

FCL.945 Privilege for FI and CRI

Scope

FCL.945 **ONLY** applies to Part FCL licences

Important note:

FCL.945 privileges are specific to the National Aviation Authority i.e. UK instructor cannot revalidate an SEP or TMG on an EASA licence and vice versa

What is FCL.945 privilege?

Extract from the Aircrew Regulation, Annex I, Part FCL

FCL.945 Obligations for instructors

Upon completion of the training flight for the revalidation of an SEP aeroplane or TMG class rating in accordance with point FCL.740.A(b)(1)(ii)(C) or for the revalidation of a single-engine helicopter type rating in accordance with point FCL.740.H(a)(2)(ii)(B), and only in the event of fulfilment of all the other revalidation criteria required by point FCL.740.A(b)(1)(ii) or point FCL.740.H(a)(2)(ii), as applicable, the instructor shall endorse the applicant's licence with the new expiry date of the rating, if specifically authorised for that purpose by the competent authority responsible for the applicant's licence.

In simple terms...

FCL.945 allows an instructor to complete the revalidation of a SEP class rating and/or TMG rating

What is FCL.740.A(b)(1)(ii)(C)?

Extract from the Aircrew Regulation, Annex I, Part FCL

FCL.740.A Revalidation of class and type ratings - aeroplanes

(b) Revalidation of single-pilot single-engine class ratings.

(1) Single-engine piston aeroplane class ratings and TMG ratings. For revalidation of single pilot single-engine piston aeroplane class ratings or TMG class ratings the applicant shall:

(ii) within the 12 months preceding the expiry date of the rating, complete 12 hours of flight time in the relevant class, including the following:

(A) 6 hours as PIC;

(B) 12 take-offs and 12 landings;

(C) refresher training of at least 1 hour of total flight time with and to the satisfaction of a flight instructor (FI) or a class rating instructor (CRI) who shall select those flight exercises that allow the applicant to refresh their competence in safely operating the aircraft and applying normal, abnormal and emergency procedures.

Applicants shall be exempted from this refresher training if they have passed any of the following, in any class or type of aeroplane:

- (1) a class or type rating proficiency check;
- (2) a skill test;
- (3) an EBT practical assessment;
- (4) an assessment of competence.

What part of FCL.740.A(b)(1) applies to the instructor with FCL.945?

Extract from the Aircrew Regulation, Annex I, Part FCL

FCL.740.A(b)(1)(ii) Revalidation of class and type ratings - aeroplanes

within the 12 months preceding the expiry date of the rating, complete 12 hours of flight time in the relevant class, including the following:

- (A) 6 hours as PIC;
- (B) 12 take-offs and 12 landings;
- (C) refresher training of at least 1 hour of total flight time with and to the satisfaction of a flight instructor (FI) or a class rating instructor (CRI) who shall select those flight exercises that allow the applicant to refresh their competence in safely operating the aircraft and applying normal, abnormal and emergency procedures.

Notes:

1. Flight time in TMGs may only be counted if the pilot holds a TMG rating
2. Flight time in a 3-axis Microlight or Annex 1 aeroplane can be counted towards the experience
3. 3-axis Microlight cannot be used for the refresher training
4. Annex 1 aeroplanes can be used for the refresher training flight provided they meet the requirements of AMC1 FCL.140.A; FCL.140.S; FCL.740.A(b)(1)(ii)

What is AMC1 FCL.140.A; FCL.140.S; FCL.740.A(b)(1)(ii)?

Extract from the Aircrew Regulation, Annex I, Part FCL

AMC1 FCL.140.A; FCL.140.S; FCL.740.A(b)(1)(ii) Recency and revalidation requirements

All hours flown on aeroplanes or sailplanes that are subject to a decision as per Article 2(8) of the Basic Regulation or that are specified in Annex I to the Basic Regulation should count in full towards fulfilling the hourly requirements of points FCL.140.A, FCL.140.S, and FCL.740.A(b)(1)(ii) under the following conditions:

(a) the aircraft matches the definition and criteria of the respective Part-FCL aircraft category, class, and type ratings; and

(b) the aircraft that is used for training flights with an instructor is an Annex I aircraft of type (a), (b), (c), or (d) that is subject to an authorisation specified in points ORA.ATO.135 or DTO.GEN.240

What is ORA.ATO.135 or DTO.GEN.240?

