaches during a test or check. This issue was discussed during an EASA Advisory Body meeting (Aircrew TeB meeting, 28 January 2021) where it was agreed that the text for these two exercises 5.4.1 and 5.4.2 should be corrected to reinstate the situation prior to Regulation (EU) 2018/1974: only one manual instrument approach (either with or without flight director) should be mandatory during a test or check.
- **Section C, point 13:** Following the comprehensive revision of point FCL.725(d) (see detailed explanations in the rationale for that point), the wording of point 13 had to be adjusted. Single-pilot operation and multi-pilot operation in principle are no longer subject to licence endorsements, except for an initial type rating issue after training and a skill test in multi-pilot operation only. In that case, the new point FCL.725(d) provides for such a multi-pilot operation limitation in all cases; hence, the term 'non-complex' is deleted (for further explanations, see the rationale for point FCL.725(d)).

ANNEX II

Amendments to Annex IV (Part-MED to Commission Regulation (EU) No 1178/2011)

- (1) In point MED.A.010, after the definition of ‘colour safe’ the following definition is inserted:

‘— ‘helicopter emergency medical services (HEMS) operation’ means a ‘HEMS flight’ as defined in point 61 of Annex I to Regulation (EU) No 965/2012.’;

Rationale

RMT.0287

During the drafting phase, the technical representatives of the rulemaking group highlighted that the age limit should not be restricted to the emergency flights but should also include other operations linked to the HEMS activity.

- (2) in point (c) of point MED.A.040, point (1) is replaced by the following:

‘(1) Class 1 and class 2 medical certificates shall be revalidated and renewed by an AeMC or an AME. Specifically, class 1 medical certificates for applicants who have reached the age of 60 and are involved in single-pilot HEMS operations shall be revalidated and renewed primarily by an AeMC or, at the discretion of the competent authority, by an experienced AME designated by the competent authority.’;

Rationale

RMT.0287

Based on the potential mitigating measures proposed for consideration by the final report of the research project on age limitations for commercial air transport pilots and in consultation with medical experts, the rulemaking group proposed to include as a mitigating measure for the affected applicants the obligation to perform their aero-medical examinations and assessments in an AeMC or have them carried out by an experienced AME designated by the competent authority, ensuring the highest quality of the assessment of fitness.

- (3) in point MED.B.005, after point (d) an additional sentence is added as follows:

‘In their examination AMEs shall give proper consideration to the degenerative effects of ageing on the body systems.’;

Rationale

RMT.0287

As a result of the safety recommendation and considering that the broader scope of RMT.0287 is a regular update of Part-MED, EASA proposed to add the text to raise awareness of the AMEs to the degenerative effects of ageing. This was supported by the rulemaking group and accepted by all stakeholders during the focused consultation.

- (4) point MED.B.010 is amended as follows:

(a) in point (a), points (3) and (4) are replaced by the following:

- (3) For a class 1 medical certificate, an extended cardiovascular assessment shall be completed at the first revalidation or renewal examination after the age of 65 and every 4 years thereafter. For applicants involved in single-pilot HEMS operations an extended cardiovascular assessment shall be completed at the first revalidation or renewal examination after the age of 60 and subject to a cardiovascular risk factor assessment thereafter.
- (4) For a class 1 medical certificate, estimation of serum lipids, including cholesterol fractions, shall be required at the initial examination, and at the first examination after having reached the age of 40.’;
- (b) in point (b), a new point (5) is added as follows:
- ‘(5) A cardiovascular risk factor assessment shall form part of examinations for class 1 and class 2 medical certificates at the first examination after reaching the age of 40 and at regular intervals thereafter.’;

Rationale

RMT.0287

Based on the potential mitigating measures proposed for consideration by the final report of the research project on age limitations for commercial air transport pilots and in consultation with medical experts, the rulemaking group proposed a set of mitigating measures for the cardiovascular system. Additionally, considering the ICAO recommendation on the preventive approach, the rulemaking group proposed an early screening for cardiovascular disease for all pilots. This is aimed at early identification and mitigation of cardiovascular risk factors before these risk factors can cause a medical condition that would require limitation of the medical certificate or even unfitness. The Opinion text was updated after the focused consultation taking into consideration the comments received.

- (5) point MED.B.015 is amended as follows:
- (a) point (b) is replaced by the following:
- ‘(b) Applicants for a class 1 medical certificate shall undertake pulmonary functional tests at the initial examination and when clinically indicated.’;
- (b) after point (b), a new point (ba) is inserted as follows:
- ‘(ba) For class 1 medical certificate holders involved in single-pilot HEMS operations, pulmonary functional tests and obstructive sleep apnoea (OSA) screening shall be completed at the first revalidation or renewal examination after the age of 60.’;
- (c) point (c) is replaced by the following:
- ‘(c) Applicants for a class 2 medical certificate shall undertake pulmonary morphological and functional tests when clinically or epidemiologically indicated.’;

Rationale

RMT.0287

Based on the potential mitigating measures proposed for consideration by the final report of the research project on age limitations for commercial air transport pilots and in consultation with medical experts, the rulemaking group proposed to include a screening for obstructive sleep apnoea to allow early identification and management of the condition in order to prevent potential complications. Additionally, the rulemaking group removed the requirement for morphological tests for initial class 1 examination in order to comply with the European requirements on exposure to radiation. The

morphological testing may be performed at clinical or epidemiological indication. At the same time, the rulemaking group added the epidemiological justification for the pulmonary morphological and functional tests for class 2 applicants.

(6) in point (a)(1) of point MED.B.070, a new point (iii) is added as follows:

‘(iii) when holders are involved in single-pilot HEMS operations, a comprehensive eye examination shall be completed at the first revalidation or renewal examination after the age of 60 and every year thereafter.’;

Rationale

RMT.0287

Based on the potential mitigating measures proposed for consideration by the final report of the research project on age limitations for commercial air transport pilots and in consultation with medical experts, the rulemaking group proposed to include a comprehensive eye examination at the first revalidation or renewal examination after the age of 60 and every year thereafter for pilots involved in single-pilot HEMS operations.

(7) in point MED.B.075(b), point (1) is replaced by the following:

‘(1) Applicants shall be subjected to the Ishihara test for the initial issue of a medical certificate. For class 1 medical certificate holders involved in single-pilot HEMS operations, a colour vision assessment shall be completed at the first revalidation or renewal examination after the age of 60 and every year thereafter. Applicants who pass that test may be assessed as fit.’;

Rationale

RMT.0287

Based on the potential mitigating measures proposed for consideration by the final report of the research project on age limitations for commercial air transport pilots and in consultation with medical experts, the rulemaking group proposed to include a colour vision test at the first revalidation or renewal examination after the age of 60 and every year thereafter for pilots involved in single-pilot HEMS operations.

