



Notice of Proposed Amendment 2023-104

in accordance with Article 6 of MB Decision 01-2022

Regular update of regulations regarding pilot training, testing and checking, and the related oversight

Reconsultation of selected elements following the focused consultation (workshop) of 21 to 23 June 2022

RMT.0587 — SUBTASK 3

EXECUTIVE SUMMARY

The purpose of this Notice of Proposed Amendment (NPA) is to reconsult with the EASA Advisory Bodies (ABs) specific proposed amendments to Regulation (EU) No 1178/2011 ('Aircrew Regulation') and to related guidance material (GM). Those proposed amendments, which were initially consulted with the EASA ABs during a focused consultation (21-23 June 2022) and were significantly revised based on comments that were received during and after the consultation, address the following topics:

- licence endorsements of privileges for multi-pilot operation in single-pilot aeroplanes;
- landing training (type rating training);
- use of flight simulation training devices for training, testing and checking;
- content of the commercial pilot licence skill test; and
- instrument rating revalidation with restricted performance-based navigation privileges.

Moreover, this NPA contains additional non-controversial proposed amendments, which were introduced following further EASA reviews. This NPA also informs about those proposed amendments that were presented during the focused consultation but are no longer considered relevant for this rulemaking task.

The proposed regulatory material is expected to improve the clarity and proportionality of existing requirements.

REGULATION TO BE AMENDED Aircrew Regulation	ED DECISION TO BE AMENDED EDD 2011/016/R that issued the AMC&GM to Part-FCL to support the implementation of the Aircrew Regulation
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AFFECTED STAKEHOLDERS
National competent authorities (NCAs), pilots, instructors, examiners, training organisations

WORKING METHODS

Development	Impact assessment	Consultation
By EASA	Light	RMT.0587: Focused consultation — Workshop

Related documents
[ToR RMT.0587](#) issued on 11.5.2016

PLANNING MILESTONES
Opinion 2023/Q2; ED Decision 2024



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1. In summary — why and what

1.1. Introduction

Subsequent to the focused consultation (workshop) that was held from 21 to 23 June 2022 with the EASA Advisory Bodies (ABs) (on rulemaking task (RMT).0190, RMT.0587, and RMT.0678), EASA decided to reconsult via this notice of proposed amendment (NPA) specific proposed amendments to Regulation (EU) No 1178/2011¹ ('Aircrew Regulation') and to related guidance material (GM). Those proposed amendments were significantly revised based on comments that were received during and after the consultation, as well as on additional internal reviews. Moreover, this NPA contains additional non-controversial proposed amendments, which were introduced following further internal reviews. All of those elements solely concern RMT.0587 'Regular update of regulations regarding pilot training, testing and checking, and the related oversight'.

IMPORTANT NOTE 1: The reconsultation of the proposed amendments with the EASA ABs via this NPA concentrates on the recent changes to the draft regulation. The changes to the draft acceptable means of compliance (AMC) and GM will be subject to a separate reconsultation at a later stage. By way of derogation from this principle, new GM1 Appendix 9 Section A point 1 is included in this NPA for information only, to complete the picture of the proposed amendments to Annex I (Part-FCL), Appendix 9 to the Aircrew Regulation.

IMPORTANT NOTE 2: This NPA includes only proposed amendments or parts thereof that are reconsulted. The proposed amendments to points or sub-points of rule points (and the related rationales) that do not need reconsultation were removed to keep this NPA as short as possible, unless the context is necessary to obtain the full picture.

1.2. Overview of the proposed amendments

The proposed amendments that were presented during the focused consultation of June 2022 and were subsequently significantly reworked, and are therefore now reconsulted via this NPA, related to the following topics:

- licence endorsements of privileges for multi-pilot operation (MPO) in single-pilot aeroplanes;
- landing training (type rating training);
- use of flight simulation training devices (FSTDs) for training, testing and checking;
- content of the commercial pilot licence (CPL) skill test; and
- instrument rating (IR) revalidation with restricted performance-based navigation (PBN) privileges.

¹ Commission Regulation (EU) No 1178/2011 of 3 November 2011 laying down technical requirements and administrative procedures related to civil aviation aircrew pursuant to Regulation (EC) No 216/2008 of the European Parliament and of the Council (OJ L 311, 25.11.2011, p. 1) (<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32011R1178&qid=1679050908453>).