Extract from the Aircrew Regulation, Annex VII, Part ORA

ORA.ATO.135 Training aircraft and FSTDs

(a) The ATO shall use an adequate fleet of training aircraft or FSTDs appropriately equipped for the training courses provided. The fleet of aircraft shall be composed of aircraft that comply with all requirements defined in Regulation 2018/1139. Aircraft that fall under points (a), (b), (c) or (d) of Annex I to Regulation 2018/1139, may be used for training if all of the following conditions are met:

(1) during an evaluation process the competent authority has confirmed a level of safety comparable to the one defined by all essential requirements laid down in Annex II to Regulation 2018/1139

(2) the competent authority has authorised the use of the aircraft for training in the ATO

(b) The ATO shall only provide training in FSTDs when it demonstrates to the competent authority:

(1) the adequacy between the FSTD specifications and the related training programme

(2) that the FSTDs used comply with the relevant requirements of Part-FCL

(3) in the case of full flight simulators (FFSs), that the FFS adequately represents the relevant type of aircraft; and

(4) that it has put in place a system to adequately monitor changes to the FSTD and to ensure that those changes do not affect the adequacy of the training programme

(c) If the aircraft used for the skill test is of a different type to the FFS used for the visual flight training, the maximum credit shall be limited to that allocated for flight and navigation procedures trainer II (FNPT II) for aeroplanes and FNPT II/III for helicopters in the relevant flight training programme

(d) Flight test training organisations. Aircraft used for flight test training shall be appropriately equipped with flight testing instrumentation, according to the purpose of the training

Extract from the Aircrew Regulation, Annex VIII, Part DTO

DTO.GEN.240 Training aircraft and FSTDs

(a) A DTO shall use an adequate fleet of training aircraft or FSTDs appropriately equipped for the training course provided. The fleet of aircraft shall be composed of aircraft that comply with all requirements defined in Regulation 2018/1139. Aircraft that fall under points (a), (b), (c) or (d) of Annex I to Regulation 2018/1139, may be used for training if all of the following conditions are met:

(1) during an evaluation process the competent authority has confirmed a level of safety comparable to the one defined by all essential requirements laid down in

Annex II to Regulation 2018/1139

(2) the competent authority has authorised the use of the aircraft for training in the DTO

(b) A DTO shall establish and keep up-to-date a list of all aircraft, including their registration marks, used for the training it provides

A further complication....

AMC2 ORA.ATO.135 and AMC2 DTO.GEN.240 require Annex I aircraft that do not hold an ICAO-level Certificate of Airworthiness (CoA) require an initial assessment by the competent authority as part of the evaluation process.

Extract from the Aircrew Regulation, Annex VII, Part ORA

AMC2 ORA.ATO.135 Training aircraft and FSTDs (extract)

EVALUATION PROCESS

(b) Annex I aircraft that do not hold an ICAO-level CoA

Before the inclusion of these aircraft in the fleet of an ATO and their use in training to obtain Part-FCL licences and ratings, the ATO should apply for the authorisation to the competent authority that should perform the evaluation process in the following order:

(1) Initial assessment by the competent authority....

Additional assessment by a qualified instructor....

Extract from the Aircrew Regulation, Annex VIII, Part DTO

AMC2 DTO.GEN.240 Training aircraft and FSTDs (extract)

EVALUATION PROCESS

(b) Annex I aircraft that do not hold an ICAO-level CoA

Before the inclusion of these aircraft in the fleet of an DTO and their use in training to obtain Part-FCL licences and ratings, the DTO should apply for the authorisation to the competent authority that should perform the evaluation process in the following order:

(1) Initial assessment by the competent authority....

(2) Additional assessment by a qualified instructor....

In simple terms...

Before using an Annex I aircraft that does not hold an ICAO-level CoA for the refresher training flight the competent authority must evaluate it.

Which instructors can gain FCL.945 privileges?

FI (see note) and CRI who have the privilege to instruct for SEP and/or TMG class ratings.

EASA Member States limit the number of instructors with FCL.945 privileges and carry out a selection process followed by a training course.

Holders of a Danish CAA [*Trafikstyrelsen*] instructor certificate may apply through this link <https://www.examiner.dk/procedures/instructors>

Note: FI restricted in accordance with FCL.915.FI(b)(2)(i) to teaching for the LAPL only, may not get the privilege because a LAPL uses recency to maintain validity

When can the single-engine piston aeroplane class rating and TMG rating be revalidated by experience?

Within the 12 months preceding the expiry date of the rating

AND

All the revalidation criteria have been completed.

What is the validity of a single-pilot single-engine piston aeroplane class rating and TMG rating?

