European Union Aviation Safety Agency

Comment-Response Document (CRD) 2020-14

RELATED NPA: 2020-14 — RELATED OPINION: NO 05/2023 — RMT.0678

21.2.2024

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Disclaimer

No quality control has been performed on this document.

Summary of the outcome of the consultation

This document comprises individual responses to all comments received for NPA 2020-14.

For an overview of essential comments received and subsequent changes to the draft regulatory material, please refer to the Opinion, Chapter 2.4.4.

Individual comments (and responses)

In responding to the comments, the following terminology is applied to attest EASA's position:

(a) **Accepted** — EASA agrees with the comment and any proposed change is incorporated into the text.

(b) **Partially accepted** — EASA either partially agrees with the comment or agrees with it but the proposed change is partially incorporated into the text.

(c) **Noted** — EASA acknowledges the comment, but no change to the text is considered necessary.

(d) **Not accepted** — EASA does not agree with the comment or proposed change.

(General Comments)	-

comment	*4* comment by: *AOPA Sweden* Attachment #1 AOPA Sweden See added file
response	Noted – thank you for your supporting comment.

comment	*106* comment by: *Europe Air Sports* **EUROPE AIR SPORTS GENERAL COMMENTS TO NPA 2020-14** Europe Air Sports appreciates the opportunity to comment on this NPA and commends EASA's efforts to develop the flight crew licensing regulatory framework. In our view, the proposed NPA is generally a step in the right direction for light aviation. However, we have a few comments, which are described in the following sections. In particular, we believe that the extra requirements proposed in respect of electric engines are disproportionate and introduce unnecessary complexity through granularity. Compared to other variants, the electric engine is treated as special. Although neither the summary nor the IA discuss the rationale for the choice, it appears that the electric-engine variant is treated as a new intermediate level of granularity. This implies a belief that the electric SEP is, for example, ”less different” from piston SEP than a TMG, but ”more different” than a variable pitch propeller, single lever power control, or turbo- or supercharged engine SEP. It falls into the trap, (outlined in ”Defeated by Complexity” by Vasa Babic, 2015) of introducing this complexity to address a specific issue, without considering the cost of this complexity on the system as a whole.

	Part-FCL does not need to address electric SEP other than through the *existing* framework of variants and differences training.
response	Partially accepted – thank you for your comment. The current Part-FCL framework cannot cover electric engines, since, for smaller aircraft, the requirements are written to exclusively cover particular engines types (piston, turbo-prop). Also, the proposed scope of the new "SEP" class rating will cover aircraft with significantly different engine types, and these differences need to be appropriately reflected in Part-FCL requirements, at least for obtaining the "SEP" class rating in its new meaning. At the same time, EASA agrees that requirements for maintaining privileges for variants with different engine types within the new SEP class rating can be further simplified. Please refer to the response to comment No 198 for further information.

comment	*132* comment by: *FNAM* The FNAM (Fédération Nationale de l'Aviation Marchande) is the French Aviation Industry Federation/ Trade Association for Air Transport, gathering the following members: • CSAE: French Handling Operators Professional Union • CSTA: French Airlines Professional Union (incl. Air France) • EBAA France: French Business Airlines Professional Union • GIPAG: French General Aviation Operators Professional Union • GPMA: French Ground Operations Operators Professional Union • SNEH: French Helicopters Operators Professional Union And the following associated members: • FPDC: French Drone Professional Union • UAF: French Airports Professional Union European Regulation. FNAM thanks EASA for the publication of consultation NPA 2020-14, and gives a positive opinion to the changes made by this proposal as it provides flexibility for the LAPL and PPL training programs, and contributes to flight safety. Hereafter, you will find FNAM comments on the consultation NPA 2020-14.
response	Noted. Thank you for your supporting comment.

comment	*153* comment by: *France* **<u>General comments regarding the general objectives of NPA 2020-14</u>** DGAC FR fully supports the general objectives that are pursued by the Agency through this NPA. We believe that the general intention is going into the right direction to facilitate general aviation.

Nevertheless we would like **to highlight two items** contained in this NPA that are in our opinion of a particular importance for the future of GA. We believe that the content of the NPA related to those items should be further reviewed before publication. We have proposed detailed comments for consideration by the Agency.

In addition we have proposed some additional comments on specific provisions of the aircrew regulation where we believe there is a clear need of improvement (FCL.625.H, FCL.800, FCL.810 ...).

1) Provisions for single-pilot single-engine electric aeroplanes

DGAC FR and FFA (Fédération Française Aéronautique) has been involved since 2018 in experiments of the use electric aeroplanes (Alpha Electro and then Velis SW121 Pipistrel). The objective was to assess and to prepare the use of those new aeroplanes using an electric propulsion technology in particular for LAPL and PPL training courses (local training flights). This early involvement has allowed France to gain a solid experience and confidence in this new type of aeroplanes.

We are convinced that the provisions that are about to be introduced in the aircrew regulation must be proportionate enough if we want to ensure a successfull and smooth transition towards the "green aviation". Ensuring such transition is in the interest of the entire aviation community.

As the electric technology is relatively new and evolution are likely to happen in the coming years (in particular regarding endurance) we are also convinced that the regulation should not set in stone too demanding flight hours experience both for pilots and instructors.

DGAC FR believes that the provisions proposed in the NPA to obtain and maintain the privileges on single engine electric aeroplanes should be further alleviated. We propose in our detailed comments revised figures based on the experience gained in France both for pilots and instructors exercising their privileges on single engine electric aeroplane.

2) Training credit for LAPL students pilots when changing to a PPL course

As stated by aircrew regulation and Annex I to the Chicago Convention, flight instructors wishing to instruct towards private pilot licence (PPL(A)) are required to met the knowledge requirements for the issue of a commercial pilot licence (translated in aircrew regulation by the necessity to hold a CPL theoretical certificate). Since a few years French declared training organisations (DTO) have been facing a major shortage of such aeroplane flight instructors (FI(A)).

In the meantime, aircrew regulation allows FI(A) aeroplane flight instructors without a CPL theoretical certificate to provide training limited to LAPL(A) training (LAPL being a non ICAO European licence). While this accommodation is appreciated by the general aviation stakeholders, it does not solve the difficulty met by candidates to a LAPL(A) licence who, during their training, decide to switch to a PPL(A) training. It comes out that quite a number of LAPL(A) candidates in flying clubs are in this

situation. At the same time, DTO rely almost exclusively on volunteer instructors, who can hardly bear the technical and financial burden of obtaining a CPL theoretical certificate and for whom accessing a professional status is irrelevant.

In order to overcome this issue, for a few months France has been suggesting to the Agency a proposal that would be easy to implement in the short run, prior to the deep revision of instructor framework currently tackled within RMT.0194 "*Modernisation and simplification of the European pilot licensing and training system and improvement of the supply of competent flight instructors*". Unfortunately the French proposal has not been retained in the current NPA.

The Agency's proposal consists in allowing a candidate to switch from a LAPL(A) training towards a PPL(A) training on the basis of a bridge course identical to the one existing already today in aircrew regulation for a candidate holding a LAPL(A) certificate (cf. FCL.210.A (b)). The candidate would be required to take 10 hours of flight instruction at a DTO or at an ATO with a flight instructor (FI(A)) holding a CPL theoretical certificate. This is the crediting provisions as it is proposed by the NPA in the new paragraph FCL.210 (d).

DGAC FR believes that this credit does not offer enough flexibility and does not match with the philosophy of transitioning towards a competency-based training and assessment system (CBTA) which is one of main goals of flight crew system modernization (see RMT.0194 ToRs).

Once again DGAC FR believes that the credit should not be set in a prescriptive way in the regulation. The credit should instead be determined based on a recommandation of the DTO/ATO assessing each individual candidate based on what he/she already achieved in LAPL(A) training.

The customized training program that would follow should at least cover the specific PPL(A) syllabus items that cannot be covered in LAPL(A) training, and should also ensure that the candidate has completed at least 45 hours of flight training as required for a PPL(A) licence. Such solution will offer more flexibility while remaining compliant with Annex I to the Chicago convention.

We are convinced that with such approach DTOs will be able to rely more on the large pool of aeroplane flight instructors (FI(A)) without a CPL theoretical certificate as they will provide a larger amount of creditable flight training hours to candidates before they move to PPL(A). Only the very specific PPL(A) items, at the end of the training, would be provided by a flight instructor (FI(A)) with a CPL theoretical certificate. It will ensure that the candidate has a satisfactory level before taking the skill test.

We are convinced that such proposal will help in solving in the short term the shortage of flight instructor that the GA aviation is experiencing and that it will pave the way to a larger revision of the aircrew framework towards CBTA.

response

Noted – thank you for your comment.
As regards your comment No 1): Please find our responses added to your relevant detailed comments in this document.

As regards comment No 2): Please also see the response to comment No 157 in reaction to which the structure of the LAPL→PPL bridge arrangements was slightly changed. Additionally, EASA believes that the solution included in NPA 2020-14 already provides a proportionate solution that will significantly improve the situation described in your comment. The new requirements will allow applicants to commence training as an LAPL(A) course but finish it as a PPL(A) course where only 15 hours out of the overall training course need to be completed with a PPL(A) instructor (training as per the proposed point FCL.210.A(b)(2)). Consistency with the already existing bridge courses (point FCL.210.A(b) in its current version) is considered important in this context, in order to ensure equivalent training regimes, irrespective of the training path chosen. Additionally, the involvement of a PPL instructor up to a certain minimum is necessary for compliance with ICAO Annex 1 – please refer to the Opinion (Rationale for amendments to point FCL.210.A) for details. Finally, this new "LAPL to PPL" training arrangement is still subject to conventional training methodologies, since the introduction of the competency-based training methodology is outside the scope of RMT.0678.

comment *201* comment by: *FFA*

FFA GENERAL COMMENTS TO NPA 2020-14

FFA (French Powered Flying Federation) appreciates the opportunity to comment on this NPA and supports EASA's efforts to develop a more proportionate Aircrew regulation.

The decision of bringing electric single engine aeroplanes into the existing SEP definition is strongly supported and is in line with Commission and EASA policy to favour early adoption of solutions for Green Deal implementation in aviation domain.

But some regulatory editorial choice and wording are contradicting with this goal especially in the domain of electric engine aeroplanes, which is evolving rapidly.

We strongly recommend:

1) moving quantitative requirements linked to new technologies, from Implementing Rules into AMCs and GMs.

It is vital to get a regulation updating process agile enough, to keep pace with the rapid and continuous improvements delivered by industry, especially in battery and electric engine domains.

2) drawing all lessons from the two-year long period of flying electric planes in France.

- More than 300 hours have been logged successfully in real conditions of flight instruction, discovery flight and cross country navigations, by both FIs and private pilots.

- Restrictive figures proposed in the present NPA are already obsolete, as they are the ones chosen at a time no real-life experiment had commenced.

3) Improvement of wording for LAPL student-pilots opting to pass PPL skill test instead of LAPL skill test.

4) Discard of two requirements in Aerobatic and Night ratings, which impose arbitrary extended or shorten delays, without evidence- or safety-based rationale.

- On one hand, benefits of aerobatic training to dynamic manoeuvres are delayed by a long and costly pre-requisite of strait-and-level flight time.
- On the other hand, night rating training programs are shortened by a 6-month max delay, without consideration to benefits of wise programs including night VFR training flights at different seasons, in particular to experience some seasonal meteorological conditions (high humidity and negative temperature, mist and fog at summer dawn …).

response

Noted – thank you for your comment.
Please be informed that the new requirements, as proposed with NPA 2020-14, have been drafted also to provide flexibility, where needed in the context of new technologies. In reaction to comments received for this NPA, further simplification have been applied (see for example the response to comment No 198 on the requirements to keep privileges for SEP aeroplane variants with different engine types).
As regards your comment on the prerequisites for the aerobatic rating in point FCL.800, please refer to the response to comment No 111.
As regards your comment on the time slot for completing night rating training (point FCL.810), please refer to the response to comment No 112.
Otherwise, your comment does not contain specific proposals for amending regulatory text and can therefore not be further taken into consideration. If you have placed more detailed comments in other parts of the CRT, we will take them into consideration and reply as needed.

comment

210 comment by: *European Sailplane Manufacturers*

The European Sailplane Manufacturers appreciate this NPA2020-14 and feel this to be a good development for the sport and recreational aeroplane communities.

Due to our involvement in the saiplane communities we would love to see some of the issues adressed in this NPA also to be taken over into the gliding world:

a...a clear statement that the mode of propulsion does not matter (might it be with regard to pilot licences or regarding maintenance or operation) as we have also Wankel engines / jet-turbines / electric motors in powered sailplanes.

	b...a clear statement that flying in Annex I aircraft is seen as equal as flying the EASA regulated aircraft with regard to pilot licence currency. (But it should be also added with regard to work on Annex I aircraft regarding currency of maintenance licences). Other things adressed here in NPA2020-14 have been already implemented during the development of "our" sailplane SFCL rules. Here it might be worthwhile to assess for the aeroplane rules whether a PPL(A) or LAPL(A) holder aiming for flying mostly TMG has now all the needed issues also in the FCL rules. We have not done such a check, this might be one little additional useful thing on the way of this NPA towards an Opinion.
response	Noted – thank you for your comment and your positive feedback. According to Annex I (Part-DEF) to Regulation (EU) 2018/1976, the definitions set out in point FCL.010 of Annex I (Part-FCL) to Regulation (EU) No 1178/2011 apply. In that point FCL.010, the definition of a powered sailplane does not refer to a particular engine type. Additionally, the updated definition of touring motor glider (TMG) contains a reference to OSD, in order to consider specific aeroplane / TMG designs. For these reasons, EASA believes that sailplane-related definitions in Part-FCL / Part-SFCL provide sufficient clarity and flexibility. In the context of Part-SFCL, the acceptability of Annex I aircraft flight time is clarified on AMC level (see AMC1 SFCL.160). It is intended to upgrade these arrangements to the rule level with the next Part-SFCL amendment, for consistency with point FCL.035(a)(4) of Part-FCL.

comment	*211* comment by: *European Powered Flying Union* Many thanks for the good proposals the Agency made in NPA 2020-14, particularly for the LAPL(sea) as well as for the adjusted provisions as regards the Mountain Rating.
response	Noted – thank you for your positive feedback.

comment	*229* comment by: *Swiss Aeroclub* We highly appreciate the efforts taken by EASA to supplement the current regulations in order to allow the use of electric driven aircraft.
response	Noted – thank you for your positive feedback.

comment	*239* comment by: *Austro Control* Regarding the NPA in general: Gyroplanes: AT suggests to discuss to what extend the gyroplanes should be integrated into the current requirements. Currently, most of the gyroplanes are 2-seater and operated for sport reasons. The risk is more compared to sailplanes and LSA/VLA airplanes than to rotorcraft. Therefore the requirements should be proportional similar to that categories. Any discussion regarding CPL and similar commercial operating rules seems to be not adequate for the time being. To cover gyroplanes in a separate rule group such as done with sailplanes and balloons might be an more reasonable and attractive

	solution for that kind of users. AT is of the position that the NPA 2020-14 may need more simplifications in the vision of “simpler lighter better”
response	Not accepted – thank you for your comment. Please be informed that gyroplanes are outside the scope of RMT.0678. The introduction of a Part-FCL gyroplane licence is undertaken with RMT.0731 (NPA 2021-12).

2. In summary — why and what p. 5-6

comment	*1* comment by: *HK aviation* Comment to 2.4. The approach only to accept electric power as a new alternative to petrol burning power solutions seems quite ignorant and shortsighted by the agency. Currently, the basic engine concept that the Agency is acknowledging in the LO´s for a LAPL or PPL certificate, is the 1950´s Lycoming/Continental concept of reciprocating aviation petrol burning piston engines. The current and modern Diesel and Mogas burning Thielert/Austro or Rotax engines with built-in reduction gear power concepts with hydraulic or electric CS propellers, are calmly accepted into Aviation certificates, or with an addendum of a FI(A) endorsement for SLP in the individual persons logbook. The agency has not once made a safety evaluation on the impact of modern aviation technology into GA. It is quite evident, that the Agency is completely cut off from the reality of GA technological advances and has quietly only given a nod of acceptance without careful judgement as far as the learning objectives are. I will not go to the concept of Glass cockpits, as there is already quite a supper served for the agency to solve the issues only to absolve the complexity of powerplants which have been completely bypassed as far as LO´s are concerned. As the Agency is taking interest in the prospect of green aviation, I am proposing that the Agency is also taking strident steps to embrace the complexity of other power solutions; as Turbines, Diesel and Mogas in conjunction with electric power, which will also include hydrazin cells as the power-to-weight ratio cannot be solved as easily as the industry has foreseed. Small turbines will become common in several applications, including Gliders and ultralight helicopters. The turbine engine will prove its efficiency and also its possibilities for mixed or bio-based fuels in the near future, especially for low- to medium altitudes which do not require extensive resilience to cold temperatures.
response	Partially accepted – thank you for your comment. Please be informed that a review of learning objectives is outside the scope of RMT.0678. Additionally, a review of the LAPL / PPL training syllabi in the context of EFIS and GNSS is planned with work package (WP) 3 of RMT.0678. EASA in principal agrees that future hybrid engine designs should be considered with this amendment. To do so, the proposal for amending Article 2 of Regulation (EU) No 1178/2011 is updated in such way that a “SEP aeroplane” will include any single-pilot aeroplane for which no type rating is required and that is powered by a single centric propulsion unit which may consist of a piston engine, an electric engine, or, if so determined during the certification process, multiple engines which may consist of a mix of electric and piston engines (hybrid engine). Please refer to the final draft amendment and related Rationale, as included in the Opinion.

	Finally, please be informed that a review of FCL requirements for turbine-powered aeroplanes is outside the scope of this RMT. However, your proposal for further simplifications regarding small turbine-powered aeroplanes will be considered for a future revision.
comment	*212* comment by: *European Powered Flying Union* 2 In summary – why and what 2.1. Subtask 2 “single-pilot single-engine electric aeroplane” will not work as a general term, please replace “single engine” with “single power train” to cater for hybrid propulsion systems. Rationale: Many of the electric planes will be hybrid aircraft, equipped with an electric engine and with a (piston) engine driving a generator charging the batteries of the electric engine. Thank you for the new definition as per [1] of page 21/74, and, at the same time, thank you for the LAPL (sea) of page 23/74, we have been waiting for this for some ten years.
response	Not accepted – thank you for your comment. Please be informed that the term “single-engine electric aeroplane” is used in explanatory text only, for referring to innovative single-engine aeroplanes with electric engines. The legal definition (see NPA 2020-14, proposal for Article 2 of Regulation (EU) No 1178/2011) will more general, referring to “single-engine, single-pilot aeroplanes” that are powered by particular engine types. As regards the proposal to include also hybrid engines, please refer to the reply to comment No 1.

3. Proposed amendments and rationales in detail | 3.1. Draft regulation (draft EASA opinion) | Cover regulation p. 7

comment	*2* comment by: *HK aviation* Art 2 Definitions (8a) I am proposing point (c) any single propeller and (d) any single axis thrust device (jet turbine). The idea of a single powerplant would also need some revision. As one concept could call for a Connected Hybrid, ie electro-diesel- or electro-petrol-engine. I would also amend point (b) as it is fully conceivable that there will be in the future powerplant combinations with 2 electric motors which drive one propeller, the engine controls of electric engines will make this feasible. Art 2 Definitons (8b) would define the powerplants of helicopters in a similar manner.
response	Partially accepted – thank you for your comment. Please refer to our response to comment No 1. As regards helicopters, the new framework is intentionally proposed solely for aeroplanes, since conventional but purely electrically powered helicopters are not expected to enter into service and to require such a regulatory solution in the near future.
comment	*7* comment by: *Swedish Royal Aero Club* Very good approach to electric aircraft that it is part of the SEP concept! We highly encourage this.

response	Noted – thank you for your positive feedback.

comment	*57* comment by: *ECAA* FCL.740.A (b)(4): The last sentence of the point is confusing if the word „hours“ is included after number 6. Until now the sentence meant that 6 (take-offs and landings) of the 12 required take-offs and landings must be completed in SEP(land) class and the same amount also in SEP(sea) class. According to the new wording, it means that in addition to 1 hour PIC requirement, a further 6 hours of 12 take-offs and landings must be completed in SEP(land) class and also in SEP(sea) class. It is suggested to remove the added word „hours“.
response	Accepted – thank you for your comment. The insertion of the word “hours” was obviously an editorial error. The word “hours” will be deleted as proposed in your comment.

comment	*58* comment by: *ECAA* FCL.740 Text is not aligned with the latest applicable amendment of Aircrew regulation (currently Regulation (EU) 2020/2193).Text should be revised so that the latest wording will be used
response	Accepted – thank you for your comment. NPA 2020-14 was drafted when amending Regulation (EU) 2020/2193 was not yet adopted. For developing the Opinion, the rule text will be updated to reflect the latest text.

comment	*59* comment by: *ECAA* FCL.110.H (b)(1) point (i) An unecessary (supposedly) text modification has been made.Instead of „to“ the word „not“ should be used.
response	Accepted – thank you for your comment. This editorial error will be corrected, the word “to” will be replaced by the word “not”, in line with the existing text of point FCL.110.H(b)(1)(i).

comment	*70* comment by: *The Norwegian Air Sports Federation* **Article 2** This method of brining electric aviation into the existing "SEP framework" is strongly supported and will be fully in line with the EU policy objectives.
response	Noted – thank you for your positive feedback.

comment	*107* comment by: *Europe Air Sports* **Article 2 Definitions** This method of bringing electric aviation into the existing SEP definition is strongly supported and will be fully in line with the EU policy objectives.
response	Noted – thank you for your positive feedback.

comment	*138* comment by: *LBA* LBA comment: On Article 2 - Definitions The change of the meaning of the abbreviation „SEP“ from „single-engine piston“ to „single-engine, single-pilot“ seems unfavourable. Especially in the community of private pilots, the abbreviation „SEP“ has been associated with the meaning „single-engine piston“ for years (already since the time of JAR-FCL). Experience has shown that it is difficult for this group of pilots, most of whom do not fly very often and who deal with new regulations rather infrequently, to adopt such changes. Proposal: Use a different, new abbreviation, e.g. „SE-SP“. This would also be in line with the corresponding abbreviation for the instructor rating (FI(A) SE SP). Where applicable, the new abbreviation should also be used in all subsequent references (Article 4, Annex I, Annex VI, AMC and GM).
response	Not accepted – thank you for your comment. When developing NPA 2020-14, the intention was to introduce electric engines for small aeroplanes with rule changes as little as possible, and to group single-engine single-pilot aeroplanes with different engine types (other than turbine engines) into one class rating. Introducing a new acronym and term would trigger the need to update more regulatory material and would add more complexity. For these reasons, the SEP class rating was re-defined to encompass small aeroplanes with piston or electric engines. This regulatory solution has been identified to be the simplest one.

comment	*141* comment by: *Civil Aviation Authority the Netherlands* Article 2 Definitions. The definition of SEP aeroplane is confusing, in relation to the existing definition of SEP (Single Engine Piston). Under SEP aeroplane two different types of engines (piston and electric) are defined, but for both the term SEP aeroplane will be used. Additionally, the term (A) can relate to two types of engines, while the term (H) will only relate to piston engines. The use of the term SEP for both piston engines and electric engines is confusing.
response	Noted – thank you for your comment. As regards the re-definition of the SEP class rating, please refer to the reply to comment No 138. As regards SEP helicopters, please refer to the reply to comment No 2.

comment	*150* comment by: *Civil Aviation Authority the Netherlands* FCL.135.A

	Under FCL.135.A(b) it is stated that for the extension of privileges of a SEP aeroplane class rating to a variant with another engine type (from piston to electric or vice versa) a difference training is required. This difference training shall consist of practical training (dual flight instruction) and theoretical knowledge instruction. The 'normal' theoretical knowledge instruction is based on a piston engine. If a student wishes to change (after qualifying for a LAPL or PPL with a piston engine) to electric propulsion, specific theoretical knowledge instruction has to be followed. This theoretical knowledge should be developed for the electric engine in the areas of aircraft general knowledge, operational procedures and flight performance and planning. Guidance for the theoretical knowledge for electric engines is in the AMC material. The same is necessary for the theoretical examination: additional questions need to be developed for testing the theoretical knowledge of the student on the new type of engine.
response	Noted – thank you for your comment. According to point FCL.725(b)(3) of Part-FCL, theoretical knowledge examinations for the issue of an additional class or type rating are to be conducted verbally by the examiner during the skill test. In this context, no AMC or GM exists today for such verbal examinations in general. The development of respective GM can be considered for the future.

comment	*164* comment by: *Agencia Estatal de Seguridad Aérea* With reference to article 2. The change in article 2 is only applicable to single engine aeroplanes and it does not take into account new types of aircrafts which will use electrical engines such us the new projects in urban mobility, mainly multi rotor aircrafts.
response	Noted – thank you for your comment. Please be informed that innovative eVTOL aircraft are outside the scope of NPA 2020-14 (RMT.0678) and will be addressed with EASA RMT.0230.

comment	*178* comment by: *The Finnish Transport Communications agency, Traficom* - Article 2 Definitions; The definition does not take into a consideration a hybrid power plant
response	Noted – thank you for your comment. Please refer to the response to comment No 1.

comment	*197* comment by: *Czech Technical University* **Article 2 Definitions** “Rebranding” SEP as single-engine, single-pilot is an elegant solution. There is no doubt that SEP class is suitable for electric engines as well as piston engines. We fully support this change.