The following non-controversial proposed amendments were not part of the focused consultation of June 2022 but are now included in this NPA under RMT.0587 (see the detailed rationale below each proposed amendment):

- amendments to Article 2 of the Aircrew Regulation: introduction of a definition for ‘complex aircraft’; deletion of the definition for ‘light aircraft pilot licence (LAPL)’; and
- amendment to Appendix I to Annex VI (Part-ARA) to the Aircrew Regulation: removal of a reference to ‘Annex II aircraft’².

1.3. Outlook on future acceptable means of compliance

In reaction to comments that were received during the focused consultation of June 2022, EASA plans to amend AMC2 FCL.930.TRI, to introduce a training syllabus for type rating instructors for helicopters (TRI(H)), who are restricted to provide training in FSTDs only and who wish to obtain privileges for landing training. The proposed amendments to said AMC will be included in a future NPA consultation, as explained under NOTE 1 in Section 1.1 above.

1.4. Deleted proposed amendments

In addition to reconsulting specific proposed amendments that were presented during the focused consultation of June 2022, EASA decided to delete the following proposed amendments and not include them in the related Opinion:

- (a) Clarifications of privileges of aeroplane licence holders to intentionally shut down the engine of a touring motor glider (TMG) in flight, particularly the following ones:
- deletion of Exercise 19 in the LAPL for aeroplanes (LAPL(A)) flight training syllabus (AMC1 FCL.115);
 - insertion of point (3) in point FCL.105.A(b);
 - insertion of point (b) in point FCL.705; and
 - deletion of ‘and TMG training’ from exercise 5.5 in Part-FCL, Appendix 9, Section B, point 5.

Rationale: During the focused consultation, the topic remained controversial. Hence, EASA needs to reassess the issue in more detail under RMT.0678, Subtask 3, before proposing how to clarify said privileges.

- (b) Amendment to point ORA.ATO.125, to clarify the required course design for integrated courses. EASA decided to reassess the need for clarification at regulation level following the completion of the work of the EASA ATP³-integrated task force.

² Aircraft as listed in Annex II to Regulation (EC) No 216/2008 (old ‘Basic Regulation’); now, Annex I to Regulation (EU) 2018/1139 (new ‘Basic Regulation’).

³ *Airline Transport Pilot*.



- (c) Amendments to points FCL.110.H and FCL.210.H, as regards increased FSTD credits for LAPL(H) and private pilot licence (PPL(H)) training. As explained during the focused consultation, those amendments were solely ‘pre-consulted’ and will be further developed and assessed under RMT.0196 due to their necessary link to the FSTD capability signature (FCS) concept, as developed under said RMT.



2. Proposed amendments and rationale

The proposed amendments for reconsulation are arranged to show deleted, new, and unchanged text as follows:

- deleted text is ~~struck through~~;
- new text is highlighted in blue; and
- an ellipsis '[...]' indicates that the rest of the text is unchanged.

Article 2 – Definitions

For the purpose of this Regulation, the following definitions shall apply:

[...]

- (3) ~~'Light aircraft pilot licence (LAPL)' means the leisure pilot licence referred to in Article 7 of Regulation (EC) No 216/2008;~~

'Complex aircraft' means:

(a) in the case of complex aeroplanes, an aeroplane:

- with a maximum certified take-off mass exceeding 5 700 kg, or
- certified for a maximum passenger seating configuration of more than 19, or
- certified for operation with a minimum crew of two pilots, or
- equipped with (a) turbojet engine(s) or more than one turboprop engine; or

(b) in the case of complex helicopters, a helicopter:

- with a maximum take-off mass exceeding 3 175 kg, or
- with a maximum passenger seating configuration of more than nine, or
- for operation with a minimum crew of two pilots; or

(c) a tilt rotor aircraft.

[...]

Rationale

RMT.0587

The definition of 'LAPL' was included in Article 2 of the Aircrew Regulation to establish the connection between this term and the term 'leisure pilot licence' that is used in Regulation (EC) No 216/2008 ('old



Basic Regulation', which is no longer in force). As Regulation (EU) 2018/1139⁴ ('new Basic Regulation' in force) does not use the term 'leisure pilot licence', such definition is no longer needed.

