Australian Government
Civil Aviation Safety Authority

MULTI-PART ADVISORY CIRCULAR AC 119-11 AND AC 138-02 v6.1

Training and checking systems

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Acknowledgement of Country

The Civil Aviation Safety Authority (CASA) respectfully acknowledges the Traditional Custodians of the lands on which our offices are located and their continuing connection to land, water and community, and pays respect to Elders past, present and emerging.

Artwork: James Baban.

Advisory circulars are intended to provide advice and guidance to illustrate a means, but not necessarily the only means, of complying with the Regulations, or to explain certain regulatory requirements by providing informative, interpretative and explanatory material.

Advisory circulars should always be read in conjunction with the relevant regulations.

Audience

This advisory circular (AC) applies to all air transport operators and some aerial work operators.

Purpose

This AC provides guidance on establishing and managing a training and checking system in accordance with the relevant provisions of Parts 119 and 138 of the *Civil Aviation Safety Regulations 1998 (CASR*). The intention is to provide background information and expand on aspects of the system to ensure the intent of the legislation is clear.

For further information

For further information or to provide feedback on this AC, visit CASA's contact us page.

Unless specified otherwise, all subregulations, regulations, Divisions, Subparts and Parts referenced in this AC are references to the *Civil Aviation Safety Regulations 1998 (CASR)*.

Status

This version of the AC is approved by the National Manager, Flight Standards Branch.

> **Note:** Changes made in the current version are annotated with change bars.

Table 1: Status

Version	Date	Details
v6.1	July 2025	Updates have been made to Chapters 1 and 2, and Annexes B and C, arising from the introduction in mid-2025 of a 4th kind of aerial work operation called a fireground personnel carriage operation.
v6.0	December 2024	The following updates have occurred: • replaced the references to EX87/21 with references to EX73/24 as this instrument replaced EX87/21 from 2 December 2024 • added references to the new transitional recognition instruments EX77/24, EX78/24 and EX79/24 • added a new Annex C that explains the application of these 3 new transitional recognition instruments.
v5.0	May 2024	Major changes to support the implementation of training and checking systems for all Part 133 and 135 operators, and some Part 138 operators. **Note:** Readers are reminded that CASA AC's can use Appendices and Annexes. Appendices are contained at the end of the main AC document. Annexes are separate documents linked to this AC wherever this AC is published on CASA's website. The changes include: • added significant new content to Chapter 2 about how to read this AC, its Appendices and Annexes • added significant new content to Chapter 3 to explain the core concepts of 'what is a training and checking system?' • replaced all existing Annexes as follows: • new Annex A containing specific guidance for Part 121 training and checking events and training and checking personnel • new Annex B containing specific guidance for Part 133, 135 and 138 training and checking events and training and checking personnel • deleted previous Annexes A, B and G because sample training and checking system manual / exposition content is now in CASA's Sample training and checking manual and guide • deleted previous Annexes C, D, E and F because Part 121, 133, 135 and 138 training and checking compliance matrices are now published on CASA's website in the protocol, principle and worksheets documents (collectively called the Flight Operations Protocol Suite) used by CASA inspectors to assess operator applications for new AOCs and new aerial work certificates (these documents can be found under the 'Related rules and publications' sections of the CASR Part 121, 133, 135 and 138 webpages on the CASA website).

Version	Date	Details
		Note: For transitional operators using the training and checking exemptions in EX87/21, CASA will provide dedicated compliance matrix tools for you at an appropriate time on the flight operations transition training and checking webpage. The Appendices have been amended as follows: • Appendix A information about training and checking personnel has been moved to Annexes A and B as appropriate • Appendix B information about Part 121 recurrent training has been moved to Annex A • Appendix C, which contained a generic grading system, has been renumbered as Appendix A • Appendix D, which contained a generic proficiency check record relevant to operators holding a particular kind of 61.040 approval, has been renumbered as Appendix B • Appendix E, which contained a generic requalification matrix for personnel whose Part 61 currency has lapsed, has been renumbered as Appendix C. We have added more information about conducting training and checking events that are intended to cover more than one aircraft type. We have added more information about using different trainers and checkers for one specific training and checking event, and not carrying out a specific training and checking event in a single activity.
v4.1	May 2023	Minor change to the wording of paragraph 8.1.5 about the Part 119 requirements for training and assessment in human factors principles and non-technical skills. Deletion of the detailed content of Annex B (the Microsoft Word formatted 'Sample training and checking system content for Parts 133, 135 and 138 operators (for all crew – not just FCM)') due to the identification of errors. CASA will aim to return this content as soon as possible.
v4.0	May 2023	Deletion of Appendix F which previously contained information about the submission of training and checking documentation to CASA for relevant operators to comply with the training and checking deferral provisions of the exemption CASA EX87/21. Replacement of Annex A which was the PDF formatted 'Sample training and checking system content for Parts 133, 135 and 138 operators' and is now a Microsoft Word formatted 'Sample training and checking system content for Parts 133, 135 and 138 operators (limited to flight crew member content only)'. Replacement of Annex B which was the Microsoft Word formatted version of the original Annex A, but which is now the Microsoft Word formatted 'Sample training and checking system content for Parts 133, 135 and 138 operators (for all crew – not just FCM)'. Addition of a new Annex G that is the Guide to the new Annex A.
v3.2	February 2023	Amended references to deferred provision timelines to reflect delayed training and checking system approval and implementation.
v3.1	August 2022	Added new content to Chapter 13 about ways to efficiently conduct checks for a Part 133 operator using multiple rotorcraft types. References in Appendix B (Part 121 recurrent training matrix) to GPWS now also include a reference to TAWS and references to TCAS now also include a reference to ACAS.