Extract from the Aircrew Regulation, Annex I, Part FCL

FCL.740 Validity and Renewal of Class and Type Ratings

(a) The period of validity of class and type ratings shall be 1 year, except for single-pilot single-engine class ratings, for which the period of validity shall be 2 years, unless otherwise determined by the operational suitability data, established in accordance with Part-21

In simply terms...

SEP class rating and TMG rating are valid for 2 years

What is Revalidation and Renewal?

Extract from the Aircrew Regulation, Annex I, Part FCL

FCL.010 Definitions

Revalidation (of, e.g. a rating or certificate) means the administrative action taken within the period of validity of a rating or certificate which allows the holder to continue to exercise the privileges of a rating or certificate for a further specified period consequent upon the fulfilment of specified requirements

Renewal (of, e.g. a rating or certificate) means the administrative action taken after a rating or certificate has lapsed for the purpose of renewing the privileges of the rating or certificate for a further specified period consequent upon the fulfilment of specified requirements

In simple terms...

Revalidation = Rating has not reached its expiry date in accordance with the entry in the pilot licence

Renewal = Rating in pilot licence has expired

Important note:

Instructors **CAN NOT** renew ratings that have expired

What is the content of the Training Flight?

Extract from the Aircrew Regulation, Annex I, Part FCL

AMC1 FCL.740.A(b)(1)(ii) Revalidation of Class and Type Rating

Content of the Refresher Training

Training flight items should be based on the exercise items of the proficiency check, as deemed relevant by the instructor, and depending on the experience of the candidate. The briefing should include a discussion on TEM with special emphasis on decision-making when encountering adverse meteorological conditions or unintentional IMC, as well as on navigation flight capabilities

What is meant by... 'Upon completion of the training flight'?

The FI or CRI shall have flown with the pilot in accordance with FCL.740.A(b)(1)(ii)(C) before any revalidation action can be completed

Important note:

FI or CRI who has not flown with the pilot **CAN NOT** carry out the revalidation action

FCL.740.A(b)(1)(ii)(C) = refresher training of at least 1 hour of total flight time with and to the satisfaction of a flight instructor (FI) or a class rating instructor (CRI) who shall select those flight exercises that allow the applicant to refresh their competence in safely operating the aircraft and applying normal, abnormal and emergency procedures.

What is 'specifically authorised for that purpose by the competent authority'?

Each EASA Member State completes this in a different way. Some will endorse the pilot licence and others will provide a list of FCL.945 instructors on their web page.

Either way the individual must have some form of authorisation from the National Aviation Authority (NAA) before being allowed to exercise the FCL.945 privileges.

Holders of a Danish CAA [*Trafikstyrelsen*] instructor certificate may apply through this link <https://www.examiner.dk/procedures/instructors>

The same link provides a list of a Danish CAA [*Trafikstyrelsen*] FCL.945 instructors.

The process of revalidation using FCL.945

What shall the instructor do?

1. Check the rating is present in the pilot's licence in Section XII and its expiry date in the Certificate of Revalidation and if present and valid continue with the revalidation

OR

if not present or expired **you cannot revalidate** (refer the pilot to an examiner for renewal of the rating)

2. Complete the refresher training flight in accordance with FCL.740.A(b)(1)(ii)(C)

Note: Instructors can only complete the refresher training flight using an SEP or TMG rating they hold, which has not expired, and on which they have instructional privileges

3. After the refresher training the pilot enters the flight(s) in logbook as follows:

- Instructor is PIC / CAPTAIN
- Pilot claims PUT / DUAL
- Instructor SHALL endorse pilot logbook (AMC1 FCL.050(i)(10)(iv))

Extract from the Aircrew Regulation, Annex I, Part FCL

AMC1 FCL.050(i)(10)(iv) Recording of flight times

(10) column 12: the 'remarks' column may be used to record details of the flight at the holder's discretion. The following entries, however, should always be made:

- (i) instrument flight time undertaken as part of the training for a licence or rating;
- (ii) details of all skill tests and proficiency checks;
- (iii) signature of PIC if the pilot is recording flight time as SPIC or PICUS:

(iv) signature of instructor if flight is part of an SEP or TMG class rating revalidation.

Suggested logbook entry by instructor if no guidance from their EASA Member State NAA:

'Training Flight(s) iaw FCL.740.A(b)(1)(ii)(C)' add instructor signature and licence number

4. Check the pilot has completed ALL the other revalidation requirements of FCL.740.A(b)(1)(ii)

Extract from the Aircrew Regulation, Annex I, Part FCL, FCL.740.A(b)(1)(ii)

'within the 12 months preceding the expiry date of the rating, complete 12 hours of flight time in the relevant class, including:

- 6 hours as PIC,
- 12 take-offs and 12 landings'

5. The instructor completes the EASA Member State NAA form(s) as applicable

6. Instructor may or may not be able to endorse the pilot licence

Instructors must consult the EASA Member State NAA or/and EASA Examiner Differences Document to check if a licence endorsement is permissible.

