



Multi-Crew Pilot License: More Safety, Not Less!

NPA-FCL 31 / ICAO MPL Transposition into JAR-FCL

1. Background

The European Cockpit Association (ECA) represents 29 European Professional Pilots' Associations and over 34.800 pilots from across Europe. It also speaks as the European Region of IFALPA, the International Federation of Air Line Pilots' Associations.¹ As such, we have a keen interest in the JAA work related to MPL, and have commented at various occasions on the proposed new MPL scheme and related rules. This paper complements the detailed comments submitted by ECA (see annex). The detailed comments are to be seen in the light of ECA's position as outlined in this paper.

2. Safety Must Not Be Compromised

ECA's objective with regard to the new type of pilot license is to safeguard aviation safety.

As stated in our Position Paper, submitted jointly with IFALPA in December 2005, ECA is concerned with the MPL scheme's implementation. We continue to be surprised by the urgency expressed for the transposition of ICAO MPL proposals. This rush has led to a situation where the new scheme will neither be based upon a scientific impact assessment nor on a proper risk analysis.

This lack of proper analysis and scientific basis is worrying as the ICAO document and its transposition through NPA-FCL 31 propose a new type of training, which has not been tested, and which contains many controversial topics that need to be discussed.

In particular, ECA is concerned that the MPL could become a serious threat to safety, if not properly implemented. It risks downgrading current, established training standards and establishes a completely different and non-conventional training philosophy that envisions a considerable reduction in real flying hours.

In parallel to the MPL changes it is proposed to reduce the flying hours for *ab-initio* training for co-pilots from 100 to 70 hours. These two changes will ultimately result in a reduction of pilot qualifications, which could gradually undermine aviation safety in Europe. The EU is free to maintain higher standards than ICAO proposes by keeping the *ab-initio* flying hour requirements at a higher level.

ECA stresses that it is not the time to downgrade the standards of commercial flight training when aircraft are becoming increasingly complex, when air traffic is expected to rise substantially over the coming years, and when high pilot qualification is a key factor

¹ ECA's position and comments are therefore also IFALPA's position and comments.

for maintaining high safety standards. This new MPL scheme potentially contradicts EASA's philosophy of providing an "even higher and uniform level of safety".

Moreover, MPL creates a number of critical questions:

- *Flight Training Organisations* (FTO) will have to focus on Human Factors, CRM, teamwork and TEM, and will therefore be faced with new standards in experience, knowledge and quality. It is unclear how FTO will deal with this challenge, not least as the most experienced flight trainers can be expected to be hired by airlines.
- *Regulators* will have to perform strict quality control of FTOs and their MPL programs. It is questionable if national Authorities or EASA have sufficient experience and/or capacity for quality assurance of the new MPL program.
- *Airlines* that hire MPL candidates will have to properly train their new recruits, focusing on airmanship, judgement, decision-making and aircraft handling. This will cost money. But given the financial difficulties of many operators and increasingly fierce competition, it is hard to see how airlines can finance this. The end-result could very well be a reduced level of experience – and safety.

Against this background, ECA reserves its final position as to the MPL schemes and their implementation in Europe. European pilots will not give their blessing to a scheme as long as they are not convinced that it will result at the very least, in an equivalent level of safety and professionalism as under the traditional ATPL.

To ensure this, ECA will continue to contribute to the NPA process. A key element will be the creation of an MPL Advisory Board that accompanies and guides the MPL implementation process, to improve current levels of safety, qualification and professionalism.

3. MPL Advisory Board – More Than a Paper Tiger

Given the absence of any scientific impact and safety assessments, ECA reiterates its call for an effective mechanism that monitors and accompanies the implementation process: an MPL Advisory Board.

This Advisory Board will involve professionals from the relevant parts of the industry during the implementing phase of the MPL. It will provide expertise, assessments and valuable advice on proposed new MPL programmes prior to their approval by the national Authorities. It will assist the Authorities – and EASA – to ensure that the MPL produces at least an equivalent level of safety and professionalism as the current schemes, and will facilitate harmonised implementation throughout Europe.

While the current draft NPA 31 contains language on such a body, the provisions are insufficient. To ensure that the Advisory Board is set up swiftly and will be able to be more than a paper tiger, it is crucial that the tasks, structure and responsibilities of this Board are spelled out in a new Appendix 2 to JAR-FCL 1.520 & 1.525. Without such an Appendix, there are insufficient guarantees that the MPL would not lead to lower safety standards in Europe.

For a detailed proposal for Appendix 2, see ECA's formal comments (attached).

4. Step-by-Step Approach to Flight Hours Reduction

MPL foresees a reduction in actual flying hours. To ensure that safety will not be compromised, any such reduction has to take place in a controlled manner, avoiding sudden and substantial reductions.

ECA stresses that the ICAO text does not impose any reduction in actual flying hours. We strongly believe that maintaining a high number of actual flying hours will ensure the current quality standards, whereas offering the possibility of drastically cutting real flying hours would 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 continuously monitor and analyse the impact of the change on the quality of training, and to enable them to take early corrective action, any future reduction in actual flying hours should be reasonable and only be implemented in a phased, step-by-step manner, allowing for effective feed-back loops for quality analysis for both FTO and airlines.

5. Link between FTO and Operators to Be Maintained

Only an FTO linked to an airline should receive approval to issue MPLs. The reason is the need for effective control by an organisation 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 disappears.

6. Conclusion

ECA is not yet convinced that the new MPL scheme will provide sufficient guarantees to safeguard the aviation safety and highest training quality standards. Downgrading of these standards can not be accepted in an industry which relies on a permanently increasing safety profile and which faces numerous challenges over the coming years.

Only a well-devised MPL scheme, with a gradual introduction and an effective Advisory Board with a clearly defined remit will help to overcome the challenges posed by the new MPL concept. ECA is willing to continue contributing to appropriate solutions. However, ECA will only be in a position to give its support once the whole picture is clear and once we are convinced that MPL does not mean less safety for crew, passengers and the general public, but increasing safety for us all.

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