(8) point MED.B.080(a) is amended as follows:

(a) in point (1), point (i) is replaced by the following:

‘(i) For a class 1 medical certificate, and for a class 2 medical certificate when an instrument rating or a basic instrument rating is to be added to the licence, hearing shall be tested with pure-tone audiometry at the initial examination, then every 5 years until the licence holder reaches the age of 40, and then every 2 years until the licence holder reaches the age of 60 and every year thereafter.’;

(b) a new point (3) is added as follows:

‘(3) For class 1 medical certificate holders involved in single-pilot HEMS operations, a comprehensive ear, nose and throat examination shall be completed at the first revalidation or renewal examination after the age of 60.’;

Rationale

RMT.0287

Based on the potential mitigating measures proposed for consideration by the final report of the research project on age limitations for commercial air transport pilots and in consultation with medical experts, the rulemaking group proposed to include a comprehensive ear, nose and throat examination at the first revalidation or renewal examination after the age of 60 for pilots involved in single-pilot HEMS operations.

Additionally, the rulemaking group decided to increase the frequency of the pure-tone audiometry to once a year for all class 1 medical certificate holders and for class 2 medical certificate holders when an instrument rating is to be added to the licence. This was added to mitigate the degenerative effects of ageing on the hearing system.

Finally, the term 'en route instrument rating' was replaced by the term 'basic instrument rating', in alignment with the recent introduction of the BIR and the in-parallel deletion of the EIR.

(9) in point MED.D.020, after point (a) a new point (aa) is inserted as follows:

- ‘(aa) For demonstrating compliance with points MED.D.010(b) and MED.D.015(c), an aviation medicine training course completed by an applicant outside the territories for which Member States are responsible under the Chicago Convention may be accepted by the competent authority, provided that:
- (i) the competent authority has assessed and verified the course syllabus in accordance with point ARA.MED.200(c)(1), and
 - (ii) the applicant has completed a specific training module on the aero-medical requirements detailed in this Annex (Part-MED) as provided by the competent authority.’.

Rationale

RMT.0287

Assessing the increasing training requests in aviation medicine within Europe and outside, and considering the interest of third-country physicians in becoming EU-certified AMEs, EASA decided to clarify the possibility of third-country training providers to provide training in accordance with the relevant provisions of Part-MED. Member States unanimously supported, during the Medical Experts' Group (MEG) meeting, enabling the certification of applicants for an AME certificate that have undergone an aviation medicine training course outside of the territory of the Member States. During further internal consultation, it was revealed that EASA cannot approve such courses taking place outside the territory of the Member States. However, the Member States may assess the course syllabus to ensure equivalence with the training courses approved within the territory of the Member States.

ANNEX III

Amendments to Annex VI (Part-ARA) to Commission Regulation (EU) No 1178/2011

(1) In point ARA.GEN.305, point (d) is replaced by the following:

‘(d) For persons that hold a licence, certificate, rating, or attestation issued by the competent authority, the oversight programme shall include an appropriate volume of inspections and unannounced inspections.’;

Rationale

RMT.0587

A discussion around the question on how to correctly translate point ARA.GEN.305(d) into the national language of a Member State revealed that this point needs to be revised in order to better reflect its intention. The phrase ‘as appropriate’, in the original wording, was intended to refer to both announced and unannounced inspections, since both types of inspections in any case need to be part of the oversight programme in an appropriate volume. The updated text provides clarity in this regard.

(2) in point ARA.GEN.360, a new point (e) is added as follows:

‘(e) When a competent authority receives an aero-medical certificate holder’s request for a change of competent authority, as specified in the requirements referred to in point (a), the procedure specified in points (a) to (d) shall apply.’;

Rationale

RMT.0287

Several discussions around the right to change the competent authority for the medical certificate holders that do not yet have a Part-FCL licence took place during the MEG meeting and Aircrew TeB meeting. The discussions highlighted that although the respective applicants do not yet have a licence, from the moment they get a Part-MED medical certificate one competent authority is responsible for the oversight of the health status of the medical certificate holder. Both the MEG and the Aircrew TeB members agreed with vast majority that if the respective applicant were to subsequently wish to apply for a licence in another Member State’s competent authority, they shall change their competent authority prior to the licence being issued, allowing the medical assessor of the future competent authority that is to issue the licence to take over the oversight, access the medical history and replace the existing medical certificate with a new one aligned with the licence to be issued. The new text provides clarity in this regard.

(3) in point ARA.FCL.200, point (d) is replaced by the following:

‘(d) Endorsement of licence by instructors. Before specifically authorising certain instructors to revalidate an SEP aeroplane class rating, a TMG class rating or a type rating for a single-engine helicopter up to a MTOM of 3 175 kg, the competent authority shall develop appropriate procedures.’;

Rationale

RMT.0678

See NPA 2020-14, page 29.

In reaction to a comment received for NPA 2020-14, text was added to reflect the amendments to point FCL.945 (see above).

(4) in point ARA.FCL.300(b), point (3) is replaced by the following:

‘(3) The examination in communications may be provided separately from those in other subjects.’;

Rationale

RMT.0587

After the merging of the subjects VFR Communications and IFR Communications into one subject Communications (see amending Regulation (EU) 2018/1974), the second sentence in point (b)(3) is no longer relevant and can be deleted.

(5) point ARA.FSTD.120 is replaced by the following:

‘ARA.FSTD.120 Continuation of an FSTD qualification

‘(a) The competent authority shall continuously monitor the organisation operating the FSTD, as part of the oversight programme, to verify that:’;

- (1) the complete set of tests in the Master QTG is rerun progressively over a 12-month period;
- (2) the results of recurrent evaluations continue to comply with the qualification basis and are dated and retained; and
- (3) a configuration control system is in place to ensure the continued integrity of the hardware and software of the qualified FSTD.

(b) The competent authority shall conduct recurrent evaluations of the FSTD in accordance with the procedures detailed in point ARA.FSTD.100. These evaluations shall take place:

- (1) every year, in the case of a full flight simulator (FFS), flight training device (FTD) or flight and navigation procedures trainer (FNPT). The start for each recurrent 12-month period is the end of the month of the initial qualification unless another date is agreed between the competent authority and the organisation operating the FSTD. Each FSTD recurrent evaluation shall take place within a period of 60 days before and 30 days after the start of each recurrent 12-month period;
- (2) every 3 years, in the case of a BITD.

(c) The competent authority may extend the recurrent evaluation period of an FSTD according to point ARA.FSTD.120(b)(1) to a maximum of 36 months, provided that all of the following apply:

- (1) during the preceding 36 months, the organisation operating that FSTD complies with the criteria specified in points (c)(1) to (c)(4) of point ARA.GEN.305;
- (2) the FSTD has been subject to an initial and at least one recurrent evaluation that have established its continuous compliance with the qualification basis;

- (3) the competent authority performs an audit of the elements of the management system of the organisation, as specified in point ORA.GEN.200 (a)(3) and (a)(6) every 12 months;
- (4) the organisation has developed procedures to conduct the tasks specified in point ORA.FSTD.225(b).’;

Rationale

RMT.0587 (ex RMT.0196)

The proposed changes for point ARA.FSTD.120 and the related point ORA.FSTD.225 were developed with EASA RMT.0196 and first published with EASA NPA 2020-15. After considering the comments received for this NPA, and based on a revision with the external expert group that supports RMT.0196, updated and improved versions of these proposals are now taken on board with RMT.0587, in order to expedite the progress of these non-controversial proposals and their timely integration into the regulatory framework, while considering the expected replanning of the RMT.0196 timeline.

