

# PREPARING FOR AFTER COVID 19

*from a National Aviation Authority perspective*



Expertise and Consultancy Office of the French Civil Aviation

## Preparing for after COVID 19

With the COVID 19 crisis, many airlines, maintenance organizations; training organizations had to stop or adapt their activities. The National Aviation Authorities (NAA) had also to postpone the majority of their oversight activities planned as part of their surveillance process, especially on-site audits and inspections. As a consequence, to go back to normal operations, organizations and NAA will have to set up a recovery plan in order to ensure the safety of the operations and to catch up with deadlines that fell during this period.

The goal of this document is to **highlight the regulatory provisions contained in ICAO Annex 1, 6, 8 and 18 that may be affected by this period of inactivity** and for which the NAA and organizations should have a thorough review to accompany a return to normal operation. **The continuous compliance with regulations should be combined with a safety decision-making process conducted by the NAA together with the SMS of approved organizations.**

This document is based on requirements contained in Annexes to the Chicago Convention, each State being responsible to promulgate them in their own national regulations.

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## 1. Operations of aircraft:

### 1.1 Air Operator Certificate and its Operations specifications

Annex 6 Part 1 contains the requirements for air operators to operate international air transport with aeroplane. It also provides requirements to the NAA as the State of the Operator or the State of Registry.

The NAA has to grant the airlines its Air Operator Certificate (AOC) with its Operations specifications and also approvals and acceptance that are listed throughout the Annex, as summarized in Attachment D.

*A 6 4.2.1.3 The issue of an air operator certificate by the State of the Operator shall be dependent upon the operator demonstrating an adequate organization, method of control and supervision of flight operations, training programme as well as ground handling and maintenance arrangements consistent with the nature and extent of the operations specified.*

*A6 4.2.1.4 The continued validity of an air operator certificate shall depend upon the operator maintaining the requirements of 4.2.1.3 under the supervision of the State of the Operator.*

According to Doc 8335, the NAA is responsible to monitor the operation by a systematic procedure which establishes safety oversight inspections. During a period like the COVID-19 such supervision was on hold or very limited. Many of the authorizations, approvals will still be valid to go back to normal operations but **the validity of some authorizations may be exceeded and the audits/inspections to be performed by the NAA for their renewal could not be realized.**

| Reference   | Designation of the requirement | Responsibility                      | Validity/duration                             | Comments   |
|---|--------------------------------|-------------------------------------|---|--|
| A6 4.2.1.1<br>A6 4.2.1.4<br>A6 App 6<br>Doc 8335<br>Chap4 | Air Operator Certificate       | Issued by the State of the operator | Validity decided by the State of the Operator | If no period of validity, should be mentioned on the AOC |

| Reference              | Designation of the requirement | Responsibility                      | Validity/duration | Comments |
|------------------------|--------------------------------|-------------------------------------|-------------------|----------|
| A6 4.2.1.2<br>A6 App 6 | Operations specifications      | Issued by the State of the operator | Linked to the AOC |          |

During the COVID-19 crisis, some States may have issued orders or laws to extend the validity of the AOC or other authorizations, on the basis of safety analysis. **The NAA has to prepare a new safety oversight inspections plan** to implement as soon as the operations can restart.

On their side, **each air operator should have, through its Safety Management System, assessed the safety risks on their operations due to the “break”** imposed by COVID 19 crisis. ICAO Annex 19 and Doc 9859 Safety Management Manual contain requirements and guidelines to implement those. Air operators need to identify the areas at risk and pay special attention to them to prepare a recovery plan, to implement mechanisms for the resolution of safety risks. These analyses should be shared with the NAA who is responsible for continuous oversight and who may decide to extend some validity, to perform “remote” inspections through videos, pictures, documents reviews.

The **analysis of the regulation below shows that special attention should be paid to the requirements regarding maintenance of the aircraft and flight crew training**. It should be combined with the safety analysis performed by the air operators and NAA mentioned before.

## 1.2 Flight crew

Annex 1 gives the requirements for the initial licensing of flight crew and Annex 6 contains the requirements for their training, experience, special qualifications.

For flight crews operating international flights under the AOC of the airlines employing them, these requirements are usually taken into account in the flight crew scheduling system. This system implements the Flight training programme approved by the NAA (Annex 6 §9.3.1).

