



EUROPE AIR SPORTS

The Association representing European National Aero Clubs and Air Sports -
Organizations in Regulatory Matters with European Authorities and Institutions

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Cover note on NPA 2014-29 by the Board of Europe Air Sports

The main objective of Notice of Proposed Amendment (NPA) 2014-29 is to introduce the long syllabus and Learning Objectives (LOs) for professional licences and instrument ratings in the EASA regulatory system. It also aims to resolve inconsistencies identified after the adoption of the FCL Implementing Rules to ensure that the EASA regulatory system reflects the state of the art, and specifically the best practices developed in the Member States, in the field of pilot training.

The parts are:

NPA 2014-29 (A) with the Explanatory Note and the changes to the rule text of 'Annex I — Part-FCL', 'Annex II — Conditions for the conversion of existing national licences and ratings for aeroplanes and helicopters', and 'Annex III — Conditions for the acceptance of licences issued by or on behalf of third countries'. It comes in a consolidated version comprising all changes since the initial publication of Part-FCL in 2011 in (EU) No. 1178/2011, amended by (EU) No. 290/2012, (EU) No. 70/2014, (EU) No. 245/2014. Chapter 2 Explanatory Note, paragraphs 2.1 to 2.4.3, pages 10 to 24, deliver the information needed to understand the objectives of all parts of the NPA. At this stage already four remarks:

- 1) FCL.035 a(2) is amended with an important clarification for "Crediting of flight time": When flight time is completed during flights operated in the same class or type of aircraft falling under points (a), (b), (c) or (d) of Annex II to Regulation (EC) No 216/2008, it shall be given full credit for the purpose of issue, revalidation or renewal of a licence, rating or certificate.
- 2) FCL.1005 "Limitation of privileges in case of vested interests" maintains the original wordings, it does not reflect what was discussed in October 2014 at the EASA Committee Meeting.
- 3) FCL.1035.SE "Specific Requirements for the Senior Examiner – SE" are introduced.
- 4) What was discussed in our community as regards "Competence-based Instrument Rating" (CB-IR) and "En-route Instrument Rating" (EIR) comes in Appendix 6.

NPA 2014-29 (B) contains the changes to the existing AMC and GM texts. **Of particular importance: AMC1 FCL.140.A Recency requirements; FCL.740.A(b)(1)(ii) Revalidation of class and type ratings — aeroplanes:**

"All hours flown on any aircraft registered in an ICAO Contracting State shall count in full towards fulfilling the hourly requirements of this Part as long as the aircraft matches the definition and criteria of the respective Part-FCL aircraft category as well as its class and type ratings."

NPAs 2014-29 (C)(1), (C)(2), (C)(3) contain the new AMC with the Flight Examiner Manual (FEM).

NPAs 2014-29 (D)(1) and (D)(2) contain the new AMC with the "Learning Objectives" (LOs) as two separate parts of the FEM..

The proposed changes are expected to increase safety, reduce regulatory burden on Member States, improve harmonisation, ensure compliance with ICAO, and improve proportionality of the rules for General Aviation by applying the principles of the "General Aviation Road Map", statement made by the Agency.

Considering the bandwidth of these seven parts of NPA 2014-29 we propose to our members to individually study the paragraphs of interest and to send **comments to the Programme Manager until 3 March 2015**, the comment period ends on 17 March 2015.

For assistance please contact our Programme Manager via the E-mail address

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