The new text elements in points ARA.FSTD.120 and ORA.FSTD.225 (see below proposed amendments and rationale) clarify the roles and responsibilities for the competent authorities and FSTD operators regarding a possible extension of the recurrent evaluation period from 12 to a maximum of 36 months. In this context, point ARA.FSTD.120(c) has been developed to set out the circumstances under which the competent authority may decide to make such an extension. The first draft for amendments to point ARA.FSTD.120, as presented during the focused consultation meeting with the EASA Advisory Bodies In June 2022, was developed to allow competent authorities to ‘delegate’ two consecutive recurrent evaluations to the organisation that operates the FSTD. However, further internal reviews concluded that a ‘delegation’ of oversight tasks is not possible in this form. Hence, to achieve the intended outcome, the draft was amended to allow competent authorities to ‘extend’ the recurrent evaluation period.

Compared to the draft as presented in NPA 2020-15, the text outlining the scope of the audit specified in draft point ARA.FSTD.120(c)(3) was amended to also cover the elements specified in point ORA.GEN.200(a)(3). NPA 2020-15 already intended such an extended scope, but expressing it less clearly and only at the AMC level. For clarity, it is now included in the rule text.

Furthermore, changes in point ARA.FSTD.120(b)(1) are introduced to clarify the start for each recurrent 12-month period for FSTDs other than BITDs. An additional time period of 30 days after the start of each recurrent evaluation is given for the completion of recurrent evaluations, to provide more flexibility to the authorities and FSTD operators to plan the recurrent evaluation, especially when trying to find dates matching both EASA and FAA validity dates under BASA-TIPS.

- (6) point ARA.MED.120 is replaced by the following:

‘ARA.MED.120 Medical assessors

The competent authority shall appoint one or more medical assessor(s) to undertake the aero-medical tasks described in this Regulation. The medical assessor shall be licensed and qualified in medicine and have:

- (a) postgraduate work experience in clinical medicine;
- (b) specific knowledge and experience in aviation medicine and aero-medical practice; and
- (c) specific training in aero-medical certification.’;

Rationale

RMT.0287

As a result of the discussions during the MEG meetings and the assessment of the rulemaking group, the following content changes have been made to further clarify the appointment and criteria for appointment of the medical assessors, aiming to reduce very specific requirements, for example 5 years postgraduate work experience.

- (7) point ARA.MED.125 is replaced by the following:

‘ARA.MED.125 Referral to the licensing authority

When an AeMC or aero-medical examiner (AME) has referred the decision on the fitness of an applicant to the medical assessor of the licensing authority:

- (a) the medical assessor or medical staff designated by the medical assessor shall evaluate the relevant medical documentation and request further medical documentation, examinations and tests where necessary;
- (b) the medical assessor shall determine the applicant’s fitness for the issuance of a medical certificate with one or more limitation(s) if necessary;
- (c) the medical assessor shall inform the AeMC or AME of the decision; and
- (d) in case the applicant is assessed as fit, the medical assessor shall issue, if appropriate, the medical certificate or delegate the issuance to the AeMC or AME that referred the respective applicant.’;

Rationale

RMT.0287

As a result of the discussions during the MEG meetings, the standardisation experience and the assessment of the rulemaking group, the content changes have been made to further clarify the requirements for the competent authority in the case of a referral. The changes are intended to facilitate medical confidentiality and further detail the tasks of the medical assessors in regard to cases referred to them in accordance with applicable requirements in Part-MED.

- (8) after point ARA.MED.125, a new point ARA.MED.126 and a new point ARA.MED.128 are inserted as follows:

‘ARA.MED.126 Limitation, suspension or revocation of medical certificates

- (a) The licensing authority shall establish a procedure to limit, suspend or revoke a medical certificate.
- (b) The licensing authority shall limit, suspend or revoke a medical certificate if there is evidence that:
 - (1) a medical certificate is falsified or obtained by a false declaration or false evidence;
 - (2) a medical certificate is used in violation of the provisions of point MED.A.020;
 - (3) the holder of a medical certificate is no longer compliant with Annex IV (Part-MED);

- (c) The licensing authority may also suspend or revoke a medical certificate upon the written request of the holder of a medical certificate.
- (d) In case of limitation, suspension or revocation of a medical certificate, the licensing authority shall inform the issuing AME or AeMC about the reason for limitation, suspension or revocation.
- (e) In case of suspension or revocation of a medical certificate, the licensing authority shall ensure that the provisions of point MED.A.046 of Annex IV (Part-MED) are complied with.
- (f) The licensing authority shall establish a procedure for reinstating a medical certificate.’;

Rationale

RMT.0287

The discussions that took place during the MEG meetings, the standardisation experience and the assessment of the rule-making group revealed the need to add a point in ARA.MED to mirror the requirements of MED.A.046 and define the responsibilities of the competent authority that issued or is to issue the applicant’s licence. This is intended to facilitate harmonisation and equal treatment of applicants across Europe and at the same time to provide the legal reference to the competent authorities allowing them to implement appropriate enforcement measures to ensure flight safety.

‘ARA.MED.128 Consultation procedure

The competent authority shall establish a consultation procedure for the AeMCs and AMEs in accordance with Annex IV (Part-MED).’;

Rationale

RMT.0287

The discussions that took place during the MEG meetings, the standardisation experience and the assessment of the rule-making group revealed the need to add a point in ARA.MED to mirror the requirements of MED.B.001(a)(1)(iii) and define the responsibilities of the competent authority that issued or is to issue the pilot licence. The requirement is intended to facilitate harmonisation and allow foreign AMEs to consult with competent authorities from other Member States than the one that certified them as AMEs.

