

# Evaluation of applicable rules for initial and recurrent pilot training, testing and checking

Fields marked with \* are mandatory.

## 1. Introduction

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Regulation (EU) 2018/1139[1] (hereafter referred to Basic Regulation) prescribes that the European Aviation Safety Agency (EASA) shall assist the European Commission in monitoring the application of the said Regulation and its delegated and implementing acts and assessing the impact of their implementation.

In this context, the Agency is launching an evaluation on the impact of the rules, regulating the initial and recurrent training of pilots, their competence assessment checking during the whole pilot's career. The overall objective of the assignment is to provide an independent, transparent, robust and evidence-based assessment to which extent the rules still fit for purpose to the new challenges in the modern aviation world. The evaluation is therefore to provide conclusions and recommendations for regulatory and non-regulatory improvements and proposals whether and how a performance-based regulation could be applied.

The assessment refers to the Basic regulation and its implementing rules, including the relevant provisions from the Air Crew Regulation[2] and Air Operations Regulation[3] and the related Alternative Means of Compliance (AMC) and Guidance Materials (GM). In terms of type of aircraft, the focus is on aeroplanes. In order to evaluate the current regulatory framework, EASA is launching a survey. It is intended to collect in-depth data/ evidence to support the evaluation and drive substantial conclusions. It explores the role of each stakeholder in the frame of the regulation, investigate the interaction among the stakeholders and gather major issues/remarks and problem in the implementation.

This questionnaire is addressed to the training organisations (approved training organisations (ATO)/ declared training organisations and other recognised training facilities), air operators, pilots (professional and non-professional), instructors, examiners, pilots representative bodies/associations in of all EASA Member States (MS) and countries and stakeholders where EASA acts as a competent authority.

[1] 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

[2] 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

[3] 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

## 2. Confidentiality

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Please note that the financial data collected from the survey will be treated with confidentiality. They will be aggregated in a report (at Member State level and/or per type of stakeholder) to avoid the possibility to recognise any entity or person who answered to the survey. Any information which will be used for the purpose of the report will be de-identified to ensure the confidentiality of the respondents.

### 3. Next steps

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The survey results will be considered as a valuable input for the evaluation report on the rules. The report will be published on EASA website.

### 4. Deadlines for submitting responses to the survey

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Responses can be submitted by **28 February 2019**. Any response submitted after the closure date of the survey will not be considered.

Please note that responding to this survey should not take you longer than 30 minutes.

### 5. Instruction for organisations representing more than one type of stakeholder

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For organisations holding multiple certificate approvals (ATO/DTO and AOC), the Agency would welcome individual responses corresponding to each approval by means of separate submissions of the survey.

## PART 1 - General information about the respondent

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\* 1. Which stakeholder category do you represent?

- Pilots (not having an instructor/examiner certificate)
- Instructors (not having an examiner certificate)
- Examiners
- Approved training organisation (ATO)
- GA training facilities/ training clubs/ declared training organisations and other recognised training facilities
- Pilots Representative Bodies
- Air Operators – Commercial air transport CAT (airline)
- Air Operators – Non-commercial air transport (NCC&NCO)
- Other

\* Please identify

\* 1a. Please identify the licence(s) you hold

- LAPL (Light Aircraft Pilot Licence)
- SPL (Sailplane Pilot Licence)
- BPL (Balloon Pilot Licence)

- PPL (Private Pilot Licence)
- CPL (Commercial Pilot Licence)
- MPL (Multi-crew Pilot Licence)
- ATPL (Airline Transport Pilot Licence)

\*2. What is your main focus country?

- Austria
- Belgium
- Bulgaria
- Croatia
- Cyprus
- Czech Republic
- Denmark
- Estonia
- Finland
- France
- Germany
- Greece
- Hungary
- Ireland
- Italy
- Latvia
- Lithuania
- Luxembourg
- Malta
- Netherlands
- Poland
- Portugal
- Romania
- Slovak Republic
- Slovenia
- Spain
- Sweden
- United Kingdom
- Other

Please specify

Name of your organisation, if applicable

Your first, family name

Your position

\*Email

Note: Information about the respondents will be kept confidential.