Version	Date	Details
v3.0	July 2022	Added new content to Chapter 13 about ways to efficiently conduct checks for a Part 135 operator using multiple aircraft types. Added new Appendix F specifying the submission process for training and checking system content associated with the end of the training and checking deferral periods associated with the commencement of the flight operations regulations. Added new Annexes C, D, E and F that provide training and checking compliance matrices for Part 121, 133, 135 and 138 operations respectively.
v2.0	June 2022	Minor changes in the main body of the AC. The significant change is the addition of Annex A that contains sample training and checking system content for Part 133, 135 and 138 operators.
v1.0	August 2021	Initial AC.

Contents

1 Reference material

1.1 Acronyms

The acronyms and abbreviations used in this AC are listed in the table below.

Table 2: Acronyms

Acronym	Description
61PC	Part 61 proficiency check
AC	advisory circular
ACAS	airborne collision avoidance system
AFM	aircraft flight manual
AMC	acceptable means of compliance
ARA	airborne radar approach
APC	aerial application proficiency check
CASA	Civil Aviation Safety Authority
CASR	*Civil Aviation Safety Regulations 1998*
CBT	computer-based training systems
CAO	Civil Aviation Order
CEO	Chief Executive Officer
EBT	evidence-based training
EDTO	extended diversion time operations
FCM	flight crew member
FCMPC	flight crew member proficiency check
FDAP	flight data analysis program
FSTD	flight simulation training device
GM	guidance material
GPWS	ground proximity warning system
HF	human factors
HFP/NTS	human factors principles and non-technical skills
HOTC	Head of Training and Checking
IFR	instrument flight rules
IOS	instructor operator station
IPC	instrument proficiency check

Acronym	Description
LAHSO	land and hold short operations
LVO	low visibility operations
MOS	manual of standards
NPC	night vision proficiency check
NTS	non-technical skills
OEM	original equipment manufacturer
OPC	operator proficiency check
PBN	performance based navigation
PIC	pilot-in-command
PRM	precision radar monitored approach
SMS	safety management system
SOP	standard operating procedures
SPC	standardisation proficiency check
TAWS	terrain awareness warning system
TCAS	traffic collision avoidance system
UPRT	upset prevention and recovery training
VFR	visual flight rules

1.2 Definitions

Terms that have specific meaning within this AC are defined in the table below. Where definitions from the civil aviation legislation have been reproduced for ease of reference, these are identified by 'grey shading'. Should there be a discrepancy between a definition given in this AC and the civil aviation legislation, the definition in the legislation prevails.

Table 3: Definitions

Term	Definition
aerial work operation	1. An aerial work operation means one or more of the following (and each of the following is a kind of aerial work operation): a. an external load operation; b. a dispensing operation; c. a task specialist operation; d. an operation of a kind prescribed by the Part 138 Manual of Standards for the purposes of this paragraph. **Note:** A *fireground personnel carriage operation* is prescribed to be a kind of aerial work operation in section 3.01AA of the Part 138 MOS. 2. Despite subregulation (1), an aerial work operation does not include the

Term	Definition
	following: a. a medical transport operation; b. an external load operation involving winching a person, if the operation is conducted as part of an air transport operation; c. glider towing; d. a person undertaking a parachute descent; e. an aerial application operation (including any external load operation undertaken as part of that operation) to apply fire retardants (including water), or oil or chemical dispersants, if the operation is conducted by a person holding a civil aviation authorisation under Part 137 to undertake the operation; f. any other aerial application operation; g. any other operation of a kind prescribed by the Part 138 Manual of Standards for the purposes of this paragraph. **Note:** Multiple operations are prescribed to not be an aerial work operation in section 3.01 of the Part 138 MOS. These operations include an aircraft towing a thing where the requirement in paragraph 91.210(2)(a) of CASR is met, the flight test of an experimental aircraft conducted under an experimental certificate, a maintenance test flight, a thing dropped by a person undertaking a parachute descent under Part 105 of CASR, and aerial spotting carried out in a weight-shift-controlled aeroplane type certificated in the primary category where the operation is administered by a sport aviation body.
aeroplane	A power-driven heavier-than-air aircraft deriving its lift in flight chiefly from aerodynamic reactions on surfaces remaining fixed under given conditions of flight but does not include a power-assisted sailplane.
aircraft	Any machine or craft that can derive support in the atmosphere from the reactions of the air, other than the reactions of the air against the earth's surface.
air crew member	A crew member (other than a flight crew member or cabin crew member) who carries out a function during the flight relating to the safety of the operation of the aircraft, or the safety of the use of the aircraft.
air transport operation	1. An air transport operation is a passenger transport operation, a cargo transport operation or a medical transport operation, that: a. is conducted for hire or reward; or b. is prescribed by an instrument issued under regulation 201.025. 2. Despite subclause (1), an air transport operation does not include an aerial work operation or a balloon transport operation.
Australian air transport operation	1. An operation is an Australian air transport operation if the operation is any of the following: a. an air transport operation conducted by an Australian operator using a registered aeroplane or rotorcraft; b. an air transport operation: i that is a flight into or out of Australian territory or an operation in Australian territory; and ii that is conducted by an Australian operator using an aeroplane or rotorcraft that is a foreign registered aircraft; c. an air transport operation: i that is conducted by an Australian operator using an aeroplane or rotorcraft; and