However, **during a period of inactivity such as the one we are facing with the COVID 19 crisis, all the flight crew schedules have to be reviewed and some period of validity may have expired**. Some flight crew may have to be scheduled on some training before flying. In order to avoid an important number of trainings and checks, each air operator should have a plan to prioritize the training schedule of their flight crew and should share it with the NAA.

| Reference  | Designation of the requirement  | Responsibility   | Validity/duration                   | Comments  |
|------------|---|--|-------------------------------------|---|
| A6 9.4.4   | <p><b>Pilot proficiency checks:</b></p> <ul style="list-style-type: none"> <li>- twice within any period of one year</li> <li>- Two such checks similar and in a period of 4 consecutive months do not satisfy the requirements</li> </ul>  | Operator, supervised by the State of the operator      | Due twice a year                    | A6 9.4.4.2: combination possible for variants; decided by the State of the operator   |
| A6 9.4.1   | <p><b>Recent experience:</b> <u>pilot-in-command</u> or a <u>co-pilot</u> to operate at the flight controls of a type or variant of a type of aeroplane during take-off and landing unless that pilot has operated the flight controls during at least <b>three take-offs and landings within the preceding 90 days</b> on the same type of aeroplane or in a flight simulator approved for the purpose</p>   | Operator, supervised by the State of the operator      | Validity in the preceding 90 days   | A6 9.4.1.2 combination possible for variants; decided by the State of the operator  |
| A6 9.4.2   | <p><b>Recent experience</b> — <u>cruise relief pilot</u> : a pilot to act in the capacity of cruise relief pilot in a type or variant of a type of aeroplane unless, within <b>the preceding 90 days</b> that pilot has either:</p> <ul style="list-style-type: none"> <li>a) operated as a pilot-in-command, co-pilot or cruise relief pilot on the same type of aeroplane; or</li> <li>b) carried out flying skill refresher training including normal, abnormal and emergency procedures specific to cruise flight on the same type of aeroplane or in a flight simulator approved for the purpose, and has practiced approach and landing procedures, where the approach and landing procedure practice may be performed as the pilot who is not flying the aeroplane.</li> </ul> | Operator, supervised by the State of the operator      | Validity in the preceding 90 days   | A6 9.4.2.2: same as above, combination decided by the State   |
| A6 9.5.3.5 | <p><b>Route qualification:</b> The operator shall not continue to utilize a pilot as a pilot-in-command on a route or within an area specified by the operator and approved by the State of the Operator unless, <u>within the preceding 12 months</u>, that pilot has made at least one trip as a pilot member of the flight crew, or as a check pilot, or as an observer in the flight crew compartment:</p> <ul style="list-style-type: none"> <li>a) within that specified area; and</li> </ul>   | The operator and approved by the State of the Operator | Validity in the preceding 12 months | 9.4.3.6 In the event that more than 12 months <b>elapse in</b> which a pilot-in-command has not made such a trip on a route in close proximity and over similar terrain, within such a specified area, route or aerodrome, and has not practiced such |

| Reference                              | Designation of the requirement   | Responsibility                           | Validity/duration  | Comments  |
|--|--|--|--|---|
|  | b) if appropriate, on any route where procedures associated with that route or with any aerodromes intended to be used for take-off or landing require the application of special skills or knowledge  |  |  | procedures in a training device which is adequate for this purpose, prior to again serving as a pilot-in-command within that area or on that route, that pilot must <b>requalify in accordance</b> with 9.4.3.2 and 9.4.3.3 |
| A6 9.4.5.1                             | Requirements of experience, recency and training applicable to <u>single pilot operations intended to be carried out under the IFR or at night.</u>  | Established by the State of the Operator | Validity established by the State of the Operator              | A6 Rec 9.4.5.2 gives these periodicity  |
| A6 chap 14<br>A18 Chap 10 and Doc 9284 | Dangerous goods training programme for operators approved or not approved to transport DG by air   | State of the operator                    | Recurrent training provided <u>within 24 months</u> (Doc 9284) | Doc 9284 Technical instructions Part 1 Chapter 4  |
| A1 1.2.9<br>A1 App1                    | Language Proficiency: for aeroplane, airship, helicopter and powered-lift pilots, ability to speak and understand the language used for radiotelephony communications to the level specified in the language proficiency requirements in Appendix 1 (ICAO level 4 minimum Att A) | Licence Holder                           | Validity depending on the level obtained                       | Below the Expert Level (Level 6) shall be formally evaluated at intervals in accordance with an individual's demonstrated proficiency level.<br>Rec 1.2.9.6; level 4, every 3 years, level 5 every 6 years                  |