Instead, the definition of 'complex aircraft' is introduced in Article 2, as Part-FCL includes specific requirements for complex aeroplanes and complex helicopters. Inserting a definition for 'complex aircraft' is necessary, as the new Basic Regulation does not include a definition of 'complex motor-powered aircraft' (unlike Article 3(j) of the old Basic Regulation). Further, in accordance with Article 140(2) of the new Basic Regulation, implementing rules shall be adapted to include those definitions that were not transferred from the old to the new Basic Regulation. The proposed definition is identical with the definition that was included in the old Basic Regulation and, as per Article 140 of the new Basic Regulation, is still applicable today.

FCL.725 Requirements for the issue of class and type ratings

[Note: Due to the comprehensive revision of point (d) and for better readability, the point is presented wholly as new text instead of showing the individual amendments in *struck through* and *blue* highlight.]

[...]

~~(d) — Single-pilot and multi-pilot operation~~

- ~~(1) — A pilot who already holds a type rating for an aircraft type, with the privilege for either single-pilot or multi-pilot operations, shall be considered to have already fulfilled the theoretical requirements when applying to add the privilege for the other form of operation on the same aircraft type.~~
- ~~(2) — Such a pilot shall complete additional flight training for the other form of operation in the relevant type in accordance with Appendix 9 to this Annex, unless specified otherwise in the operational suitability data established in accordance with Annex I (Part 21) to Commission Regulation (EU) No 748/2012. This training shall be completed at either of the following:
 - ~~(i) — an ATO;~~
 - ~~(ii) — an organisation to which Annex III (Part ORO) to Regulation (EU) No 965/2012 applies and that is entitled to provide such training on the basis of either an approval or, in the case of single-pilot helicopters, a declaration.~~~~
- ~~(3) — Except for single-pilot helicopters, the form of operation shall be entered in the licence.~~
- ~~(4) — In the case of single-pilot helicopters, all of the following shall apply:~~

⁴ Regulation (EU) 2018/1139 of the European Parliament and of the Council of 4 July 2018 on common rules in the field of civil aviation and establishing a European Union Aviation Safety Agency, and amending Regulations (EC) No 2111/2005, (EC) No 1008/2008, (EU) No 996/2010, (EU) No 376/2014 and Directives 2014/30/EU and 2014/53/EU of the European Parliament and of the Council, and repealing Regulations (EC) No 552/2004 and (EC) No 216/2008 of the European Parliament and of the Council and Council Regulation (EEC) No 3922/91 (OJ L 212, 22.8.2018, p. 1) (<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32018R1139&qid=1679328144296>).



- ~~(i) — In the case where a skill test or a proficiency check for a non-complex single-pilot helicopter type rating was completed in multi-pilot operations only, a restriction to multi-pilot operation shall be endorsed with the type rating in the licence. This endorsement shall be removed when the applicant completes a proficiency check that included the necessary elements for single-pilot operation as specified in Appendix 9 to this Annex.~~
- ~~(ii) — In all other cases, the form of operation shall not be entered in the licence. The pilot is entitled to exercise the privileges of the type rating:~~
- ~~(A) — in single-pilot operation, provided that the skill test or proficiency check either:~~
- ~~(1) — was completed in single-pilot operation; or~~
- ~~(2) — was completed in multi-pilot operation and contained additional elements for single-pilot operation, as specified in Appendix 9 to this Annex.~~
- ~~(B) — in multi-pilot operation under all of the following conditions:~~
- ~~(1) — the pilot complies with point FCL.720.H(a)(2);~~
- ~~(2) — the privileges are exercised in accordance with Annex III (Part-ORO) to Regulation (EU) No 965/2012 only;~~
- ~~(3) — the skill test or proficiency check was completed in multi-pilot operation.~~

(d) Single- and multi-pilot operation – type ratings

- (1) The privileges of holders of a type rating for a single-pilot aircraft include the privileges to fly the aircraft in single-pilot operation (SPO) and multi-pilot operation (MPO). However, such holders shall exercise those privileges for either SPO or MPO only if they comply with all of the following:
- (i) They have successfully completed flight training for the relevant form of operation in the relevant aircraft type in accordance with Appendix 9 to this Annex, unless specified otherwise in the operational suitability data that are established in accordance with Annex I (Part 21) to Commission Regulation (EU) No 748/2012⁵. The training for a particular form of operation shall either be included in the initial type rating training course at an approved training organisation (ATO) or, following the initial issue of the type rating, be completed in the form of additional training at either of the following:
- (A) an ATO; or

⁵ Commission Regulation (EU) No 748/2012 of 3 August 2012 laying down implementing rules for the airworthiness and environmental certification of aircraft and related products, parts and appliances, as well as for the certification of design and production organisations (recast) (OJ L 224, 21.8.2012, p. 1) (<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32012R0748&qid=1679484943210>).