3. Please identify the size of your organisation

	1-10	11-25	26-50	51-100	101-250	251-500	501-1000	>1001
No of pilots	<input type="radio"/>							
No of pilots who are working /exercising the privileges of their licences/ratings in the same Member State where originally issued	<input type="radio"/>							
No of instructors	<input type="radio"/>							
No of instructors who are working /exercising the privileges of their certificate in the same Member State where originally issued	<input type="radio"/>							

## PART 2 – Specific questions

Do you provide/get more training hours, than the minimum required training hours in the applicable regulation, to achieve the level of competence for a licence/certificate/type rating?

- Yes  
 No

a. You may provide additional information here, if needed.

What is the indicative percentage of **total extra training hours** typically needed to achieve the level of competence for a licence/certificate/type rating compared with the minimum requirements in the applicable regulation?

	≤5%	6-10%	11-20%	21-30%	31-40%	41-50%	>50%
LAPL	<input type="radio"/>						
PPL	<input type="radio"/>						
SPL	<input type="radio"/>						
BPL	<input type="radio"/>						
CPL	<input type="radio"/>						
MPL	<input type="radio"/>						
Type Rating	<input type="radio"/>						

a. You may provide additional information here, if needed.

If applicable for you, what is the indicative percentage of extra training hours typically needed to achieve the level of competence for a **private pilot licence (PPL)** compared with the minimum requirements in the applicable regulation?

	≤5%	6-10%	11-20%	21-30%	31-40%	41-50%	>50%
% Extra Theoretical Hours	<input type="radio"/>						

% Extra Simulator Hours	<input type="radio"/>						
% Extra Flight Hours	<input type="radio"/>						

a. You may provide additional information here, if needed.

If applicable for you, what is the indicative average percentage of extra training hours typically needed to achieve the level of competence for a **commercial pilot licence (CPL)** compared with the minimum requirements in the applicable regulation?

	≤5%	6-10%	11-20%	21-30%	31-40%	41-50%	>50%
% Extra Theoretical Hours	<input type="radio"/>						
% Extra Simulator Hours	<input type="radio"/>						
% Extra Flight Hours	<input type="radio"/>						

a. You may provide additional information here, if needed.

If applicable for you, what is the indicative average percentage of extra training hours typically needed to achieve the level of competence for a **multi-crew pilot licence (MPL)** compared with the minimum requirements in the applicable regulation?

	≤5%	6-10%	11-20%	21-30%	31-40%	41-50%	>50%
% Extra Theoretical Hours	<input type="radio"/>						
% Extra Simulator Hours	<input type="radio"/>						
% Extra Flight Hours	<input type="radio"/>						

a. You may provide additional information, if needed.

If applicable for you, what is the indicative average percentage of extra training hours typically needed to achieve the level of competence for a **type rating** compared with the minimum requirements in the applicable regulation?

	≤5%	6-10%	11-20%	21-30%	31-40%	41-50%	>50%
% Extra Theoretical Hours	<input type="radio"/>						
% Extra Simulator Hours	<input type="radio"/>						
% Extra Flight Hours	<input type="radio"/>						

a. You may provide additional information, if needed.

If students typically need extra training, please explain what are the needs, how you detect the needs, how do you solve shortcomings of your students?

Do you exercise the privileges of your instructor certificate in the same Member State where it was originally issued?

- Yes
- No

Please clarify the reason and if you transfer your rating/certificate from the Member State that issued your certificate to the National Aviation Authority of the Member State where you are exercising your privileges.

How many flight hours does your air operator typically require by entry level pilots?

How do you select instructor(s) and examiner(s)?

How does your training organisation select instructors and examiners?

In your opinion, are the competent authority officers trained enough to face the future challenges as regards pilots training, checking and testing?

- Yes
- No
- I do not know

Please specify the gaps and areas for further training.

Do you exercise your examiner certificate privileges in the same Member State where it was originally issued?