	What we find less elegant is describing the engine type in the definition. This effectively divides the SEP aeroplane class rating to variants at the cover regulation level. This is not in line with the current approach when variants are defined at the GM level (GM1 FCL.700) and adds on complexity. We believe it is not necessary to include the engine type in the definition (8a). We understand such change would affect the philosophy of the proposed change and require extensive editing, however, we would like to encourage EASA to reconsider this approach based on operational experience with electric engines in future FCL updates.
response	Noted – thank you for your comment. Since new Part-FCL requirements for class rating training, differences training and revalidation, as proposed with NPA 2020-14, are connected to specific SEP variants with different engine types (piston engine, electric engine), these legally-crucial variants need to be defined at rule level. An exclusive reference to engines types is also necessary to exclude turbine engines which are not intended to be part of the re-defined SEP class rating.

comment	*230* comment by: *Swiss Aeroclub* **Art. 2 (8a) 'SEP aeroplane'** The proposed definition would not apply to an aircraft driven by hybrid propulsion. We suggest extending the definition also to „a combination of piston and electric engine"
response	Accepted – thank you for your comment. Please refer to the response to comment No 1.

comment	*231* comment by: *Swiss Aeroclub* **Art. 2 (8b) 'SEP helicopter'** What is the rationale to exclude electric engines with regard to helicopters?
response	Noted – thank you for your comment. Please refer to the response to comment No 2.

comment	*240* comment by: *Austro Control* The class TMG should be deleted from the Aircrew Regulation and instead handled as part of the class SEP (land), as a differences training within the class SEP(land) should be sufficient to allow flying a TMG, considering that some variants within the class SEP(land) practically require a more extensive training e.g. when a pilot changes from a C152 (fixed prop, conventional instrumentation) to a PA46 (which may be fitted with EFIS, has a constant speed prop, retractable gear etc)) than it would be necessary for obtaining the class rating TMG. It would also eliminate the legal issues regarding the fact that the class TMG is incorporated as a class rating in the Aircrew Regulation and as privileges in the Sailplane Rule Book which often raises questions in regard to crediting of experience/training regarding pilots holding a license for either category. In addition SEP helicopters are by definition excluded from being fitted with an electric engine. We do not see a practical reason why this should be the case as it

	makes sense that the regulation should also provide for the possibility that helicopters are fitted with electric engines in the future. Proposal: AT recommends to change the definition as follows: *"(8a) 'SEP aeroplane' means a single-engine, single-pilot aeroplane or sailplane for which no type rating is required and that is powered by either of the following: (a) a piston engine; (b) an electric engine;* *(8b) 'SEP helicopter' means a single-engine, single-pilot helicopter that is powered by either of the following: (a) a piston engine; (b) an electric engine;"* We would like to propose to delete the definition of Touring Motor Glider in FCL.010 and the respective parts in the regulation regarding the TMG class rating.
response	Not accepted – thank you for your comment. The idea to make the TMG a SEP variant will be reviewed with WP3 of RMT.0678. However, the cross-crediting of TMG privileges issued in accordance with Part-FCL and Part-SFCL has already been clarified with the introduction of Part-SFCL (see point FCL.725(f); point SFCL.150(c)). As regards helicopters, please refer to the response to comment No 2.

3. Proposed amendments and rationales in detail | 3.1. Draft regulation (draft EASA opinion) | ANNEX I (PART-FCL) p. 8-19

comment	*3* comment by: *HK aviation* FCL.710 Class and type ratings - variants (a) as there will most likely not be OSD´s for single-engine aircraft (traditional SEP) with some exceptions, it is necessary to bring this part of variant training up to date for electric, diesel powered and turbine variants of single-pilot aircraft. It is to be noticed that there already are some single-pilot non-complex turbine aircraft which are rated as a separate class, to some considerations unnecessary, as a separate class from the traditional SEP for no other reason than classic ignorance. Considering the learning objectives of a PT6 turbine compared to the delicacies of electric aircraft with the associated systems of high-end Li-ion batteries, bms and charging, I would claim that by separating the powerplant from the general acft knowledge, the need for the Pilot to know things, the learning curve is about the same. As I previously commented, the LO for the traditional SEP is still in the 1950´s technology and the training organisation is forced to relearn (EASA TKO´s) the student away for the actual aircraft which will be used for the training (DA20 Rotax, DA40 TDI, or similar). I would also claim that the requirements for technical instruction on a PT6 vs a student initiating flying training in a Diesel powered DA40 or DA42 are not on par. The biggest problem lies in the Agency itself, which is focused on the big industry, which again proves that EASA is not on the footpath for a lighter GA unless it changes its tacks on how to resolve the issue of competence based training. The reason why am I taking up the issue of competence based training, that is because people today are not driving two-stroke mopeds and actually not digging into the mysteries of their automobiles. This is something the training organisations are not necessarily aware of, as the students are distancelearning on different

	platforms for the LO´s set by 1950´tech, the reality hits the instructor in his/her face as he starts the long briefing on DA20 with an Rotax engine! Based on this assumption, it can be deemed that People have a completely different technical background and basic skills (competencies) about mobility and mobile technology that can be assessed by the LO`s in type/class/ or variant instruction. The prerequisite for a single-engine turbine class rating (non-complex) is only 200 hrs/70 hrs pic.
response	Noted – thank you for your comment. Please be informed that amendments for aeroplanes with jet turbine or turbo-prop engines are outside the scope of RMT.0678. However, your proposal for further extending the concept of the revised SEP class rating is noted down for a review with a future rulemaking task. As regards modernisation of LAPL/PPL syllabi, please also refer to the response to your comment No 1. General aviation (GA) is a priority for EASA, visible through the GA Roadmap project which contains lots of initiatives that already have made and will make life easier for GA. For more information, please check the EASA website under https://www.easa.europa.eu/domains/general-aviation/general-aviation-road-map. Finally, EASA would like to highlight that the introduction of competency-based training and assessment (CBTA) will be introduced in Part-FCL with EASA RMT.0194, in close alignment with CBTA-related amendments to ICAO Annex 1 which are also currently under development at ICAO level.

comment	*8* comment by: *Swedish Royal Aero Club* FCL.135.A (b) I think you are making this too complicated. No need to introduce this regarding a new type of engine. It should be a difference training and that is it. FCL.140.A (c) Please just make the type of engine a regular differences training. FCL.210 (d) Very good! FCL.710 (a) Please just make the type of engine a regular differences training. FCL.741.A Please just make the type of engine a regular differences training. FCL.835 Please include BIR in the scope of DTO! The goal with the BIR is for more pilots to get their instrument rating to improve flight safety. If this is not allowed at a DTO, the goal will never ever be reached. Not many more pilots will get their instrument... FCL.915 (b) (5) 10 hrs is too much. 3-5 hrs is enough. That would include a couple of hours after your own checkout. The aircraft itself is usually of conventionel design and therefore it is only the engine that needs conversion. 10 hrs is way too much.

response	Not accepted – thank you for your comment. As regards your comment to points FCL.135.A(b), FCL.140.A(c), FCL.710(a) and FCL.741.A: The new re-designed SEP class contains variants of small single-engine single-pilot aeroplanes with significantly different engine types. Hence, it is deemed necessary that Part-FCL sets out essential elements for related differences training. As regards your comment to point FCL.835: The extension of the DTO training scope is outside the scope of RMT.0678 and will be considered after having collected more experience with the DTO framework (see explanations in EASA Opinion No 11/2016). As regards your comment to point FCL.915(b)(5): Please refer to the response to comment No 114.

comment	*9* comment by: *Waterford Aero Club* Page 15; FCL.740.A(b)(4) The revalidation of SEP aeroplane-sea class rating paragraph does not make sense. The last line should read "At least 1 hour of the required PIC time and 6 **hours** of the required 12 take-offs and landings shall be completed in each class. The addition of hours in this paragraph does not make sense and compares hours to takeoffs.
response	Noted – thank you for your comment. Please refer to the response to comment No 57.

comment	*10* comment by: *Waterford Aero Club* Page 19: FCL.930.FI (a) Applicants for the FI certificate shall have passed a specific pre-entry flight test assessment with an FI qualified in accordance with point **FCL.905.FI(i)** within the 6 months preceding the start of the course, to assess their ability to undertake the course The aim of this paragraph is that an applicant for the FI certificate passes a pre flight entry assement with a Flight Instructor who is qualified to teach Flight Instructors. The regulation reference of FCL.905.FI(i) is an Instructor who can instruct single-pilot multi-engine class or type ratings. The correct reference should be FCL.905.FI(j). This error appears many times in the regulation.
response	Accepted – thank you for your comment.

	Point FCL.905.FI had been restructured with amending Regulation (EU) 2019/1747 while the references to that point in point FCL.930.FI(a), FCL.930.CRI(a)(2) and FCL.930.IRI(b). All references will be corrected.

comment	*11* comment by: *Waterford Aero Club* Page 12 FCL.210.A Applicants for a PPL(A) shall have completed at least 45 hours of **flight time**. The word Instruction was removed from this line to facilitate the night rating as part of the training for the PPL(A). FCL.1005 details the word **Flight Instruction** when it talks about cases of vested interest in examiners, I understand the requirement of the change was to facilitate stakeholders to complete the night rating in the required flight time but this change now reduces the amount of time an examiner can instruct and examine an applicant for a PPL. FCL.1005 details; "provided more than 25 % of the required flight instruction" Perhaps FCL.1005 can be updated to reflect the word "Flight time" also.
response	Noted – thank you for your comment. Please refer to the response to comment No 238. In that context, the term “flight instruction” is kept in point FCL.210.A and point FCL.210.H.

comment	*12* comment by: *Ministry for Innovation and Technology, Hungary (CAA HU)* The proposed amendment of the last sentence of point (b)(4) of FCL.740.A contains an error: "...6 hours of the required 12 take-offs and landings..." The number "6" should refer to number of take-offs and landings, not hours.
response	Accepted – thank you for your comment. Please refer to the response to comment No 57.

comment	*13* comment by: *PROAVIATE* FCL.210 d) based on this ammendment - is it possible to add a brief procedure/crediting of flight instructions for PPL applicants under the training who decide to continue as LAPL(A)? It happens basically in the middle of training when they realise they do not need to have PPL.. FCL.915.FI - is it possible to make more clear the procedure in case the applicant gets the FI certificate with limitation to provide the LAPL(A) training only and he by the time fulfills the condition of CPL theory exam and wants to start providing the PPL(A) training as well. In this moment it is not clear for them how to proceed. Thank you
response	Partially accepted - thank you for your comment.

	An additional paragraph (d) will be added to point FCL.115, to allow to change a PPL training course into an LAPL training course. A comprehensive revision of Part-FCL Subpart J (instructor certificates) is planned with EASA RMT.0194 but is outside the scope of this RMT.
comment	*14* comment by: *PROAVIATE* FCL.025 (c) (2) - Is it possible to explain the validity of ATPL theoretical knowledge examination in case of the applicant will get only CPL(A) within 36 months as he currently does not need IR. Does it mean the ATPL theory exam will remain valid even after 5 years to get IR or other qualifications? In this covid time it is a very important decision making part for applicants.
response	Noted. Your comment is not related to rulemaking proposals of NPA 2020-14. However, please be informed that theoretical knowledge examinations remain valid for the issue of a CPL or an IR for a period of 36 months (point FCL.025(c)(1)(ii)). For further information, please contact your competent authority.
comment	*15* comment by: *IAOPA (Europe)* .pdf p9/74 FCL.110.A IAOPA Europe strongly supports the proposal. **Also propose** that FCL.110.A (a) should be amended to read: [...]at least 30 hours of flight ~~instruction~~ time This would enable flight time of the night rating course and the LAPL(A) skill test to be included in the 30 hours. A similar proposal is already included in NPA 2020-14 for the PPL(A); there is no obvious reason why the same methodology could not be applied to the LAPL(A), which would also achieve regulatory consistency. This would require a new GM1 FCL.110.A(a) to be included: FLIGHT-TIME PREREQUISITE FOR THE ISSUE OF A LAPL(A) The introductory sentence of point FCL.110.A(a) requires applicants for a LAPL(A) to have completed in total 30 hours of flight time in aeroplanes. This means that, in addition to the LAPL(A) training as specified in point FCL.110.A(a)(1) and (2), these 30 hours of flight time in aeroplanes may include the flight time of the night rating training course specified in point FCL.810(a)(1)(ii) and (2) as well as the flight time of the skill test for the LAPL(A)
response	Not accepted – thank you for your comment. Allowing night rating training to be included within the 30-hour LAPL training would mean that LAPL training time can be reduced to 25 hours. EASA believes that such a reduction of pure LAPL training time should not be possible.
comment	*16* comment by: *IAOPA (Europe)*

	.pdf p10/74 FCL.135.A(b) LAPL(A) IAOPA (Europe) supports this proposal.
response	Noted – thank you for your positive feedback.

comment	*17* comment by: *IAOPA (Europe)* .pdf p10/74 FCL.140.A (a)(1)(ii) LAPL(A) To improve flexibility, IAOPA (Europe) considers that the wording of this proposal should be amended to read as follows: dual refresher training ~~with an instructor~~ ~~who shall select~~ including those flight exercises [...] Note that 'Dual' means with an instructor by definition. Increases flexibility by permitting as many instructors and flights as necessary to meet the requirements.
response	Not accepted – thank you for your comment. EASA believes that the current wording would also allow applicants to complete the refresher training by more than one flight with different instructors, if necessary. At the same time, EASA believes that ideally the refresher training including all components as set out in AMC1 FCL.740.A(b)(1)(ii)(C) is conducted by one instructor.

comment	*18* comment by: *IAOPA (Europe)* .pdf p10/74 FCL.140.A (c) LAPL(A) IAOPA (Europe) considers that 3 hours of flight time as PIC plus dual refresher training (or a proficiency check) in the 24 months prior to the intended flight would probably not maintain adequate recency. We propose the following **amended wording**: (c) Holders of a LAPL(A) with privileges for SEP aeroplanes who, in accordance with point FCL.135.A(b), have obtained privileges for variants with different types of engines specified in Article 2(8a) of this Regulation shall exercise their privileges in variants with a particular type of engine only if, in the preceding ~~24~~ 12 months, they have completed one of the following in SEP aeroplanes with that type of engine: (1) a proficiency check; (2) at least ~~3~~ 1 hour~~s~~ of flight time as PIC and refresher training in accordance with point (a)(1)(ii).
response	Noted – thank you for your comment. Please refer to the response to comment No 198.

comment	*19* comment by: *IAOPA (Europe)* .pdf p12/74 FCL.210 PPL training course IAOPA (Europe) welcomes and strongly supports this proposal.
response	Noted – thank you for your positive feedback. Please also refer to the response to comment No 238.

comment	*20* comment by: *IAOPA (Europe)* .pdf p12/74 FCL.210.A PPL(A) IAOPA (Europe) welcomes and strongly supports this proposal. For clarification, we recommend the following minor amendment: FCL.210.A(a)(1) should read '[...]dual instruction by day[...]' and FCL210.A(a)(2) should read'[...]supervised solo flight time by day[...]'
response	Not accepted – thank you for your comment. Initial PPL training typically takes place at day time. However, EASA considers it important to keep the text flexible, since, especially in Member States in the Northern part of Europe, some elements of PPL(A) training might take place at night time. Additionally, the general approach in Part-FCL is to set out training hour requirements without the addendum “by day” while night training hours are mentioned separately. Hence, also for consistency reasons, it is not deemed necessary to add such additional wording.

comment	*21* comment by: *IAOPA (Europe)* .pdf p 13/74 FCL.210.H PPL(H) IAOPA (Europe) supports this proposal. For clarification we suggest the following minor amendment: FCL.210.H(a)(1) should read '[...]dual instruction by day[...]' and FCL210.H(a)(2) should read'[...]supervised solo flight time by day [...]'
response	Not accepted – thank you for your comment. Please refer to the response to comment No 20.

comment	*24* comment by: *IAOPA (Europe)* .pdf p15/74 FCL.741.A Recency requirements for variants within the SEP aeroplane class IAOPA (Europe) considers that 3 hours of flight time as PIC plus dual refresher training (or a proficiency check) in the 24 months prior to the intended flight would probably not maintain adequate recency. Hence we recommend the following **amended wording**:

	By way of derogation from point FCL.710(d), holders of a SEP aeroplane class rating who, in accordance with point FCL.710(a), have obtained privileges for variants with different types of engines specified in Article 2(8a) of this Regulation shall exercise their privileges in variants with a particular type of engine only if, in the preceding ~~24~~ 12 months, they have completed one of the following in SEP aeroplanes with that type of engine: (1) a proficiency check; (2) at least ~~3~~ 1 hour~~s~~ of flight time as PIC and refresher training in accordance with point FCL.740.A(b)(1)(ii)(C).
response	Noted – thank you for your comment. After further considerations of several comments received, draft point FCL.741.A is deleted. Please refer to the response to comment No 198.

comment	*25* comment by: *IAOPA (Europe)* .pdf p 16/74 FCL.740.H Revalidation of type ratings - helicopters IAOPA (Europe) supports this proposal.
response	Noted – thank you for your positive feedback.

comment	*26* comment by: *IAOPA (Europe)* .pdf p17/74 FCL.815 Mountain rating IAOPA (Europe) supports this proposal.
response	Noted – thank you for your positive feedback.

comment	*27* comment by: *IAOPA (Europe)* .pdf p18/74 FCL.915 General prerequisites and requirements for instructors IAOPA (Europe) supports this proposal.
response	Noted – thank you for your positive feedback.

comment	*28* comment by: *IAOPA (Europe)* .pdf p19/74 FCL.915.FI FI prerequisites IAOPA (Europe) supports this proposal.
response	Noted – thank you for your positive feedback.

comment	*29* comment by: *IAOPA (Europe)* .pdf p13/74 FCL.710 Class and type ratings - variants IAOPA (Europe) supports this proposal, but makes the following point:

	Class ratings do not include 'types', hence (d) **should be amended** to read '[...] except for ~~types or~~ variants within [...]
response	Accepted – thank you for your comment. The phrase “types or” will be deleted.

comment	*30* comment by: *IAOPA (Europe)* .pdf p15/74 FCL.740.A Revalidation of class and type ratings - aeroplanes IAOPA (Europe) partially supports this proposal, but recommends the following amended wording of FCL.740.A(b)(ii)(C) to improve flexibility: —(C) dual refresher training ~~of at least 1 hour of total flight time with a flight instructor (FI) or a class rating instructor (CRI) who shall select~~ including those flight exercises that allow the applicant to refresh their competence in safely operating the aircraft and applying normal, abnormal and emergency procedures. 'Dual' means with an instructor by definition. Increases flexibility by permitting as many instructors and flights as necessary to meet the requirements.
response	Not accepted – thank you for your comment. Please refer to the response to comment No 17.

comment	*31* comment by: *IAOPA (Europe)* .pdf p19/74 FCL.915.FI FI prerequisites IAOPA (Europe) supports this proposal.
response	Noted – thank you for your positive feedback.

comment	*32* comment by: *IAOPA (Europe)* .pdf p19/74 Appendix 1 Crediting of theoretical knowledge IAOPA (Europe) supports this proposal.
response	Noted – thank you for your positive feedback.

comment	*64* comment by: *Swedish Transport Agency, Civil Aviation Department (Transportstyrelsen, Luftfartsavdelningen)* Page 15, FCL.740.A (b)(4) Relevant Text: (4) When applicants hold both a SEP aeroplane-land class rating and a SEP aeroplane-sea class rating, they may complete the requirements of paragraph (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 hours of the required 12 take-offs and landings shall be completed in each class.

Comment: The last sentence with the wording 6 hours make no sense. Is the word hours correct?

Proposal: At least 1 hour of the required PIC time and 6 take-off and landings of the required 12 take-offs and landings shall be completed in each class.

response

Noted.
Please refer to the response to comment No 57.

comment

65 comment by: *Swedish Transport Agency, Civil Aviation Department (Transportstyrelsen, Luftfartsavdelningen)*

Page: 10,11,15,16,17

Relevant Text: refresher training

Comment: We believe that it is important that the refresher training must have been completed to the satisfaction of the instructor. As it stands now, it could be possible for a pilot to undergo refresher training in an unsatisfactory manner and still be allowed to continue flying because he has completed the refresher training regardless.

Proposal: Add the words "to the satisfaction of the instructor" after all the parts of the NPA where refresher training occurs.

response

Accepted – thank you for your comment.
The phrase “and to the satisfaction of” is inserted in points FCL.140.A(a)(1)(ii), FCL.140.H(a)(2), FCL.740.A(b)(1)(ii)(C) and FCL.740.H(a)(2)(ii)(B).

comment

66 comment by: *Swedish Transport Agency, Civil Aviation Department (Transportstyrelsen, Luftfartsavdelningen)*

Page: 16-17, FCL.740.H (c)

Relevant Text: When applicants hold more than one type rating for single-engine turbine helicopters with a maximum certified take-off mass up to 3 175 kg, they may achieve revalidation of all the relevant type ratings by completing the proficiency check in accordance with point (a)(1)(ii) 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) at least 2 hours of PIC flight time on each of the other types during the validity period. 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 performed.

Comment: The last words "or the refresher training is performed" appear to be incorrect and do not belong to the SET requirements.