- (B) an organisation to which Annex III (Part-ORO) to Regulation (EU) No 965/2012⁶ applies and that is entitled to provide such training on the basis of either an approval or a declaration.
- (ii) They have passed a skill test or a proficiency check:
- (A) for SPO:
- (1) in SPO; or
 - (2) in MPO with additional elements for SPO as specified in Appendix 9 to this Annex; or
- (B) for MPO, in MPO.
- (iii) In the case of MPO in single-pilot aircraft:
- (A) they meet the requirements that are specified in:
- (1) point FCL.720.A(b)(4) or point FCL.720.H(a)(2), as applicable; and
 - (2) point FCL.720.A(b)(5), for single-pilot aeroplanes, before starting flight training for MPO in accordance with point (d)(1)(i); and
- (B) they exercise their privileges in accordance with Annex III (Part-ORO) to Regulation (EU) No 965/2012 only.
- (2) When applicants for the initial issue of a type rating for a single-pilot aircraft complete the flight training and pass the skill test in MPO only, a restriction to MPO shall be endorsed with the type rating on the licence. That endorsement shall be removed when applicants complete, in accordance with Appendix 9 to this Annex, additional training and a proficiency check that include the necessary elements for SPO.
- In all other cases, the form of operation shall not be entered onto the licence.
- (da) SPO and MPO – aeroplane class ratings
- The privileges of holders of a class rating for a single-pilot aeroplane include the privileges to fly the aeroplane in MPO, provided that such holders:
- (1) comply with the following requirements of point FCL.720.A:
 - (i) point (b)(4); and
 - (ii) point (b)(5), before starting flight training for MPO in accordance with point (da)(2);

⁶ Commission Regulation (EU) No 965/2012 of 5 October 2012 laying down technical requirements and administrative procedures related to air operations pursuant to Regulation (EC) No 216/2008 of the European Parliament and of the Council (OJ L 296, 25.10.2012, p. 1) (<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32012R0965&qid=1679485397908>).



- (2) have completed flight training and passed a proficiency check for MPO in the relevant aeroplane class in accordance with point (5)(g) of Section B of Appendix 9 to this Annex at an organisation that is specified in point (d)(1)(i); and
- (3) exercise their privileges in accordance with Part-ORO only.

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

[...]

Rationale

RMT.0587

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

In reaction to comments that were received during the focused consultation of June 2022 with the EASA ABs, the following changes are made to the initial proposed amendments:

- Point (d) is completely revised to introduce a new comprehensive approach as regards the licensing arrangements for SPO and MPO in single-pilot aircraft, inspired by the principles that were introduced for helicopter type ratings by Regulation (EU) 2021/2227 amending the Aircrew Regulation. The amended point (d) provides for the following:
 - Type rating endorsements automatically include the privileges for SPO and MPO. In principle, no additional endorsements for limitations or extensions of privileges are necessary, except for one particular case (see explanation further down). Pilots can exercise their privileges only under an operator that is subject to Part-ORO, Subpart FC, and that operator will need to monitor and record that pilots exercise their privileges in accordance with the training and checking that they have completed for the different forms of operation.
 - Once a type rating is issued (encompassing privileges for either SPO or MPO), pilots can ‘activate’ and exercise their privileges for the other form of operation by complying with the relevant requirements whose technical content has not been changed: i.e. additional training and checking, for MPO, additionally multi-crew cooperation (MCC) training, and