Flight crew may also have their Medical assessment (class 1 or Class 2) due during the period. Annex 1 explicitly provides the possibility for the licensing authority to extend the medical assessment up to 45 days.

| Reference  | Designation of the requirement   | Responsibility | Validity/duration                     | Comments |
|------------|--|----------------|---------------------------------------|----------|
| A1 1.2.5.2 | <u>Validity of medical assessment</u><br>— <b>60 months</b> for the private pilot licence — aeroplane, airship, helicopter and powered-lift; | Licence holder | Validity depending on the licence and |          |



| Reference       | Designation of the requirement   | Responsibility      | Validity/duration                      | Comments   |
|-----------------|--|---------------------|--|--|
|                 | <ul style="list-style-type: none"> <li>— <b>12 months</b> for the commercial pilot licence aeroplane, airship, helicopter and powered-lift;</li> <li>— <b>12 months</b> for the multi-crew pilot licence aeroplane;</li> <li>— <b>12 months</b> for the airline transport pilot licence aeroplane, helicopter and powered-lift;</li> <li>— <b>60 months</b> for the glider pilot licence;</li> <li>— <b>60 months</b> for the free balloon pilot licence;</li> <li>— <b>12 months</b> for the flight navigator licence;</li> <li>— <b>12 months</b> for the flight engineer licence</li> </ul> |                     | the age of the holder (see below)      |  |
| A1<br>1.2.5.2.2 | <ul style="list-style-type: none"> <li>- airline transport pilot licences — aeroplane, helicopter and powered-lift,</li> <li>- commercial pilot licences — aeroplane, airship, helicopter and powered-lift,</li> </ul> <p><u>in single-crew commercial air transport operations carrying passengers</u><br/>passed their <b>40th birthday</b><br/>the period of validity shall be reduced to <b>six months</b>.</p>  | Licence holder      | Validity is 6 months if more than 40   |  |
| A1<br>1.2.5.2.3 | <ul style="list-style-type: none"> <li>- <u>airline transport pilot licences</u> — aeroplane, helicopter and powered-lift,</li> <li>- <u>commercial pilot licences</u> — aeroplane, airship, helicopter and powered-lift,</li> <li>- <u>multi-crew pilot licences</u> — aeroplane,</li> </ul> <p>In commercial air transport operations,<br/>passed their <b>60th birthday</b>,<br/>the period of validity shall be reduced to <b>six months</b>.</p>  | Licence holder      | Validity is 6 months if more than 60   |  |
| A1<br>1.2.5.2.4 | <ul style="list-style-type: none"> <li>- <u>private pilot licences — aeroplane, airship, helicopter and powered-lift, free balloon pilot licences, glider pilot licences</u></li> </ul> <p>passed their <b>40th birthday</b>,<br/>the period of validity shall be reduced to <b>24 months</b>.</p>   | Licence holder      | Validity is 24 months if more than 40  |  |
| A1<br>1.2.4.4.1 | The period of validity of a Medical Assessment may be extended, at the discretion of the Licensing Authority, <b>up to 45 days</b> .   | Licensing Authority | Possibility of extension up to 45 days | In some States the extension is already included in the validity of their medical assessment |

### 1.3 Cabin crew

As explicitly stated in Doc 8335, there is no requirement in ICAO annexes for a licence for cabin crew members. Some states may have decided to issue such licence in their national regulation. However, Annex 6 explicitly mentions that operators shall have cabin crew training programme, approved by the State of the Operator and that **cabin crew shall complete a recurrent training programme annually**. Some details on the content of this programme can be found in Doc 10002 and provides some explanations to implement a requalification process in case of a stop in the activity of a cabin crew. The air operator should review its schedule of cabin crew training in order to provide regulatory training before flying.

| Reference                              | Designation of the requirement   | Responsibility                        | Validity/duration  | Comments   |
|--|--|---------------------------------------|--|--|
| A6 12.4                                | Cabin crew training programme<br><u>Cabin crew members</u> shall complete a <b>recurrent training programme annually</b> . | Approved by the State of the operator | Validity of 1 year   | Doc 10002: The content of recurrent training must be covered within the cycle defined by the State. The doc gives example of requalification process if training has expired |
| A6 chap 14<br>A18 Chap 10 and Doc 9284 | Dangerous goods training programme for operators approved or not approved to transport DG by air                           | State of the operator                 | Recurrent training provided <u>within 24 months</u> (Doc 9284) | Doc 9284 Technical instructions Part 1 Chapter 4   |

