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AIR PILOTS - COMMERCIAL AIR TRANSPORT **SAFETY BRIEFING NOTE 01**

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PILOT REGENCY WHEN NORMAL RATING VALIDITY REQUIREMENTS ARE RELAXED

The Context

In response to Covid 19, some State Safety Regulators have temporarily relaxed normal requirements for re-validation of ICAO-compliant professional pilot licence ratings. In some cases, operators who normally have recency requirements more restrictive than regulatory requirements have relaxed those too. This has left licence holders in one of three positions in respect of the operation of commercial air transport flights:

- Normal recency requirements have been alleviated subject to a specified alternative regime
- Normal recency requirements have been alleviated without a specified alternative regime
- There has been no change to normally applicable recency requirements

Coupled with one of these, many pilots are only flying at much less frequent intervals and there is a potential for pilots to be undertaking commercial air transport flights after excessive intervals since their most recent previous flight or full flight simulator session. In respect of regulatory alleviation from normal licence validity requirements, being permitted to use extended licence privileges does not guarantee proficiency.

An apparent example of the avoidable consequences of lack of recency

In September 2020, an Airbus A330-300 Indonesian scheduled passenger flight from Jakarta to Medan touched down partly off the destination runway whilst making a manual landing following an otherwise uneventful flight during which “line standardisation” flying for a Captain new to type was being conducted¹. The Instructor Pilot in occupying the right seat who was PF for the landing involved was dual rated on the A320 and A330. Although he had last acted as PF from the left seat one month previously, he had not done so from the right seat for six months. The Captain under supervision had not flown for 7½ months after gaining his type rating and initial type experience at another airline in a different country. The investigation is continuing, but in the apparent absence of any risk mitigation response, the investigation agency has issued a formal Safety Recommendation to the State Safety Regulator that they “develop guidance for implementing the alleviation or require the aircraft operator to adopt the existing guidance issued by ICAO”.

Discussion

Lack of recency is always a potential risk to pilot competency no matter what the reason for it. But over the coming months, far more pilots than usual are likely to be exposed to it and not all will be working for operators who, despite having been placed under considerable

¹ http://knkt.dephub.go.id/knkt/ntsc_aviation/baru/pre/2020/PK-LEG%20Preliminary%20Report.pdf

practical and economic pressure because of Covid 19, will still recognise the need to carefully risk manage the return to regular flying. Not only has passenger traffic dramatically reduced, but use of and access to full flight simulators has been constrained for some. Regardless of whether alleviations to normally required pilot recency have been relaxed by State Safety Regulators or not, safety management principles demand that every aircraft operator carries out and documents a full risk assessment of any significant operational consequences which have resulted from lack of regular flying opportunities and/or recurrent training sessions at normal intervals following a significant reduction in the number of flights being operated. Without such an assessment and appropriate risk mitigation, diminished pilot recency is likely to increase the accident and serious incident risk to which the aircraft operator and its pilots are exposed.

Safety Recommendations

To Aircraft Operators

- If temporary alleviations to normal pilot licence validity have been issued by your regulator, their implications should be risk assessed. A decision should then be taken as to whether any conditions associated with these alleviations are sufficient for your flight operations to deliver an equivalent level of operational safety to that which prevails using the requirements normally in place.
- If the recency requirements to which you operate have temporarily changed, it may be considered appropriate to provide corresponding clear guidance to crew rostering.
- It may be useful to identify senior training pilots who can be contacted by individual line pilots who have recency-related concerns arising from their rostered duties so that an extra level of release supervision is provided in such circumstances.
- Particular attention should be paid to pilots who are current on more than one type, hold type ratings which cover multiple variants of an aircraft type or who are qualified to fly in command from both seats.
- Careful consideration should also be given as to whether the eventual return of pilots to regular flying will justify recurrent training beyond the applicable regulatory minimum. It may also be worth considering whether keeping only the number of pilots needed to fly a reduced programme working normally and the rest grounded could help support operational safety both during reduced and back-to-normal operations.

To Pilots

- If the aircraft operator for whom you fly has implemented temporary alleviations to normal flight and/or simulator recency requirements, you should be careful to ensure you comply with them.
- Even if you're 'legal' to fly, skill fade is a human fact and affects people to differing degrees so assume the worst and make sure you've done all you can to help yourself. Maybe some 'armchair flying' in a quiet room and a careful read through the whole of your normal and non normal procedures would be useful.
- If you, as the responsible licence holder, are still concerned that your lack of relevant recency makes you unsure of your ability to guarantee the normal operating safety standard which both you and your operator rightly expect and no other procedures are in place, be prepared to seek a discussion with your line manager, a senior training pilot and/or a competent colleague before you find out that your concern was justified.
- Pilots who are current on more than one aircraft type, hold type ratings which cover multiple variants of an aircraft type or who are qualified to fly in command from both seats should be particularly mindful of the implications of lack of recency.
- If you are involved in training for your operator, you might usefully be especially careful in exercising your recurrent training authorisation responsibilities in respect of the return of pilots to regular flying after a significant non-flying period.