



## Position Paper: Managing the Pilot Training and Licensing Extension: Second option for National Aviation Authorities to grant alleviations to avoid the increase in volume of training ("Stacking effect")

### Context

In March 2020, the COVID-19 crisis has created the need for both training organizations and operators to extend the period of validity of the pilot license and associated ratings (including the instructor one), to provide similar flexibilities to the operator recurrent training and checking requirements, and to find solutions for the pilots to maintain sufficient recent experience in the cockpit.

National Aviation Authorities have globally approved, for a limited period, exemptions to the traditional licensing and operational requirements. This has been possible for operators and training organizations that have implemented suitable special conditions of operations monitored by their respective Safety Management Systems.

The value of those exemptions was clearly to maintain operations when the training capacity was limited, or when the administrative licensing revalidation process was disturbed. Nevertheless, the positive aspects of the license or the operator training validity extension for a few months (generally 3 to 4 months) represents some challenges for IATA members, which need to be addressed to ensure a safe and efficient return to normal operations.

### **Problem Statement:** Potential cumulative training effect due to states' exemption applicability date to individual flight crew members.

The states' exemptions are often granted for a period of a few months (generally from 2 up to 4 months) to extend the validity period of training or checking of each concerned individual crew member.

The concerned flight crew members are identified by their license and associated ratings expiry date and the expiry date of their operator recurrent training and checking.

The states alleviations mention a threshold (specific date) applicable to the expiry date after which the license holder won't be eligible to the alleviation.

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### Example of a typical National Aviation Authority (NAA) alleviation wording

Provided that the regular validity period of a rating or a certificate expires before DD/MM/YYYY, that validity period is extended as follows:

- (1) by "X" months, in the case of class ratings, type ratings and instrument ratings ....
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Although those initial exemptions have been very helpful to maintain operations, they will induce a “stacking effect” on the amount of training to be carried out from still uncertain return to service until the end of the application of the exemption.

The stacking effect is due to the segregation of two pilot populations: those who are eligible to the alleviation and those who are not eligible to the alleviation. The consequence is that the day after the threshold date the pilots that have benefited from the alleviation must perform their recurrent training and checking along with the pilots that have not benefited from the alleviation. The result is that the volume of training is multiplied by two compared to the pre-COVID situation and the industry needs the maximum of training capacities in the context of restart of operations.

**Solution:** IATA proposes that states offer a second option for alleviations which extends the period of validity of recurrent training and checking for the entire operator’s flight crew members population.

This second option will allow operators to maintain a uniform and balanced training schedule. Furthermore, it must be stressed that giving some flexibility and time for the operators to organize the return to normal operations, will help them work on the most adequate training to be provided.

As a matter of fact, this option will allow operators to postpone their entire recurrent training cycle and thus avoid the following undesirable effects:

- The accumulation of training and checking to cope with in a reduced period of time which will repeat over the years. These repeated stacking effects will put the training department under regular stress and consequently compromise the quality of the training and checking provided.
- Difficulties in managing the three-year cycle of training programs which is normally perfectly balanced. The great induced disruption will lead to risks of errors and misses (e.g. to name a few; the revision of major failures of aircraft systems and associated procedures, UPRT exercises during simulator sessions)

This option can be achieved by avoiding mentioning a threshold (specific date) applicable to the expiry date after which the license holder won’t be eligible to the alleviation.

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### Example of NAA alleviation wording for Option 2

Provided that the regular validity period of a rating or a certificate expires before 31 March 2021 inclusively, that validity period is extended as follows:

- (1) by “X” months, in the case of
  - (i) class ratings, type ratings and instrument ratings ....



The duration of the exemption period (X months) should be limited to the 31<sup>st</sup> of March 2021, as per ICAO's recommendation.

**Refer to ANNEX 1 for an example of alleviations** that extend the period of validity of recurrent training and checking for the entire operator's flight crew members population.



## Annex 1 – Example of alleviations that extend the period of validity of recurrent training and checking for the entire operator flight crew members' population.