### 1.4 Flight dispatchers

The NAA has to approve the Method of control and supervision of the operator (A6 §10.1) and the flight dispatchers have then to be licensed in accordance with Annex 1. The operator is responsible for the recurrent training of its flight dispatchers on a periodicity determined in the training programme. Annex 6 mentions explicitly **the qualification flight that a flight dispatcher shall take in the preceding 12 months**.

| Reference  | Designation of the requirement  | Responsibility   | Validity/duration                   | Comments  |
|------------|---|--|-------------------------------------|---|
| A6 10.3 b) | Flight dispatcher training and one-way qualification flight in the crew compartment in the <u>preceding 12 months</u> | Operator, under the supervision of the State of the Operator | Validity in the preceding 12 months | Training Manual (Doc 7192), Part D-3 — Flight Operations Officers/Flight Dispatchers. |



| Reference                                    | Designation of the requirement   | Responsibility        | Validity/duration  | Comments   |
|--|--|-----------------------|--|--|
| A6 chap 14<br>A18 Chap<br>10 and Doc<br>9284 | Dangerous goods training programme for operators approved or not approved to transport DG by air | State of the operator | Recurrent training provided <u>within 24 months</u> (Doc 9284) | Doc 9284 Technical instructions Part 1 Chapter 4 |



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## 2. Maintenance

To ensure the continuous airworthiness of its fleet, the air operator has to establish a Maintenance control manual (acceptable to the State of Registry A6 §8.2.1), a maintenance programme (approved by the State of Registry A6 8.3.1), makes arrangement (or have its own) aircraft maintenance organization (A6 §8.1.2 and §8.7) with appropriate maintenance personnel, the one signing the maintenance release licenced in conformity with Annex 1 §4.2.

During the COVID 19 crisis, as many aircraft were grounded, the maintenance of aircraft may have been reduced to minimum. The quality system of the maintenance organization should not be completely stopped but some internal or subcontractors audits may had to be postponed. **The air operator and the maintenance organization should take all necessary measures to ensure safety and conformity to regulations. However some deadlines may fall during the period.** The NAA may take derogations/deviation to extend some period of validity as some licence may expire, some maintenance tasks may not be realized on time, the airworthiness certificate may expire etc..

*Annex 8 Part II 3.2.3 A Certificate of Airworthiness shall be renewed or shall remain valid, subject to the laws of the State of Registry, provided that the State of Registry shall require that the continuing airworthiness of the aircraft shall be determined by a periodical inspection at appropriate intervals having regard to lapse of time and type of service or, alternatively, by means of a system of inspection, approved by the State, that will produce at least an equivalent result.*

The Maintenance organization has to be approved in accordance with Annex 6, Part I, 8.7 or the aircraft are maintained and released to service under an equivalent system, either of which is acceptable to the State of Registry. **The Approved Maintenance Organization (AMO) is required to have a SMS (A6 8.7.3.1 and A19 3.3.2.1) which should be used to assess the risks implied by the Covid-19 break and to implement adequate safety actions.**

| Reference           | Designation of the requirement   | Responsibility   | Validity/duration   | Comments      |
|---------------------|--|--|---|---------------|
| A6 8.3.1<br>A8 10.3 | Maintenance tasks performed in conformity with the Maintenance programme | Approved by the State of Registry; acceptable to the State of the Operator | Maintenance tasks shall respect intervals                       |               |
| A8 PII Chap 3       | Certificate of airworthiness (CoA)                                       | Issued and renewed by the State of registry                                | Depending if the State writes on the CoA a periodic endorsement | Doc 9760 §4.6 |

| Reference            | Designation of the requirement   | Responsibility  | Validity/duration   | Comments                                    |
|----------------------|--|---|---|---|
|                      |  |   | (giving date of expiry) or a statement that the aircraft is being maintained under a system of continuous inspection. |   |
| A6 8.7               | Maintenance organization approval  | State of the organization together with State of registry | Validity as decided by the State  | Doc 9760 Part III Chap 10                   |
| A1 4.2<br>A6 8.7.6.3 | Aircraft maintenance licence;<br>To sign a maintenance release: recent experience <b>in the last 24 months</b> | Licence holder and/or its employer                        | Recent experience <b>in the last 24 months</b>  | Recent experience detailed in A1 4.2.2.2 c) |
| A6 8.7.6.4           | Continuation training for maintenance personnel  | Training programme of the maintenance organization        | Validity depending on the State regulation  | Doc 9760 10.7.2                             |

Other regulatory items are not listed here but may be concerned by a deadline during the COVID 19 crisis and have to be addressed by the organization: mass and balance report (periodicity depending on national regulation Doc 9760 PIII §7.6.2), calibration of tools and equipments etc.