- for aeroplanes, advanced upset prevention and recovery training (UPRT). The additional training can take place at an ATO or an organisation to which Part-ORO, Subpart FC applies.
- Skill tests and proficiency checks can include both SPO and MPO elements, which means that both SPO and MPO privileges remain active.
 - Only in one particular scenario, a licence endorsement for the specific form of operation is necessary: If an applicant initially obtains a type ratings in MPO only, that type rating needs to be endorsed with a limitation to MPO, to demonstrate that the pilot obtained only MPO privileges. To remove that limitation, the pilot needs to complete the additional necessary training and pass the proficiency check for SPO, in accordance with Appendix 9 to Part-FCL. When Regulation (EU) 2021/2227 introduced the revised point (d) in the context of helicopter type ratings, the need for such an ‘MPO limitation’ after initial MPO type rating training was limited to non-complex helicopters, for the reasons explained in EASA Opinion 02/2021. However, based on feedback received from Member States and an additional internal review at EASA, it is proposed to generally require such a limiting endorsement in all cases of initial type rating training that is completed in MPO only, since full visibility of the limited qualification on the licence is deemed necessary in that specific scenario.
 - Once pilots have obtained SPO privileges, a subsequent proficiency check in MPO only will entitle the pilot to continue to exercise their privileges only in MPO; however, it will no longer be necessary to endorse a restriction in the type rating. The operator will be responsible for ensuring that pilots exercise only those privileges for which they have been checked.
 - The content of point (3) from the initial proposed amendment for the new point (da) is deleted, since the relevant content (maintaining SPO and MPO privileges) is now fully covered by the proposed amendments to Part-FCL, Appendix 9, Section B, point (5)(i). Point (da)(3) now requires holders of class ratings to exercise their privileges in MPO only in accordance with the requirements of Part-ORO (for consistency with point (d)(1)(iii)(B) in the case of type ratings).
 - Additionally, based on an internal review, at the end of point (da), a sentence is introduced to clarify that additional MPO privileges do not need to be entered onto a single-pilot aeroplane class rating, for consistency with the last sentence of point FCL.725(d)(2).

FCL.720.A Experience requirements and prerequisites for the issue of class or type ratings – aeroplanes

[...]

(a) Single-pilot aeroplanes

~~Applicants for the initial issue of privileges to operate a single-pilot aeroplane in multi-pilot operations, either when applying for the issue of a class or type rating or when extending the~~



~~privileges of a class or type rating already held to multi-pilot operation, shall meet the requirements in point (b)(4) and, before starting the relevant training course, point (b)(5).~~

~~Additionally, for:~~

- (1) Single-pilot multi-engine aeroplanes

[...]

Rationale

RMT.0587

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

Appendix 4 – Skill test for the issue of a CPL

[...]

B. Content of the skill test for the issue of a CPL – Aeroplanes

[...]

CONTENT OF THE TEST

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

[...]

Rationale

RMT.0587

This proposed amendment stems from an issue that was highlighted by a Member State, which is related to the transitional arrangements of Regulation (EU) 2018/1048⁷ (the ‘Airspace Usage Requirements (PBN) Regulation’) and the decreasing numbers of VHF omni-directional radio ranges (VORs) and non-directional beacons (NDBs). In that context, it becomes more difficult to comply with the Part-FCL requirements (and use the related AMC) on conventional navigation aids. The related skill test exercise may therefore be conducted in an FSTD.

In reaction to comments that were received during the focused consultation of June 2022 with the EASA ABs, in Section B, point 5, an additional sentence is introduced to allow examiners to decide whether to include Item 6(d) (engine shut-down and restart) in the skill test. That high-risk manoeuvre

⁷ Commission Implementing Regulation (EU) 2018/1048 of 18 July 2018 laying down airspace usage requirements and operating procedures concerning performance-based navigation (OJ L 189, 26.7.2018, p. 3) (<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32018R1048&qid=1679561281657>).



should primarily be conducted in a safe training environment, while during a skill test, the examiner should decide whether to include it or not.

Appendix 9 Training, skill tests and proficiency checks for the MPL, the ATPL, and for type and class ratings, and proficiency checks for the BIR and the IR

A. General

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

Training in an FFS in accordance with the subsequent points of this point shall be complemented with take-off and landing training in a single-pilot or multi-pilot aircraft, as applicable, in accordance with point 17, unless the training is completed in accordance with point FCL.730.A.

[...]

The training, skill test or proficiency check for class or type ratings for SPA and helicopters shall be conducted in:

- (a) an available and accessible FFS, or
- (b) a combination of FSTD(s) and the aircraft if an FFS is not available or accessible; or
- (c) the aircraft if no FSTD is available or accessible.