- (9) point ARA.MED.130 is amended as follows:
 - (a) point (a) is amended as follows:
 - (1) point (2) is deleted;
 - (2) point (3) is replaced by the following:
 - ‘(3) Medical certificate number commencing with the UN country code of the State where the pilot licence has been issued or applied for and followed by a code of numbers and/or letters in Arabic numerals and Latin script (III)’;
 - (3) point (6) is replaced by the following:
 - ‘(6) Date of birth of holder: (dd/mm/yyyy) (IVa)’;
 - (4) point (9) is replaced by the following:

- ‘(9) Expiry date of the medical certificate (IX) for:
- (i) Class 1,
 - (ii) Class 1 single-pilot commercial operations carrying passengers,
 - (iii) Class 2,
 - (iv) LAPL.’;
- (5) point (11) is replaced by the following:
‘(11) Date of last and next electrocardiogram’;
- (6) point (12) is replaced by the following:
‘(12) Date of last and next audiogram’;
- (7) a new point (12a) is inserted as follows:
‘(12a) Date of last and next ophthalmological examination’;
- (b) point (b) is replaced by the following:
‘(b) The paper or other material used shall prevent or readily show any alterations or erasures. Any entries or deletions to the form shall be clearly authorised by the licensing authority.’;
- (c) point (c) is replaced by the following:
‘(c) Language: Medical certificates shall be written in the national language(s) and in English and such other languages as the competent authority deems appropriate.’;

Rationale

RMT.0287

The discussions that took place during the MEG meetings regarding the implementation experience, the standardisation experience and the assessment of the rulemaking group revealed the need to update the content of the medical certificate to facilitate harmonisation, reduce the risk of fraud attempts and allow AMEs and applicants to have an easier understanding of the examinations required and at which subsequent aero-medical examination they are to be undertaken. Further changes have been made compared to the text presented in the NPA to implement several comments received.

- (10) point ARA.MED.135 is replaced by the following:

‘ARA.MED.135 Aero-medical forms

The competent authority shall provide the AMEs with the format for:

- (a) the application form for a medical certificate;
- (b) the examination report form for class 1 and class 2 applicants; and
- (c) the examination report form for light aircraft pilot licence (LAPL) applicants.’;

Rationale

RMT.0287

The discussions that took place during the MEG meetings regarding the implementation experience, the standardisation experience and the assessment of the rulemaking group revealed the need to update the content of ARA.MED.135 to reduce the burden of using specific forms for the competent authorities,

replacing it with the obligation to provide the AMEs with the format of the standard forms. This comes in the context where the majority of competent authorities already use electronic tools, while the use of paper forms is becoming rather limited.

(11) point ARA.MED.145 is replaced by the following:

‘ARA.MED.145 GMP notification to the competent authority

The competent authority, when applicable, shall establish a notification process for general medical practitioners (GMPs) to ensure that the GMP is aware of the applicable requirements laid down in this Regulation.’;

Rationale

RMT.0287

The discussions that took place during the MEG meetings, the standardisation experience and the assessment of the rule-making group revealed the need to update the content of ARA.MED.145 to ensure that GMPs are aware of all applicable requirements not limited only to the medical requirements. This would allow them to comply with the obligations regarding the aero-medical certification process.

(12) point ARA.MED.150 is replaced by the following:

‘ARA.MED.150 Record-keeping

- (a) In addition to the records required in point ARA.GEN.220, the competent authority shall include in its system of record-keeping, details of aero-medical examinations, and assessments submitted by AMEs, AeMCs or GMPs.
- (b) All aero-medical records of applicants/licence holders shall be kept for a minimum period of 10 years after the expiry date of their last medical certificate.
- (c) For the purpose of aero-medical assessments and standardisation, aero-medical records shall be made available after written consent of the applicant/licence holder to:
 - (1) an AeMC, AME or GMP for the purpose of completion of an aero-medical assessment;
 - (2) a medical review board that may be established by the competent authority for secondary review of borderline cases;
 - (3) relevant medical specialists for the purpose of completion of an aero-medical assessment;
 - (4) the medical assessor of the competent authority of another Member State for the purpose of cooperative oversight;
 - (5) the applicant/licence holder concerned upon their written request; and
 - (6) the Agency for standardisation purposes, in a manner that ensures that medical confidentiality is respected at all times.
- (d) The competent authority may make aero-medical records available for other purposes than those mentioned in point (c) in accordance with Regulation (EU) 2016/679.
- (e) The competent authority shall maintain a list of:

- (1) AeMCs and AMEs that it has certified;
- (2) AMEs certified by other competent authorities exercising their privileges in its territory and to whom it has provided a briefing in accordance with point MED.D.001(f)(3) of Annex IV (Part-MED);
- (3) GMPs exercising their privileges in accordance with point MED.A.040 of Annex IV (Part-MED), where applicable;
- (4) OHMPs having notified the competent authority of their intention to perform cabin crew aero-medical assessments in accordance with points MED.C.005(c) and MED.D.040 of Annex IV (Part-MED), where applicable.

The list shall state the privileges of the persons and organisations specified in points (1) to (4) of point (e) and shall be published and kept updated by the competent authority.

- (f) The competent authority shall analyse the health data of pilots above the age of 60, especially of those involved in single-pilot HEMS operations, and report such health data in an anonymised and aggregated manner to EASA on a yearly basis.’;

Rationale

RMT.0287

The discussions that took place during the MEG meetings regarding the implementation experience, the standardisation experience and the assessment of the rulemaking group revealed the need to update the content of ARA.MED.150 to ensure that the record-keeping system of the competent authorities is up to date, including the data on GMPs and OHMPs acting as AMEs, and the foreign AMEs exercising privileges in their territory. This will allow for better traceability of the work of AMEs and AeMCs, especially in the context of examinations for aircrew members and ATCOs licensed by the competent authorities of a different Member State. Furthermore, the change is expected to facilitate the process of finding a suitable AME by interested applicants.

Point (f) was added to mandate the reporting of health data for pilots above the age of 60 in an anonymised and aggregated manner, identifying trends to facilitate decision-making. This will allow EASA to further explore the need for changes to pilot age limits.

- (13) point ARA.MED.200 is replaced by the following:

‘ARA.MED.200 Procedure for the issue, revalidation, renewal or change of an AME certificate

Without prejudice to the provisions laid down in point ARA.GEN.315, all of the following shall apply:

- (a) The competent authority shall ensure that before the issue, revalidation, renewal or extension of privileges of an AME certificate, applicants demonstrate their aero-medical competency in accordance with points (a)(6) and (b)(5) of point MED.D.030.
- (b) The competent authority shall have a procedure in place to ensure that, before issuing the AME certificate, it has the evidence that the AME practice is equipped and the appropriate processes are in place to perform aero-medical examinations within the scope of the AME certificate applied for. In the case of multiple AME practice locations, all of them shall be specified on the AME certificate.

- (c) For applicants referred to in point MED.D.020(aa), the competent authority may accept an aviation medicine training course completed by an applicant outside the territories for which Member States are responsible under the Chicago Convention, provided that the competent authority has done all of the following:
- (1) assessed and verified that the course syllabus is equivalent to the aviation medicine training courses available in the Member States, and
 - (2) provided to the applicant a specific training module on the aero-medical requirements detailed in Annex IV (Part-MED).
- (d) When satisfied that the AME is in compliance with the applicable requirements, the competent authority shall issue, revalidate, renew or change the AME certificate for a period not exceeding 3 years, using the form established in Appendix VII to this Annex.’;

Rationale

RMT.0287

The discussions that took place during the MEG meetings regarding the implementation experience, the standardisation experience and the assessment of the rulemaking group revealed the need to update the content of ARA.MED.200 to facilitate a better understanding and harmonisation of the provisions for the issue, revalidation, renewal or change of an AME certificate allowing the establishment of national procedures.