Proposal: Remove the words “or the refresher training is performed".

response

Noted – thank you for your comment.
EASA agrees that the phrase “or the refresher training” was initially inconsistent, since the option of revalidation via refresher training was not available for SET helicopters. However, after extending the scope of the refresher training option to SET helicopters (see the response to comment No 130), this phrase does make sense and is therefore kept.

comment

67 comment by: *Swedish Transport Agency, Civil Aviation Department (Transportstyrelsen, Luftfartsavdelningen)*

Page: 18, FCL.945

Relevant Text: 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), and only in the event of fulfilment of all the other revalidation criteria required by point FCL.740.A(b)(1), the instructor shall endorse the applicant’'s licence with the new expiry date of the rating or certificate, if specifically authorised for that purpose by the competent authority responsible for the applicant’'s licence.

Comment: Should it not also be possible for a FI(H) to revalidate a SEP helicopter rating when the requirements according to FCL.740.H(a)(2)(ii) are met? Or can only an examiner or the authority make the revalidation?

Proposal: Remove the word "aeroplane" and add reference FCL.740.H(a)(2)(ii).

response

Partially accepted – thank you for your comment.
EASA agrees that point FCL.945 should also apply in the case of refresher flight training for helicopter type rating revalidation as per the revised point FCL.740.H. However, a simple removal of the word “aeroplane” would not be sufficient, since the remaining text still refers to class ratings while for helicopters only type ratings exist. Point FCL.945 will be updated to refer to both points FCL.740.A and FCL.740.H appropriately. Additionally, point ARA.FCL.200(d) will be updated accordingly.

comment

68 comment by: *Alpine airlines - FR.AOC.0088*

FCL.815

DRAFT EASA OPINION
(d) Validity. A mountain rating shall be valid for a period of 24 months. 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 6 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).

OPERATOR OPINION

Justification :

There are many different mountain surface designated to require a mountain rating, with very different levels of difficulty as well.
Limiting the revalidation of mountain ratoing to the use of one does not seem to justify a sufficient level of competence.
Indeed, the pilot can make 6 landings on the same surface, at one time. The experience thus acquired is well below the regulatory requirement, particularly in terms of the initial proficiency check of mountain qualification.

Many accidents that have occurred on mountain surfaces have involved a pilot who is under-trained or used to a single mountain surface (most of the time, on a reputedly low difficulty surface).

A positive impact on safety would be to limit the revalidation of the mountain rating to the completion of 6 landings on 3 different mountain surfaces.

Proposed text :

(d) Validity. A mountain rating shall be valid for a period of 24 months. 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 6 landings on **3 different surfaces** designated to require a mountain rating;
or
(2) have passed a proficiency check that complies with the requirements in point (c).

response

Not accepted – thank you for your comment.
Point FCL.815 is proposed to be amended only in order to simplify the administrative aspect of the revalidation process, as described in NPA 2020-14. The technical revalidation requirements (6 landings or proficiency check) have not been changed and, in the view of EASA, are sufficient, also in terms of flexibility. If the revalidation requirements should be changed to be more prescriptive, as per your proposal, it would be necessary to establish criteria for different surfaces. As your proposal refers to “3 different surfaces”, obviously you are not referring to the two types of surfaces the current point FCL.815(a)(1) and (2) (covered by snow / not covered by snow).

comment

69 comment by: *The Norwegian Air Sports Federation*

FCL.115(b) [currently (c)]
This provision allows the student to do the theoretical knowledge instruction and the flight instruction in two different ATO/DTOs. However, a similar explicit possibility does not exist with regard to ratings. In the past, we have had flight schools specialising in theoretical knowledge instruction for ratings, such as the night rating. This should be introduced as an explicit option in Part-FCL, as those DTOs well equipped and capable of providing good theoretical knowledge instruction may not be able to do flight training.

response	Noted – thank you for your comment. It was already clarified between EASA and the Member States that a change of a training organisation is possible in any case, not only in those cases which are specifically mentioned in Part-FCL. EASA will evaluate the need to further clarify this point in the future.

comment	*71* comment by: *The Norwegian Air Sports Federation* **FCL.110.A (c) (2)** This clarification is strongly supported. While the option was clear already through the travaux préparatoires, certain member states refused to give the ATOs/DTOs the option of taking into account flight hours covered by reg. (EU) 2018/1139 artikkel 2(8) or Annex I (e).
response	Noted – thank you for your positive feedback.

comment	*72* comment by: *The Norwegian Air Sports Federation* **FCL.135.A(b)** We do not support the proposed solution. Electric propulsion should be dealt with through differences training, in the same way as diesel engine single-lever power control is treated for those trained on convention engines – and vice versa.
response	Not accepted – thank you for your comment. Please refer to the response to comment No 106.

comment	*73* comment by: *The Norwegian Air Sports Federation* **FCL.140.A(c)(2)** We do not support the proposed solution. The minimum hourly requirement – as well as the separate dual instruction requirement – should be deleted of the following reasons: • *It is not a performance-based criterion*. We should in our view be working towards a performance-based regulatory framework for leisure pilots, to the extent possible. • *It is not proportionate*. There is no similar hourly requirement in parallell cases, e.g. for a person with a SEP(land) rating, who flies both fixed-gear, retractable gear and tail-wheel aeroplanes. (No refresher training is required either.) In our view, the differences in flying e.g. a Pipistrel Velis Electro compared to a Pipistrel Virus SW-121 is not more significant. Electric propulsion should be dealt with through differences training, in the same way as diesel engine single-lever power control is treated for those trained on convention engines – and vice versa.
response	Not accepted – thank you for your comment. Please refer to the response to comment No 106.

	Additionally, please be informed that the competency-based training methodology is planned to be introduced for all Part-FCL licences and ratings with RMT.0194, in close alignment with respective ongoing revisions of ICAO Annex 1.

comment	*74* comment by: *The Norwegian Air Sports Federation* **FCL.135.H** While our suggestion may indeed be beyond the scope of NPA 2020-14, we would encourag EASA to consider introducing a helicopter class rating along the lines of the system in the US. Please find further details here: 14 CFR Appendix I to Part 141 – Additional Aircraft Category and/or Class Rating Course: "**(1)** For the recreational pilot certificate, the course requires 15 hours of flight training on the areas of operations under part 141, appendix A, paragraph 4.(c)(2) that includes - **(i)** Two hours of flight training to and at an airport that is located more than 25 nautical miles from the airport where the applicant normally trains, with three takeoffs and three landings, except as provided under § 61.100 of this chapter; and **(ii)** Three hours of flight training in a rotorcraft category and a helicopter class aircraft within 2 calendar months before the date of the practical test."
response	Not accepted – thank you for your comment. As you already indicate in your comment, the introduction of helicopter class ratings is outside the scope of RMT.0678 and could be evaluated with a future rulemaking task.

comment	*75* comment by: *The Norwegian Air Sports Federation* **FCL.741.A** We do not support the proposed solution. The minimum hourly requirement – as well as the separate dual instruction requirement – should be deleted of the following reasons: • *It is not a performance-based criterion*. We should in our view be working towards a performance-based regulatory framework for leisure pilots, to the extent possible. • *It is not proportionate*. There is no similar hourly requirement in parallell cases, e.g. for a person with a SEP(land) rating, who flies both fixed-gear, retractable gear and tail-wheel aeroplanes. (No refresher training is required either.) In our view, the differences in flying e.g. a Pipistrel Velis Electro compared to a Pipistrel Virus SW-121 is not more significant. Electric propulsion should be dealt with through differences training, in the same way as diesel engine single-lever power control is treated for those trained on convention engines – and vice versa.
response	Not accepted – thank you for your comment. Please refer to the response to comment No 106.

comment	*76* comment by: *The Norwegian Air Sports Federation* **FCL.815** We support the structure of the change, but we find 6 landings to be disproportionate compared to the currency requirement for the night rating. Taking the risk hierarchy into account, similar currency requirements as for the night rating should apply. The most important element is to protect passengers.
response	Not accepted – thank you for your comment. Point FCL.815 is proposed to be amended only in order to simplify the administrative aspect of the revalidation process, as described in NPA 2020-14. The technical revalidation requirements (6 landings or proficiency check) have not been changed. Since revalidating the mountain rating via experience is an alternative to the completion of a proficiency check, EASA believes that requiring an experience of 6 landings is appropriate.

comment	*77* comment by: *The Norwegian Air Sports Federation* **FCL.020(a)(2)** We support this performance-based approach.
response	Noted – thank you for your positive feedback.

comment	*78* comment by: *The Norwegian Air Sports Federation* **FCL.210(d)** We strongly support this addition. However, paragraph (d)(2) is not required, confusing and should be deleted.
response	Not accepted – thank you for your comment. Please refer to the response to comment No 153.

comment	*80* comment by: *Danish Transport and Construction Agency* FCL.020 do not mention theoritical knowledge requirements. Suggestion: Either the student have passed the theoretical exams or as a minimum completed the theoretical course.
response	Not accepted – thank you for your comment. Draft point FCL.020(a)(2) in general refers to “the competence to safely operate the relevant aircraft” which, in EASA’s understanding, includes the theoretical knowledge as relevant for the intended solo flight (local traffic patterns, cross-country flights).

comment	*81* comment by: *Danish Transport and Construction Agency* Page 10 FCL.140.A LAPL(A): It is our opinion that the refresher training requrements can not be completed in less than 1 hour flight time.

	We are concerned if there is not a minumum flight time requirement, some will take advantage an do the refresher training on much lesser time.
response	Accepted – thank you for your comment. EASA agrees that it is better to keep this 1-hour requirement in the context of LAPL(A) refresher training, but also in the context of refresher training for the revalidation of the SEP aeroplane class rating in accordance with point FCL.740.A. The text in both points FCL.140.A and FCL.740.A will be amended accordingly.

comment	*82* comment by: *Danish Transport and Construction Agency* Page 11 FCL.140.H LAPL(H): It is our opinion that the refresher training requrements can not be completed in less than 1 hour flight time. We are concerned if there is not a minumum flight time requirement, some will take advantage an do the refresher training on much lesser time
response	Accepted – thank you for your comment. EASA agrees that it is better to keep this 1-hour requirement. Consequently, this 1-hour requirement should also be introduced for the new refresher training – option in point FCL.740.H for certain helicopter type ratings. The text in both points FCL.140.H and FCL.740.H will be amended accordingly.

comment	*83* comment by: *Danish Transport and Construction Agency* Page 13 FCL.710: The wording "type of engine" could be misunderstood and shold be considered reworded. We suggest "category of engine".
response	Not accepted – thank you for your comment. The phrase “type of engine” stands in the context of a reference to the new definition in Article 2(8a) of Regulation (EU) No 1178/2011 and is therefore believed to be sufficiently clear.

comment	*84* comment by: *Danish Transport and Construction Agency* Page 15 FCL.740.A (b)(1)(ii)(C) It is our opinion that the refresher training requrements can not be completed in less than 1 hour flight time. We are concerned if there is not a minumum flight time requirement, some will take advantage an do the refresher training on much lesser time.

	"Applicants shall be exempted from this refresher training if they have passed a class or type rating proficiency check, skill test or assessment of competence in any other class or type of aeroplane." From a flight safety perspective we do not agree that person flies for example a B777 should be exempted from the refresher training on a SEP. Based on recent accident/incidents on SEP, it has been noted that PIC was qualified on MPA and therefor exempted from refresher training on SEP.
response	Noted – thank you for your comment. With regard to the 1-hour requirement for the refresher training, please refer to the response to comment No 81. Additionally, EASA would like to highlight that the option to receive a full credit for the refresher training on the basis of a skill test, proficiency check or assessment of competence in any other class or type of aeroplane is part of point FCL.740.A from the initial issue of Part-FCL. If you believe that this requirement should be changed, please be invited to send us a rulemaking proposal (Rulemaking proposals | EASA (europa.eu)) which also includes explanations and justifications as relevant.

comment	*85* comment by: *Danish Transport and Construction Agency* Page 15 FCL.741.A: The wording "type of engine" could be misunderstood and shold be considered reworded. We suggest "category of engine".
response	Not accepted – thank you for your comment. Please refer to the response to comment No 83.

comment	*86* comment by: *Danish Transport and Construction Agency* Page 18 FCL.915 (5) What is the definition of a "particular type of engine"? FCL.945 with reference to 740.H (A)(2)(II)(B): SEP(H) should be added!
response	Noted – thank you for your comment. The phrase “particular type of engine” stands in the context of a reference to the new definition in Article 2(8a) of Regulation (EU) No 1178/2011 and is therefore believed to be sufficiently clear. As regards your comment to point FCL.945, please refer to the response to comment No 67.

comment	*89* comment by: *Aéro-Club Redonnais* FCL.025.

	The proposition is unclear. "Before retaking the complete set of the examination papers...". ***Examination paper*** is unclear, as well as "***the complete set***". We don't use "paper" for the exam anymore. Wouldn't be clearer to rephrase it this way "Before retaking any of all theoretical examination modules, ...".
response	Not accepted – thank you for your comment. Please refer to GM1 FCL.025 where an explanation of the term "examination paper" is given.

comment	*90* comment by: *Aéro-Club Redonnais* FCL.210 This is a great proposal to allow to credit PPL licence training with the LAPL licence training flying experience as the training are exactly the same. However, we do have also applicants who wants to revert from an initial PPL licence training course to a LAPL licence training course. So my proposal is to allow also the credit in the otherway : allow to credit a LAPL licence training based on the flying experience of an applicant who has already started a PPL licence training.
response	Accepted – thank you for your comment. Please refer to the response to comment No 13.

comment	*101* comment by: *Europe Air Sports* Page 8: **FCL.020(a)(2) Student pilot** We support this performance-based approach.
response	Noted – thank you for your positive feedback.

comment	*102* comment by: *Europe Air Sports* Page 9: **FCL.110.A (c) (2) LAPL(A) — Experience requirements and crediting** This clarification is strongly supported. While the option was clear already through the travaux préparatoires, certain member states refused to give the ATOs/DTOs the option of taking into account flight hours covered by reg. (EU)2018/1139 article 2(8) or Annex I (e).
response	Noted – thank you for your positive feedback.

comment	*103* comment by: *Europe Air Sports*

Page 8:

FCL.115(b) [currently (c)] LAPL — Training course
This provision allows the student to do the theoretical knowledge instruction and the flight instruction in two different ATO/DTOs. However, a similar explicit possibility does not exist with regard to ratings. In the past, we have had flightschools specialising in theoretical knowledge instruction for ratings, such as the night rating. This should be introduced as an explicit option in Part-FCL, as those DTOs well equipped and capable of providing good theoretical knowledge instruction may not be able to do flight training.

Proposal: Add the text of FCL.115(b) [currently (c)] to the provisions covering additional ratings.

response

Noted – thank you for your comment.
Please refer to the response to comment No 69.

comment

104 comment by: *Europe Air Sports*

Page 9:

FCL.135.A(b) LAPL(A) — Extension of privileges to another class or variant of aeroplane
We do not support the proposed substantive change (”When extending the privileges… planning.”). The electric engine should be addressed through the existing framework for variants and differences training.

response

Not accepted – thank you for your comment.
Please refer to the response to comment No 106.

comment

105 comment by: *Europe Air Sports*

Page 11:

FCL.135.H LAPL(H) — Extension of privileges to another type or variant of helicopter
While our suggestion may indeed be beyond the scope of NPA 2020-14, we would encourage EASA to consider introducing a helicopter class rating along the lines of the system in the US. Please find further details here:
14 CFR Appendix I to Part 141– Additional Aircraft Category and/or Class Rating Course:
"
(1)
For the recreational pilot certificate, the course requires 15 hours of flight training on the areas of operations under part 141, appendix A, paragraph 4.(c)(2) that includes -
(i)

Two hours of flight training to and at an airport that is located more than 25 nautical miles from the airport where the applicant normally trains, with three takeoffs and three landings, except as provided under § 61.100 of this chapter; and
(ii)
Three hours of flight training in a rotorcraft category and a helicopter class aircraft within 2 calendar months before the date of the practical test."

response

Noted – thank you for your comment.
Please refer to the response to comment No 74.

comment

108 comment by: *Europe Air Sports*

Page 10:

FCL.140.A(c) LAPL(A) — Recency requirements

EAS Comment:

We do not support the extra requirements introduced in new para (c). The electric engine should be addressed through the existing framework for variants and differences training.

The minimum hourly requirement is particularly unwelcome, because it is not a performance-based criterion, and therefore works in a direction contrary to EASA's strategic intent.

response

Noted – thank you for your comment.
Please refer to the response to comment No 106.
Additionally, please be informed that the competency-based training methodology is planned to be introduced for all Part-FCL licences and ratings with RMT.0194, in close alignment with respective ongoing revisions of ICAO Annex 1.

comment

109 comment by: *Europe Air Sports*

Page 12:

FCL.210 (d) (2) Training course
d) Applicants for a PPL may receive credits for previous LAPL training they have undergone in the same aircraft category, based on an assessment of the applicant by the ATO or the DTO that is responsible for the PPL training course.
In any case, applicants shall:
(1) comply with the experience requirements set out in points FCL.210.A(a) or FCL.210.H(a), as applicable; ~~and~~
~~(2) during the PPL training course, complete the flight instruction set out in points FCL.210.A(b) or FCL.210.H(b), as applicable.~~

Comment:
EAS is of the opinion that:

- Paragraph (1) is sufficient and strongly supported by EAS.
- Paragraph (2) is not relevant, creates confusion and must be erased.

The reason is: this paragraph (2) requires a student-pilot to comply with requirements FCL.210.A(b) which are explicitly specific to licenced pilots holding a LAPL.
FCL.210.A(b) says:
b) Specific requirements for applicants that holding an LAPL(A). Applicants for a PPL(A) that holding an LAPL(A) shall have completed all of the following:

response

Not accepted – thank you for your comment.
Please refer to the response to comment No 153.

comment

110 comment by: *Europe Air Sports*

Page 15:
FCL.741.A

We do not support the proposed FCL.741.A, which should be deleted. The electric engine should be addressed through the existing framework for variants and differences training.

FCL.741.A
The minimum hourly requirement is particularly unwelcome for the following reasons:

- There is no similar requirement in parallel cases, e.g. for a person with a SEP(land) rating, who flies two or more variants, e.g. variable pitch propeller, single lever power control, or turbo- or supercharged engine. (No refresher training is required either, btw.) In our view, the differences in flying e.g. a Pipistrel Velis Electro compared to a Pipistrel Virus SW-121 is not more significant.
- The present proposal would put quantitative requirements related to new technology in Hard Law (*Implementing Rules*).
- It contradicts with the EASA policy to ease rapid adoption of new technology when they improve safety or environmental friendliness.
- The update life cycle of the implementing rule is incompatible with the momentum new tech industry delivers improvements in engine, energy, electronics, monitoring systems, etc. Putting such requirements in the implementing rule would prevent GA pilots to get safety and economic benefits from new technology made available on the market, with a reasonable delay. Such figures must evolve at the same momentum with

development of new technology, then it is highly recommendable to put them into AMC/GM.

In the particular case of emerging electric engines.

Progress on battery management is moving forwards fast, rollout of electric engine aeroplanes in flying schools is at its early development.
Then nobody can predict how private pilots who qualify on both types of engine, will spilt their flight time between electric and piston aeroplanes. And it can evolve rapidly according to new development.

response

Not accepted – thank you for your comment.
Please refer to the response to comment No 106.

comment

111 comment by: *Europe Air Sports*

Not included in the NPA but we recommend inclusion:

FCL.800 Aerobatic rating
Regulation (EU) 2020/359
(a) Holders of a pilot licence with privileges to fly aeroplanes or TMGs shall undertake aerobatic flights only if they hold an aerobatic rating in accordance with this point.

(b) Applicants for an aerobatic rating shall have completed:
~~*(1) after the issue of the licence, at least 30 hours of flight time as PIC in aeroplanes or TMGs;*~~
(~~2~~ 1) a training course at DTO or at an ATO, including:

EAS is of the opinion that flying 30 hours straight and level, does not prepare, in any way, a pilot to fly aerobatic manoeuvres in a safer manner.

The requirement:

- is not aerobatic flight related,
- does not meet risk-based regulation or competency-based training criteria.
- introduces significant pilot's resources spoiling without link with aerobatic rating aims.

response

Not accepted – thank you for your comment.
EASA reviewed your proposal with its experts and concluded not to accept your comment. In EASA's view, a pilot, immediately after licence issue, should collect

some PIC (solo) flight experience and build self-confidence, before moving on to more advanced flying (aerobatics). Please also consider that, with Regulation (EU) 2020/359, point FCL.800(b)(1) was already amended in such way that the amount of required PIC hours was reduced from 40 to 30.

comment *112* comment by: *Europe Air Sports*

Page 17:

FCL.810 Night rating

(a) Aeroplanes, TMGs, airships.
(1) Applicants shall have completed a training course ~~within a period of up to 6 months~~ at a DTO or at an ATO to exercise the privileges of an LAPL or a PPL for aeroplanes, TMGs or airships in VFR conditions at night. The course shall comprise:
(i) theoretical knowledge instruction;

EAS is of the opinion that this requirement introduces a time constraint which does not deliver benefits for the gain of a night rating.

For each night flight lesson, student pilot has to set up a perfect combination of following elements:

- nice meteorological conditions,
- a night-fitted aeroplane,
- an opened aerodrome with lighting system in service,
- an available FI with night rating,
- a precise organisation of pre-night and post-night ferry flights when home base airfield is not certified for night flight.

The number of opportunities is obviously reduced along the year and the requirement of training completion within 6 months raises a hurry-up syndrome which has no link with night rating aims.

In addition, the requirement contradicts with a wise training policy which would include VFR night training flights at different seasons to experience some seasonal meteorological conditions, as negative temp and high humidity in winter, mist and fog at summer dawn …

response Not accepted – thank you for your comment.
EASA believes that, without the 6-month time frame for completing the night rating training, stretching the 5-hour NVFR course over a longer period of time would not ensure proper training progression.

comment *113* comment by: *Europe Air Sports*

Page 17:

FCL.815 Mountain rating
We support the structure of the change, but we find 6 landings to be disproportionate compared to the currency requirement for the night rating. Taking the risk hierarchy into account, similar currency requirements as for the night rating should apply. The most important element is to protect passengers.

response

Not accepted – thank you for your comment.
Please refer to the response to comment No 76.

comment

114 comment by: *Europe Air Sports*

Page 18:

FCL.915
FCL.915 General prerequisites and requirements for instructors
[…]
(b) Additional requirements for instructors that provide providing flight instruction in aircraft.
Applicants for the issue of or holders of an instructor certificate with privileges to conduct flight instruction in an aircraft shall:
[…]
(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, completed at least 10 hours of flight time in that variant.
[…

EAS Comment:

Europe Air Sports is of the opinion to delete the 10-hour requirement or at least reduce it significantly to a figure correlated with outcomes of real operations experience.

The 10-hour requirement was a quantity defined as a conservative value, before any feedback from regular operations was collected.

Hundreds of hours later, electric engine aeroplanes operations in real conditions of flying schools and discovery flights, have demonstrated that FIs succeed easily transition from piston engine to electric engine.

As each flight is around 40 minute-airborne time, it sums up at least to 15 uneventful flights which became rapidly boring for transitioning instructors.