By way of derogation from the previous point, the training, skill test or proficiency check for class or type ratings for non-complex single-pilot aeroplanes (SPAs) and for non-complex helicopters may be conducted in a combination of FSTD(s) and the aircraft even if an FFS is available and accessible.

[...]

SPECIFIC REQUIREMENTS FOR THE TRAINING, SKILL TEST AND /PROFICIENCY CHECK FOR TYPE RATINGS FOR MULTI-PILOT AIRCRAFT, FOR SINGLE-PILOT AIRCRAFT WHEN OPERATED IN MULTI-PILOT OPERATION MPO, FOR THE MPL AND FOR THE ATPL

[...]

17. When their type rating course has included less than 2 hours of flight training in the aircraft, ~~the applicants skill test may be conducted in an FFS and~~ shall, before or after the skill test, ~~may be completed before the~~ flight training in the aircraft.

~~The~~Such approved flight training shall include take-off and landing manoeuvres and shall be performed by a qualified instructor under the responsibility of:

[...]



B. Specific requirements for the aeroplane category

[...]

CONTENT OF THE TRAINING/SKILL TEST/PROFICIENCY CHECK

5. Single-pilot aeroplanes, except for high-performance complex aeroplanes

[...]

(g) ~~If To exercise the privileges of a class or type rating in for multi-pilot operation MPO in accordance with point FCL.725(d) or (da) are sought for the first time, pilots that are already entitled to operate the relevant class or type of aeroplane in holding privileges for~~ single-pilot operations shall:

- (1) complete a bridge course containing manoeuvres and procedures including MCC as well as the exercises of Section 7 using threat and error management (TEM), CRM and human factors at an ~~ATO~~ organisation that is specified in point FCL.725(d)(1)(i); and
- (2) pass a proficiency check in ~~multi-pilot operations~~ MPO.

(h) ~~If To exercise the privileges of a type rating in for single-pilot operations in accordance with point FCL.725(d) are sought for the first time, pilots that are already entitled to operate the relevant type of aeroplane in holding privileges for multi-pilot operations MPO~~ shall be trained at an ~~ATO~~ organisation that is specified in point FCL.725(d)(1)(i) and checked for the following additional manoeuvres and procedures in ~~single-pilot operations~~ SPO:

- (1) for SE aeroplanes, 1.6, 4.5, 4.6, 5.2 and, if applicable, one approach from Section 3.B; and
- (2) for ME aeroplanes, 1.6, Section 6 and, if applicable, one approach from Section 3.B.

(i) Pilots ~~entitled to exercise the privileges of a class or type rating in holding privileges for~~ both ~~single-pilot~~ SPO and ~~multi-pilot operation~~ MPO in accordance with points (g) and (h) may ~~maintain~~ revalidate privileges for both ~~forms~~ types of operations by completing ~~either of the following:~~

(A) two proficiency checks, one in SPO and one in MPO;

(B) a proficiency check in ~~multi-pilot operation~~ MPO in addition to the exercises referred to in points (h)(1) or (h)(2), as applicable, in ~~single-pilot operation~~ SPO.

Proficiency checks for the revalidation of class ratings shall always include the exercises referred to in points (h)(1) or (h)(2), as applicable, in SPO.

(j) ~~If a skill test or a proficiency check is completed in multi-pilot operations only, the type rating shall be restricted to multi-pilot operations.~~ To remove a restriction to MPO from a single-pilot aeroplane type rating in accordance with point FCL.725(d)(2), pilots ~~The restriction shall be removed when pilots~~ comply with point (h).

[...]



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

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

[...]

6. Multi-pilot aeroplanes and single-pilot high performance complex aeroplanes

[...]

- (h) ~~In the case of~~ **To remove a restriction to MPO in accordance with point FCL.725(d)(2) from a single-pilot high-performance complex aeroplanes type rating, when a skill test or proficiency check is performed in multi-pilot operations,** the type rating **pilot** shall **complete** ~~be restricted to multi-pilot operations. If privileges of single-pilot are sought,~~ the manoeuvres/procedures in 2.5, 3.8.3.4, 4.4, 5.5 and at least one manoeuvre/procedure from Section 3.4 ~~have to be completed in addition as in SPO~~ **single-pilot.**

[...]

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

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

C. Specific requirements for the helicopter category

[...]