- (14) the title of point ARA.MED.240 is replaced by the following:

‘ARA.MED.240 General medical practitioners (GMPs) exercising the privileges in accordance with point MED.A.040 of Annex IV (Part-MED)’;

Rationale

RMT.0287

The discussions that took place in the rulemaking group revealed the need to update the title of point ARA.MED.200 to avoid confusion that GMPs would be entitled to act as certified AMEs without the proper training and experience.

- (15) point ARA.MED.245 is replaced by the following:

‘ARA.MED.245 Continuing oversight of AMEs and GMPs

When developing the continuing oversight programme referred to in point ARA.GEN.305, the competent authority shall take into account:

- (1) the number of AMEs and GMPs exercising their privileges within the territory where the competent authority exercises oversight;
- (2) the number of AMEs certified by competent authorities of other Member States exercising their privileges within the territory where the competent authority exercises oversight;
- (3) a risk-based assessment of the AMEs’ and GMPs’ activity.’;

Rationale

RMT.0287

The discussions that took place during the MEG meetings regarding the implementation experience, the standardisation experience and the assessment of the rulemaking group revealed the need to update the content of ARA.MED.245 to facilitate a better understanding and harmonisation of the provisions for the continuing oversight of AMEs and GMPs. The change is expected to support the competent authorities with the development and implementation of their oversight programmes.

(16) after point ARA.MED.245, a new point ARA.MED.246 is inserted as follows:

‘ARA.MED.246 Cooperative oversight of AMEs and AeMCs

Without prejudice to the provisions laid down in point ARA.GEN.300(e):

- (a) Where an AME or AeMC carries out their activity in more than one Member State, the competent authority that certified the AME or AeMC shall have a procedure in place to ensure the exchange of information in accordance with points ARA.GEN.200(c) and ARA.GEN.300(d) and (e) with the competent authority of the other Member State(s) where the AME or AeMC carries out their activity. The procedure shall be agreed upon by the competent authorities involved.
- (b) In the case mentioned in point (a), the competent authority of the other Member State(s) where the AME or AeMC carries out their activity shall share all information relevant to the oversight of the AME or AeMC with the competent authority certifying the AME or AeMC.’;

Rationale

RMT.0287

The standardisation experience and the assessment of the rulemaking group revealed the need to add the new ARA.MED.246 to facilitate a better understanding and harmonisation of the provisions for the cooperative oversight of AMEs and AeMCs, complementing the provisions of ARA.GEN.300(e) with specific requirements related to aero-medical certification. The change is expected to support the competent authorities with their cooperative oversight, where needed.

(17) point ARA.MED.250 is amended as follows:

- (a) in point (a), the introductory phrase and point (1) are replaced by the following:
 - ‘(a) The competent authority shall limit, suspend or revoke an AME certificate in, but not limited to, the following circumstances:
 - (1) the AME does not comply with applicable requirements.’;
- (b) the introductory phrase of point (b) is replaced by the following:
 - ‘(b) The certificate of an AME shall be considered invalid in either of the following circumstances and the competent authority shall immediately revoke it.’;
- (c) after point (b), a new point (c) is added as follows:

- ‘(c) The competent authority shall have a process in place for retrieval of the revoked AME certificates, shall update the AME list, and inform the competent authorities of the other Member States accordingly.’;

Rationale

RMT.0287

The discussions that took place during the MEG meetings regarding the implementation experience, the standardisation experience and the assessment of the rulemaking group revealed the need to update the content of ARA.MED.250 to facilitate a better understanding and harmonisation of the provisions for the limitation, suspension or revocation of an AME certificate allowing the establishment of corresponding national procedures.

- (18) point ARA.MED.255 is replaced by the following:

‘ARA.MED.255 Enforcement measures

If, during oversight or by any other means, evidence is found showing a non-compliance of an AeMC, an AME or a GMP, the competent authority shall have a process to review the medical certificates issued by that AeMC, AME or GMP and may render them invalid, where required, to ensure flight safety.

For medical certificates issued to applicants who have a licensing authority different from the competent authority that issued the AME certificate, that competent authority shall inform and exchange relevant information with the medical assessor of the licensing authority of the affected medical certificate holder.’;

Rationale

RMT.0287

The assessment of the rulemaking group revealed the need to update the content of point ARA.MED.255 for clarity. As this point refers to enforcement measures linked to non-compliant AeMCs, AMEs or GMPs, it is more appropriate to use the term ‘competent authority’ instead of ‘licensing authority’. Additionally, a new sentence was added to clarify the situation for the medical certificates issued on behalf of other Member States.

- (19) point ARA.MED.315 is replaced by the following:

‘ARA.MED.315 Review of examination reports

The licensing authority shall have a process in place for the medical assessor to:

- (a) review examination and assessment reports received from the AeMCs, AMEs and GMPs and inform them of any inconsistencies, mistakes or errors made in the assessment process;
- (aa) take the appropriate corrective actions for any inconsistencies, mistakes or errors identified; and
- (b) assist AMEs and AeMCs on their request regarding their decision on aero-medical fitness in borderline and complex cases.’;

Rationale

RMT.0287

The discussions that took place during the MEG meetings regarding the implementation experience, the standardisation experience and the assessment of the rulemaking group revealed the need to update the content of ARA.MED.315 to facilitate a better understanding and harmonisation of the provisions for review of examination reports allowing the establishment of an adequate process and allocating the required resources for the process.

As a result of the comments received, the text presented in the NPA was further amended to accommodate the comments received.

(20) point ARA.MED.325 is replaced by the following:

‘ARA.MED.325 Secondary review procedure

The competent authority shall establish a procedure for the review of borderline and contentious cases and cases where an applicant requests a review in accordance with the applicable medical requirements and accredited medical conclusion as defined in point MED.A.010 of Annex IV (Part-MED).’;

Rationale

RMT.0287

The discussions that took place during the MEG meetings regarding the implementation experience, the standardisation experience and the assessment of the rulemaking group revealed the need to update the content of ARA.MED.325 to facilitate a better understanding and harmonisation of the provisions for secondary review allowing the establishment of adequate national procedure.

Subject to the complexity of the case and availability of adequate medical specialists, the competent authorities should have the flexibility in the secondary review procedure to decide whether they need external medical advisors or whether to carry out the assessment internally.

The text presented in the NPA was further amended to accommodate the comments received, suggesting that reference be made to an accredited medical conclusion as defined in Part-MED.

(21) point ARA.MED.330 is deleted.

Rationale

RMT.0287

See rationale for proposed Article 3a of Regulation (EU) No 1178/2011 (see Annex I to this Opinion).