### Exemption from regulation (EU) 2018/1139 - COVID-19 XXX/D71.1/COVID-19-2-01

<b>Operator involved</b>	Operator holding an air operator certificate
<b>Exemption reference</b>	XXX/D71.1/COVID-19-2-01
<b>Exemption type</b>	Exemption issued in accordance with Article 71(1) of Regulation (EC) N°2018/1139
<b>Exempted requirements</b>	<b>Regulation (EU) No 1178/2011:</b> <ul style="list-style-type: none"><li>- Points FCL.625, FCL.740, FCL.940 and FCL.1025 of annex I (Part-FCL)</li><li>- Point MED.A.045 of annex IV (Part-MED)</li></ul> <b>Règlement (EU) No 965/2012 :</b> <ul style="list-style-type: none"><li>- Points ORO.GEN.110, ORO.FC.230, ORO.FC.330, ORO.FC.A.245, ORO.CC.140 of annex III (Part-ORO)</li><li>- SPA.DG.105 of annex V (Part-SPA)</li></ul>
<b>Aircraft involved</b>	All aircraft
<b>Exemption clauses</b>	<p>(a) Qualifications, certificates and authorisations issued in accordance with Annex I (Part-FCL), Annex IV (Part-Med) and Annex V (Part-CC) of Regulation (EU) No 1178/2011</p> <p>Provided that the regular validity period of a rating or a certificate expires before <b>31 March 2021</b> inclusive, that validity period is extended as follows:</p> <p>(1) by 4 months from the initial date of expiry in the case of:</p> <ul style="list-style-type: none"><li>(i) class ratings, type ratings and instrument ratings endorsed in Part-FCL commercial pilot licences (CPL, MPL, ATPL) for operating aircraft representing those classes and types within an organisation for which Annex III (Part-ORO) to Regulation (EU) No 965/2012 is applicable;</li><li>(ii) Part-MED Class 1 medical, with the same restrictions, if any, of holders of the ratings and certificates specified in point (i) above;</li><li>(iii) part-FCL instructor and examiner certificates the holders of which are involved in training and checking of holders of the class and type ratings specified in point 1(i) above;</li><li>(iv) cabin crew medical reports, with the same restrictions, if any, issued in accordance with point MED.C.030 of Part-MED</li></ul> <p>If the French Civil Aviation Authority considers that the reasons for granting this Exemption justify an additional extension of the validity period of the rating or certificate, it may allow the operator an additional extension of up to 2 months.</p>

- (b) Training and checking in accordance with Annex III (Part-ORO) to Regulation (EU) No 965/2012

Provided that the regular validity period of training and checking, as set out in the applicable training and checking requirements of Part-ORO, expires before **31 March 2021** inclusive, that validity period of all of the following is extended by 4 months:

- (1) Operator Proficiency Checks (OPC) in accordance with paragraphs ORO.FC.230 (b) and ORO.FC.330 of Part-ORO
- (2) Operator line-oriented evaluations (LOE) in accordance with ORO.FC.A.245 (d), if applicable
- (3) operator emergency and safety equipment training and checking in accordance with ORO.FC.230 (d) of the Part-ORO
- (4) the operator's ground and flight training and drills in accordance with ORO.FC.230 (f) of the Part-ORO
- (5) training and periodic checking of the operator's cabin crew in accordance with ORO.CC.140 of the Part-ORO
- (6) operator line checks (LC) in accordance with ORO.FC.230 (c) of the Part-ORO
- (7) Dangerous goods recurrent training in accordance with ORO.GEN.110 (j) of the Part-ORO and, where applicable, in accordance with SPA.DG.105 (a) of the Part-SPA, for flight and cabin crews ;
- (8) Operator crew resource management (CRM) recurrent training in accordance with point ORO.FC.230 (e)(1) and (e)(2) of Part-ORO

The list above includes any applicable Part-SPA recurrent training and checking elements.

If the (name of the state) Civil Aviation Authority considers that the reasons for granting this Exemption justify an additional extension of the validity period of relevant training and checking, it may allow the operator an additional extension of up to 2 months.