The 10 hour-flight time required for an FI before teaching on electric engine aeroplane, is no longer an appropriate figure and worst it introduces an ineffective delay between end of completeness of dual flight instruction and start of instruction.

The most important part of the transition is about mastering abnormal and emergency situations and it is better achieved during dual flight instruction than during standard flight where something bad is expected.

	In addition, we strongly propose to move any specific hourly requirements to AMC or GM.
response	Not accepted – thank you for your comment. EASA understands this 10-hour requirement to refer to the instructor's total time as a pilot on that aircraft, meaning that the flight time of his/her differences training would be included. In this context, the 10-hour requirement is believed to be appropriate for ensuring minimum experience of a pilot on that aircraft before instructing in it. Additionally, please be informed that simply moving all hourly requirements to AMC or GM under the current regulatory framework is not possible. Hourly requirements that are critical in the context of compliance with ICAO Annex 1 need to be kept at rule level. Also, removing all hourly requirements would be incompatible with the current (conventional) training methodologies that are reflected in Part-FCL. The introduction of competency-based training and assessment (CBTA; planned with EASA RMT.0194) will introduce a new training methodology in Part-FCL, making the reference to a particular number of training hours less relevant in the future.
comment	*116* comment by: *UK CAA* **Page No:** 10 of 74 **Paragraph No:** FCL.140.A (a) (1) (ii) **Comment:** We strongly recommend that the following statement: 'of at least 1 hour of total flight time' should not be removed. **Justification:** 1. It is a retrograde safety step to not nominate minimum training flight times. To not specify a minimum standard flight time can lead to unsatisfactory, inappropriate, incomplete training sessions in order to save money and time, especially if not conducted under the supervision of an ATO/DTO. 2. A minimum recommended flight time is specified for test/checks in Part FCL and as this replaces a check flight it should be subject to the similar time recommendations. **Proposed Text:** Amend to read: "(ii) refresher training at an ATO/DTO of at least 1 hour of total flight time with 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;"
response	Accepted – thank you for your comment. Please refer to the response to comment No 81.

comment	*117* comment by: *UK CAA* **Page No:** 11 of 74 **Paragraph No:** FCL.140.H (a)(1) **Comment:** We believe the flying 'dual or solo under the supervision of an instructor' at para (a)(1) and the refresher training at para (a)(2) should be conducted at an ATO/DTO **Justification:** 1. Aeroplanes operate a class rating system, whereas helicopters operate type ratings and therefore the training should be conducted at a DTO/ATO and not by an 'independent' instructor. This is already recognised in para FCL.740.(b)(2)(i) where the delivery of class and type rating renewal training is different for aeroplanes and helicopters. 2**.** Conducting dual instruction and supervising solo flight should only be conducted at a training organisation with the appropriate SMS/safety policy/hazard identification/risk assessment and appropriate mitigation measures in place. 3. AMC. FCL. 140. H (a) (2) refers to the PPL(H) syllabus for which only ATO/DTO have the approved training syllabus/programmes to conduct this training. 4. The Authority must be able to verify the pilot has completed the appropriate training. ATO/DTO have the requirement to maintain records therefore the training that has been provided is auditable by the Authority. **Proposed Text:** Amend to read: "(a)(1) … or flying dual or solo at an ATO/DTO under the supervision of an instructor…
response	Not accepted – thank you for your comment. Already today, refresher training for the LAPL(H) on single-engine helicopters within the LAPL(H) scope can take place outside an ATO or DTO (point FCL.140.H(a)), and to date this arrangement was not reported to be an issue. For this reason, and for consistency with the refresher training arrangements for aeroplane ratings, the refresher training for helicopter type rating revalidation will not require an ATO or a DTO. Also, EASA holds the opinion that referring to particular training exercises does not necessarily make the involvement of a training organisation mandatory. Flight instructors (FI(H)) per se are deemed to be sufficiently qualified to deliver the refresher training in this context.
comment	*118* comment by: *UK CAA* **Page No:** 11 of 74 **Paragraph No:** FCL.140.H (2) **Comment:**

We strongly recommend that the following statement: 'of at least 1 hour of total flight time' should not be removed.

Justification:
1. It is a retrograde safety step to not nominate minimum training flight times. To not specify a minimum standard flight time can lead to unsatisfactory, inappropriate, incomplete training sessions in order to save money and time, especially if not conducted under the supervision of an ATO/DTO.

2. A minimum recommended flight time is specified for test/checks in Part FCL and as this replaces a check flight it should be subject to the similar time recommendations.

Proposed Text: Amend to read:
"(2) a refresher training at an ATO/DTO of at least 1 hour of total flight time with 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"

response

Accepted – thank you for your comment.
Please refer to the response to comment No 82.

comment *119* comment by: *UK CAA*

Page No: 11 of 74

Paragraph No: FCL.140.H (2)

Comment: There is no method indicated of how the flights at (a)(1), (a)(2) or (b) are recorded by the instructor.

Justification: The candidate must have a record of the relevant flights to enable the NAA to verify the pilot has completed the appropriate training.

Proposed Text: Add additional paragraph as follows:
(C) The training at para (a)(1) and (a)(2) shall be entered in the pilot's logbook or equivalent and shall be signed by the instructor.

response

Accepted – thank you for your comment.
New paragraphs will be added to both points FCL.140.A and FCL.140.H to include a requirement on the recording method (logbook entries by instructor or examiner, as applicable).

comment *120* comment by: *UK CAA*

Page No: 12 of 74

Paragraph No: FCL.210.A

Comment:

Allowing the Night Rating course towards the 45 hours flight time required for the licence, would reduce the time allowed for other exercises required for the PPL, many student pilots are taking in excess of 60 hours currently

Justification:
The Night Rating course has a 6 months validity as stated in FCL.810(a)(1), this would have to be considered

response

Noted – thank you for your comment.
The 45-hour flight time requirements required for the initial issuance of a PPL, even if now with the possibility to include the 5 hours of night rating training, remain a minimum figure which can and will be exceeded by many students who are in the need for a longer training duration.
XXX

comment

121 comment by: *UK CAA*

Page No: 15 of 74

Paragraph No: FCL.740.A (b), (1) (ii)(C)

Comment:
The removal 'of at least 1 hour of total flight time', would not benefit the candidate.

Justification:
1. It would be a retrograde safety step to not nominate minimum training flight times. To not specify a minimum standard flight time can lead to unsatisfactory, inappropriate, incomplete training sessions in order to save money and time, especially if not conducted under the supervision of an ATO/DTO.

2. A minimum recommended flight time is specified for test/checks in Part FCL and as this replaces a check flight it should be subject to the similar time recommendations.

Proposed Text: Amend to read:
"(C) refresher training of at least 1 hour of total flight time with 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 a class or type rating proficiency check, skill test or assessment of competence in any other class or type of aeroplane "

response

Accepted – thank you for your comment.
Please refer to the response to comment No 81.

comment

122 comment by: *UK CAA*

Page No: 16 of 74

Paragraph No: FCL.740.H (a)(2)(ii)(B)

Comment:
We believe the refresher training flying at para (2)(ii) (B) should be conducted at an ATO/DTO

Justification:
1. Aeroplanes operate a class rating system, whereas helicopters operate type ratings and therefore the training should be conducted at a DTO/ATO and not by an 'independent' instructor. This is already recognised in para FCL.740.(b)(2)(i) where the delivery of class and type rating renewal training is different for aeroplanes and helicopters.

2**.** Conducting dual instruction and supervising solo flight should only be conducted at a training organisation with the appropriate SMS/safety policy/hazard identification/risk assessment and appropriate mitigation measures in place.

3. AMC. FCL. 140. H (a) (2) refers to the PPL(H) syllabus for which only ATO/DTO have the approved training syllabus/programmes to conduct this training.

4. The Authority must be able to verify the pilot has completed the appropriate training. ATO/DTO have the requirement to maintain records therefore the training that has been provided is auditable by the Authority.

Proposed Text: Amend to read:
"(B) within the 3 months immediately preceding the expiry date of the rating a refresher training flight at a ATO/DTO with an instructor who shall…"

response

Not accepted – thank you for your comment.
Please refer to the response to comment No 117.

comment

123 comment by: *UK CAA*

Page No: 16 of 74

Paragraph No: FCL.740.H (a)(2)(ii)(B)

Comment:
We recommend a 1 hour minimum flight time should be specified

Justification:
1. It is a retrograde safety step to not nominate minimum training flight times. To not specify a minimum standard flight time can lead to unsatisfactory, inappropriate, incomplete training sessions in order to save money and time, especially if not conducted under the supervision of an ATO/DTO.

2. A minimum recommended flight time is specified for test/checks in Part FCL and as this replaces a check flight it should be subject to the similiar time recommendations.

Proposed Text: Amend to read:
"(B) within the 3 months immediately preceding the expiry date of the rating a refresher training flight of at least 1 hour at a ATO/DTO with an instructor who shall …"

response | Accepted – thank you for your comment.
Please refer to the response to comment No 82.

comment | *124* comment by: *UK CAA*

Page No: 16 of 74

Paragraph No: FCL.740.H (a)(2)(ii)(B)

Comment: There is no method indicated of how the refresher training flight at (a)(2)(ii)(B) is recorded and who is authorised to sign the candidates pilots licence.

Justification:
Aeroplane FIs who are authorised to sign pilot's licences for training are specified at Part FCL.945 and ARA.FCL.200. There is no such provision for helicopters instructors.

Proposed Text: Add additional paragraph as follows:
" (a)(ii)(C) On completion of the training at (B) the pilot's licence and logbook should be endorsed by an authorised instructor in accordance with para FCL.945 and ARA.FCL.200."

response | Accepted – thank you for your comment.
Please refer to the response to comment No 67.

comment | *125* comment by: *UK CAA*

Page No: 16 of 74

Paragraph No: FCL.740.H (b)(1)(2)

Comment:
The present regulation allows the candidate with 2 hours PIC on another type to revalidate by experience after completing a proficiency check flight on a different type. The new regulation permits 6 hours experience and a training flight to replace the check proficiency flight however, still only requires 2 hours PIC on the other types to be revalidated by experience.

We believe there should be the equivalent 6 hours PIC on each type for revalidation by experience if no check flight is to be undertaken and passed.

Justification:

1.Prior to the NPA, a proficiency check flight by an examiner was required to ensure a safe standard was being maintained before allowing revalidation by experience on the other types with 2 hours PIC in the preceding 12 months. The training flight does not specify a pass/fail or minimum standard to be achieved by the candidate, therefore allowing revalidation by experience for other types with only 2 hours PIC in the preceding 12 months is not an equivalent level of safety.

2. If the NPA requires 6 hours of flight experience to be conducted in the period to achieve a safe level of competence in order to safely negate the requirement for a proficiency check for a type rating, then the equivalent level of experience on the other types revalidating by experience should also be 6 hours PIC in the previous 12 months.

3. Robinson helicopters are precluded from the revalidation by experience. Therefore the predominate SEP helicopter utilising the revalidation by experience in Europe is G2 Cabri. This type does not share the same characteristics as all the other SEP helicopters and therefore 2 hours PIC is insufficient for the cross crediting for revalidation by experience between types without a proficiency check on one type.

Proposed Text: Replace para (b) in its entirety with the following:

"(b) When applicants hold more than one type rating for single-engine piston helicopters, they may achieve revalidation of all the relevant type ratings by complying with ~~all of~~ the following:

(1), they have passed the proficiency check in accordance with point (a)(1)(ii) ~~or have completed the refresher training in accordance with point (a)(2)(ii)(B)~~ in only one of the relevant types held,

(2), they have completed at least 2 hours of flight time as PIC on each of the other relevant types during the validity period. 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 performed or

(3), have completed the refresher training in accordance with point (a)(2)(ii)(B) in only one of the relevant types held,

(4), they have completed at least 6 hours of flight time as PIC on each of the other relevant types during the validity period. The training flight 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

response

Accepted – thank you for your comment.
Point FCL.740.H(b)(2) will be reworded to require applicants to have completed at least 6 PIC hours on each type, in case the opt to revalidate with the refresher training flight instead of a proficiency check.

comment *126* comment by: *UK CAA*

Page No: 17 of 74

Paragraph No: FCL.815

Comment:
This will incur a cost to the NAA as there will be a need to reformat the licence with the non-expiring rating.

response

Noted – thank you for your comment.
This amendment has been developed based on input from affected stakeholders, for the reasons explained in NPA 2020-14. EASA believes that the administrative simplification provided by this amendment outweighs the cost for adapting the licence format in this area.

comment *127* comment by: *UK CAA*

Page No: 18 of 74

Paragraph No: FCL.945

Comment:
This paragraph does not reflect the relevant authorisation for helicopter flight instructors to sign applicants licences for the revalidation of helicopter type ratings at new para FCL.740.H (a)(2)(ii)(B).

Justification:
Helicopter FIs under new proposals require an authorisation to sign applicants' licence for new revalidation procedure.

Proposed Text: Amend to read:
"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), and only in the event of fulfilment of all the other revalidation criteria required by point FCL.740.A(b)(1), and for SEP helicopters point FCL.740H.(a)(2)(ii)(B) the instructor shall endorse the applicant's licence with the new expiry date of the rating or certificate, if specifically authorised for that purpose by the competent authority responsible for the applicant's licence."

response

Accepted – thank you for your comment.
Please refer to the response to comment No 67.

comment *130* comment by: *European Helicopter Association*

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FCL.740.H
(a)(2) we propose the text to read: for type ratings for single-engine piston **and turbine helicopters with a certified take-off mass up to 3175 kg**, they shall:.....

Justification: light SET helicopters should be treated like SEP helicopters with regard to training and checking to revalidate the type rating. Also for SET helicopters safety is increased by asking for 6 hours PIC and a refresher training like for SEP helicopters as an alternative to 2 hours PIC including one proficiency check

(c) should read: When applicants hold more than one type-rating for single-engine turbine helicopters with a maximum certified take-off mas up to 3175 kg, they may achieve revalidation of the relevant type ratings by having passed the proficiency check in accordance with point (a)(1)(ii) **or having completed the refresher training in accordance with point (a)(2)(ii)(B) in only one of the relevant types**, provided that they have completed:.....

Justification: offering the refresher training option would definetly increase the safety level for pilots flying SET like it does for pilots flying SEP

response

Accepted – thank you for your comment.
EASA agrees that the option to revalidate a helicopter type rating with refresher training can be extended as suggested in your comment. Point FCL.740.H will be updated accordingly, allowing also type ratings for SET helicopters up to an MTOM of 3175 kg to be revalidated via refresher training. In this context, the scope of the associated new AMC1 FCL.740.H(a)(2)(ii)(B) will also be revised.

comment

131 comment by: *Europe Air Sports*

Page 13:

FCL.710 Class and type ratings — variants (a)

Text in NPA:
Pilots shall complete a differences training or familiarisation in order to extend their privileges to another variant of aircraft within aone class or type rating. In the case of variants within a class or type rating, the differences training or familiarisation shall include the relevant elements defined in the OSD, 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.~~

EAS Comment:

Move the new text in FCL.710 (a) to AMC.

Rationale:
The text proposed in the NPA introduces new complexity in the implementing rule, by treating the electric engine variant as special (compared to e.g. variable pitch propeller, single lever power control, or turbocharged engine).. Practical experience (see our other comments) indicates that the differences do not warrant such prescriptive text in the Rule.

response | Not accepted – thank you for your comment.
Please refer to the response to comment No 106.

comment | *134* comment by: *FNAM*

On the whole, FNAM welcomes the proposed changes as they:

- Add flexibility to the types of licenses;
- Take into account the experience acquired by pilots holding an LAPL (A) license towards a PPL (A) license;
- Improve flight safety and training instructions for LAPL (A) and PPL (A) pilots.

For FCL.210 A and H: Why EASA have tripled the number of total flight hours for a holder of an LAPL (A) license?

response | Noted – thank you for your comment.
The training requirements for LAPL holders who upgrade to a PPL have not been changed and flight hours have not been tripled. Points FCL.210.A(b) and FCL.210.H(b) have only been modified for the reasons explained in NPA 2020-14, top of page 25. As regards pure flight hours, the current version requires applicants to have completed 15 hours after the issuance of the LAPL(A) (30 hours LAPL training + 15 hours = 45 hours of total experience), while the proposed amendment simply refers to 45 hours of total flight time experience. Hence, no change to the overall flight hour requirement is made.

comment | *139* comment by: *LBA*

LBA comment:
<u>On FCL.025</u>
Further clarification in GM is required, whether a failed exam can be repeated without additional training. Furthermore the timeframe has to be defined, when the repetitive exam has to be successfully completed.
Clarification, if the repetitive exam can be conducted without additional training.

response | Not accepted – thank you for your comment.
Proposed amendments to point FCL.025(b)(5) will clarify that, only in the case where all examination papers are failed, additional training is required. When only some of the examination papers are failed, additional training may be advisable, but Part-FCL does not require the completion of additional training in such a case, and it would be legally inappropriate to “clarify” the need to do so only on GM level. Additionally, it is clear for point FCL.025(b)(2) that all exams (including retaken exams) need to be completed within 18 months. There is no need to be more prescriptive in the specific context of retaken exams.

comment | *140* comment by: *LBA*

LBA comment:
On FCL.140.A - LAPL(A) - Recency requirements
The deletion of the minimum flight time of one hour in point (a) (1) (ii) does not seem appropriate. Experience shows that especially in aero clubs (where licence holder and instructor usually know each other well) there is a certain tendency that the refresher training is completed purely formally with a minimum of effort, i.e. a very short flight time, without sufficient possibilities of oversight on the part of the competent authority, since the documentation of the refresher training is only to be done formally in the licence holder's logbook, i.e. without the contents of the training.

Proposal: No deletion of the minimum flight time of one hour. This at least indirectly ensures the framework for sufficient training.

To listing c:
The content is inconsistent or misleading.
The applicant might gain new privileges for electric propulsed aircraftundergoing difference training with an FI/CRI according to FCL.135.A (b), but for the recency requirements, the applicant has to have 3 hours of PIC time

Proposal:
AMC/GM should clarify, that recency requirements can first be fulfilled two years after the initial/difference training.

To listing c:
According to listing (a)(1) of FCL.140.A the applicant has to have flight time as PIC, OR dual flight time, OR solo flight time under the supervision of an instructor, but for the other variant, it always has to be PIC time!

Proposal for an amendment of listing c:
(1) at least 3 hours of flight time as PIC or dual flight flight times or solo flight times under supervision of an instructor, including refresher training in accordance with point (a)(1)(ii), or
(2) a proficiency check

response

Accepted – thank you for your comment.
As regards your comment on the deletion of the 1-hour refresher training flight requirement, please refer to the response to comment No 81.
As regards your comment to paragraph (c) of point FCL.140.A: After a major revision of that paragraph (c) (please refer to the response to comments No 198 and 202), the issues highlighted in your comment no longer exist.

comment

142 comment by: *LBA*

LBA comment:
On FCL.140.H - LAPL(H) - Recency requirements

The deletion of the minimum flight time of one hour in point (a) (2) does not appear to be appropriate. Experience shows that especially in the comparatively

small community of private helicopter pilots (where licence holder and instructor usually know each other well) there is a certain tendency that the refresher training is completed purely formally with a minimum of effort, i.e. a very short flight time, without sufficient possibilities of oversight on the part of the competent authority, since the documentation of the refresher training is only to be done formally in the licence holder's logbook, i.e. without the contents of the training.

Proposal: No deletion of the minimum flight time of one hour. This at least indirectly ensures the framework for sufficient training.

response

Accepted – thank you for your comment.
Please refer to the response to comment No 81.

comment

143 comment by: *LBA*

LBA comment:

On FCL.210.A - PPL(A) - Experience requirements and crediting

The amendment appears unacceptable as it effectively leads to a reduction of the basic flight training (VFR day) by 6 to 7 flight hours (5 hours night rating training, 1 to 2 hours skill test), which may also have a negative impact on flight safety. Also, the rationale (14) does not fit: according to JAR-FCL 1.125(c), at least five additional hours flight time (to the minimum 45 flight hours according to JAR-FCL 1.120) were required to obtain the night qualification, resulting in a total of 50 flight hours. Experience has shown that 45 hours of flight training are usually (at least) required to fulfil the requirements of the syllabus (which has not been changed!) according to AMC1 FCL.210 (c), in order to be able to provide the training content in the required profundity (the training programmes of the ATOs/DTOs are designed accordingly).

Proposal: No change to the regulation; alternatively: Regulation according to JAR-FCL.

response

Partially accepted – thank you for your comment.
Please note that the hours given in point FCL.210.A constitute minimum hours. The duration of a particular training course for a particular student pilot will surely need to exceed these figures, if that student pilot needs more training in order to develop the necessary proficiency up to a safe standard. Additionally, please note that, in EASA's understanding, the phrase "five additional hours" in paragraph (c) of point JAR-FCL 1.125 was connected to the hourly requirements in the preceding paragraph (b) (25 hours of dual instruction, 10 hours of supervised solo flight time), and not to the overall 45-hour flight time requirement in point JAR-FCL 1.120.
However, EASA, while still holding the opinion that training for PPL and NVFR can be combined as per the NPA proposal, the flight time for the skill test event should not

be included in the 45-hour requirement. Hence, the term “flight instruction” is kept, and the possibility to include NVFR training within the 45 hours is clarified in an additional sentence at the end of point FCL.210.A(a).

comment *144* comment by: *LBA*

LBA comment:

On FCL.740.A - Revalidation of class and type ratings - aeroplanes

The deletion of the minimum flight time of one hour in point (b) (1) (ii) (C) does not seem appropriate. Experience shows that especially in aero clubs (where licence holders and instructors usually know each other well) there is a certain tendency that the refresher training is completed purely formally with a minimum of effort, i.e. a very short flight time.

Proposal: No deletion of the minimum flight time of one hour. This will at least indirectly ensure the framework for sufficient training.

Supplementary suggestion: An amendment to the last sentence of the above mentioned point is suggested. It is not apparent why an exemption from the refresher training in the case of an assessment of competence is only granted if passed in another class or type of aeroplane.

response Accepted – thank you for your comment.
Please refer to the response to comment No 81.

comment *145* comment by: *LBA*

LBA comment:

On FCL.740.H - Revalidation of type ratings - helicopters

The amendment to (a) (2) (ii) (B) seems appropriate in principle. However, the specification of a minimum flight time is also necessary here. Experience shows that in the comparatively small community of private helicopter pilots (where licence holders and instructors usually know each other well) there is a certain tendency that the refresher training is completed purely formally with a minimum of effort, i.e. a very short flight time.

Proposal: Insert a minimum flight time of one hour. This will at least indirectly ensure the framework for sufficient training.

The amendment to (b) (2), first sentence of the last paragraph, does not take into account that, according to the new version of (a), the revalidation of a type rating

for single-engine piston-powered helicopters can now also be accomplished by refresher training.

Proposal: Rewording: „The proficiency check *or the refresher training* shall be performed each time on a different type.“

The amendment to (c), last sentence, does not take into account that according to the new version of (a), the possibility to revalidate a type rating by refresher training is only applicable to single-engine piston-powered helicopters.