(22) in point (a)(2) of Appendix I, point (XIII) is replaced by the following:

‘(XIII) remarks: i.e. special endorsements relating to limitations and endorsements for privileges, including endorsements of language proficiency, and remarks on the automatic validation of the licence; and’;

Rationale

RMT.0587

Based on an internal EASA review, this amendment is proposed for consistency with Regulation (EU) 2018/1139 (‘new Basic Regulation’), which, contrary to Regulation (EC) No 216/2008 (‘old Basic Regulation’), no longer provides for the licensing and operation of Annex I (previous Annex II) aircraft under the EU regulatory framework, when used for commercial air transport.

(23) Appendix III is amended as follows:

(a) on page 1, the text following the phrase ‘[Competent Authority]’ is replaced by the following:

‘(*) “European Union” to be deleted for non-EU Member States or EASA.

EASA Form 143 Issue 3 – page 1/2’;

(b) on page 2, the text following the phrase ‘For the Member State/EASA’ is replaced by the following:

‘EASA Form 143 Issue 3 – page 2/2’;

Rationale

RMT.0587

The text is amended to clarify that the phrase ‘European Union’ is part of the certificate only in cases of certificates issued by EU Member States, for clarification and for consistency with other EASA certificates, e.g. the maintenance organisation certificate set out in Appendix V to Annex I (Part-M) to Regulation (EU) No 1321/2014.

(24) Appendix IV is amended as follows:

(a) the footnote on page 1 of the certificate template is replaced by the following:

‘(*) ‘European Union’ to be deleted for non-EU Member States or EASA.

EASA Form 145 – Issue 2 – page 1/2’;

(b) on page 2 of the certificate template, the text after the phrase ‘Signed...’ is replaced by the following:

‘EASA Form 145 – Issue 2 – page 2/2’;

Rationale

RMT.0587

See the rationale above for the proposed amendment to Appendix III to Annex VI (Part-ARA).

(25) Appendix V is amended as follows:

- (a) the phrase ‘Pursuant to Commission Regulation (EU) No 1178/2011 and subject to the conditions specified below, the [competent authority] hereby certifies’ is replaced by the following:
 ‘Pursuant to Commission Regulation (EU) No 1178/2011 and Regulation (EU) 2015/340² and subject to the conditions specified below, the [competent authority] hereby certifies’;
- (b) the phrase ‘Date of issue:..... Signature:.....’ is replaced by the following:
 ‘Date of issue: dd/mm/yyyy Signature: [Competent Authority]’;
- (c) the phrase ‘EASA Form 146 Issue 1’ is replaced by the following:
 ‘EASA Form 146 Issue 2’;
- (d) after the text referred to in the previous point (c), the footnote is replaced by the following:
 - ‘⁽¹⁾ ‘European Union’ to be deleted for non-EU Member States or EASA.
 - ‘⁽²⁾ Reference to Regulation (EU) No 1178/2011 or Regulation (EU) 2015/340 shall be modified as per the certificate’s scope.’;
- (d) a second page is added with the following content:

‘AERO-MEDICAL CENTRE CERTIFICATE

Attachment* to AeMC certificate number:

PRIVILEGES AND SCOPE

[Name of the organisation] has obtained the privilege(s) to undertake aero-medical examinations and assessments for the issuance of medical certificates and medical reports as stated in the table below and to issue these medical certificates and medical reports for:

	Initial/revalidation/renewal	Date of issue
Class 1		
Class 2/ LAPL/ Cabin Crew		
Class 3**		

Date: dd/mm/yyyy

Signature: [Competent Authority]

* This attachment may be issued as part of the AeMC certificate or as a separate document.

** Class 3 shall be added only for the AeMCs approved to perform class 3 aero-medical examinations’;

Rationale

RMT.0287

The text is amended to enable the possibility of issuing only one AeMC certificate for AeMCs that have privileges to perform both class 1 and class 3 examinations, which is applicable to the vast majority of AeMCs in Europe.

Furthermore, Appendix V is amended for clarification and consistency with other EASA certificates by clarifying that the phrase ‘European Union’ is part of the certificate only for certificates issued by EU Member States, and by aligning the format for the date of issue and the signature.

Additionally, page 2 is added containing an attachment to the AeMC certificate to allow the competent authorities to specify the privileges and scope of the AeMC.

(26) Appendix VII is amended as follows:

- (a) on the first page, the phrase ‘Pursuant to Commission Regulation (EU) No 1178/2011 and subject to the conditions specified below, the [competent authority] hereby certifies’ is replaced by the following:

‘Pursuant to Commission Regulation (EU) No 1178/2011 and Regulation (EU) 2015/340** and subject to the conditions specified below, the [competent authority] hereby certifies’;
- (b) on the first page, the phrase ‘[ADDRESS OF THE AERO-MEDICAL EXAMINER]’ is replaced by the following:

‘[PRACTICE ADDRESS(ES) OF THE AERO-MEDICAL EXAMINER]’;
- (c) on the first page, after the term ‘CONDITIONS’, points 2 and 3 are replaced by the following:
 - ‘2. This certificate requires compliance with the implementing rules and procedures specified in Part-MED / Part ATCO.MED**.
 3. This certificate shall remain valid from [dd/mm/yyyy] until [dd/mm/yyyy***] subject to compliance with the requirements of Part-MED / Part ATCO.MED** unless it has been surrendered, superseded, suspended or revoked.’;
- (d) the phrase ‘Date of issue: xx/yy/zzzz’ on the first and on the second page is replaced by the following:

‘Date of issue: dd/mm/yyyy’;
- (e) on the first page, the phrase ‘EASA Form 148 Issue 1’ is replaced by the following:

‘EASA Form 148 Issue 2’;
- (f) on the first page, after the text referred to in the previous point (e), the footnotes are replaced by the following:

‘* ‘European Union’ to be deleted for non-EU Member States.

** Reference to Regulation (EU) No 1178/2011 or Regulation (EU) 2015/340 as well as Part-MED and Part ATCO.MED shall be modified as per the certificate’s scope.

*** Expiry date format: day/month/year’;

(g) on the second page, the phrase ‘Attachment to AME certificate number:’ is replaced by ‘Attachment* to the AME certificate number:’, and a new footnote is added at the end of page 2 as follows:

‘* This attachment may be issued as part of the AME certificate or as a separate document.’;

(h) on the second page, the phrase and table following the title ‘ PRIVILEGES AND SCOPE’ are replaced by the following:

‘[Name and academic title of the aero-medical examiner] has obtained the privilege(s) to undertake aero-medical examinations and assessments for the issuance of medical certificates and medical reports as stated in the table below and to issue these medical certificates and medical reports for:

Class 1 revalidation/renewal	[valid until] / [Not Applicable]
Class 2 / LAPL / Cabin crew Initial/revalidation/renewal	[valid until]
Class 3** revalidation/renewal	[valid until] / [Not Applicable]

’;

(i) on the second page, a new footnote is added to clarify when class 3 should be listed on the attachment to the AME certificate as follows:

‘** Class 3 shall be added only for the AMEs approved to perform class 3 aero-medical examinations’.