**Exemption validity period** The validity periods for licences, rating, training and checking addressed in this exemption cannot be extended of more than **8 months**.

**Technical conditions**

- (A)
- (1) Part-FCL licence holders benefiting from this exemption shall comply with all of the following:

- (a) they shall hold a valid class or type rating on March 16, 2020
- (b) they shall operate under the management system of an organisation for which Part-ORO is applicable
- (c) they shall have received refresher training, followed by the completion of an assessment by means established by the operator to determine that the required level of knowledge to operate the applicable class or type is maintained. That assessment shall include class – or type – specific abnormal and emergency procedures..

Upon successful completion of the refresher training and the assessment as per point (c), the new expiry date of the relevant rating shall be endorsed in the licence of the pilot or in a supplementary document to the licence compliant with the format established by the French CAA, by the competent authority or a Type Rating Examiner (TRE) acting in accordance with point FCL.1030, as applicable.

- (2) Part-MED Class 1 medical certificate holders benefitting from this exemption shall hold a valid Class 1 medical certificate on 16 March 2020, including with an associated medical restriction, unless a TML limitation or a SIC limitation is or are stated on the medical certificate.
- (3) Part-MED cabin crew medical report holders benefitting from this exemption a cabin crew medical report valid on 16 March 2020, including with an associated medical restriction, unless a "TML" or a "SIC" limitation is or are stated on the medical report.
- (4) Part-FCL instructors and examiners certificate holders benefitting from this exemption shall hold a valid instructor and, if applicable, a valid examiner certificate on 16 March 2020. The new expiry date must be endorsed on the certificate of the instructor or examiner concerned or on a supplementary document to the certificate compliant with the format established by the (name of the state) CAA, by the competent authority or an examiner designated by the operator acting in accordance with paragraph FCL.1030 ;
- (5) Operators benefitting from this exemption should comply with all the following conditions:
  - (a) The operator shall ensure that the initial expiry dates of the concerned training and checking is beyond 16 March 2020
  - (b) The operator shall ensure that flight crew members benefitting from this exemption comply with the refresher training specified in point (1) above in all the following cases:
    - (i) operator proficiency checks (OPC) in accordance with point ORO.FC.230(b);
    - (ii) line checks in accordance with point ORO.FC.230(c);



(iii) line-oriented evaluation in accordance with point ORO.FC.A.245(d), if applicable.

(c) In addition to point (a) above, the refresher training referred to in point (1)(c) shall include any additional elements related to Part-SPA, if applicable.

(d) The operator shall ensure that crew members receive additional training "through any means" in all the following cases:

- (i) operator emergency and safety equipment training and checking in accordance with ORO.FC.230 (d)
- (ii) ground and flight training in accordance with point ORO.FC.230 (f)
- (iii) Recurrent training and checking of cabin crew in accordance with point ORO.CC.140
- (iv) recurrent training on dangerous goods in accordance with ORO.GEN.110 (j) and, if applicable, SPA.DG.105 (a)
- (v) crew resource management recurrent training in accordance with ORO.FC.230 (e)(1) and (e)(2)

Note: The intent of "through any means" is that operators provide additional training to crew members in order to compensate for the extended validity of the different training elements of Part-ORO and Part-SPA, as applicable. This could be done for example via briefing/leaflet/bulletin/CBT/video.

B) This exemption applies to the following number of crew members :

- a. XX flight crews ;
- b. XX cabin crews.

**Associated administrative conditions**

The validity period of rating, certificate, training or checking of a crew member which have already been extended under exemption XXX/D71.1/COVID-19-01 cannot be extended again under the present exemption XXX/D71.1/COVID-19-2-01.

In accordance with provisions of Article 71(1) of Regulation (EU) No 2018/1139, this derogation shall be notified to the EASA, the European Commission and the other Member States.

<b>Written by:</b>	<b>Checked by:</b>	<b>Approved by:</b>  <b>Date of signature:</b>
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