



ECA - IFALPA POSITION ON THE ICAO FCLTP TRANSPOSITION INTO JAR FCL

1. GENERAL COMMENT: TIMING URGENCY, RISK ASSESMENT, SAFETY

ECA and IFALPA are surprised by the urgency expressed for the implementation of ICAO FCLTP proposals.

The ICAO document proposes a new type of training, which has not been tested, and which contains many controversial topics that need to be discussed. The implementation of responsible safety regulations calls for a more thorough analysis and a broader technical preparation than is evidenced in this regulation..

ECA and IFALPA consider that the proposed rushed implementation of the ICAO MPL represents a real threat to safety as it downgrades current, established training standards and establishes a completely different and non conventional training philosophy that envisions a considerable reduction in real flying hours.

ECA and IFALPA believe that there should be a serious debate on any modifications to the current licensing system, and that such modifications should be based upon scientific impact assessment and risk analysis reports.

THEREFORE:

ECA and IFALPA proposes that, before the JAA approves the transposition of the ICAO FCL TP into JAR FCL, a proper validation and assessment programme is carried out, and that appropriate monitoring mechanisms for any new programme implemented are established.

ECA and IFALPA believe that the validation and monitoring programs shall be developed at European level (Initially by the EU and when appropriate by EASA), with the aim of defining standards.

A centralised monitoring body with representatives from all of the involved professionals shall be established. This body would be responsible for the following:

- The validation of the implementation in the successive approach (PANS Chapter3 att. A 2. 3. "step by step" approach)
- The issuance of the provisional approvals
- The decisions on changes from provisional to steady approval

- The oversight on uniform application (guaranteeing uniform level of application, verification of the links between the FTO, the Airline and the graduates etc).

Pilot representatives shall be fully associated in all these processes.

2. ACTUAL FLYING HOURS

The reduction in actual flying hours in the *Integrated Multi-Crew Pilot Licence training course* by 50% is **UNACCEPTABLE**.

The ICAO text does not impose any reduction in actual flying hours and ECA and IFALPA believe that maintaining a high number of actual flying hours will ensure the current quality standards. The proposed reduction will represent a significant downgrade in the quality of training and will be a risk to aviation safety.

To allow the authorities and the experts to analyse the impact of the change in the quality of training, any reduction in actual flying hours should be reasonable and only implemented by a phased programme.

3. NECESSARY LINK BETWEEN FTO'S AND OPERATORS

Only FTO's linked to an airline should receive approval to issue MPL's. The reason for this restriction is the need for effective control by an organization with the knowledge and understanding of competency-based training in the multi-pilot environment. Supervision, control, and feedback of the training cannot be assured if the direct link between the airline and the training entity disappears.

4. INVOLVEMENT OF PROFESSIONAL PILOTS ASSOCIATIONS

ECA and IFALPA encourage the JAA and the Member States to involve further the professionals that are directly concerned and affected by the proposed current and any future changes in legislation. The lack of involvement of pilot organisations at early stages of this important reform will result in a broad rejection of the proposal by these professionals.

5. CONCLUSION

The general opinion of the pilot organisations is that the current proposal represents a very real threat to safety because it downgrades the training quality standards and is driven mainly by an economic interest. It should therefore be rejected in its present form and adapted to the above mentioned criteria under the involvement of the pilot organisations.

6. DETAILED COMMENTS

Please see detailed comments as notes to the JAA draft report (attached). Comments concern proposed changes to:

- JAR-FCL 1.001

Aircraft required to be operated with a co-pilot.

A type of aircraft that is required to be operated with a co-pilot as specified by the type certificate or the air operator certificate.

As the licence is granting privileges to fly this type of aircraft, any mention here to single-pilot aircraft within an AOC requiring two pilots is not appropriate.

THEORETICAL KNOWLEDGE EXAMINATION

10 An applicant shall demonstrate the level of knowledge appropriate to the privileges of the holder of an ATPL(A), in accordance with the requirements in JAR-FCL 1 (Aeroplane) Subpart J.

Needs to be added: the test for the Theoretical part of the Type rating

- Appendix 1c to JAR-FCL 1.055

New paragraph 7, and renumber other paragraphs

7 The skill test for the issue of a MPL(A) shall be taken with a TRE(A) designated and authorised by the JAA approving Authority , provided that the examiner is authorised in accordance with JAR-FCL Subpart I and completely independent from the FTO except with the expressed consent in writing of the approving Authority

Given the difficulty of having a TRE completely independent from FTOs, an independent organization, like a Professional Pilot Association, should control the TRE for each exam that has to be made, thus isolating the pass or the failure of the exam from any of commercial aspects.

- JAR-FCL 1.155

JAR-FCL 1.155 Experience and crediting

The same should apply JAR-FCL 1.190. Otherwise, a pilot trained in IR in a multi-crew environment, who desires to have the privileges to fly solo IR, only needs to go through the skill test without any other additional training required.

- JAR-FCL 1.330

(g) the issue of a MPL(A), only during the core flying skills phase of training, provided that the FI(A) has completed at least 500 hours of flight time as a pilot of aeroplanes including at least 200 hours of flight instruction and the requirements of JAR-FCL 1.310(d) are met.

Basic phase is a multi-crew phase, and the FI is not required to have that experience. It should not be possible for senior instructors to give simulator in FNPT II for the instrumental rating. IR training was designed to be in a multi-pilot environment Therefore, the FI should have that type of experience. So “basic” is deleted from the paragraph. Only SFI’s and TRI’s will be allowed to give instruction on this basic phase.

- JAR-FCL 1.360

(1) the instruction required during the basic, intermediate and advanced phases of training of the MPL(A) course (See Appendix 1 to JAR-FCL 1.525), provided the requirements of JAR-FCL 1.310(d) are met.

Measures should be established to control times of activity of these instructors, as the majority of them will be working for an airline. If other FTO's are approved, the need of TRI's will increase the number of pilots working for two different operators. If they work for their own airline, this may do the job of controlling this times of activity.

- Appendix 1 to JAR-FCL 1.525

The course shall be provided by an operator of aircraft as referred to in paragraph 1 above or a training organisation having arrangements with such an operator.

More extensive rules on the content of the agreements are needed. Control over the training by the operator and by the pilot professional representatives is needed

* * *

20 Dec. 2005