- Yes
- No

How was your familiarisation with the Examiner differences document assessed by the competent authority?

In your opinion, to what extent have the rules for pilot's initial and recurrent training, testing and checking met the initial needs and objectives of the original FCL regulations in terms of facilitating a free movement of people, services and level playing field?

- Completely met
- Somewhat met
- Did not meet at all

Please justify your answer.

What are the recurrent findings resulting from the oversight of your training organisation, since the implementation of FCL regulations?

Did you encounter any difficulties to obtain Operational Suitability Data (OSD) established in accordance with Part-21, for developing the training programmes for the type rating courses provide?

- Yes
- No
- I do not know

Please specify.

Does your training organisation design the content and develop the courses in terms of setting out training objectives, identifying trainee's needs, defining training content and choosing training tools and environments?

- Yes
- No

Please describe briefly the approach taken by your training organisation.

Does your training organisation have a management system in order to guarantee the compliance with minimum regulatory requirements?

- Yes
- No

Please describe briefly the main features of system.

Does your training organisation assess the quality of examinations preparation and questions?

- Yes
- No

Please describe briefly the process for quality of examinations preparation.

Please describe briefly the approach taken by your training organisation for documenting and integrating feedback from the examiners.

Has your training organisation introduced new training areas or subjects due to technologies within the last 8 years (e.g. PBN)?

- Yes
- No

Which ones?

In your opinion, has the regulation facilitated the introduction of new training areas or subjects due to technologies?

- Yes
- No
- I do not know

Please indicate how.

Please indicate how the regulation should facilitate this.

Has your training organisation introduced technology innovations to enhance course delivery within the last 8 years (e.g. computer-based training, assessing competency, carrying out flight instruction in aircraft or in flight simulators and other training devices, checking the progress/ monitoring the development of the

pilot's competencies, oversight of the training delivery, oversight of training organisation performance and compliance)?

- Yes
- No

Which ones?

In your opinion, has the regulation facilitated the introduction of the technologies to enhance course delivery?

- Yes
- No
- I do not know

Please indicate how.

Please indicate how the regulation should facilitate this.

In your opinion, has the regulation facilitated the implementation of the competency based training concept (i.e. knowledge, skills and attitude in forms of objective targets/objectives)?

- Yes
- No
- I do not know

Please indicate how.

Please indicate how the regulation should facilitate the implementation of the competency-based concept.

Have innovative training tools contributed to reducing the cost of your training organisation?

- Yes
- No
- I do not know

Please could you provide as a reasonable value of the reduction.

How did you become a pilot? Could you briefly describe your career path for obtaining and maintaining the licenses/certificates/ratings that you hold?

How do pilots within your organisation become commercial pilots? Please provide the indicative percentage for each category (e.g. 80-90%, above 90% ...).

	% of pilots
Pilots holding PPL and then completing CPL modular training	
Pilots completing CPL integrated training	
Pilots completing ATPL integrated training	
Pilots completing MPL integrated training	
Pilots holding a Military pilot licence and then completing CPL conversion training	
Other (please specify)	

How did you become an instructor? Could you briefly describe your career path for obtaining and maintaining the instructor certificates that you hold

How did you become an examiner? Could you briefly describe your career's path for obtaining and maintaining the examiner certificate that you hold?

Could you provide a reasonable value for the **initial training cost** of the licence(s) and the rating(s) that you hold?

	Amount in EUR
PPL initial training	
CPL initial training	
MPL initial training	
Instrument rating (IR) initial training	
Type rating initial training	

You may provide additional information, if needed.

Could you provide a reasonable value for the **recurrent training cost** for the following rating(s) and certificate(s) that you hold?

	Amount in EUR
Type rating recurrent training cost	
Instrument rating (IR) recurrent training cost	
Instructor certificate	
Examiner certificate	

You may provide additional information, if needed.

Could you provide a reasonable value for the **individual cost for initial training** for a pilot in your organisation?

	Amount in EUR
PPL initial training	
CPL initial training	
MPL initial training	
Instrument rating (IR) initial training	
Type rating initial training	

You may provide additional information, if needed.