### 3. The safe transport of dangerous goods by air

As mentioned before, the operator is responsible to provide recurrent training on the safe transport of dangerous goods by air to its personnel, in accordance with the Technical Instruction (Doc 9284) whether it is authorized or not to transport such goods (Annex 18 10.1). Chapter 4 of Doc 9284 Part 1 list all the persons concerned by Dangerous Goods training:

- a) shippers of dangerous goods, including packers and persons or organizations undertaking the responsibilities of the shipper;
- b) operators;
- c) ground handling agencies which perform, on behalf of the operator, the act of accepting, handling, loading, unloading, transferring or other processing of cargo or mail;
- d) ground handling agencies located at an airport which perform, on behalf of the operator, the act of processing passengers;
- e) agencies, not located at an airport, which perform, on behalf of the operator, the act of checking in passengers;
- f) freight forwarders;
- g) agencies engaged in the security screening of passengers and crew and their baggage and/or cargo or mail; and
- h) designated postal operators.

Personnel must be trained in the requirements commensurate with their responsibilities, as detailed in the Tables available in the Technical instructions which precise:

*4.2.3 Recurrent training must be provided within 24 months of previous training to ensure knowledge is current. However, if recurrent training is completed within the final three months of validity of previous training, the period of validity extends from the month on which the recurrent training was completed until 24 months from the expiry month of that previous training.*

All the dangerous **goods training that were postponed due to the Covid 19 Crisis should be rescheduled in order to be in compliance with the regulation.** The NAA may decide to extend some validity.

| Reference                                    | Designation of the requirement                                       | Responsibility             | Validity/duration  | Comments  |
|--|--|----------------------------|--|---|
| A6 chap 14<br>A18 Chap<br>10 and Doc<br>9284 | Dangerous goods recurrent training, as appropriate to each personnel | Depending on the personnel | Recurrent training provided <b>within 24 months</b> (Doc 9284) | Doc 9284 Technical instructions Part 1 Chapter 4 tables |

## 4. Medical Assessment and Medical examiners

### 4.1 Medical assessment

As mentioned before for Flight crew and below for Air traffic controllers, a medical assessment, provided by a medical examiner, applies for licence holders as follow:

*Ref A1 6.1.1:*

*Class 1 Medical Assessment; applies to applicants for, and holders of:*

- commercial pilot licences — aeroplane, airship, helicopter and powered-lift
- multi-crew pilot licences — aeroplane
- airline transport pilot licences — aeroplane, helicopter and powered-lift

*Class 2 Medical Assessment; applies to applicants for, and holders of:*

- flight navigator licences
- flight engineer licences
- private pilot licences — aeroplane, airship, helicopter and powered-lift
- glider pilot licences
- free balloon pilot licences

*Class 3 Medical Assessment; applies to applicants for, and holders of:*

- air traffic controller licences

Annex 1 §1.2.5.2 defines the validity of these medical assessments, and the reduction of periodicity for licences holders over a certain age. The licence holders (and their employers) are responsible to ensure their **medical assessment is still valid to exercise the privileges of their licence**. Because of the distancing measures taken during the COVID 19 crisis, the NAA may decide to extend some validity depending on the activity and age of the licence holder. It could also help medical examiners to catch up by spreading appointments. In the regulation, extension of validity of medical assessment is only possible up to 45 days (A1 1.2.4.4.1). Moreover, if the licence holder is operating in an area distant, there is a possibility of deferral of medical assessment (A1 1.2.5.2.6), but this requirement is not a major help in the case of Covid 19 crisis.