Each EASA Member State NAA has its own procedure.

If licence endorsement is permitted

XII - CERTIFICATE OF REVALIDATION

Rating	Date of Rating Test	Date of IR Test	Valid Until	Examiner's Certificate Number	Examiner's Signature
SEP (land)	N/A	N/A	31/12/2015	223477F	A Examiner
SEP (land)	N/A	N/A	31/12/2017	123456H	A Instructor

Instructor to complete pilot licence entry as shown in example above (see purple entry).

Important note:

No entries allowed outside the certificate boxes

The date of expiry shall be 24 months after the previous expiry date.

If there are no free spaces the pilot must apply to the EASA Member State NAA for a new licence.

Frequently Asked Questions (FAQ)

What to do if?

- On inspection of a pilot's licence, you notice the rating revalidation pages are full

DO NOT make an entry into the licence in any other position.

The pilot shall contact the EASA Member State NAA to have the licence re-issued

- The refresher training brings into question applicants flying skill

If the pilot's performance is not satisfactory, they may have to complete further refresher training. Only when the instructor deems the pilot's performance to be satisfactory may the flight be used towards the revalidation of the SEP / TMG class rating [Regulation (EU) 2024/2076]

- After the refresher training the applicant still has to complete some/all of the other revalidation requirements

The pilot can return to the same instructor once outstanding items are completed. The instructor can then complete the process

OR

The pilot may go to an examiner

OR

If more than one instructor completed the refresher training over a number of flights the pilot may approach any of those instructors who have FCL.945 to complete the process (normally this would be the last instructor who flew with the pilot)

Important note:

An instructor with FCL.945 who has not flown with the pilot as part of the revalidation **CAN NOT** complete the process

- On inspection of the pilot's licence, you notice the rating is not endorsed on the licence

You **CAN NOT** revalidate a rating that is not endorsed on a licence

Only an examiner can renew the rating

The EASA Member State NAA will add the renewed rating to the pilot licence

- On inspection of the pilot's licence, you notice the rating has expired

You **CAN NOT** revalidate an expired rating

Only an examiner can renew an expired rating

- Applicant did not complete the refresher training with you

You **CAN NOT** revalidate rating

An examiner can complete the revalidation

OR

The instructor who conducted the refresher training may revalidate the rating if they hold FCL.945 privileges

- I am an FI (Restricted). Can I still complete the refresher training under FCL.945?

Yes, in accordance with FCL.910.FI(a)(3)

You have to be supervised whilst conducting the refresher training in accordance with FCL.910.FI(a)

- I am an FI (Restricted) can I apply to the EASA Member State NAA for FCL.945 privileges?

Yes

- If the pilot holds both TMG and SEP (Land) Class Ratings, how do I make the entry into the licence?

Make a separate entry for each class rating on a separate line (see example below)

XII - CERTIFICATE OF REVALIDATION

Rating	Date of Rating Test	Date of IR Test	Valid Until	Examiner's Certificate Number	Examiner's Signature
SEP(land)	N/A	N/A	31/12/2024	223477F	A Examiner
TMG	N/A	N/A	31/12/2024	223477F	A Examiner
SEP(land)	N/A	N/A	31/12/2026	123456H	A Instructor
TMG	N/A	N/A	31/12/2026	123456H	A Instructor

- The pilot has flown a training flight with the instructor in a Beech Duchess. Can this be used as part of the revalidation?

No. The pilot must fly the training flight with the instructor in an SEP or TMG for it to count for the revalidation

- The pilot has flown a Proficiency Check in another class or type of aeroplane. Can this count towards the revalidation?

Yes. **BUT** only an examiner, not an instructor with FCL.945, can revalidate the pilot's SEP or TMG in this case

For the instructor with FCL.945 to be able to revalidate the SEP or TMG the pilot and the instructor must fly together on the refresher training

- I have made a mistake when entering the details on the pilot's licence. What shall I do?
 - **DO NOT** cross it out;
 - **DO NOT** use correction fluid/tape.

Simply leave the entry and make a new entry

If there is no more space on the licence **DO NOT** make an entry in any other position on the licence

The pilot must apply to the EASA Member State NAA for licence re-issue

We hope these notes have explained your obligations under FCL.945

Should you have any questions or comment please contact On-Track Aviation

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