SINGLE-PILOT HELICOPTERS

13. **To exercise the privileges of the type rating in accordance with point FCL.725(d), A** Applicants for the issue, revalidation or renewal of a single-pilot helicopter type rating shall:
- ~~if privileges for~~ **SPO** ~~single-pilot operation are sought,~~ complete the skill test or proficiency check in **SPO** ~~single-pilot operation;~~
 - ~~if privileges for~~ **MPO** ~~multi-pilot operation are sought,~~ complete the skill test or proficiency check in **MPO** ~~multi-pilot operation;~~



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

Rationale

RMT.0587

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

However, based on a further assessment of the overall situation and the legal and factual consequences of the proposal, EASA proposes not to introduce such a general OSD reference, thereby not allowing OSD to bypass the standard training platform arrangements in Part-FCL, Appendix 9, Section A, point 1. Those arrangements constitute the basic regulatory policy that if simulation training devices are available and accessible, they shall be used, rather than conducting training in the aircraft. The OSD is a ‘type-specific tool’ that shall not be given the possibility to bypass generic safety-driven regulatory policies. The issue of older OSD reports that include a mix of FFS and in-aircraft training can indeed be addressed within the existing regulatory framework, as explained in the proposed new GM1 Appendix 9 Section A point 1 (see below). That GM will also explain how to apply the training platform arrangements of Appendix 9, Section A, point 1 in case of FFSs that are not equipped for serving as a training platform for the entire type rating training course (see below the proposal and related rationale).

Nevertheless, Section A, point 1 is proposed to be amended to clarify the following:



- After the first point of point 1, a new second point is proposed to be inserted, to clarify the legal basis for landing training after type rating training in an FFS (outside zero flight time training). At the moment, the legal basis for landing training is exclusively located in Appendix 9, Section A, point 17, which due to the headline between points 12 and 13 ('Specific requirements for the skill test/proficiency check for type ratings for multi-pilot aircraft, for single-pilot aircraft when operated in multi-pilot operations, for MPL and for ATPL'), can be interpreted to apply solely in cases of multi-pilot aircraft and MPO in single-pilot aircraft. Hence, the second point of Section A, point 1 clarifies the original intention of that requirement: The landing training as per Section A, point 17 applies in any case (of single-pilot or multi-pilot aircraft/operation) where the type rating training is delivered in FSTDs.
- **In reaction to comments that were received during the focused consultation of June 2022 with the EASA ABs**, after the third point of Section A, point 1, a new point is inserted to allow training, testing and checking in non-complex SPAs and non-complex helicopters in a combination of FSTDs and the aircraft, even if an FFS is available and accessible. This proposed amendment constitutes a more proportionate solution for training in aircraft that are mainly used in General Aviation.
- **Section A, point 17:** For consistency with the clarifications in Section A, point 1, point 17 is revised to refer to take-off and landing manoeuvres. Additionally, the text is simplified, since the conditions for the use of FFS are comprehensively outlined in Section A.
- **Points (g), (h), (i), (j) of Section B, point 5,:** The draft amendment to point (j), as presented during the focused consultation of June 2022, clarified that only in the case of type ratings, it is possible to obtain or maintain a rating in MPO only. Class ratings may include, but can never solely consist of, privileges for MPO (see proposal for new point FCL.725(da) above).

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

For consistency with the further redrafting of points FCL.725(d) and (da), the wording and terminology of points (g) through (j) needed to be adjusted.
- **Section B, points 5(l) and 6(j):** **In reaction to comments that were received during the focused consultation of June 2022 with the EASA ABs**, the proposed text is revised to clarify that a 'partial PBN check' cannot be done voluntarily but only in cases where the aircraft or representing FSTD is not equipped for performing a full PBN check, thereby better expressing the original intention of those requirements (special rule for 'legacy aircraft').



- **Section B, point 6(h):** For the reasons explained in a previous item of this list (related to Section B, points 5(g) through (j)), it is proposed to revise the text and to adjust the terminology.
- **Section C, point 13:** Following the comprehensive revision of point FCL.725(d) (see detailed explanations in the rationale for that point), the wording of point 13 had to be adjusted. SPO and MPO in principle are no longer subject to licence endorsements, except for an initial type rating issue after training and a skill test in MPO only. In that case, the new point FCL.725(d) provides for such an MPO limitation in all cases; hence, the term ‘non-complex’ is deleted (for further explanations, see the rationale for point FCL.725(d)).

