

Overseas simulator training during government-imposed travel restrictions

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The CAA position

During the travel restrictions imposed by the NZ Government some airlines are unable to complete routine simulator checking due to simulator locations in Australia, USA, and other countries. Since any simulator that is not located in NZ is effectively “not available” then the only option is to check on-aircraft.

The Civil Aviation Rules have provision for on-aircraft checking however CAA approval is required. Reference **135.565 Flight crew training programme, 125.565 Flight crew training equipment, 121.565 Flight crew training equipment.**

Only CAR125 and CAR121 flight training requires specific CAA approval. An acceptable safe practice guide is required before approval.

CAA has discussed this activity and is concerned about additional risk when non-routine flight operations are conducted. Some operators are already conducting this type of activity on-aircraft.

The following determination has been made

Operators who cannot access a simulator and who do not have an approved on-aircraft operational competency assessment program must apply to the CAA for approval. This is to limit undue risk to operators who commence a novel activity.

Any approval granted will be limited to allow a pilot to complete the next due Operational Competency Assessment (OCA) on the aircraft. This OCA will be valid for 6 months. In addition, a grace period of up to 60 days may be applied in the case of pilots who have already completed an OCA in an overseas simulator. If the most recent OCA has already been completed up to 60 days prior to the original expiry date, the next OCA may be completed on-aircraft 6 months from that expiry date.

A check pilot is a flight examiner who is appropriately trained, and company approved for on-aircraft checks/assessments.

The two types of checks being considered are Base Checks (sometimes called an operator proficiency check) and Instrument Rating Renewals.

Base checks involve simulated or real non-normals, or simulated emergencies. This requires detailed training for the Check Pilot and is not part of this approval process. Base checking will not be approved at this time.

Instrument Rating Renewals – the usual approved 180-day cyclical operational competency assessment checks (OCA), which also renew (annual) instrument ratings (IRR), can be replaced for one cycle only with an IRR check in-aircraft. This IRR check will not have any simulated non-normals or emergencies but will otherwise complete the requirements of 24061-07 instrument rating competency demonstration. Excluded are: rejected takeoff, engine failure, one engine operations, limited panel, unusual attitudes, or circling approach.

In circumstances where an OCA cannot be conducted in an aircraft due to non-availability of acceptable check pilots and CAA is not able to assist, then an Exemption may be necessary.

The application from the operator must request approval as a temporary amendment to exposition.

1. Application on form 24119-01 to Airlines@caa.govt.nz,
 - a. location and type of simulator that is not available for use
 - b. aircraft type to be used
 - c. named check pilots
 - d. location for checking
 - e. other relevant information
2. Draft amendment to exposition (may be a reference to a temporary supplement, including the safe practice guide below)
 - a. Flight profile, noting excluded elements above
 - b. Trainee programme including prerequisites, syllabus
 - c. Flight Examiner (Check Pilot) qualifications, including their training record
3. Airline specific safe practice guide (not limited to the areas below)
 - a. Min/max crew
 - i. 1 crew under training/check in an operating seat
 - ii. The other pilot in operating seat is a qualified Check Pilot on type
 - iii. Safety pilot in observer seat, may be a Flight Examiner or other pilot
 - iv. Observer seat must have adequate view of crew, with coms
 - v. No passengers, may carry additional crew waiting to be checked
 - b. Responsibilities of each person
 - c. Flight planning, fuel, ATC, min weather
 - d. Limitations
 - e. Standard calls
 - f. Statement on simulated non-normals (discussion only)
 - g. Statement on simulated emergencies (on ground discussion only, touch-drills)
 - h. Statement on any allowable variation from planned profile
 - i. Procedures for real emergency
 - j. CRM, MCC
 - k. Human factor considerations
 - l. Intervention calls and actions
 - m. Ground based exercise with touch drills may be used to discuss excluded elements

It is expected that the greatest detail would be required by the 121 operators to convince CAA the operation can be conducted safely however other operators should provide as much relevant information as possible. Those operators certificated for SMS are expected to utilize and present a risk analysis and management plan to determine risk and necessary mitigations.