Proposal: Rewording: „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.“

response

Partially accepted – thank you for your comment.
As regards the 1-hour refresher training requirement, please refer to the response to comment No 82.
The last sentence of paragraphs (b)(2) is reworded as suggested in your comment.
As regards your comment on the last sentence in paragraph (c), please refer to the response to comment No 66.

comment

146 comment by: *LBA*

LBA comment:
On FCL.945 - Obligations for instructors

The rule should be amended in line with the proposed amendment to FCL.740.H (a) (2) (ii) (B) to also allow the revalidation of type ratings for single-engine piston-powered helicopters by endorsement of instructors (under the same conditions as for FI/A). Without this modification, any revalidation of a type rating would have to be done by the competent authority itself, which should be avoided in terms of workload for the authority and costs for the licence holder.

response

Accepted – thank you for your comment.
Please refer to the response to comment No 67.

comment

151 comment by: *Civil Aviation Authority the Netherlands*

FCL.110.H

In FCL.110.H(b)(1)(i) it is stated that the credit shall 'to exceed the total flight time as PIC'.
In the current regulation the statement is 'not exceed the total flight time as PIC'.

The 'to' should be changed in 'not' to remain in line with the existing regulation.

response

Accepted – thank you for your comment.

	The text is corrected accordingly.

comment	*154* comment by: *France* **Comment on FCL.110.A paragraph (c) (2) and FCL.110.H (b) (2)** Member States have adopted different approaches regarding the application of article 2(8) of the BR. In a same manner Annex I regulation might differ a lot from one MS to another. Therefore, without opposing the proposal, we believe that it should be clarified that accepting or not a credit for previous flight time performed on Article 2(8) or Annex I aircraft should ultimately remain in the hand of the competent Authority that will actually issue the licence to the candidate. In addition we believe that that the terms "*match the definition and criteria*" are open to various interpretations and should be clarified in an AMC.
response	Noted. As explained in NPA 2020-14, this amendment does not introduce a substantial change but simply clarifies the original intent of these provisions. The terminology “match the definition and criteria” (as already used when introducing AMC1 FCL.140.A; FCL.140.S; FCL.740.A(b)(1)(ii)) should express that the aircraft in question should constitute a helicopter, as defined in Part-FCL. In this context, EASA agrees that the phrase “and criteria” is not necessary and will be deleted.

comment	*155* comment by: *France* **Comment on FCL.135.A paragraph (a) and FCL.135.H paragraph (a)** For clarification and consistency we propose a slight rewording of FCL.135.A (a) and FCL.135.H (a). The titles of FCL 135.A and FCL 135.H refer an "*extension of privileges to another class or variant*". In the meantime FCL.135.A paragraph (a) and FCL.135.H paragraph (a) mention a "*removal of a limitation*" to a class/type. For consistency both paragraph (a) we propose the following amendments. ***Alternative amendment to FCL.135.A and FCL135.H*** **FCL 135.A LAPL(A)** (a) The privileges of the holder of an LAPL(A) **are exercised on** the class of aeroplanes or TMGs in which the skill test was taken. **In order to extend the privileges to another class of aeroplanes or TMGs, the pilot shall complete in another class** all the following : […]

FCL 135.H LAPL(H)

(a) The privileges of the holder of an LAPL(H) **are exercised on** the specific type of helicopter in which the skill test was taken. **In order to extend the privileges to another type, the pilot shall have completed all the following:**
[…]

response

Accepted – thank you for your comment.
Paragraphs (a) of points FCL.135.A and FCL.135.H will be slighty reworded, to better match with the title of these points, as pointed out in your comment.

comment

156 comment by: *France*

Comment on FCL.140.A (a) (1) (ii) and FCL.140.H (a) (2)

Comment on FCL.740.A (b) (1) (ii) (C)

The deletion of the requirement for "*at least one hour of total flight time*" for the refresher training should be further justified. In the rationale it is stated that:
"*The requirement for the training flight to have a duration of at least 1 hour is deleted, leaving it to the discretion of the instructor to determine the duration of the training flight the individual applicant needs in order to meet the objectives of the training flight.*"

We understand that such deletion has been introduced due the limited endurance of electric powered aeroplane (that is currently lower than 1 hour).

Anyway we shall ensure that all the necessary drills and exercices are not suppressed because the endurance of the aircraft does not permit the refresher training flight to last one hour.

In addition it shall be ensured that instructors conducting the refresher training are properly trained to assess the candidate's needs and determines the areas on which the refresher training flight should focus. Such assessment of the candidate supposes that the instructor is familiar with CBTA technics.

Finally the deletion of "flight time" in the text leaves only the notion of "refresher training" without clearly specifying that this refresher training includes a flight and not only a theoretical refresh. We therefore propose to keep the word "flight" in the text.

Alternative amendment to FCL.140.A (a) (1) (ii)

FCL.140.A
[...]

(c) (2) at least 3 hours of flight time as PIC and refresher training **flight** in accordance with point (a)(1)(ii).

Alternative amendment to FCL.740.A (b) (1) (ii) (C)

FCL.740.A
[...]

(C) refresher training **flight** with a flight instructor (FI) or a class rating instructor (CRI)
[...]

response

Partially accepted – thank you for your comment.
As regards the 1-hour requirement, please refer to the response to comment No 81. Additionally, please note that the term "refresher training" is used in many places in Part-FCL (e.g. point FCL.625, point FCL.740) and is commonly understood to include practical flight training. EASA therefore believes that, for consistency, the text should not be changed, also because it is clear from the context of points FCL.140.A and FCL.740.A ("select those **flight exercises** that allow the applicant to refresh their competence to safely operating the aircraft…") that practical flight training is required.

comment

157 comment by: *France*

Comment in relation to our general comment on the NPA:

- Comment on FCL.210
- Comment on FCL.210.A (b) and FCL.210.H (b)

DGAC FR supports the introduction of a provision aiming at crediting for applicants for a PPL a previous training performed under a LAPL course.

Nevertheless we would like propose an alternative wording for this new paragraph. We believe that FCL.210 (d) should be reworded to offer enough flexibility and to match with the philosophy of transitioning towards a competency-based training and assessment system (CBTA). The credit should not be set in a prescriptive way in the regulation. The amount of credit should instead be determined on the basis of a recommandation of the DTO/ATO assessing each individual candidate taking into account on what he/she already achieved in LAPL training.

The customized training program that would follow should at least cover the specific PPL syllabus items that cannot be covered in LAPL training, and should also ensure that the candidate has completed at least 45 hours of flight training as required for a PPL licence. Such solution will offer more flexibility while remaining compliant with Annex I to the Chicago convention.

In parallel we propose to delete FCL.210.A (b) and FCL.210.H (b) as we consider the new revised paragraph FCL.210 (d) would be sufficient to cover both the situation of applicants holding a LAPL and applicants currently having received part or full LAPL training.

Finally we propose to define the principles and content of the bridge training courses content in an AMC to FCL.210 (d). We propose here below a draft AMC for the aeroplane category.

Alternative amendment to FCL.210

FCL.210 Training course
[...]

(d) Applicants for a PPL may receive credits for previous LAPL training they have undergone or a LAPL already held in the same aircraft category, based on an assessment of the applicant by the ATO or the DTO that is responsible for the PPL training course. In any case, the applicant shall comply with the experience requirements set out in points FCL.210.A (a) or FCL.210.H (a) as applicable.

Alternative amendment to FCL.210.A

FCL.210.A

(a) Applicants for a PPL(A) shall have completed at least 45 hours of flight instruction in aeroplanes or TMGs, 5 of which 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 1 cross-country flight of at least 270 km (150 NM), during which full stop landings at 2 aerodromes different from the aerodrome of departure shall be made.

~~(b) Specific requirements for applicants holding an LAPL(A). Applicants for a PPL(A) holding an LAPL(A) shall have completed at least 15 hours of flight time on aeroplanes after the issue of the LAPL(A), of which at least 10 shall be flight instruction completed in a training course at a DTO or at an ATO. That training course shall include at least four hours of supervised solo flight time, including at least two 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~~

Alternative amendment to FCL.210.H

FCL.210.H

(a) Applicants for a PPL(H) shall have completed at least 45 hours of flight instruction on helicopters, 5 of which may have been completed in an FNPT or FFS, 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 1 cross-country flight of at least 185 km (100 NM), with full stop landings at 2 aerodromes different from the aerodrome of departure.
(3) 35 of the 45 hours of flight instruction have to be completed on the same type of helicopter as the one used for the skill test.

~~(b) Specific requirements for an applicant holding an LAPL(H). Applicants for a PPL(H) holding an LAPL(H) shall complete a training course at a DTO or at an ATO. That training course shall include at least five hours of dual flight instruction time and at least one supervised solo cross-country flight of at least 185 km (100 NM), with full stop landings at two aerodromes different from the aerodrome of departure.~~

Additional AMC to FCL.210 (d)

The following AMC to FCL.210 (d) defines the general principles for the credit and the minimum content of the bridge training course for aeroplane category. The AMC should be completed with a similar content for helicopter category.

AMC to FCL.210 (d) - Bridge course LAPL(A) to PPL(A)

(a) GENERAL
Applicants who have previously received flight training for the LAPL(A) in accordance with FCL.110.A may receive credit for flight training towards the PPL(A), subject to the following conditions:

(i) The head of training (HT) of the DTO or ATO should review the applicant's previous training, identify those items required under FCL.210.A which have not been completed and prepare appropriate training needs analysis for each individual applicant.

(ii) All dual flight instruction and supervised solo flight time experience gained during the applicant's previous LAPL(A) training may be credited.

(iii) Notwithstanding (ii) the training course should include at least the exercises as dual flight training described in (b).

(iv) Instruction for all items identified by the training needs analysis should be delivered by an FI(A) who has met the requirements for CPL knowledge.

(b) INSTRUCTION FOR APPLICANT HAVING RECEIVED PREVIOUS LAPL(A) TRAINING

The flight instruction syllabus determined by the head of training (HT) of the DTO or ATO should include at least the following exercises as dual flight training:

(i) Exercise 1: Turning:
(A) faults in the turns (slipping and skidding on suitable types);

(ii) Exercise 2: Spin avoidance:
(A) safety checks;
(B) stalling and recovery at the incipient spin stage (stall with excessive wing drop, about 45 °);
(C) instructor induced distractions during the stall.

Note 1: training should emphasize stall awareness and spin avoidance.

Note 2: consideration of manoeuvre limitations and the need to refer to the aircraft manual and mass and balance calculations.

(iii) Exercise 3: Navigation:
(A) flight planning:
(a) map selection and preparation:
(1) controlled airspace;
(2) danger, prohibited and restricted areas;

(B) departure:
(a) use of navaids;

(iv) Exercise 4: Radio navigation:
(A) use of VHF omni range:
(a) availability, AIP and frequencies;
(b) selection and identification;
(c) OBS;
(d) to or from indications and orientation;
(e) CDI;
(f) determination of radial;
(g) intercepting and maintaining a radial;
(h) VOR passage;
(i) obtaining a fix from two VORs.

(B) use of ADF equipment: NDBs:
(a) availability, AIP and frequencies;
(b) selection and identification;
(c) orientation relative to the beacon;
(d) homing.

(C) use of DME:
(a) station selection and identification;
(b) modes of operation: distance, groundspeed and time to run.

Note 3: the navigation training should ensure that the applicant for the PPL(A) licence has the adequate skill level for the use of radio navigation aids including ones already addressed during LAPL(A) previous training and in particular GNSS.

(v) Exercise 5: Basic instrument flight:
(A) physiological sensations;

(B) instrument appreciation; attitude instrument flight;

(C) instrument limitations;

(D) basic manoeuvres:
(a) straight and level at various air speeds and configurations;
(b) climbing and descending;
(c) standard rate turns, climbing and descending, onto selected headings;
(d) recoveries from climbing and descending turns.

response

Partially accepted – thank you for your comment.
Please also refer to the response to comment No 153.
We appreciate the intention of your proposal to simplify the new regulatory structure for allowing LAPL → PPL crediting. Inspired by your comment, the following changes have been made:
1)
The draft point FCL.210(d) is deleted. Instead, amendments to paragraphs (b) are proposed for points FCL.210.A and FCL.210.H to also address the scenario where applicants have undergone LAPL training but did not finish that training up to licence issue. The text will be more clear as regard this scenario of upgrading an ongoing training course. As regards the bridge course arrangements, the requirements to complete of certain elements with a PPL instructor remain in place, to ensure alignment with ICAO SARPs (this topic cannot be left to AMC). Please refer to the Opinion (Rationale for amendments to point FCL.210.A) for details.
2)
Additional AMCs (AMC1 FCL.210.A(b) and AMC1 FCL.210.H(b) have been developed to illustrate the necessary training content of the LAPL→PPL bridge training, based on an analysis of the differences between the LAPL and PPL flight training syllabi (AMC1/AMC2 FCL.115; AMC1/AMC2 to FCL.210).

comment

158 comment by: *France*

Comment on FCL.210.A and FCL.210.H

Could it be clarified if previous experience as PIC in aircraft that fall within the scope of article 2(8) of the BR or within the scope of Annex I could be credited for a PPL applicant ?

The proposed text for FCL.210.A and FCL.210.H does not seem to reflect well the rationales #14 and #15 (on top of page 25).

response

Noted – thank you for your comment.

As explained in NPA 2020-14 (page 25), for the initial issuance of a PPL the 45-hour flight time experience requirement needs to be complied with in 'EASA aircraft' (which includes aircraft which are subject to authorisations as per points ORA.ATO.135 and DTO.GEN.240. Apart from that, points FCL.210.A and FCL.210.H do not contain specific requirements that allow further crediting of flight time on aircraft which are outside the scope of Regulation (EU) 2018/1139. Hence, points FCL.210.A and FCL.210 need to be understood as not allowing crediting in terms of your comment, further than the aforementioned credits in accordance with points ORA.GEN.135 and DTO.GEN.240).

comment *159* comment by: *France*

Comment on FCL.710 (d)

The sentence in paragraph FCL.710 (d) (and in particular words "following the training listed in points (b) or (c)") suggests that a pilot is required to have flown the variant only within the initial 2 years that follow training. In others words the sentence might be understood that, after this initial period of 2 years, he/she would no longer be required to meet any recent experience on the variant.

To avoid this interpretation, we propose a rewording.

Alternative amendment to FCL.710 (d)

FCL.710 (d)
[...]

(d) Except for types or variants within the SEP aeroplane and TMG class ratings, at anytime if pilots have not flown the variant within 2 years, a further differences training or a proficiency check in that variant shall be completed.

response Accepted – thank you for your comment.
The reference to "the training listed in points (b) or (c) has to be understood to refer to the last differences training which could be the initial differences training or any subsequent differences training which is done in accordance with point FCL.710(d). So, point FCL.710(d) requires a pilot do undergo differences training if he/she did not fly the aircraft within the two years since he/she did the last differences training. However, the current wording does not consider that subsequent differences training may be replaced by a proficiency check. Hence, EASA agrees that the wording can be improved and will propose a rewording that follows the intention of your proposal.

comment *160* comment by: *France*

Comment on FCL.710 (a) (1)

The terms "*aircraft general knowledge*" are too vague (no definition). We propose to introduce a reference to the "aircraft flight manual".

Alternative amendment to FCL.710 (a)

FCL.710
(a)
[...]

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, **as detailed in the aircraft flight manual:**
(1) aircraft general knowledge;
(2) operational procedures;
(3) flight performance and planning

response

Partially accepted – thank you for your comment.
A reference to the aircraft flight manual will be included in the relevant new AMC1 FCL.710(a).

comment

161 comment by: *France*

Comment in relation to our general comment on the NPA

- Comment on FCL.140.A (c) (2)
- Comment on FCL.741.A (2)

Regarding electric powered aircraft, we are convinced that the provisions that are about to be introduced in the aircrew regulation must be proportionate enough if we want to ensure a successfull and smooth transition towards the "green aviation". Ensuring such transition is in the interest of the entire aviation community.

We believe that the provisions proposed in the NPA to obtain and maintain the privileges on single engine electric aeroplanes should be further alleviated. We propose here below revised figures based on the experience gained in France both for pilots and instructors exercising their privileges on single engine electric aeroplane.

From the experience gained since 2018 we believe that requiring 3 hours of flight time as a PIC in the last 24 months specifically on each variant with a particular type of engine will hamper the development of the single engine electric aeroplane. Given the current endurance of electric aircraft, 3 hours represents a significant number of local flights for GA pilots wishing to maintain their privileges on that variant.

The experience gained during the experiments shows that the differences between the variant piston engine and electric engine have a limited impact on the piloting itself. All the pilots and instructors involved in the experiments reach the conclusion that, once initialy trained according to the manufacturer training syllabi, exercising privileges on the variant electric does not present any particular difficulty. In the case

of the Pipistrel it is not the type of engine that makes a difference in the manual handling but the weight/type of aircraft. In addition the main difference between the variant piston and electric engines lies within the emergency check-list that could be appropriately reviewed during classroom briefings.

We believe that the refresher training is the most important and valuable requirement to maintain the recency on each SEP variant with a different type of engine. This refresher training allows the pilot to review in detail all the important elements including the review of emergency procedures.

Therefore requiring specifically 3 hours on the electric variant does not bring any particular value in terms of pilot competences. Such amount of hours has never been required for others existing SEP variant.

We propose to reduce the experience in the last 24 months to 1 hour on each variant with a particular type of engine.

Alternative amendment to FCL.140.A

FCL.140.A
[...]

(c) Holders of aLAPL(A) with privileges forSEP aeroplaneswho, in accordance with pointFCL.135.A(b),have obtained privileges for variants with different typesof enginesspecified inArticle 2(8a) of this Regulationshall exercise their privileges in variants with a particular typeof engineonly if, in the preceding 24 months, they have completed one of the following in SEP aeroplanes with that type of engine:

(1) a proficiency check;

(2) **at least 1 hour of flight time as PIC** and refresher training in accordance with point (a)(1)(ii).

Alternative amendment to FCL.741.A

FCL.741.A

By way of derogation from pointFCL.710(d), holders of a SEP aeroplane class rating who, in accordance with pointFCL.710(a),have obtained privileges for variants with different typesof enginesspecified in Article 2(8a) of this Regulationshall exercisetheir privileges in variants with a particular typeof engineonly if, in the preceding 24 months, they have completed one of the followingin SEP aeroplanes with that typeof engine:

(1) a proficiency check;

(2) **at least 1 hour of flight time as PIC** and refresher training in accordance with point FCL.740.A(b)(1)(ii)(C).

response | Noted – thank you for your comment.
Please refer to the response to comment No 198.

comment | *162* comment by: *France*

Additional proposal to review prerequisites for aerobatic rating (FCL.800 (b) (1))

In former french regulation it was possible to start an aerobatic training and have such rating issued without a prerequisite in terms of experience. It has never raised any safety concern.

We considers that the prerequisite FCL.800 (b) (1) is unreasonably restrictive and will prevent pilots who would like to start aerobatics soon after the issuance of their licence. Regulation should encourage pilots to be properly trained for dynamic flight events earlier in their flying experience. Flying 30 hours straight and level, does not prepare, in any way, a pilot to fly aerobatic manoeuvres in a safer manner.

This prerequisite of 30 hours is not aerobatic related, is not line with a risk based regulation or CBTA principles. Therefore we propose to replace this prerequisite by a pre-entry assessment performed by the ATO or DTO that will in charge of th aerobatic training.

Proposed amendment to FCL.800

FCL.800
[…]

(b) Applicants for an aerobatic rating shall have completed:

(1) ~~after the issue of the licence, at least 30 hours of flight time as PIC in aeroplanes or TMGs;~~

A specific pre-entry flight test with an FI qualified in accordance with FCL.905.FI(g) within the 6 months preceding the start of the course, to assess their ability to undertake the course

(2) a training course at DTO or at an ATO, including:
(i) theoretical knowledge instruction appropriate for the rating;
(ii) at least 5 hours of aerobatic instruction in aeroplanes or TMGs flown with engine power.

response | Not accepted – thank you for your comment.
Please refer to the response to comment No 111.

comment | *163* comment by: *France*

Additional proposal to review night rating (FCL.810 (a) (1) and (b) (2))

We believe that the maximum period of 6 months for the completion for the night rating training is a heavy constraints for GA pilots wishing to follow such training.

For each night flight lesson, student pilot has to set up a perfect combination of the following elements:
- good meteorological conditions,
- a night-fitted aeroplane,
- an opened aerodrome with lightning system in service,
- an available FI having the privilege to instruct to night rating,
- a precise organisation of pre-night and post-night ferry flights when home base airfield is not certified for night flight.

The number of opportunities is obviously reduced along the year.

In addition, the requirement contradicts with a wise training policy which would include VFR night training flights at different seasons to experience some seasonal meteorological conditions, as negative temp and high humidity in winter, mist and fog at summer dawn …

Therefore we propose to delete the maximum period of 6 months for the completion of the night rating training.

Proposed amendment to FCL.810

FCL.810
[…]

(a) Aeroplanes, TMGs, airships.

(1) Applicants shall have completed a training course ~~**within a period of up to 6 months**~~ at a DTO or at an ATO to exercise the privileges of an LAPL or a PPL

[...]

(b) Helicopters.

If the privileges of a PPL for helicopters are to be exercised in VFR conditions at night, the applicant shall have:

(1) completed at least 100 hours of flight time as pilot in helicopters after the issue of the licence, including at least 60 hours as PIC on helicopters and 20 hours of cross-country flight;

(2) completed a training course at a DTO or at an ATO. The course shall ~~**be completed within a period of six months and**~~ comprise

response

Not accepted.
Please refer to the response to comment No 112.

comment	*165* comment by: *France*

Comment on FCL.815 (d)

We support the proposal to make the mountain rating a non-expiring rating with recency requirements.

We propose to include transitional provisions to organize the transition from a mountain rating with a validity of 2 years to a non-expiring mountain rating based on recent experience.
It should be provided that the amendment applies to the expiry of the mountain rating currently mentioned on the license and not to the publication of the amending regulation.

As mentioned in the regulations balloons and gliders, we propose that the result of the proficiency check will be recorded on the logbook.

Alternative amendment to FCL.815 (d)

FCL.815
[...]

(d)
[...]
(2) have passed a proficiency check that complies with the requirements in point (c). **The completion of the proficiency check is recorded in the pilot's logbook and signed by the qualified examiner.**

response	Accepted – thank you for your comment. An additional Article will be proposed to be inserted in the Cover Regulation, to address the migration of today's expiring mountain ratings to the new arrangements for keeping recent experience. Also, in point FCL.815(d)(2) an additional sentence will be added to address the recording of the proficiency check.

comment	*166* comment by: *France*

Comment on FCL.915 (b) (5) in relation to our general comment on the NPA

Regarding electric powered aircraft, we are convinced that the provisions that are about to be introduced in the aircrew regulation must be proportionate enough if we want to ensure a successfull and smooth transition towards the "green aviation". Ensuring such transition is in the interest of the entire aviation community.

We believe that the provisions proposed in the NPA to obtain and maintain the privileges on single engine electric aeroplanes should be further alleviated. We propose here below revised figures based on the experience gained in France both

for pilots and instructors exercising their privileges on single engine electric aeroplane.

From the experience gained since 2018 with the first instructors authorized on electric aeroplane according to FCL.900 (b), we believe that requiring for instructors 10 hours of flight time in a variant with a particular type of engine will hamper the development of the single engine electric aeroplane and might create a shortage of instructors on the electric variant. Given the current endurance of electric aircraft, 10 hours represents a significant number of local flights for instructors wishing to get the privileges to instruct.