GM1 Appendix 9 Section A point 1

FRAMEWORK FOR THE MANDATORY USE OF A FULL-FLIGHT SIMULATOR IN CASE OF SINGLE-PILOT AEROPLANES AND HELICOPTERS

(a) Partial availability of FFS and additional in-aircraft training

Appendix 9, Section A, point 1 requires training to be conducted in a full-flight simulator (FFS), if available, and in the case of single-pilot aeroplanes (SPAs) and helicopters, accessible. In that context, an FFS can be deemed ‘available’ only to the extent to which that FFS can, based on its capabilities, serve as training platform for class rating or type rating training. For example, if the FFSs that exist for a particular type of aircraft can only serve as a training platform for 80 % of the type rating training syllabus (e.g. in the case of helicopters, near-ground manoeuvres cannot be simulated appropriately), that FFS is ‘available’ only to 80 % of the training syllabus. For the remaining 20 % of the training syllabus, an FFS is not deemed available; therefore, additional training in a combination of an FSTD and the aircraft is necessary to cover the remaining 20 % of the training syllabus (as per Appendix 9, Section A, point 1, fourth point, point (b)).

(b) In-aircraft training arrangements in older operational suitability data (OSD) for flight crew

The framework and conditions for the mandatory use of FFSs and other flight simulation training devices (FSTDs) in training, skill tests, and proficiency checks for class ratings and type ratings were introduced into Part-FCL, Appendix 9, Section A, point 1 through Regulation (EU) 2018/1974⁸ and became applicable as from 20 December 2019. From that day, training, skill tests, and proficiency checks for class ratings and type ratings for SPAs and helicopters need to be conducted in FFSs, or in other FSTDs in combination with in-aircraft training, in accordance with the currently applicable Part-FCL, Appendix 9, Section A, point 1. Completing training courses solely in the aircraft is only possible in the case of SPAs or helicopters for which no FSTD exists.

⁸ Commission Implementing Regulation (EU) 2018/1974 of 14 December 2018 amending Regulation (EU) No 1178/2011 laying down technical requirements and administrative procedures related to civil aviation aircrew pursuant to Regulation (EU) 2018/1139 of the European Parliament and of the Council (OJ L 326, 20.12.2018, p. 1) (<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32018R1974&qid=1680275113066>).



Training considerations (not mandatory training elements) in OSD for flight crew which was established prior to 20 December 2019 may refer to in-aircraft training although an FFS exists for the respective type of aircraft. Today, those OSD for flight crew need to be understood in the light of the requirements of the currently applicable Part-FCL, Appendix 9, Section A, point 1, as those requirements do not allow OSD to determine alternative training platform arrangements (OSD cannot overrule Part-FCL, Appendix 9 as regards the requirements of that Appendix for the use of FSTDs). This means that the in-aircraft training content that is referred to in training considerations for flight crew in such older OSD after 20 December 2019, needs to be delivered in an FFS in accordance with Part-FCL, Appendix 9, Section A, point 1, and considering the content of point (a) of this GM.

Rationale

RMT.0587

After repeated requests from industry on how to interpret Part-FCL, Appendix 9, Section A, point 1 in specific cases, EASA proposes to introduce this new GM for clarification.

Firstly, Part-FCL, Appendix 9 must not be interpreted as requiring the completion of type rating training exclusively on available and accessible FFSs, when for particular reasons, those FFSs cannot serve as a training platform for all required training exercises. In that context, FFSs must be understood to be only 'partially available and accessible', with consequences as explained in the GM.

Secondly, considerations in older OSD reports with regard to the training platform to be used cannot bypass the principles that are set out in Part-FCL, Appendix 9, Section A, point 1 and must be reinterpreted to be in line with those principles.

Appendix I to ANNEX VI (Part-ARA) – Flight crew licence

[...]

(a) [...]

(2) Variable items

[...]

(XIII) remarks: i.e. special endorsements relating to limitations and endorsements for privileges, including endorsements of language proficiency; and remarks on the automatic validation of the licence, ~~and ratings for Annex II aircraft, when used for commercial air transportation~~; and

[...]



Rationale

RMT.0587

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