<p>Rationale</p> <p><i>The text is amended to enable the possibility of issuing only one AME certificate for AMEs that have privileges to perform both class 1 and class 3 examinations, and that is applicable to the many AMEs in Europe.</i></p> <p><i>Furthermore, Appendix VII is amended for consistency with other EASA certificates and the format for the date of issue and the signature is aligned.</i></p> <p><i>Additionally, the table of privileges on page 2 is replaced to further clarify the privileges and their validity period for the respective AME.</i></p>	<p>RMT.0287</p>
---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------

ANNEX IV

Amendments to Annex VII (Part-ORA) to Commission Regulation (EU) No 1178/2011

- (1) Point ORA.FSTD.225 is amended as follows:
- (a) point (a) is amended as follows:
- (1) the introductory phrase is replaced by the following:

‘(a) The FSTD qualification certificate shall remain valid subject to:’;
 - (2) point (2) is replaced by the following:

‘(2) the competent authority being granted access to the organisation as defined in point ORA.GEN.140 to determine continued compliance with the relevant requirements of Regulation (EU) 2018/1139 and the implementing and delegated acts adopted on the basis thereof; and’;
- (b) points (b) and (c) are replaced by the following:
- ‘(b) If the competent authority has extended the recurrent evaluation period for an FSTD in accordance with point ARA.FSTD.120(c) of Annex VI (Part-ARA), the organisation shall assign a person or group of persons with adequate experience who shall do all of the following within a period of 60 days before and 30 days after the start of each recurrent 12-month period in accordance with point ARA.FSTD.120(b)(1):
- (1) review the regular reruns of the complete tests in the Master QTG;
 - (2) conduct the relevant functions and subjective tests; and
 - (3) send a report of the results to the competent authority.
- (c) A BITD qualification shall remain valid subject to regular evaluation for compliance with the applicable qualification basis by the competent authority in accordance with point ARA.FSTD.120.’;

Rationale

RMT.0587 (ex RMT.0196)

See the rationale for proposed amendments to point ARA.FSTD.120 for general information.

Point (a) of point ORA.FSTD.225 is proposed to be modified to refer to any FSTD qualification, due to the general nature of its points (1) to (3).

In point (b) of point ORA.FSTD.225, the conditions for extended evaluation intervals in point ORA.FSTD.225(b) are deleted and transferred to point ARA.FSTD.120(c), since, according to the proposed new arrangement, it is up to the competent authority to decide whether to extend the recurrent evaluation period, subject to these conditions being complied with. Additionally, it has been clarified that the FSTD operator can assign one or more than one person to carry out the tasks specified in point (b) and to report to the competent authority. Finally, it is proposed to provide more flexibility to FSTD operators when planning the recurrent evaluation by adding a period of an additional 30 days after the start of each recurrent evaluation period for the completion of the tasks specified in point (b).

Based on a final review by the RMT.0196 rulemaking group, the text in point (b)(2) is made clearer by referring to a ‘recurrent evaluation’ instead of a ‘relevant evaluation’, and the phrase ‘every

12 months' is deleted, since the 12-month cycle (including the '– 60 / + 30-day – tolerance') is already covered by the introductory phrase of point (b).

- (2) point ORA.AeMC.105 is replaced by the following:

‘ORA.AeMC.105 Scope

This Subpart establishes the additional requirements to be met by an organisation to qualify for the issue or continuation of an approval as an aero-medical centre (AeMC) to:

- (a) provide aero-medical expertise and practical training for AMEs; and
- (b) issue medical certificates and cabin crew medical reports, including initial class 1 medical certificates, and/or class 3 medical certificates in accordance with Regulation (EU) 2015/340, as applicable.’;

Rationale

RMT.0287

The discussions that took place during the MEG meetings regarding the implementation experience and the assessment of the rulemaking group revealed the need to update the content of ORA.AeMC.105 to facilitate a better understanding of the scope of Subpart ORA.AeMC.

- (3) point (b) of point ORA.AeMC.115 is replaced by the following:

- ‘(b) in addition to the documentation for the approval of an organisation required in point ORA.GEN.115, provide details of activities that are contracted to designated hospitals or medical institutes for the purpose of specialist medical examinations.’;

Rationale

RMT.0287

The discussions that took place during the MEG meetings regarding the implementation experience and the assessment of the rulemaking group revealed the need to update the content of ORA.AeMC.115 clarifying the details needed to be provided when applying for an AeMC certification.

- (4) after point ORA.AeMC.115, a new point ORA.AeMC.120 is inserted as follows:

‘ORA.AeMC.120 AeMC certificate

An organisation holding an AeMC certificate shall not, at any time, hold more than one AeMC certificate issued with the same scope in accordance with Regulation (EU) 2018/1139 and the implementing and delegated acts adopted on the basis thereof.’;

Rationale

RMT.0287

The discussions that took place during the MEG meetings regarding the implementation experience, standardisation experience and the assessment of the rulemaking group revealed the need to add a new point ORA.AeMC.120 for consistency with similar requirements for pilot licences and associated certificates. Following the comments received during the NPA consultation, further clarification is made to highlight that an AeMC cannot hold more than one AeMC certificate with the same scope.

- (5) point ORA.AeMC.135 is replaced by the following:

‘ORA.AeMC.135 Continued validity

The AeMC certificate shall be issued for an unlimited duration. It shall remain valid subject to the holder and the aero-medical examiners of the organisation:

- (a) complying with point MED.D.030 of Annex IV (Part-MED) or point ATCO.MED.C.025 of Annex IV (Part-ATCO.MED) to Regulation (EU) 2015/340, as applicable; and
- (b) ensuring their continued experience by performing an adequate number of class 1 medical examinations, or class 3 medical examinations in accordance with Regulation (EU) 2015/340, or equivalent military aero-medical examinations, as appropriate, every year.’;

Rationale

RMT.0287

The discussions that took place during the MEG meetings regarding the implementation experience and the assessment of the rulemaking group revealed the need to update the content of ORA.AeMC.135 to also include relevant legal reference for class 3 aero-medical examinations and to enable the crediting of military aero-medical examinations. Additionally, as a result of the comments received, further changes have been made to enable the possibility of crediting equivalent military aero-medical examinations as a criterion to maintain the validity of the AeMC certification.

- (6) after point ORA.AeMC.135, a new point ORA.AeMC.160 is added as follows:

‘ORA.AeMC.160 Reporting

The AeMC shall provide the competent authority with statistical reports regarding the aero-medical assessments of applicants, including reports of the drugs and alcohol screening performed in accordance with point MED.B.055(b) of Annex IV (Part-MED) and any health risk factors or trends identified during the aero-medical assessments.’;

Rationale

RMT.0287

The discussions that took place during the MEG meetings regarding the implementation experience, standardisation experience and the assessment of the rulemaking group revealed the need to add a new point ORA.AeMC.160 to facilitate analysis and early mitigation when risks are identified.