| Reference    | Designation of the requirement  | Responsibility | Validity/duration  | Comments |
|--------------|---|----------------|--|----------|
| A1 1.2.5.2   | <p><u>Validity of medical assessment</u></p> <ul style="list-style-type: none"> <li>— <b>60 months</b> for the private pilot licence — aeroplane, airship, helicopter and powered-lift;</li> <li>— <b>12 months</b> for the commercial pilot licence aeroplane, airship, helicopter and powered-lift;</li> <li>— <b>12 months</b> for the multi-crew pilot licence aeroplane;</li> <li>— <b>12 months</b> for the airline transport pilot licence aeroplane, helicopter and powered-lift;</li> <li>— <b>60 months</b> for the glider pilot licence;</li> <li>— <b>60 months</b> for the free balloon pilot licence;</li> <li>— <b>12 months</b> for the flight navigator licence;</li> <li>— <b>12 months</b> for the flight engineer licence;</li> <li>— <b>48 months</b> for the air traffic controller licence;</li> </ul> | Licence holder | Depending on the licence and the age of the holder (see below) |          |
| A1 1.2.5.2.2 | <ul style="list-style-type: none"> <li>- airline transport pilot licences — aeroplane, helicopter and powered-lift,</li> <li>- commercial pilot licences — aeroplane, airship, helicopter and powered-lift,</li> </ul> <p><u>in single-crew commercial air transport operations carrying passengers</u><br/>passed their <b>40th birthday</b><br/>the period of validity shall be reduced to <b>six months</b>.</p>   | Licence holder | Valid 6 months if more than 40                                 |          |
| A1 1.2.5.2.3 | <ul style="list-style-type: none"> <li>- <u>airline transport pilot licences</u> — aeroplane, helicopter and powered-lift,</li> <li>- <u>commercial pilot licences</u> — aeroplane, airship, helicopter and powered-lift,</li> <li>- <u>multi-crew pilot licences</u> — aeroplane,</li> </ul> <p>In commercial air transport operations,<br/>passed their <b>60th birthday</b>,<br/>the period of validity shall be reduced to <b>six months</b>.</p>   | Licence holder | Valid 6 months if more than 60                                 |          |
| A1 1.2.5.2.4 | <ul style="list-style-type: none"> <li>- <u>private pilot licences — aeroplane, airship, helicopter and powered-lift, free balloon pilot licences, glider pilot licences</u></li> <li>- <u>air traffic controller licences</u></li> </ul>   | Licence holder | Valid 24 months if more than 40                                |          |



| Reference       | Designation of the requirement   | Responsibility      | Validity/duration                      | Comments   |
|-----------------|--|---------------------|--|--|
|                 | passed their <b>40th birthday</b> ,<br>the period of validity shall be reduced to <b>24 months</b> .                                 |                     |  |  |
| A1<br>1.2.4.4.1 | The period of validity of a Medical Assessment may be extended, at the discretion of the Licensing Authority, <b>up to 45 days</b> . | Licensing Authority | Possibility of extension up to 45 days | In some States the extension is already included in the validity of their medical assessment |

It should be noted that Annex 1 gives clear responsibility to a licence holder *to not exercise the privileges of their licences and related ratings at any time when they are aware of any decrease in their medical fitness which might render them unable to safely and properly exercise these privileges (A1 1.2.6.1);* Annex 1 chapter 6 and Doc 8984 Manual of Civil Aviation Medicine give details on the content of each medical examination and, as an example, §6.3.2.9 emphasizes that *there shall be no acute disability of the lungs nor any active disease of the structures of the lungs, mediastinum or pleurae likely to result in incapacitating symptoms during normal or emergency operations.*

#### **The NAA should raise awareness of licence holders on the impact of Covid 19 for the safety of operations.**

##### 4.2 Medical examiners and Assessor

As mentioned before, the medical examiners are designated by the NAA to perform the medical assessment. The Doc 8984 Manual of Civil Aviation medicine describes the content of the medical examinations. It also highlights the refresher training that medical examiners shall receive at regular intervals (A1 1.2.4.6.1). Intervals and content of refresher training are defined by the NAA, to ensure the medical examiners keep practical knowledge and experience of the conditions in which the holders of licences and ratings carry out their duties.

