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Title	Update of ORO.FC — evidence-based training subtask
NPA Number	NPA 2018-07(A)

UK CAA (European.Affairs@caa.co.uk) has placed **5** unique comments on this NPA:

Cmt#	Segment description	Page	Comment	Attachments
31	(General Comments)	0	<p>General comment</p> <p>Comment: As Appendix 9 will no longer be applicable, the basis for the issue of a licence will be that a pilot has reached a competent standard in the EBT module. Appendix 9 has a very clear set of test items, definable standards and tolerances to ensure a minimum safety standard, but EBT does not have such prescriptive rules. This may be good in many ways, but the process then relies on the standard of instruction and integrity of any oversight and training management system.</p> <p>Whilst the EBT instructor training is part of ORO.FC.145, it is not an approval held under an ATO. We are concerned about the ability to achieve and maintain the appropriate 'standard' across all member states. The only 'approval' lies within the Part ARO 'approval of EBT programmes' by the respective NAA. The understanding of what EBT truly is varies across the industry, therefore the standard of instruction will not be the same - as a mitigation, it is strongly recommended that operators must do 2 years of Mixed-Implementation EBT prior to removing Appendix 9 requirements.</p> <p>Justification: Potential lack of standardisation due to varying levels of interpretation and understanding. Improved implementation concepts and regulatory compliance checking would help maintain/improve training standards.</p>	
32	(General Comments)	0	<p>General comment</p> <p>Comment: We note that there is no plan for a final assessment/evaluation but only an initial evaluation before further continuous training. This would make it very difficult for the TRI/Operator/NAA to prevent a pilot from flying as he/she would not be checked for competency. We recommend that clear guidance/criteria on minimum standards to be achieved are provided to ensure that pilots reach a demonstrable and safe standard.</p> <p>Justification: Lack of check points in the training would make it very difficult to gauge pilot performance.</p>	
33	(General Comments)	0	<p>General comment</p> <p>Comment: The EBTI does not include any criteria/training standards for the TRI's to achieve prior to being able to conduct EBT. TRE's receive significant assessment training in order to be considered competent in this field. TRI's receive no such training. During mixed EBT this will not be an issue as there is still the protection afforded by Annex 9. Thereafter this may result in a wide variation of standards</p>	

			<p>developing and may introduce safety issues.</p> <p>Justification: To mitigate any such consequences we recommend that consideration is given to have TRI's assessed periodically by a TRE to validate the efficacy of the programme/instructor competency.</p>	
34	(General Comments)	0	<p>General comment</p> <p>Comment: We are concerned that the EBT programme may result in a loss of pilots from the industry as not all pilots/trainers will be able to cope with this model.</p> <p>Justification: Potential for loss of resources due to unintended consequences of the programme. Careful management will be necessary to ensure no detrimental effects of its introduction.</p>	
35	(General Comments)	0	<p>General comment</p> <p>Comment: We believe that there is a danger of a conflict of interest arising within this proposed programme in that an EBT instructor is required to assess the competence of a pilot to whom he has provided training. The TRI may feel that any under performance by the student would reflect poorly on his instructional technique and he may be tempted to evaluate positively at all times. The TRI will be in the employ of the Operator and there may be subtle perceived/real pressure to ensure pilots complete the modules successfully. To mitigate this situation, we would strongly recommend that any assessment is carried out by an independent TRI or TRE</p> <p>Justification: Standardisation and fairness.</p>	