- (7) point ORA.AeMC.200 is amended as follows:

- (a) point (a) is replaced by the following:

‘(a) for medical certification in compliance with Part-MED;’;

- (b) after point (a), a new point (aa) is inserted as follows:

‘(aa) to facilitate cooperation between the AMEs and other medical experts of the AeMC; and’;

Rationale

RMT.0287

The discussions that took place during the MEG meetings regarding the implementation experience, standardisation experience and the assessment of the rulemaking group revealed the need to insert a new point (aa) to point ORA.AeMC.200 to facilitate the use by the AeMCs of the properly qualified medical experts it has on staff, as it was noticed that even when having experts available within the same AeMC some AMEs continue to work in isolation without consulting the specialists, even in difficult cases.

- (8) after point ORA. AeMC.200, a new point ORA.AeMC.205 is inserted as follows:

‘ORA.AeMC.205 Contracted activities

Notwithstanding point ORA.GEN.205, all of the following shall apply:

- (a) Minimum required aero-medical examinations shall be performed within the organisation of the AeMC, in accordance with the scope and privileges defined in the terms of approval attached to the AeMC’s certificate.
- (b) Additional medical examinations and investigations may be performed by contracted individual experts or organisations. The organisation shall ensure that when contracting any part of its activity, the contracted service or product conforms to the applicable requirements.’;

Rationale

RMT.0287

The discussions that took place during the MEG meetings regarding the implementation experience, standardisation experience and the assessment of the rulemaking group revealed the need to add a new point ORA.AeMC.205 to what shall be performed within the organisation and what can be contracted to external experts or organisations.

- (9) point ORA.AeMC.210 is replaced by the following:

‘ORA.AeMC.210 Personnel requirements

- (a) The AeMC shall have:
- (1) an aero-medical examiner (AME) nominated as head of the AeMC, with privileges to issue class 1 medical certificates, or class 3 medical certificates in accordance with Regulation (EU) 2015/340, as applicable, in accordance with the scope defined in the terms of approval attached to the AeMC’s certificate and sufficient experience in aviation medicine to exercise his or her duties;
- (2) on staff at least one additional qualified AME with privileges to issue class 1 medical certificates, or class 3 medical certificates in accordance with Regulation (EU) 2015/340, as applicable, in accordance with the scope defined in the terms of approval attached to the AeMC’s certificate privileges, and other technical staff; and
- (3) available medical experts.
- (b) The head of the AeMC shall be responsible for:
- (1) coordinating the assessment of examination results;

- (2) signing reports, certificates, and initial class 1 medical certificates and class 3 medical certificates in accordance with Regulation (EU) 2015/340.’.

Rationale

RMT.0287

The discussions that took place during the MEG meetings regarding the implementation experience, standardisation experience and the assessment of the rulemaking group revealed the need to amend point ORA.AeMC.210 to clarify the requirements regarding the AeMC staffing and especially the minimum number of AMEs as well as their qualification.

ANNEX V

Amendments to Annex VIII (Part-DTO) to Commission Regulation (EU) No 1178/2011

Point DTO.GEN.135 is replaced by the following:

‘DTO.GEN.135 Termination of entitlement to provide training

- (a) A DTO shall no longer be entitled to provide some or all of the training specified in its declaration on the basis of that declaration, where one of the following occurs:
 - (1) the DTO has notified the competent authority of the cessation of some or all of the training activities covered by the declaration in accordance with point DTO.GEN.116(b);
 - (2) the DTO has not provided the training for more than 36 consecutive months.
- (b) A DTO shall return approval certificates in accordance with point DTO.GEN.230(c) to the competent authority without delay:
 - (1) in case of cessation of training activities in accordance with point (a);
 - (2) in case of revocation in accordance with point ARA.GEN.350(da)(3) of Annex VI (Part-ARA).’.

Rationale*RMT.0587*

Based on an internal EASA review, point DTO.GEN.135 is proposed to be amended to clarify the obligation and conditions for returning approval certificates for DTO training programmes (where applicable) to the competent authority, for consistency with point ORA.GEN.135(b).

ANNEX VI

Amendments to Annex III (Part-ORO) to Commission Regulation (EU) No 965/2012

In point ORO.FC.A.201(b)(2), point (iii) is replaced by the following:

- ‘(iii) recurrent training and checking in accordance with point ORO.FC.230, with the exception that the checking:
- (A) may not include take-off manoeuvres; and
 - (B) shall include landing manoeuvres at least in the role of the pilot monitoring.’.

Rationale

RMT.0190

See NPA 2014-25.

In reaction to comments received for NPA 2014-25, as well as on the basis of an analysis of the RMT.0190 review group, the proposal for amending point ORO.FC.A.201 was further developed, to address implementation issues related to the current wording and to clarify the following principles.

- *The CRCP does not need to perform any checking for the take-off manoeuvres, since a CRCP will never need to perform a take-off. In the event of crew issues before take-off, the crew will not continue with the departure and return to the gate.*
- *The CRCP is required to be checked in the landing manoeuvre at least in the role of the pilot monitoring, in order to have the competence to take over a pilot function in the event of a possible incapacitation of a crew member in flight.*

Additionally, the intention is that operators develop training programmes that ensure a proper development of the CRCP by practising both take-off and landing in a training environment.

ANNEX VII

Amendments to Annex V (Part-SPA) to Commission Regulation (EU) No 965/2012

In point SPA.HEMS.130, a new point (g) is added as follows:

- ‘(g) Flight crew members who have attained the age of 60 years and who perform single-pilot HEMS operations in accordance with point FCL.065(a) of Annex I (Part-FCL) to Regulation (EU) No 1178/2011.
- (1) For flight crew members who have attained the age of 60 years and who perform single-pilot HEMS operations in accordance with point FCL.065(a) of Part-FCL, the operator shall ensure that the operational conditions do not increase the risk of incapacitation due to cardiovascular and cerebrovascular factors.
 - (2) Training and checking for flight crew members specified in point (1) shall be conducted by personnel that has received appropriate training to allow them to identify mild cognitive decline.’.

Rationale*RMT.0287*

Based on existing scientific literature and expert opinion, the rulemaking group decided to add this point as mitigating measures for potential cardiovascular risks related to shift work and fatigue, along with risks of cognitive decline due to ageing, specifically related to raising the age limit for HEMS pilots. These requirements are intended to raise awareness of the pilots in question and their operators, and to support the latter to monitor, identify and mitigate these risks. During the focused consultation there were voices that asked for more prescriptive requirements and commentators that did not see the need for the addition. Finally, EASA considers that the current text is well balanced and provides the operators with flexibility to effectively implement it and monitor it.