The Medical Assessors, employed or contracted by the NAA, have no requirements for refresher trainings. However, as the physicians evaluating the medical reports submitted to the medical examiners (A1 1.2.4.9), Doc 8984 1.2.14 states *that they should have advanced training in the specialty of aviation medicine and extensive experience in regulatory and clinical civil aviation medicine. The audit of medical reports by designated medical examiners and refresher training of medical examiners will usually fall within the remit of the medical assessor.* **The NAA and its medical assessors should work with the designated medical examiners to evaluate the impact on safety of the health of licences holders after COVID 19.**

| Reference       | Designation of the requirement                               | Responsibility         | Validity/duration                           | Comments                                     |
|-----------------|--|------------------------|---|--|
| A1<br>1.2.4.6.1 | Refresher training at regular intervals of Medical examiners | State of establishment | Intervals depending on the State regulation | A1 1.2.4.6.2 note and Doc 8984 Part 1 1.2.12 |



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## 5. Approved Training Organization and FSTD Approvals

### 5.1 Approved training organization

*A1 1.2.8.3 Approved training for flight crew and air traffic controllers shall be conducted within an approved training organization.*

*Note.— The approved training considered in 1.2.8.3 relates primarily to approved training for the issuance of an Annex 1 licence or rating. It is not intended to include approved training for the maintenance of competence or for an operational qualification after the initial issuance of a licence or rating, as may be required for air traffic controllers or for flight crew, such as the approved training under Annex 6 — Operation of Aircraft, Part I — International Commercial Air Transport — Aeroplanes, 9.3, or Part III — International Operations — Helicopters, Section II, 7.3.*

*A1 1.2.8.4 Until 2 November 2022, competency-based approved training for aircraft maintenance personnel shall be conducted within an approved training organization.*

Annex 1 Appendix 2 states that the validity of the approval of a training organization depends on the State requirements. Doc 9841 Manual on the approval of Training organization mentions that some States issue a training organization approval that contains an explicit period of validity while others issue an open-ended approval that remains valid as long as the conditions under which the approval has been granted are fulfilled.

In addition, Annex 19 explicitly requires an SMS for approved training organizations in accordance with Annex 1 that are exposed to safety risks related to aircraft operations during the provision of their services. **The surveillance of the ATO by the NAA should be adapted during the COVID 19 crisis, and using its SMS the ATO, together with the NAA, should assess the impact on safety.**

| Reference  | Designation of the requirement            | Responsibility   | Validity/duration                          | Comments |
|------------|---|------------------|--|----------|
| A1 1.2.8.3 | Renewal of Training Organization Approval | State of the ATO | Validity depending on the State regulation | Doc 9841 |

## 5.2 Instructors and Evaluators

There is no explicit requirement of recurrent training for instructors or evaluators in Annex 1. However, Doc 9841 §1.3.6 introduces that **instructors and evaluators are expected to undergo initial training and recurrent training at intervals that the Licensing Authority deems necessary**. In addition, Doc 9841 §7.3.3 states that *besides training its regular staff, ATOs should ensure that refresher training is implemented on a scheduled basis for part-time or temporary instructional personnel prior to commencing their duties after a specified period of inactivity. Re-familiarization with the ATO's quality system and expected levels of service should be included in this training scheme.*

## 5.3 Flight Simulation Training Device (FSTD)

### A1 2.1.6

*The use of a FSTD for acquiring the experience or performing any manoeuvre required during the demonstration of skill for the issue of a licence or rating shall be approved by the Licensing Authority, which shall ensure that the FSTD used is appropriate to the task.*

The approval of FSTD is also mentioned in Doc 9841 Manual on the approval of Training organization §6.3.2, completed by Doc 9625 Manual of Criteria for the Qualification of Flight Simulation Training Devices, which stipulates in §2.11.6 that a system of periodic evaluations should be established to ensure that FSTDs continue to maintain their initially qualified performance, functions and other characteristics. **The NAA having jurisdiction over the FSTD should establish the time interval between the recurrent evaluations.**

| Reference | Designation of the requirement | Responsibility   | Validity/duration                          | Comments |
|-----------|--------------------------------|------------------|--|----------|
| A1 2.1.6  | Renewal of FSTD approval       | State of the ATO | Validity depending on the State regulation | Doc 9625 |