Could you provide a reasonable value for the **individual cost for recurrent training** for a pilot for the following rating(s) and certificate(s) within your organisation?

	Amount in EUR
Type rating recurrent training cost	
Instrument rating (IR) recurrent training cost	
Instructor certificate	
Examiner certificate	

You may provide additional information, if needed.

Could you provide a reasonable value for the average extra training costs for the "frozen ATPL" holders until they are hired by an air operator? Please identify the type of costs.

Do you have regular information exchanges with the competent authority?

- Yes
- No

Is the relationships productive, in term of solving questions and doubts? What type of questions and doubts does your training organisation typically have (i.e. gaps between Parts FCL/ORR/ARA)?

Does your training organisation have regular information exchanges with the air operators?

- Yes
- No

Of what nature? Are the relationships with them productive (in term of training design and management)?

What is the % of ab-initio trainees sponsored by an air operator in the training organisation?

Are there any mentoring programmes in place by airlines for your student pilots (i.e. MPL programs)?

- Yes
- No

Please provide additional information.

What is the % of ab-initio trainees sponsored by your air operator? Have you implemented a mentoring program for your future pilots? Have you developed an MPL program?

What are the average success rate of your students for the licences/ratings that you provide? (e.g. 95-97%, above 99% ...)

	in %
Success rate one year after completing the training for MPL and associated ratings if applicable	
Success rate one year after completing the training for CPL and associated ratings if applicable	
Success rate one year after completing the training for PPL associated ratings if applicable	
Success rate one year after completing the training for Instrument rating if applicable	
Success rate one year after completing the training skill test if applicable	

You may provide additional information, if needed.

What is the employment rate of your students holding the following licences with the associated ratings one year after completing the initial training?

	in %
Employment rate after one year holding a CPL	
Employment rate after one year holding a "frozen ATPL"	
Employment rate after one year holding a MPL	

You may provide additional information, if needed.

What are the average success rates of your applicants/pilots during screening/selection process and the type rating recurrent training?

	in %
Applicants success rate during the screening/selection process	
Type rating recurrent training success rate	

You may provide additional information, if needed.

What are the three most common reasons for failure during the screening/selection process

Could you provide a reasonable value of the average economic turnover in EUR of your training organisation, related to service/training provided?

How would you assess the following aspects of the regulation in the scale 1 (worst) to 5 (best)?

	1 (worst)	2	3 (medium)	4	5 (best)
Complexity	<input type="radio"/>				
Clarity and easy to understand	<input type="radio"/>				
Proportionality for each stakeholder	<input type="radio"/>				
Adequate to modern aviation challenges	<input type="radio"/>				

Please justify your answer and provide examples.

How would you assess the following aspects in terms of rules efficiency (rules achieve maximum results with minimum costs) in a scale 1 (worst) to 5 (best)?

	1 (worst)	2	3 (medium)	4	5 (best)
Initial training requirements	<input type="radio"/>				
Recurrent training requirements	<input type="radio"/>				

Please justify your answer and provide examples.

How would you assess the following aspects in terms of proportionality (rules can sustain diversified development of aviation) in a scale 1 (worst) to 5 (best)?

	1 (worst)	2	3 (medium)	4	5 (best)
Initial training requirements	<input type="radio"/>				
Recurrent training requirements	<input type="radio"/>				

Please justify your answer and provide examples.

Do you think that the training rules should be changed to improve the safety level?

- Yes
- No
- I do not know

Please specify which improvement is needed and what are the safety issues identified.

Do you think that there are inconsistencies between Aircrew Regulation and Air Operations Regulation?

- Yes
- No
- I do not know

Please identify the major inconsistencies that you have noticed.

Do you think that there are superfluous requirements in the rules, regulating pilot training, testing and checking?

- Yes
- No
- I do not know

Please identify the major superfluous requirements that you have noticed.

### Part 3- Other comments

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Do you have any comment or remarks (e.g. requirements too lax, too strict or totally missing, wrong implementations...) regarding the applicable rules, regulating pilot training, testing and checking?