The reasons supporting this comment are the same that have been mentioned for the experience to maintain the variant as a pilot (see comment on FCL.140.A and FCL.741.A). One of the conclusion from french experiment is that requiring specifically 10 hours on the electric variant will not bring any particular value in terms of instructor competences. Such amount of hours has never been required for others existing SEP variant.

We propose to reduce the required experience to 5 hours of flight time on a variant with a particular type of engine.

Alternative amendment to FCL.915 (b) (5)

FCL.915
[...]

(b)
[...]
(5) when providing flight instruction in a variant of the SEP aeroplane class with a particular type of engineas specified in Article 2(8a) of this Regulation, completed **at least 5 hours** of flight time in that variant

response

Not accepted – thank you for your comment.
Please refer to the response to comment No 114.

comment

167 comment by: *France*

Additional proposal on FCL.915

In addition to the SEP variants, we propose an additional clarification within FCL.915 to specify in the general prerequisites how an instructor could get the privilege to instruct on any others aircraft variant.

In present aircrew regulation the conditions to extend privileges on a variant are only clearly mentionned for TRI (FCL.910.TRI (b) and (c)) and for SFI (FCL.910.SFI).

Our proposal is to specify in FCL.915 that an instructor might be authorized to instruct on a variant only if he/she complies with the general following conditions:
-hold the variant
and
-comply with the recency requirements in point 710 (d) for the variant.

Alternative amendment to FCL.915

FCL.915
[...]

(b)
[...]

(6) when providing flight instruction in a variant others than of the SEP aeroplane class with a particular type of engine as specified in Article 2(8a) of this regulation:

(i) hold the variant

and

(ii) comply with the recency requirements in point 710 (d) for the variant.

response

Not accepted – thank you for your comment.
In EASA's understanding, point FCL.915(b)(4) already today requires pilots to comply with the requirements of point FCL.710(d). A pilot is not allowed to act as PIC in an aircraft, if he/she does not comply with point FCL.710(d).
Furthermore, please note that a comprehensive review of Part-FCL Subpart J is performed with EASA RMT.0194.

comment *168* comment by: *FOCA Switzerland*

Not exceed the total flight time as PIC

Rationale: Typo

response

Accepted – thank you for your comment.
The text is corrected accordingly.

comment *169* comment by: *FOCA Switzerland*

Notwithstanding the requirement in point (b), differences training for TMGs, (SEP), single-engine turbine (SET) and multi-engine piston (MEP) aeroplanes or single-engine piston helicopters and single-engine turbine helicopters up to a MTOW of 3175 kg may be conducted by an appropriately qualified instructor unless otherwise provided in the OSD.

Rationale:

	This possibility should also apply to helicopters in analogy to aeroplane. A general simplification (piston engines / turbine engines) as set out in the rotorcraft safety roadmap should be aimed at.
response	Accepted – thank you for your comment. The rule text of point FCL.710(c) will be further amended to also refer to single-engine helicopters up to 3175 kg.

comment	*170* comment by: *FOCA Switzerland* Applicants who successfully complete a skill test for the issue of an additional type rating or a proficiency check for renewal of an expired type rating shall achieve revalidation for the relevant type ratings already held in the common groups, as specified in points (b) and (c). Rationale: Add the possibility to revalidate the group also in case of renewal, as it is already the case for initial and revalidation. For every renewal the candidate has to go through an ATO or DTO with a management system, as it is for the skill test. Therefore, no safety issues are to be expected
response	Accepted – thank you for your comment. Although one could argue that the new point FCL.740.H(b)(1), when referring to a proficiency check, could already be understood to include proficiency checks for the purpose of renewal, EASA agrees that it is better to clarify the rule text in point FCL.740.H(d) as you suggest. The text will be updated accordingly.

comment	*171* comment by: *FOCA Switzerland* for type ratings for single-engine piston helicopters or single-engine turbine helicopters up to a MTOW of 3175 kg, they shall: Rationale: The same possibility to revalidate a type rating with flight experience should also be possible with non-complex SET helicopters. We do not see the reason why this should not be possible on all non-complex helicopters. The aim of refreshing the competence or demonstrating the skills remains the same for piston and turbine helicopters. A general simplification (piston engines / turbine engines) as set out in the rotorcraft safety roadmap should be aimed at.
response	Accepted - thank you for your comment. Please refer to the response to comment No 130.

comment	*172* comment by: *FOCA Switzerland* 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.

Rationale:
The rule of changing types for the proficiency check should also apply to the refresher training with an instructor when revalidating the type ratings with flight hours and refresher training.

response | Accepted – thank you for your comment.
The text is updated accordingly.

comment | *173* comment by: *FOCA Switzerland*

When applicants hold more than one type rating for single-engine turbine helicopters with a maximum certified take-off mass up to 3 175 kg, they may achieve revalidation of all the relevant type ratings by completing the proficiency check in accordance with point (a)(1)(ii) or have completed the refresher training in accordance with point (a)(2)(ii)(B) in only one of the relevant types held, provided that they have completed:

Rationale:
This point is related to the one of FCL.740.H (a) (2) above, for consistency.

response | Accepted – thank you for your comment.
Please refer to the response to comment No 130.

comment | *176* comment by: *France*

Additional proposal on FCL.930.FI (a)

We propose to take the opportunity of amending FCL.930.FI to add a clarification to mention that the pre-entry assessment has to be conducted by a FI designated by the ATO that will be responsible for the FI training course.

Alternative amendement for FCL.930.FI

FCL.930.FI

(a) Applicants for the FI certificate shall have passed a specific pre-entry flight assessment with an FI **designated by the ATO** and qualified in accordance with point FCL.905.FI(i) 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.

response | Partially accepted – thank you for your comment.
The text will be updated to read “Applicants for the FI certificate shall, at an ATO, have passed…”, in order to clarify that the pre-entry flight test cannot take place outside an ATO. At the same time, EASA believes that the text should be kept flexible in case an FI is changing the ATO during the course.

comment | *177* comment by: *France*

Additional proposal on FCL.625.H

The succession of several versions of FCL.625.H has led to complexity and inconsistencies in the wording. We would like to take the opportunity of this NPA to clarify its content.

Prior to the amendment of FCL.625.H by regulation 2019/1747, it was possible to revalidate an IR(H) rating without holding an associated helicopter type rating. In other words, it was possible for a pilot to revalidate his/her IR rating by not combining it with the revalidation of a type rating.

Since aircrew regulation was amended in 2019, paragraph (a)(1) of FCL.625.H requires now that the pilot holds a relevant type rating. Therefore a pilot must conduct a proficiency check on a FSTD representing a type (on a FTD or an FFS) for which he or she is also qualified. It is no longer possible to perform a non-combined test. In other words there is no longer any dissociation possible between the revalidation of the IR(H) and the revalidation of the type rating.

However, paragraphs FCL.625.H (a) (2) and (3) continue to refer to a possible combination/non-combination of revalidation. We believe that text should be revised for clarification.

An additional justification supporting the need for clarification is linked to the fact that the current wording in FCL.625.H introduces a difference of treatment between helicopter pilots performing their revalidation (type and IR) on the helicopter or on a FSTD. We believe that there should be no difference in treatment, especially since aircrew regulation clearly states that extensions can be split between FSTD and helicopter.

Finally, aircrew regulation contains a numbering error in FCL.615 H IR(H) (b). The competency check mentioned in this paragraph is the one mentionned in (a) 2) and not in (a) 3).

Proposal of amendment of FCL.625.H

FCL.625.H

(a) To revalidate an IR(H), applicants shall:

(1) hold the relevant type rating, unless the IR revalidation is combined with the renewal of the relevant type rating;

(2) pass a proficiency check in accordance with Appendix 9 to this Annex for the relevant type of helicopter ~~**if the IR revalidation is combined with the revalidation of a type rating;**~~

~~**(3) if the IR revalidation is not combined with the revalidation of a type rating, complete Section 5 and the relevant parts of Section 1 of the proficiency check in accordance with Appendix 9 to this Annex for the relevant type of helicopter.**~~

	(b) An FTD 2/3 or an FFS representing the relevant type of helicopter may be used for the proficiency check pursuant to **point (a)(2)**, provided that at least each alternate proficiency check for the revalidation of an IR(H) is performed in a helicopter. (c) Cross-credit shall be given in accordance with Appendix 8 to this Annex.
response	Not accepted – thank you for your comment. EASA would like to highlight that point FCL.625.H, before and after the amendment with Regulation (EU) 2019/1747, was and still is allowing isolated proficiency checks for either type rating or IR revalidation. This is particularly expressed by the wording that is proposed to be deleted in your comment. With that amending Regulation, point FCL.625.H was intentionally amended to ensure that pilots, when revalidating an IR(H), do hold the relevant type rating and no "empty" IR (IR without a type rating) would be endorsed on the licence. Finally, the reference to paragraph (a)(3) in paragraph (b) is correct, since the requirement in paragraph (b) is intended to refer to "isolated IR revalidations" – as it is also the case in point FCL.625.A, where paragraph (a)(4) refers to paragraph (a)(3).

comment	*179* comment by: *The Finnish Transport Communications agency, Traficom* - FCL.110.A (c) (2); A welcome and needed addition to lower the threshold for transitioning to EASA system.
response	Noted – thank you for your positive feedback.

comment	*180* comment by: *The Finnish Transport Communications agency, Traficom* - FCL.135.A ja FCL.710; A well proportined differences training for transitioning between variants with different power plants.
response	Noted – thank you for your positive feedback.

comment	*181* comment by: *The Finnish Transport Communications agency, Traficom* - FCL.140.A a) / FCL.140.H + FCL.740.A; We support the removal of the 1 hour duration limitation that has been done on this NPA.
response	Noted – thank you for your positive feedback.

comment	*182* comment by: *The Finnish Transport Communications agency, Traficom* - FCL.140.A c) + FCL.741.A; The requirement is considerably more than the requirement for maintaining the current SEP land and sea privileges concurrently. When introducing new technologies it understandable, that the approach to regulation may conservative. However, there should be a consideration for proportionality, with regards the land/sea privileges example, or at least a written statement from EASA, that clarifies that this requirement will be taken under

	reconsideration after we have gained sufficient experience about its application in practice.
response	Noted – thank you for your comment. Please refer to the response to comment No 198.

comment	*183* comment by: *The Finnish Transport Communications agency, Traficom* FCL.210 (d); A good clarification to the procedure that has already been in use in some member states. It should also be considered, could the application of this change be used to support one aim of the RMT.0194, the improvement of the supply of competent instructors (in this case for the GA), by enabling the wider use of non ICAO Annex I qualified flight instructors. Perhaps, even the widening of the scope of the training that a LAPL qualified FI can provide should be considered?
response	Noted – thank you for your positive feedback. EASA holds the opinion that the improved "LAPL→PPL bridge" proposed with NPA 2020-14 as well as the comprehensive review of Part-FCL Subpart J with RMT.0194 will effectively improve the availability of flight instructors in general aviation. There is however no intention (neither with RMT.0678 nor with RMT.0194) to allow holders of national (non-ICAO-compliant) instructor certificates to provide training for Part-FCL licences.

comment	*184* comment by: *The Finnish Transport Communications agency, Traficom* - FCL.915 (b)(5); 10 hrs experience requirement seems to be an excessive and an old fashioned way to regulate, in order to ensure the competence of the instructor for this task. It will also create a not an insignificant road block for the wider uptake for the aircraft with new, cleaner propulsion technologies.
response	Noted – thank you for your comment. Please refer to the response to comment No 114.

comment	*185* comment by: *The Finnish Transport Communications agency, Traficom* - Appendix 1 1.3. ; A good clarification to the procedure that has already been in use in some member states.
response	Noted – thank you for your positive feedback.

comment	*191* comment by: *France* **<u>Additional comment on FCL.740.H (e) (related to our comment on FCL.625.H)</u>** In order to be consistent with our comment on FCL625.H we believe that there is no longer any dissociation between type rating and IR(H) in revalidation, the point (e) of the FCL.740.H should therefore be deleted. **FCL.740.H** **[…]**

~~**(e) The revalidation of an IR(H), if held, may be combined with a proficiency check for a type rating**~~

response

Not accepted – thank you for your comment.
Please refer to the response to comment No 177.

comment

192 comment by: *France*

Additional comment on FCL.740.H (f) (related to our comment on FCL.625.H)

In order to be consistent with our comment on FCL625.H we believe that in FCL.740.H (f) it should be clarified what is the starting point for the new validity of the rating.

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 is performed.

Alternative amendment to FCL.740.H (f)

FCL.740.H
[...]

(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. **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 is performed.**

response

Not accepted – thank you for your comment.
EASA holds the opinion that the last sentences of paragraphs (c) and (d) of point FCL.740.H (as proposed with NPA 2020-14) sufficiently address the need to align validity periods in the case of combined type rating revalidation. There is no need to repeat the related phrase in paragraph (f), and its wording ("revalidated in accordance with this point") does not make sense in the context of this paragraph (f) which is not directly containing a revalidation requirement.

comment

194 comment by: *France*

Additional comment on FCL.815

Our understanding of FCL.815 (d) (1) is that the 6 landings could be conducted indifferrently on wheels or ski.

We would like to avoid a situation where all the 6 landings on the same day on a same surface. Clearly such way to comply with the requirement will not meet the objectives to have a competent mountain pilot. Therefore we believe that a minimal number of landings should be required on a minimal number of different surfaces.

We would like to suggest an additional amendment on FCL.815.

response

Not accepted.
Please also see the response to comment No 68.
It is possible to obtain and keep a mountain rating on either on wheels (paragraph (a)(1)) or skis (paragraph (a)(2)). For revalidation, it would be therefore inconsistent to require landings on both wheels and skis.

comment *196* comment by: *France*

Additional general comments on mountain rating rating and mountain rating instructor (MI)

Recent incidents and accidents has conducted DGAC FR to launch a reflection about the mountain provisions in the aircrew regulation.

On the mountain rating itself, we believe that the moutain rating course should be reinforced in particular on its theoretical part. Some additional elements should be introduce to raise awareness of mountain pilot students on cross-border flights conduct. The training course should also include additional elements about the identification of local hazards when performing a mountain flight.

We are in favour to work on a full review of the mountain rating insructor (MI) and in particular of the MI training. We propose to tackle this review within RMT.0194.

response

Noted – thank you for your comment.
We appreciate your future support to RMT.0194.

comment *198* comment by: *Czech Technical University*

FCL.741.A
We understand EASA has chosen a conservative approach. However, this is not based on operational experience. Under the current regulation (FCL.710 d), a transition from SEP(land) with SLPC to SEP(land) with turbocharged engine and variable pitch propeller is a once-in-a-lifetime differences training; no recency is required on variants within the SEP class. There is no comprehensive evidence this has caused any in service difficulties, thus it may be implied a similar approach can be safely utilized with electric engines. Operation of an electric engines is indeed similar to SLPC.

We believe FCL.741.A requirement may be removed.

If it needs to be retained, please consider rewording as FCL.741.A to some extent contradicts FCL.740.A (b)(1)(ii):
A pilot has obtained privileges for variants with different types of engines specified in Article 2(8a), flown 6 hours as PIC and made 12 take-offs and 12 landings in EACH variant. The pilot passed a proficiency check on a SET and is exempted from the refresher training. The SEP class rating is revalidated, however, the pilot cannot utilize the rating with either engine as he has not completed neither proficiency check (FCL.741.A (a)) nor refresher training (the second half of FCL.741.A (b)) on any SEP engine type.

Suggest rewording as follows:
[…]
(1) a proficiency check;
(2) at least 3 hours of flight time as PIC and refresher training **if required** in accordance with point FCL.740.A(b)(1)(ii)(C).
[…]

Alternatively:
[…]
(1) a proficiency check;
(2) at least 3 hours of flight time as PIC**;**
(3) refresher training in accordance with point FCL.740.A(b)(1)(ii)(C)**; or**
(4) differences training in accordance with point FCL.710(a).
[…]

response

Partially accepted.
EASA agrees that the refresher training requirement in point FCL.741.A, as presented in NPA 2020-14, is in conflict with the exemption for refresher training in point FCL.740.A(b)(1)(ii)(C). Additionally, after analysing your comment as well as several other comments that asked for a lighter approach as regards recency requirements for SEP variants with different engine types (for both LAPL(A) and PPL(A); point FCL.140.A(c) and point FCL.741.A), EASA has decided to take a different approach:
The draft for point FCL.741.A is deleted. Instead, in point FCL.710, paragraph (d) will be amended, and a new paragraph (da) will be inserted, in order to establish the following arrangements:

- Holders of a 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 a SEP class rating have not flown in a 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.

Additionally, point FCL.140.A(c) (LAPL(A) recency requirements for different engine SEP engine types) is proposed to be revised along the same lines. LAPL holders need to complete further differences training OR a proficiency check OR refresher training only if they have not flown the particular variant within the preceding two years (no minimum hours required).

comment	*199* comment by: *Czech Technical University* **FCL.915(b)(5)** It is very important for an instructor to gain experience before giving instruction. However, prescribing hours goes against the competency-based trend. It may be more appropriate to provide a “release for instruction” by another qualified instructor e.g. during differences training.
response	Not accepted – thank you for your comment. Please refer to the response to comment No 114.

comment	*200* comment by: *Agencia Estatal de Seguridad Aérea* FCL.110.A The amendment of FCL.110.A stablish that previous experience in Annex I aircrafts and those subject to a decision of a Member State taken in accordance with articel 2.8 of Regulation 2018/1139 "may" be considered. Tha last amendment of Regulation 1178/2011, specifically requirement FCL.035 (a)(4), stablish that all hours flown ....shall be credited. "may" is an option and "shall" is mandatory. For this reason it should be reviewed the use of "may" in FCL.110.A
response	Not accepted – thank you for your comment. While, under the conditions specified in point FCL.035(a)(4) of Part-FCL, flight time in aircraft as per Article 2(8) of or Annex I to Regulation (EU) 2018/1139 “shall” be credited for the purpose of revalidation, the credits specified in point FCL.110.A(c) are not in any case guaranteed but depend from an assessment of the candidate by the responsible training organisation. Hence, the word “may” is deemed appropriate, also for consistency with the use of that word in the introductory sentence of point FCL.110.A(c).

comment	*202* comment by: *FFA* **FCL.140.A(c) LAPL(A) — Recency requirements** ~~(c) Holders of a LAPL(A) with privileges for SEP aeroplanes who, in accordance with point FCL.135.A(b), have obtained privileges for variants with different types of engines specified in Article 2(8a) of this Regulation shall exercise their privileges in variants with a particular type of engine only if, in the preceding 24 months, they have completed one of the following in SEP aeroplanes with that type of engine:~~ ~~(1) a proficiency check;~~ ~~(2) at least 3 hours of flight time as PIC and refresher training in accordance with point (a)(1)(ii)~~.

We do not support:
1) Creation of variations in the existing 'variant' domain.

- The last two-year long period of daily operations of electric aeroplanes has demonstrated that flight instructors and licenced pilots are assimilating "electric engine variant", in a rapid and safe manner, as they did before for other variants related to engine management as /Variable Pitch propellers /Single Lever Power Control /Turbo- or supercharged engine.
- Then, Electric Engine variant should be treated as other existing variants related to engine management as /VP/SLPC/T.

2) Placing quantitative requirements related to engine and energy new technologies in hard law (Implementing Rules).

- It contradicts with rapid adoption of solutions for the success of the Green Deal in the domain of aviation.
- The speed of improvement of performances, reliability, and safety by new technology, is obviously much faster than the speed of Implementing Rules updating process.
- Should a remaining requirement be kept until further experience gained and/or expressed in flight hour number, it should be placed in a GM or AMC, never in an implementing rule.

response

Partially accepted – thank you for your comment.
After considering several comments received that asked for a lighter approach to recency requirements for SEP variants with different engine types, paragraph (c) of point FCL.140.A is not deleted but revised and aligned with the revised proposals on SEP class rating recency requirements for different engine types (proposed changes to point FCL.710; deletion of the draft point FCL.741.A; please refer to the response to comment No 198).

comment

203 comment by: *FFA*

FCL.210 (d) (2) Training course
d) Applicants for a PPL may receive credits for previous LAPL training they have undergone in the same aircraft category, based on an assessment of the applicant by the ATO or the DTO that is responsible for the PPL training course.
In any case, applicants shall:
(1) comply with the experience requirements set out in points FCL.210.A(a) or FCL.210.H(a), as applicable; ~~and~~
~~(2) during the PPL training course, complete the flight instruction set out in points FCL.210.A(b) or FCL.210.H(b), as applicable.~~

FFA's comment:

- Paragraph (1) is sufficient and strongly supported by FFA.

- Paragraph (2) is not relevant, creates confusion and must be erased.

In fact, this paragraph (2) requires a student-pilot to comply with requirements *FCL.210.A(b)* which are explicitly specific to licenced pilots holding a LAPL.

FCL.210.A(b) says:
b) Specific requirements for applicants that holding an LAPL(A). Applicants for a PPL(A) that holding an LAPL(A) shall have completed all of the following:

response

Not accepted – thank you for your comment.
Please refer to the response to comment No 153.

comment

204 comment by: *FFA*

FCL.741.A

~~***FCL.741.A Recency requirements for variants within the SEP aeroplane class***~~
~~*By way of derogation from point FCL.710(d), holders of a SEP aeroplane class rating who, in accordance with point FCL.710(a), have obtained privileges for variants with different types of engines specified in Article 2(8a) of this Regulation shall exercise their privileges in variants with a particular type of engine only if, in the preceding 24 months, they have completed one of the following in SEP aeroplanes with that type of engine:*~~
~~*(1) a proficiency check;*~~
~~*(2) at least 3 hours of flight time as PIC and refresher training in accordance with point FCL.740.A(b)(1)(ii)(C).*~~

We do not support the proposed FCL.741.A, which should be deleted. The electric engine should be addressed through the existing framework for variants and differences training.
The minimum hourly requirement is particularly unwelcome for the following reasons:

- There is no similar requirement in parallel cases, e.g. for a person with a SEP(land) rating, who flies variable pitch propeller, single lever power control, or turbo- or supercharged engine.
- It does not reflect positive outcomes from the last 2-year long period of standard operations.
- It contradicts with the EASA policy to ease rapid adoption of new technology when they improve safety or environmental friendliness.

The update life cycle of the Implementing Rules is incompatible with the momentum new tech industry delivers improvements in engine, energy, electronics, monitoring systems, etc.

Should some quantitative requirements be useful for a limited period, they should be put in GMs or AMCs, never in Implementing Rules.

response

Accepted – thank you for your comment.

Please refer to the response to comment No 198.

comment *205* comment by: *FFA*

We propose to review prerequisites for following rating.

FCL.800 Aerobatic rating
Regulation (EU) 2020/359
(a) Holders of a pilot licence with privileges to fly aeroplanes or TMGs shall undertake aerobatic flights only if they hold an aerobatic rating in accordance with this point.

(b) Applicants for an aerobatic rating shall have completed:
~~*(1) after the issue of the licence, at least 30 hours of flight time as PIC in aeroplanes or TMGs;*~~
(~~2~~ 1) a training course at DTO or at an ATO, including:

FFA is of the opinion that flying 30 hours straight and level, does not prepare, in any way, a pilot to fly aerobatic manoeuvres in a safer manner.