## 6. Language proficiency

Annex 1 requires demonstrating some licence holders their ability to speak English in the radiotelephony communications. This requirement is only for licence holders for which the language used is not the native language (English most of the time). The minimum ICAO level to exercise is level 4 as determined in Annex 1 Att A and in Doc 9379 Part II Chap 6. Doc 9835 Manual on the Implementation of ICAO Language Proficiency Requirements provides elements on language training and testing. If the licence holder obtains a level 4 or level 5, he has to be evaluated on a regular basis; **the validity of its language proficiency evaluation could end during the Covid 19 Crisis.**

| <i>Reference</i>    | <i>Designation of the requirement</i>  | <i>Responsibility</i> | <i>Validity/duration</i>                 | <i>Comments</i>   |
|---------------------|--|-----------------------|--|---|
| A1 1.2.9<br>A1 App1 | Language Proficiency: for aeroplane, airship, helicopter and powered-lift pilots air traffic controllers, ability to speak and understand the language used for radiotelephony communications to the level specified in the language proficiency requirements in Appendix 1 (ICAO level 4 minimum Att A) | Licence Holder        | Validity depending on the level obtained | Below the Expert Level (Level 6) shall be formally evaluated at intervals in accordance with an individual's demonstrated proficiency level.<br>Rec 1.2.9.6 and Doc 9379 Part II 6.2.9: level 4, every 3 years, level 5 every 6 years |

## 7. Air Traffic Controllers

Air Traffic controllers licence is described in Annex 1, together with the ratings associated. There is an explicit requirement on the **period of validity of these ratings, which may be affected during the Covid 19 crisis.**

### 4.5.3.4 Validity of ratings

*A rating shall become invalid when an air traffic controller has ceased to exercise the privileges of the rating for a period determined by the Licensing Authority. That period shall not exceed six months. A rating shall remain invalid until the controller's ability to exercise the privileges of the rating has been re-established.*

Recurrent/refresher training of Air Traffic Controller is mentioned in *Doc 9868, PANS-TRG*, the periodicity should be determined by the NAA. Air Traffic controllers can only use the privilege of their licence together with a valid Medical assessment Class 3.

| Reference           | Designation of the requirement  | Responsibility | Validity/duration   | Comments  |
|---------------------|---|----------------|---|---|
| A1 4.5.3.4          | <u>Validity of ratings:</u><br>for a period determined by the Licensing Authority. That period shall not exceed six months          | Licence holder | Validity as prescribed by the licensing authority, not more than 6 months |   |
| A1 1.2.5.2          | <u>Validity of medical assessment</u><br>— 48 months for the air traffic controller licence;  | Licence holder | Validity depending on the licence and the age of the holder (see below)   |   |
| A1 1.2.5.2.4        | - air traffic controller licences passed their <u>40th birthday</u> , the period of validity shall be reduced to <u>24 months</u> . | Licence holder | Validity of 24 months if more than 40                                     |   |
| A1 1.2.9<br>A1 App1 | Language Proficiency: for air traffic controllers, ability to speak and understand the language used for radiotelephony             | Licence Holder | validity depending on   | Below the Expert Level (Level 6) shall be formally evaluated at |



| Reference | Designation of the requirement  | Responsibility | Validity/duration  | Comments   |
|-----------|---|----------------|--------------------|--|
|           | communications to the level specified in the language proficiency requirements in Appendix 1 (ICAO level 4 minimum Att A) |                | the level obtained | intervals in accordance with an individual's demonstrated proficiency level.<br>Rec 1.2.9.6; level 4, every 3 years, level 5 every 6 years |

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## 8. List of ICAO documents used or referenced:

Annex 1 Personnel licensing  
Annex 6 Operations of aircraft Part I  
Annex 8 Airworthiness of aircraft  
Annex 18 the Safe Transport of Dangerous goods by air  
Annex 19 Safety management

Doc 7192 Part D-3 flight dispatchers - training manual  
Doc 8335 Manual of Procedures for operations, inspections, certification and continued surveillance  
Doc 8984: Manual of Civil Aviation Medicine  
Doc 9284 Technical Instructions for the safe transport of Dangerous goods by air  
Doc 9379: Manual of procedures for establishment and management of a State's Personnel licensing System  
Doc 9625: Manual of Criteria for the Qualification of Flight simulation training devices  
Doc 9760 Airworthiness manual  
Doc 9841: Manual on the approval of Training organization  
Doc 9859: Safety Management Manual  
Doc 9868: PANS-TRG - Procedures for Air Navigation services-training  
Doc 10002: Cabin crew training programme  
Doc 10011: Manual on Aeroplane Upset Prevention and Recovery Training

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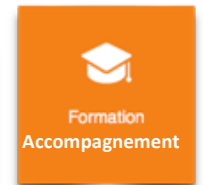
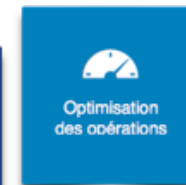


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