The requirement is not aerobatic flight related, does not meet risk-based regulation or competency-based training criteria, and introduces significant pilot's resources spoiling which would be better invested in more dual aerobatic flight training hours.

response Not accepted – thank you for your comment.
Please refer to the response to comment No 111.

comment *206* comment by: *FFA*

FCL.810 Night rating

(a) Aeroplanes, TMGs, airships.
(1) Applicants shall have completed a training course ~~within a period of up to 6 months~~ at a DTO or at an ATO to exercise the privileges of an LAPL or a PPL for aeroplanes, TMGs or airships in VFR conditions at night. The course shall comprise:
(i) theoretical knowledge instruction;

FFA is of the opinion that this requirement introduces a time constraint which does not deliver benefits for the gain of a night rating.

For each intended night flight lesson, student pilot has to set up a perfect combination of following elements:

- nice meteorological conditions,
- a night-fitted aeroplane,
- an opened aerodrome with lighting system in service,
- an available FI with night rating,

- a precise organisation of pre-night and post-night ferry flights when home base airfield is not certified for night flight.

The number of opportunities is obviously reduced along the year and the requirement of training completion within 6 months raises a hurry-up syndrome which has no link with night rating aims.

In addition, the requirement contradicts with a wise training policy which would include VFR night training flights at different seasons, to experience some seasonal meteorological conditions, as negative temp and high humidity in winter, mist and fog at summer dawn …

response

Not accepted – thank you for your comment.
Please refer to the response to comment No 112.

comment

207 comment by: *FFA*

FCL.915 General prerequisites and requirements for instructors
[…]
(b) Additional requirements for instructors that provide providing flight instruction in aircraft.
Applicants for the issue of or holders of an instructor certificate with privileges to conduct flight instruction in an aircraft shall:
[…]
(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, completed at least 10 hours of flight time in that variant.~~
[…

The minimum hourly requirement is particularly unwelcome for the following reasons:

- It does not reflect positive outcomes from the last 2-year long period of standard operations.
- It contradicts with the EASA policy to ease rapid adoption of new technology when they improve safety or environmental friendliness.
- Should some quantitative requirements be useful for a limited period, they should be put in GMs or AMCs, never in Implementing Rules.

The 10-hour requirement was a quantity defined as a conservative value, before any feedback from regular operations was collected.

Hundreds of hours later, electric engine aeroplanes operations in real conditions of flying schools and discovery flights, have demonstrated that FIs easily complete adaptation to electric engine.

	The 10 hour-flight time required for an FI before teaching on electric engine aeroplane, is no longer an appropriate figure and it introduces an ineffective delay between end of completeness of dual flight instruction and start of instruction. As each flight is around 40 minute-airborne time, it sums up at least to 15 uneventful flights which became rapidly boring for instructors. The most important part of the adaptation is about mastering abnormal and emergency situations and it is better achieved during dual flight instruction than during solo standard flight hours where something bad is absolutely not expected, and luckily it does not appear.
response	Not accepted – thank you for your comment. Please refer to the response to comment No 114.

comment	*208* comment by: *Airbus Helicopters* **Comment on FCL.740.H Revalidation of type ratings - helicopters paragraph c) (page 16)** The possibility to have as an alternative completed the refresher training in accordance with point (a)(2)(ii)(B) should also be available for SET Comment on FCL.740.H Revalidation of type ratings - helicopters paragraph a) Consequently the point (a)(2)(ii)(B) should not be limited to SEP but also apply to SET
response	Accepted – thank you for your comment. Please refer to the response to comment No 130.

comment	*213* comment by: *European Powered Flying Union* Page 13/74 FCL.710 (c) OSD Page 14/74 FCL.725 (a) Operational suitability data Please use identical wordings. Rationale: In doing so you increase the understanding of what is meant.
response	Accepted – thank you for your comment. The OSD references in paragraphs (a) and (c) of point FCL.710 are revised for consistency with other OSD references in Part-FCL.

comment	*214* comment by: *European Powered Flying Union* Page 17/74 FCL.740.H (d) “Applicants who successfully completes” should read “applicants who successfully complete”

	Rationale: The proposed wording is grammatically not correct.
response	Accepted – thank you for your comment. The text is corrected accordingly.

comment	*215* comment by: *European Powered Flying Union* Page 17/74 FCL.740.H (f) "Applicants who fails" should read "applicants who fail" Rationale: The proposed wording is grammatically not correct.
response	Accepted – thank you for your comment. The text is corrected accordingly.

comment	*216* comment by: *European Powered Flying Union* Page 18/74 FCL.835 (b)(1)(ii) Remark: I do not understand what is meant: I do not see a context between an aeroplane variant and required instrument rating.
response	Noted – thank you for your comment. According to point FCL.825(a)(1), it is possible to use the BIR to fly under IFR on single-pilot aeroplanes for which a class rating is required. However, certain single-pilot aeroplanes (requiring a class rating) are excluded (meaning that an IR is required to fly these aeroplanes under IFR). These excluded aeroplanes are (i) high-performance aeroplanes and (ii) any variant within a class for which OSD has determined that, as a prerequisite for the pilot to fly it under IFR, an IR is required. Today, this OSD reference indeed has no effect, since OSD today is applicable only for type ratings. However, the reference was put in place to consider potential future developments of OSD applicability.

comment	*232* comment by: *Swiss Aeroclub* **FCL.110.A LAPL(A)** (page 9 of 74) (c)(1) …. but shall in no case: (i) exceed the total flight time as PIC ; (ii) exceed 50% of the hours required in point (a) ; (iii) include the requirements of point (a)(2) ;
response	Not accepted – thank you for your comment. EASA has considered your proposal for rewording with its regulatory proofreading experts and has concluded not to change the text. From a technical perspective, the current text is easy to read and to understand, since the limiting character of each subparagraph is emphasised by starting with the word "not". Additionally, for consistency reasons, the general rulemaking policy of EASA is to change existing text only in case of confirmed issues with the existing text, which in this case does not apply.

comment	*233* comment by: *Swiss Aeroclub*

FCL.110.H LAPL(H) Experience requirements and crediting (page 10 of 74)
(b)(1) … but shall in no case:
(i) exceed the total flight time as PIC ;
(ii) exceed 50% of the hours required in point (a) ;
(iii) include the requirements of point (a)(2) ;

response: Not accepted – thank you for your comment.
Please refer to the response to comment No 232.

comment *234* comment by: *Swiss Aeroclub*

FCL.815 Mountain rating (page 17 of 74)
Revalidating a SEP class rating requires 12 landings/take offs within the last 12 months – is a pilot with only 6 landings on a surface requiring a mountain rating within 2 years sufficiently trained to safely perform landings in such an environment ?

response: Noted – thank you for your comment.
Please be informed that the technical revalidation requirements for the mountain rating have not been changed. They apply in this from for 10 years now and have so far not been subject to safety concerns.

3. Proposed amendments and rationales in detail | 3.1. Draft regulation (draft EASA opinion) | ANNEX I (PART-FCL) | Appendix 9 p. 20

comment *33* comment by: *IAOPA (Europe)*

.pdf p20/74 Appendix 9 B. Specific requirements

IAOPA (Europe) supports this proposal.

response: Noted – thank you for your positive feedback.

comment *147* comment by: *LBA*

LBA comment:
On Appendix 9 ... - B. - Section 5

The proposed deletion of engine shutdown and restart from TMG training is not justified. The rationale (30) does not fit: It is not evident why holders of aeroplane licences should not be entitled to intentionally switch off the engine of a TMG during flight. TMGs are defined by FCL.010 as a specific class of powered **sailplane**; powered sailplanes are by definition **sailplanes** equipped with one or more engines that have, with engines inoperative, the characteristics of a sailplane. Accordingly, the TMG class rating explicitly allows aeroplane licence holders to fly a specific type of sailplane. Accordingly, it is not comprehensible why a certain type of operation of the TMG (gliding), which is covered by the type certificate, can be excluded from use by holders of aeroplane licences - in other words: no legal basis for this is apparent. There is also no concern for safety, since the intended engine shutdown and subsequent operation of the TMG in gliding flight are essential elements of the

	training for the TMG class rating for holders of aeroplane licences. In fact, the safety level will even be increased by the limited training in gliding, because holders of aeroplane licences learn here practically the handling of aircraft with stopped engines (gliding flight), which can be very helpful in case of engine failures in aeroplanes.
response	Noted – thank you for your comment. Holders of aeroplane licences do not get a full training in operating a glider. Hence, TMG class privileges for aeroplane licence holders are understood not to include privileges to intentionally operate a TMG in gliding mode. It would be therefore inconsistent to include, into TMG training for aeroplane licence holders, a manoeuvre which the pilots subsequently are not allowed to perform. Additionally, "limited gliding training" during LAPL(A)/PPL(A) training is already achieved through the existing relevant training exercises (e.g. forced landing without power). In reaction to your comment, it will be considered to clarify in Part-FCL that holders of aeroplane licence (without holding an SPL in parallel) are not entitled to intentionally and completely shut down the engine of a TMG during flight.

comment	*186* comment by: *The Finnish Transport Communications agency, Traficom* - Appendix 9 5.5; We support the removal of the TMG in-flight engine shutdown and restart.
response	Noted – thank you for your positive feedback.

3. Proposed amendments and rationales in detail | 3.1. Draft regulation (draft EASA opinion) | ANNEX VI (PART-ARA) p. 21

comment	*128* comment by: *UK CAA* **Page No:** 21 of 74 **Paragraph No:** ARA.FCL.200(d) **Comment:** This paragraph does not reflect the relevant authorisation for helicopter flight instructors to sign applicants licences for the revalidation of helicopter type ratings at new para FCL.740.H (a)(2)(ii)(B). **Justification:** Under new proposal helicopter FIs require authorisation to sign applicants' licence for new revalidation procedure **Proposed Text:** Amend to read: "(d) Endorsement of licence by instructors. Before specifically authorising certain instructors to revalidate a ~~single-engine piston~~ SEP aeroplane, a TMG class rating or SEP helicopter rating, the competent authority shall develop appropriate procedures."
response	Partially accepted – thank you for your comment.

	Please refer to the response to comment No 67.

comment	*174* comment by: *FOCA Switzerland* Endorsement of licence by instructors. Before specifically authorising certain instructors to revalidate a SEP aeroplane or TMG class rating, or a single-engine piston helicopter rating, the competent authority shall develop appropriate procedures. Raionale: For consistency, it should also be possible to authorise helicopter instructors to revalidate the licences. If revalidation of single-engine turbine helicopters with hours and refresher training could be possible, it should be added ..."or a single-engine piston or single-engine turbine helicopter up to a MTOW of 3175 kg..."
response	Partially accepted – thank you for your comment. Please refer to the response to comment No 67.

3. Proposed amendments and rationales in detail | 3.1. Draft regulation (draft EASA opinion) | Rationales | ANNEX I (PART-FCL) p. 22-29

comment	*148* comment by: *LBA* LBA comment: On rational #14 The rational does not fit: according to JAR-FCL 1.125(c), at least five additional hours flight time (to the minimum 45 flight hours according to JAR-FCL 1.120) were required to obtain the night qualification, resulting in a total of 50 flight hours.
response	Noted – thank you for your comment. Please refer to the response to comment No 143.

comment	*149* comment by: *LBA* LBA comment: On rational #30 The rational does not fit: It is not evident why holders of aeroplane licences should not be entitled to intentionally switch off the engine of a TMG during flight. TMGs are defined by FCL.010 as a specific class of powered **sailplane**; powered sailplanes are by definition **sailplanes** equipped with one or more engines that have, with engines inoperative, the characteristics of a sailplane. Accordingly, the TMG class rating explicitly allows aeroplane licence holders to fly a specific type of sailplane. Accordingly, it is not comprehensible why a certain type of operation of the TMG (gliding), which is covered by the type certificate, can be excluded from use by holders of aeroplane licences - in other words: no legal basis for this is apparent. There is also no concern for safety, since the intended engine shutdown and

	subsequent operation of the TMG in gliding flight are essential elements of the training for the TMG class rating for holders of aeroplane licences. In fact, the safety level will even be increased by the limited training in gliding, because holders of aeroplane licences learn here practically the handling of aircraft with stopped engines (gliding flight), which can be very helpful in case of engine failures in aeroplanes.
response	Noted – thank you for your comment. Please refer to the response to comment No 147.

comment	*217* comment by: *European Powered Flying Union* Page 24/74 (14) Amendments to point FCL.210.A Including the FCL.810 provisions in FCL.210.A as regards night flying is highly positive. Rationale: It will contribute to the safety of flight of those who are willing to learn a bit more than just the basics.
response	Noted – thank you for your positive feedback.

comment	*218* comment by: *European Powered Flying Union* Page 27/74 (23) Amendments to point FCL.815 To make the mountain rating a non-expiring rating with recency requirements is a positive step. Rationale: this is the outcome of discussions held.
response	Noted – thank you for your positive feedback.

3. Proposed amendments and rationales in detail | 3.2. Draft acceptable means of compliance and guidance material (draft EASA decision) | AMC and GM to ANNEX I (PART-FCL) p. 30-57

comment	*5* comment by: *Marco Rizzato* The proposed text refers to batteries as the only possible source of energy for electric aeroplanes. The more general term “EESS - Electrical Energy Storage System” from other EASA documentation such as SC-VTOL could make the regulation more flexible. Marco Rizzato - Pipistrel Vertical Solutions
response	Not accepted – thank you for your comment. After carefully considering your comment, it was decided to keep the term “battery”, as this term is believed to be more common and better to understand. The term “EESS” is a certification-specific term which might not be well understood by people without certification background.

comment	*6* comment by: *Marco Rizzato*

	AMC1 FCL.725(a) "Requirements for the issue of class and type ratings" I.(c)(2)(vii) refers to "effects of battery ageing on available power". It is suggested to also include effects of battery ageing on available energy. Marco Rizzato - Pipistrel Vertical Solutions
response	Accepted – thank you for your comment. The text will be updated to refer to available “energy and power”.

comment	*34* comment by: *IAOPA (Europe)* .pdf p30/74 GM1 FCL.020(a) Student pilot IAOPA (Europe) supports this proposal.
response	Noted – thank you for your positive feedback.

comment	*35* comment by: *IAOPA (Europe)* .pdf p31/74 AMC1 FCL.050(b)(1)(ii) Recording of flight time IAOPA (Europe) supports this proposal in part, but we recommend that such flights should be logged as PIC U/S with the Examiner countersigning in the 'Remarks' column. The Examiner should log the flight time as PIC.
response	Not accepted – thank you for your comment. The concept of “PICUS” is reserved for a multi-crew environment (see the definition of “PICUS” in point FCL.010, referring to a “co-pilot”). Additionally, it is already clear that examiners can log PIC flight time for flights where they were providing tests or checks (AMC1 FCL.050 paragraph (b)(1)(iv)).

comment	*36* comment by: *IAOPA (Europe)* .pdf p31/74 AMC1 FCL.050(i)(10)(iv) Notes on recording of flight time IAOPA (Europe) supports this proposal in part, but we recommend that additional wording should be added to include this requirement for LAPL validity extension flights as these are technically not 'class rating revalidation' flights.
response	Accepted – thank you for your comment. The text will be updated to also refer to flying activity in relation to compliance with LAPL recency requirements.

comment	*37* comment by: *IAOPA (Europe)* .pdf p32.74 AMC1 FCL.115(c)(xiv) Note 1 LAPL(A) Training course IAOPA (Europe) supports this proposal.
response	Noted – thank you for your positive feedback.

comment	*38* comment by: *IAOPA (Europe)* .pdf p32/74 AMC1 FCL.115(c)(xiv) Note 2 LAPL(A) Training course IAOPA (Europe) OBJECTS to this proposal. AMC1 DTO.GEN.240 (c) states: *The fleet should include, as appropriate to the training courses:* *(1) in the case of aeroplanes and sailplanes, aircraft suitable for demonstrating stalling and spin avoidance;* The proposed Note 2 does not comply with this AMC, neither does it provide an equivalent level of safety. AMC1 DTO.GEN.240 (d) states: *One single aircraft that has all the required characteristics of a training aircraft mentioned in (b) and (c) above may be sufficient.* Requiring a DTO to include such an aeroplane within its training fleet is entirely reasonable. Hence Note 2 should be deleted.
response	Accepted – thank you for your comment. Please refer to the response to comment No 188.

comment	*39* comment by: *IAOPA (Europe)* .pdf p32/74 AMC1 FCL.115(c)(xvii) (E) LAPL(A) Training course IAOPA (Europe) supports this proposal
response	Noted – thank you for your positive feedback.

comment	*40* comment by: *IAOPA (Europe)* .pdf p34/74 AMC1 FCL.135.A(b) LAPL(A) Extension of privileges to another class or variant of aeroplane IAOPA (Europe) supports this proposal.
response	Noted – thank you for your positive feedback.

comment	*41* comment by: *IAOPA (Europe)* .pdf p34/74 AMC1 FCL.140.A(a)(1)(ii) LAPL(A) recency requirements IAOPA (Europe) supports this proposal in part, but makes the following comments: (a) implies that training must be in a single flight. For flexibility training should be permitted in as many flights as necessary, hence (a) should be amended to read:

	Before ~~the~~ a training flight [...] (b) should include partial power loss and should also indicate that recognition and recovery from stall scenarios should include some of the listed scenarios. Hence (b) should be amended to read: (b) ~~The~~ Training flight items should be based on the exercise items of the proficiency check, as deemed relevant by the instructor, and depending on the experience of the candidate. In any case, the training flight items should include exercises related to simulated partial loss of engine power and ~~related~~ to recognition and recovery from some of the following stall scenarios: (1) clean stall; (2) approach to stall in descending turn with bank with approach configuration and power; (3) approach to stall in landing configuration and power; and (4) approach to stall, climbing turn with take-off flap and climb power.
response	Partially accepted – thank you for your comment. Paragraph (a) will be amended to refer to "flight training" instead of "training flight", and, in paragraph (b), an additional subparagraph (5) will be added to include exercises on simulated (partial) loss of engine power. Also, in the introductory phrase of paragraph (b), the phrase "recognition of" will be inserted. The insertion of the phrase "some of" is however not accepted, since EASA believes that the refresher flight training should address all the listed exercises.

comment	*42* comment by: *IAOPA (Europe)* .pdf p35/74 AMC1 FCL.140.H(a)(2) LAPL(H) recency requirements IAOPA (Europe) supports this proposal in part, but makes the following comments: (a) implies that training must be in a single flight. For flexibility training should be permitted in as many flights as necessary, hence (a) should be amended to read: Before ~~the~~ a training flight [...] Similarly, (b) should be amended to read: (b) ~~The t~~ Training flight items should [...]
response	Accepted – thank you for your positive feedback. Please refer to the response to comment No 41. The text will be updated accordingly.

comment	*43* comment by: *IAOPA (Europe)* .pdf p36/74 AMC1 FCL.210(c)(xiv) Note 1 PPL(A) Training course IAOPA (Europe) supports this proposal.
response	Noted – thank you for your positive feedback.

comment	*44* comment by: *IAOPA (Europe)* .pdf p36/74 AMC1 FCL.210(c)(xiv) Note 2 PPL(A) training course IAOPA (Europe) OBJECTS to this proposal for the following reason: AMC1 DTO.GEN.240 (c) states: *The fleet should include, as appropriate to the training courses:* *(1) in the case of aeroplanes and sailplanes, aircraft suitable for demonstrating stalling and spin avoidance;* The proposed Note 2 does not comply with this AMC, neither does it provide an equivalent level of safety. AMC1 DTO.GEN.240 (d) states: *One single aircraft that has all the required characteristics of a training aircraft mentioned in (b) and (c) above may be sufficient.* Requiring a DTO to include such an aeroplane within its training fleet is entirely reasonable. Hence Note 2 should be deleted.
response	Accepted – thank you for your feedback. Please refer to the response to comment No 188.

comment	*45* comment by: *IAOPA (Europe)* .pdf p37/74 AMC1 FCL.210(c)(xvii) (E) PPL(A) Training course IAOPA (Europe) supports this proposal.
response	Noted – thank you for your positive feedback.

comment	*46* comment by: *IAOPA (Europe)* .pdf p37/74 AMC1 FCL.210(c)(xvii) (E) PPL(A) Training course IAOPA (Europe) supports this proposal.
response	Noted – thank you for your positive feedback.

comment	*47* comment by: *IAOPA (Europe)* .pdf p38/74 GM1 FCL.210.A(a) PPL(A) - Experience requirements and crediting IAOPA (Europe) welcomes and strongly supports this proposal.
response	Noted – thank you for your positive feedback. Please refer to the response to comment No 238.

comment	*48* comment by: *IAOPA (Europe)* .pdf p39/74 GMC1 FCL.700 (a) Circumstances in which class or type ratings are required IAOPA (Europe) supports this proposal.
response	Noted – thank you for your positive feedback.

comment	*49* comment by: *IAOPA (Europe)* .pdf p39/74 AMC1 FCL.710(a) Class and type ratings - variants IAOPA (Europe) supports this proposal.
response	Noted – thank you for your positive feedback.

comment	*50* comment by: *IAOPA (Europe)* .pdf p40/74 AMC1 FCL.725(a) Requirements for the issue of class and type ratings IAOPA (Europe) supports this proposal.
response	Noted – thank you for your positive feedback.

comment	*51* comment by: *IAOPA (Europe)* .pdf p51/74 AMC1 FCL.740.A(b)(ii)(C) Revalidation of class and type ratings. IAOPA (Europe) supports this proposal in part, but we note that (a) implies that training must be in a single flight. For flexibility training should be permitted in as many flights as necessary, hence (a) should be amended to read: Before ~~the~~ a training flight [...] (b) should include partial power loss and should also indicate that recognition and recovery from stall scenarios should include some of the listed scenarios. Hence (b) should be amended to read: (b) ~~The~~ Training flight items should be based on the exercise items of the proficiency check, as deemed relevant by the instructor, and depending on the experience of the candidate. In any case, the training flight items should include exercises related to simulated partial loss of engine power and ~~related~~ to recognition and recovery from some of the stall exercises that cover different stall scenarios (as specified in Exercise 2.3 of the table in point (5) of Section B of Appendix 9) should be completed. [...]
response	Partially accepted – thank you for your comment. Please refer to the response to comment No 41. The text will be updated accordingly.

comment	*52* comment by: *IAOPA (Europe)* .pdf p51/74 AMC1 FCL.740.H(a)(2)(ii)(B) Revalidation of type ratings - helicopters IAOPA (Europe) supports this proposal in part, but we note that (a) implies that training must be in a single flight. For flexibility training should be permitted in as many flights as necessary, hence (a) should be amended to read: Before ~~the~~ a training flight [...] Similarly, (b) should be amended to read: (b) ~~The t~~ Training flight items should [...]
response	Accepted – thank you for your positive feedback. Please refer to the response to comment No 41. The text will be updated accordingly.

comment	*53* comment by: *IAOPA (Europe)* .pdf p52/74 AMC1 FCL.800 Aerobatic rating IAOPA (Europe) supports this proposal.
response	Noted – thank you for your positive feedback.

comment	*54* comment by: *IAOPA (Europe)* .pdf 52/74 AMC1 FCL.810(a) (d) Flying training IAOPA (Europe) supports these proposals.
response	Noted – thank you for your positive feedback.

comment	*55* comment by: *IAOPA (Europe)* .pdf p53/74 GM1 FCL.810 Night Rating IAOPA (Europe) supports this proposal.
response	Noted – thank you for your positive feedback.

comment	*60* comment by: *ECAA* GM1 FCL.010 If SEP in the context of aeroplanes means „Single-Engine Single-Pilot“, it could also include SET (Single-Engine Turboprop) aeroplanes but that is not correct in the meaning of this NPA. It is suggested to use wording as per Article 2 of the regulation, for example: SEP – in the context of aeroplanes: Single-Engine Piston and Electric

response	Accepted – thank you for your comment. A reference to Article 2(8a) will be included.

comment	*61* comment by: *ECAA* AMC1 FCL.115; FCL.120 If in the text such an amendment to the AMC number will be made, the new AMC (AMC1 FCL.210) refers to flight training and not to theoretical knowledge instruction and examination, as intended. The reference to the AMC number should remain unchanged, i.e. the reference should be for AMC1 FCL.210; FCL.215.
response	Accepted – thank you for your comment. The text will be updated to contain the correct reference to “AMC1 FCL.210; FCL.215”.

comment	*62* comment by: *ECAA* AMC1 FCL.140.H(a)(2) point (b) Since the AMC is describing LAPL(H) recency requirements, LAPL(H) training syllabus should be used for training flight items instead of PPL(H) syllabus. Reference should be for LAPL(H) training syllabus (AMC2 FCL.115) and for exercises 7, 15 and 26.
response	Accepted – thank you for your comment. The text will be amended to reflect LAPL(H) references.

comment	*79* comment by: *The Norwegian Air Sports Federation* **AMC1 FCL.115(c)(xiv)** We support the notes on exercise 11. However, how should "available" be interpreted? Available in the ATO's/DTO's regular training fleet?
response	Noted – thank you for your comment. EASA confirms that “available” in this context means that the ATO or DTO does not have a suitable training aircraft in the fleet.

comment	*87* comment by: *Danish Transport and Construction Agency* Page 32 AMC1. FCL.115: Safety concern: We do not believe than spin training can be performed by a discussion. If the ATO/DTO do not comply with ORA.ATO.135 and DTO.GEN.240 which states that the organistion should have a adequate fleet of aicrafts.
response	Noted – thank you for your comment. Please refer to the response to comment No 188.

comment	*88* comment by: *Danish Transport and Construction Agency* Page 36 AMC1.FCL.210: Safety concern: We do not believe than spin training can be performed by a discussion. If the ATO/DTO do not comply with ORA.ATO.135 and DTO.GEN.240 which states that the organistion should have a adequate fleet of aicrafts.
response	Noted – thank you for your comment. Please refer to the response to comment No 188.

comment	*115* comment by: *Europe Air Sports* Page 32: **AMC1 FCL.115(c)(xiv) Spin avoidance** We support the notes on exercise 11. However, how should "available" be interpreted? Available in the ATO's/DTO's regular training fleet?
response	Noted – thank you for your comment. EASA confirms that “available” in this context means that the ATO or DTO does not have a suitable training aircraft in the fleet.

comment	*129* comment by: *UK CAA* **Page No:** 35 of 74 **Paragraph No:** AMC.FCL.140.H(a)(2) **Comment:** 1.We believe the content of the briefing and training flight is incomplete and lacks a minimum time specification. 2. To specify the flight ‘should include the following exercises from the PPL syllabus’ indicates the whole exercise is to be taught whereas it should be ‘the relevant elements from the exercises.’ 3. The term ‘Navigation flight capabilities’ is confusing. 4. The TEM at para (a)(1) does not take account of the management of Anticipated Threats in the pre-flight planning stage only the Unanticipated Threat of encountering adverse weather. **Justification:** 1. We suggest it is a retrograde safety step to not nominate minimum training flight times. To not specify a minimum standard flight time can lead to unsatisfactory,

inappropriate, incomplete training sessions in order to save money and time, especially if not conducted under the supervision of an ATO/DTO.

2. EHSAT work resulting in EHEST leaflet HE1 specified the most common causes of helicopter accidents to be DVE, Vortex Ring, LTE and Dynamic Rollover. The proposed syllabus does not take account of all these elements.

3. Exercise 10 Basic Autorotation is an inappropriate exercise to be listed as it is only an academic building block exercise leading to the Exercise 21 Practice Force Landing (PFL). Ex 21 PFL includes the practical elements of an autorotation in an emergency/abnormal situation including ADM, field selection, emergencies procedures, RT calls etc.

4. There is no reference to DVE, or the Exercise 25b actions in the event of encountering DVE (i.e. decision to divert or conduct precautionary landing).

5. There is no reference to the practice of the skills required by a pilot on entry to inadvertent IMC in as outlined in Exercise 30.

6. There is no reference to appropriate type OSD TASE elements, manufactures safety notices/bulletins, or conducting appropriate emergency procedures in Exercise 14c.

7. There is no reference to dynamic rollover as included in Ex 27 Sloping Ground.

8. Each NAA should have the ability to include safety elements relevant to their own terrain, weather systems, airspace, accident statistics etc

Proposed Text: Replace to read as follows:

(a), Before the training flight takes place, the instructor should hold a briefing with the candidate of at least 1 hour duration. That briefing should include a discussion on all of the following:

(1) TEM with special emphasis on pre-flight planning and ADM when encountering DVE, adverse meteorological conditions and unintentional IMC;
(2) aircraft type OSD TASE items and manufactures safety notices /bulletins;
(3) navigation flight techniques including the use of GNSS;
(4) aircraft emergency procedures:
(5) specific items designated by the NAA
(6) exercises as specified in point (b), as applicable.

(b), The training flight should be at least 1 hour duration and items should be based on the exercise items of the proficiency check, as deemed relevant by the instructor, and depending on the experience of the candidate. In any case, the training flight items should include the relevant elements from following exercises from the PPL(H) flight training syllabus (AMC2 FCL.210):

(1) Exercise 14c: Emergency Procedures
(2) Exercise 18: Hovering OGE and vortex ring;

(3) Exercise 21: Practice Forced Landings
(4) Exercise 27: Sloping ground
(5) Exercise 29: Confined areas.
(6) Exercise 30: Instrument Flying (including recovery from UA)

response

Not accepted – thank you for your comment.
EASA reviewed your proposal with its experts and finally concluded not to change the text. The overall intention is to leave it to the flight instructor to decide about the detailed content of the refresher training, beside some essential elements. Hence, the text should not be too prescriptive. Additionally, please consider all of the following:

- in point FCL.140.H and point FCL.740.H (as well as in point FCL.140.A and point FCL.740.A), the 1-hour requirement for the duration of refresher flight training has been re-inserted (please refer to the response to comment No 82);
- additional GM to points FCL.140.H and FCL.740.H will be introduced, comprising recommendations for safety awareness briefings during refresher training or proficiency checks;
- further guidance on refresher training is also provided by the EASA helicopter flight instructor guide (Link: Helicopter Flight Instructor Guide | EASA (europa.eu); next update to be published soon).

However, in reaction to your comment, for clarification purposes the title and the text of Exercise 15 (LAPL(H) syllabus) and Exercise 18 (PPL(H) syllabus) are slightly amended to clarify the full scope of these exercises (hover OGE, vortex ring, unanticipated yaw (LTE). Additionally, in AMC1 FCL.140.H as well in other AMCs to points FCL.140.A, FCL.740.A and FCL.740.H the term “navigation flight capabilities” is replaced by “navigation flight techniques”.

comment

137 comment by: *FNAM*

On the whole, FNAM welcomes the proposed changes as they:

- Improve the global comprehension of Part FCL;
- Add flexibility to the types of licenses;
- Take into account the experience acquired by pilots holding an LAPL (A) license towards a PPL (A) license;
- Improve flight safety and training for LAPL (A) and PPL (A) pilots.

response

Noted – thank you for your positive feedback.

comment

175 comment by: *FOCA Switzerland*

the applicant for or the holder of a pilot licence may log as PIC time all solo flight time, flight time as SPIC, flight time under supervision as well as flight time of

	successfully completed skill tests and proficiency checks, provided that such SPIC time and flight time under supervision are countersigned by the instructor or in case of successfully completed skill test and proficiency checks by the examiner; Rationale: We support to add the case of a completed test or check. However after successful completion of a test or check, the examiner signs the logbook in the function of the examiner and not as an instructor. Therefore this should be added. It would be helpful and consistent if the case of a failed or partial passed skill test or proficiency check would also be adressed where the examiner signs Dual flight time.
response	Partially accepted – thank you for your comment. EASA agrees that, since the updated text now also refers to skill tests and proficiency checks, a reference to examiners needs to be added. However, since the text will still refer to flights under supervision and SPIC time, the reference to instructors must be kept. Instead of replacing the term “instructor” by “examiners”, the phrase “or examiner, as applicable” will be added.

comment	*187* comment by: *The Finnish Transport Communications agency, Traficom* - AMC1 FCL.050; We support the inclusion of the successfully completed skill tests and proficiency checks. This change should be also reflected elsewhere in the regulation, for example on all license and rating experience requirements and FCL.1030 (a) (2).
response	Noted – thank you for your positive feedback. EASA believes that AMC1 FCL.050 applies in general and therefore sufficiently addresses the subject matter. You are invited to submit detailed proposals for further rule changes, if you deem such additional changes necessary.

comment	*188* comment by: *The Finnish Transport Communications agency, Traficom* - AMC1 FCL.115 & FCL.210(A); All certified light aircraft are approved for the kind of stall that is experienced during the early stages of an incipient spin, when the rotation of an aircraft is around the longitudinal, but not yet around the vertical axis of an aircraft. The insipient stage lasts from the stalling until the spin rotation has stabilized and it has never been the intention of this requirement to experience later phase of an incipient spin, where a spin recovery procedure would be the correct recovery method. The word insipient spin has created a lot of confusion with the current regulation and the new wording creates new problems with a possibility of avoiding the exercise completely. While the briefing is important, the exercise itself is of a crucial importance and cannot be replaced by a briefing. At its core the exercise is an uncoordinated stall. Student needs to experience it and be able to recover from it using the correct stall recovery technique. As there is an element of a startle factor involved, this cannot be done as a table top exercise. We suggest the removal of the last sentence from the AMC1 FCL.115 and FCL.210 Note 2. And we propose a new text to replace the point (B) with the following text;

	Uncoordinated stall and recovery (stall with a clear wing drop whose magnitude allows the student pilot to experience an uncoordinated stall and to learn how to recover from such a flight condition);
response	Noted – thank you for your feedback. EASA agrees with your comment, as regards the problematic content of the proposed Note 2 in Exercise 11. Hence, this Note 2 is deleted. Additionally, the text in paragraph (B) of Exercise 11 will be further revised to better illustrate the objective of this Exercise (spin avoidance, not spin recovery) and how to achieve it.

comment	*189* comment by: *The Finnish Transport Communications agency, Traficom* - AMC1.140A; A very welcome further development for the refresher training flight requirement.
response	Noted – thank you for your positive feedback.

comment	*190* comment by: *The Finnish Transport Communications agency, Traficom* - GM1 FCL.210.A(a)We support strongly the possibility to include the NF-training and the skill test to PPL flight time experience requirement. We have a decades long experience about this prior to EASA and can assure anyone who might have doubts about this issue, that there is nothing to worry about this change. We would also suggest a creation of an AMC that includes the training program for the PPL that includes the NF. This would be especially helpful for DTO´s. Naturally, we can offer our assistance with this matter.
response	Noted – thank you for your positive feedback. For the time being, there is no plan to develop AMC on a “PPL/night rating” syllabus, but we in case of such an initiative, EASA will gladly appreciate your support and input. Please also refer to the response to comment No 238.

comment	*195* comment by: *France* **Comment on AMC1 FCL.115 (c) (xiv) Note 2** We strongly disagree with the content of the note 2. It seems not in line with UPRT We believe it is not credible to think that a pilot will be able to avoid a spin without having experienced it in flight.
response	Noted – thank you for your feedback. Please refer to the response to comment No 188.

comment	*209* comment by: *Airbus Helicopters* **Comment on AMC1 FCL.740.H(a)(2)(ii)(B) Revalidation of type ratings — helicopters (on page 51)**

	The content of the refresher training as proposed in AMC 1 740.H (a)(2)(ii)(B) would also be adequate for SET and MET (except the autorotation for MET) It is therefore suggested not to limit the scope of applicability of the AMC to the sole paragraph 740.H (a)(2)(ii)(B) For all single rotor helicopter, it is recommended to add the un-anticipated yaw subject in paragraph (b)of the AMC
response	Noted – thank you for your comment. The purpose of this AMC is to outline the content of refresher training flights for the purpose of type rating revalidation. Since not all type ratings can be revalidated via refresher training, the applicability of this AMC needs to have a limited scope. See however also the response to comment No 130. As regards your comment on including an exercise on un-anticipated yaw, please refer to the response to comment No 129.

comment	*219* comment by: *European Powered Flying Union* Page 30/74 GM1 FCL.010 Definitions Question: what is to happen if one day in a not so distant future fully electric or hybrid rotorcraft and its operations are no longer confined to the excentric?
response	Noted – thank you for your comment. Please refer to the response to comment No 2.

comment	*220* comment by: *European Powered Flying Union* Page 30/74 GM1 FCL.020(a) Student pilot Remark: This provisions is, in my eyes, reasonable.
response	Noted – thank you for your positive feedback.

comment	*221* comment by: *European Powered Flying Union* Page 32/74 AMC1 FCL.115 LAPL (A), mid-page (xvii) (C) mislanding: never read or heard of before… See also page 37/74 (xvii) (C) mid-page
response	Noted – thank you for your comment. For clarity, the term “mislanding” will be replaced by the term “rejected landing”.

comment	*222* comment by: *European Powered Flying Union* Page 39/74 AMC1 FCL.710(a) Class an type ratings – variants I would not write “…with an electric engine”, I would write “electrically powered aeroplane”

	Rationale: the plural form pops already up in the line below, it is, in my eyes, not the number of engines that is important, it is the design of the propulsion device.
response	Noted – thank you for your comment. Please refer to the response to comment No 1. For consistency with the proposed wording for updating Article 2 of Regulation (EU) No 1178/2011, the text of this AMC is updated to refer to an "electric engine system" (which may consist of more than one electric engine which all together drive one single centric propulsion unit.

comment	*223* comment by: *European Powered Flying Union* Page 41/74 AMC1 FCL.725(a) Requirements for the issue of class and type ratings I propose to re-word/re-structure the provisions by strictly separating the liquid fuels and the electrics. Rationale: the characteristics of electrically powered flying machines are not covered in a sufficiently clear manner. (3)(i) being one of the examples, as well as (iv) at the top of page 42/74.
response	Not accepted – thank you for your comment. The purpose of AMC1 FCL.725(a) is to outline, in general, the minimum content of theoretical knowledge for class/type rating training on a relatively high level, not going too much into technical details (as necessary for a particular training programme or particular training material). In this context, the structure and content as drafted with NPA 2020-14 is deemed appropriate.

comment	*224* comment by: *European Powered Flying Union* Page 45/74 AMC1 FCL.725(a) Requirements for the issue of class and type ratings (b) limitations (1) (iii) (F) Question: should it not read "maximum zero fuel mass"
response	Accepted – thank you for your comment. The text is updated as suggested.

comment	*225* comment by: *European Powered Flying Union* Page 48/74 (2) (ix) Question: "start air" in not known to me… Would not "starter air" be correct? And if "lavatory" is added why not add "galley"?
response	Accepted – thank you for your comment. The text is updated to refer to "starter air" and to also include "galley".

comment	*226* comment by: *European Powered Flying Union* Page 53/74 GM1 FCL.810 Night rating

	(d) “other exceptional conditions”: what is meant? Please be more precise, present at least a (non-exhaustive) list. Rationale: Unclear to us.
response	Noted – thank you for your comment. Paragraphs (a) to (c) already constitute a non-exhaustive list. The additional paragraph (d) serves as a placeholder for any further conditions, as specified by the ATO or DTO, as deemed necessary.

comment	*227* comment by: *European Powered Flying Union* Page 53/74 GM1 FCL.900 Instructor certificates General remark: This figure should be reduced in order to obtain a simplification and to add attractiveness of the tasks. Rationale: Nine is a bit much. What are the figures at UK CAA, FAA or Transport Canada level?
response	Noted – thank you for your comment. Please be informed that Part-FCL Subpart J (instructor certificates) is currently under review with Rulemaking Task (RMT) RMT.0194, also with the objective to reduce the number of instructor certificates in the interest of simplification.

comment	*235* comment by: *Swiss Aeroclub* **GM1 FCL.010 Definitions** (page 30 of 74) In case SEP H will also be revised with regard to hybrid propulsion, the GM needs to be adjusted too.
response	Noted – thank you for your comment. Please refer to the response to comment No 2.

comment	*236* comment by: *Swiss Aeroclub* **AMC1 FCL.115 LAPL(A) – Training course** (page 32 of 74) (c) (xvii) (C) Is “mislanding” a well-known and accurate expression, namely taking into account, that an aircraft might be stuck on ground after a “mislanding”? If not, we suggest “abandoned” or “aborted landing”?
response	Noted – thank you for your comment. Please refer to the response to comment No 221.

comment	*237* comment by: *Swiss Aeroclub* **AMC1 FCL.210 PPL(A) Training course** (page 37 of 74) (c) (xvii) (c) Is “mislanding” a well-known and accurate expression, namely taking into account, that an aircraft is normally stuck in the ground after a real “mislanding”? If not, we suggest “abandoned” or “aborted landing”?

response	Noted – thank you for your comment. Please refer to the response to comment No 221.

comment	*238* comment by: *Swiss Aeroclub* **GM1 FCL.210.A(a) PPL(A) Experience requirements and crediting** (page 38 of 74) We highly appreciate the philosophy that flight time for night rating training and skill tests can be credited for the PPL. Since guidance material is not binding, we would prefer to integrate this rule in FCL itself or at least publish it as am AMC. Furthermore we wonder if the same privileges should also apply to LAPL and PPL(H).
response	Noted – thank you for your comment. After further internal review, EASA decided not to allow to include the flight time of the skill test into the 45-hour requirement (more information to be provided with the Opinion document). However, the proposal for including the flight time of the night rating training course remains and will be clarified directly in the rule, through an additional sentence at the end of point FCL.210.A. This draft for a GM1 FCL.210.A(a) will therefore be removed.

3. Proposed amendments and rationales in detail | 3.2. Draft acceptable means of compliance and guidance material (draft EASA decision) | AMC and GM TO ANNEX VII (PART-ORA) p. 58

comment	*56* comment by: *IAOPA (Europe)* .pdf p58/74 GM1 ORA.ATO.110(d) Personnel requirements IAOPA (Europe) supports this proposal.
response	Noted – thank you for your positive feedback.

comment	*63* comment by: *ECAA* GM1 ORA.ATO.110(d) Does this GM concerns only IR training courses or also training courses that include IR (for example ATP integrated course)? Clarification is recommended.
response	Noted – thank you for your comment. In terms of point FCL.905.FI(h) (scope of instructor privileges) and this GM1 ORA.ATO.110(d), instruction for an "IR" means instruction provided during both modular IR courses and during integrated courses. The text of this GM remains unchanged, for consistency with the text in point FCL.905.FI(h).

3. Proposed amendments and rationales in detail | 3.2. Draft acceptable means of compliance and guidance material (draft EASA decision) | Rationales | AMC and GM to ANNEX VII (PART-ORA) p. 63

comment	*193* comment by: *France*

Comment on GM1 ORA.ATO.110 (d)

Regulation 2020/359 has amended FCL.905.FI, from september 2021 its paragraph (h) (3) will be the following:

*"**(h)** a BIR or an IR in the appropriate aircraft category, provided that FI meets the following conditions:*

[...]

***(3)** if during an approved training course at an ATO, the FI is providing training in FSTDs or supervising SPIC training flights that take place under IFR, the FI shall have completed at least 50 hours of flight time under IFR after the issuance of the BIR or the IR, of which a maximum of 10 hours may be instrument ground time in an FFS, an FTD 2/3 or an FNPT II;*

***(4)** if the FI is providing training in an aircraft, the FI shall have completed at least 200 hours of flight time under IFR, of which up to 50 hours may be instrument ground time in an FFS, an FTD 2/3 or an FNPT II."*

The GM proposed here aims at giving some guidance to ATO that will use FI qualified according to FCL.905.FI (h) (3) (see texte highlighted here above). This FI will be restricted to provide training in FSTD and to supervise SPIC training flights.

We agree with the content of the GM but we believe that such GM should be upgraded in AMC. In additionwe would like to add a new GM/AMC to deal with the issue summarized here below.

As a matter of fact we would like to come back on one of the pitfall of the new provision FCL.905.FI (h) (3) that was identified during the discussion on regulation 2020/359.

If everything goes well during a SPIC training flight the instructor is not supposed to intervene in the conduct of the flight. The hours will be counted as SPIC hours. The objective of a SPIC session is to let the student pilot to act with the largest autonomy possible in order to come close to the actual conditions of a flight with a pilot holding an IR and exercising his/her privileges in solo.

On the contrary, if for the safe conduct of the same flight, the instructor has to intervene the flight shall no longer be considered as a SPIC flight. Then the question is how the flight hours will be counted bith for the instructor and for the student pilot ?

As a matter of fact, the FI qualified according to FCL.905.FI (h) (3) does not hold the privilege to instruct IR in an aircraft (the instructor is limited to FSTD and SPIC flight). Therefore from a regulatory point of view in the case of an interruption of the SPIC session the situation will be the following :

- the FI will not be authorized to log those hours as IFR training hours (in fact training in an aircraft is out of the scope of his/her privileges),

	- the student pilot will also not be authorized to log the hours as dual-command IFR hours in his/her logbook as the session could not be counted as an instruction session having in mind that the instructor present during the flight does not hold th privilege to instruct in an aircraft. We continue to believe that this new provision will certainly conduct to non solvable question regarding login of hours. It seems that the only way out will be to count those hours as VFR ... The proposed GM does not give any clue on how to deal with the issue and nothing in the aircrew regulation does. We stress the necessity to find a regulatory solution to this situation.
response	Noted – thank you for your comment. With regard to the text of point ORA.ATO.110(d) and the content of the new GM1 ORA.ATO.110(d), we believe that the GM format is more suitable. Additionally, we agree that additional GM would help to better clarify the legal consequences of an intervention by an instructor with "reduced IFR" experience in accordance with point FCL.905.FI(h)(3), when supervising an SPIC training flight. To that end, a proposal for a new GM1 FCL.905.FI(h)(3) will added to the draft. This GM will explain that, in case of such an intervention, the instructor will need to take over controls and end the flight as PIC or continue with VFR instruction, since he or she is not entitled to provide IR instruction in an aeroplane in flight.

4. Impact assessment (IA) p. 64-68

comment	*228* comment by: *European Powered Flying Union* Page 67/74 Table 2: Safety impacts per option Question to the criterion "Option 1": What does "enable flying of electric propulsion single-piston aeroplanes for GA" mean? No try to translate this made it clear, I am sorry to write this, but in my eyes and ears this sentence does not make sense…
response	Noted – thank you for your comment. Option 1 refers to amending Part-FCL to enable the operation of electric-propulsion aeroplanes by Part-FCL licence holders in a general aviation (GA) context. Option 1 is the contrary to the also presented Option 0 (no amendments to Part-FCL), not providing the necessary regulatory framework for GA pilots to fly electric-propulsion aeroplanes under Part-FCL.

Appendix A - Attachments

EASA NPA 2020-14.pdf

Attachment #1 to comment #4