Term	Definition
	ii that is provided for under the ANZA mutual recognition agreements; d. an air transport operation conducted by a foreign operator: i using an aeroplane or rotorcraft that is a foreign registered aircraft; and ii undertaken wholly within Australia; and iii not undertaken as part of a flight into or out of Australian territory; e. an operation, conducted using an aeroplane or rotorcraft, of a kind prescribed by the Part 119 Manual of Standards for the purposes of this paragraph. 2. However, each of the following is not an Australian air transport operation: a. the operation of an aeroplane or rotorcraft under a permission under: i section 25 (non-scheduled flights by foreign registered aircraft) of the Act; or ii section 27A (permission for operation of foreign registered aircraft without AOC) of the Act; b. an air transport operation authorised by a New Zealand AOC with ANZA privileges that is in force for Australia; c. an operation of an aircraft to which Part 129 (foreign air transport operations) of these Regulations applies; d. an operation, conducted using an aeroplane or rotorcraft, of a kind prescribed by the Part 119 Manual of Standards for the purposes of this paragraph. Note: See Part 129 for provisions relating to foreign operators conducting flights into or out of Australian territory, or flights wholly within Australian territory that are conducted as part of flights into or out of Australian territory. **Note:** This note does not form part of the official definition. At the time of publishing v6.1 of this AC, no operations had been prescribed in the Part 119 MOS, and no such MOS had yet been consulted, made, commenced or published.
cabin crew member	A crew member who performs, in the interests of the safety of an aircraft's passengers, duties assigned by the operator or the pilot-in-command of the aircraft but is not a flight crew member.
check pilot	A flight crew member assigned by an operator to carry out flight crew training and checking duties.
checker	A person assigned by an operator to carry out an assessment of competence.
checking	The assessment of proficiency of the personnel of an aircraft operator or the operator of a flight simulation training device that is conducted to ensure that the personnel are competent to carry out their responsibilities.
Chief Executive Officer	A key person required under the Act and described in Subpart 119.D and Subpart 138.B.4.
competency	A combination of skills, knowledge and attitudes required to perform a task to the prescribed standard.
competency-based training	A structured approach to training and assessment that is directed toward achieving specific outcomes. A person is trained and assessed to meet specified standards that define the knowledge, skills and attitudes required to safely and effectively perform a task.

Term	Definition
conversion training	Training provided to a person by a Part 119 or Part 138 operator to enable that person to carry out their duties and responsibilities in accordance with the operator's policies and procedures prior to the person commencing unsupervised duty.
crew member	A person is a crew member of an aircraft if the person is carried on the aircraft and is: a. a person: i who is authorised by the operator of the aircraft to carry out a specified function during flight time relating to the operation, maintenance, use or safety of the aircraft, the safety of the aircraft's passengers or the care or security of any cargo which may affect the safety of the aircraft or its occupants; and ii who has been trained to carry out that function; or b. a person who is on board the aircraft for the purpose of: i giving or receiving instruction in a function mentioned in subparagraph (a)(i); or ii being tested for a qualification associated with a function mentioned in subparagraph (a)(i); or c. a person authorised by CASA under these Regulations, or by the operator, to carry out an audit, check, examination, inspection or test of a person mentioned in paragraph (a) or (b).
dispensing operation	means dropping or releasing any substance or object from an aircraft in flight and includes training for such an operation.
emergency equipment	Equipment installed or carried for use in abnormal and emergency situations for the safe conduct of the flight and protection of the occupants.
exposition	a. for an Australian air transport operator, means: i the set of documents approved by CASA under regulation 119.075 in relation to the operator; and ii if the set of documents is changed under regulation 119.085, 119.095 or 119.105, or in accordance with the process mentioned in regulation 119.100—the set of documents as changed; b. for an ASAO, means: i the set of documents approved by CASA under regulation 149.080 in relation to the ASAO; or ii if the set of documents is changed under regulation 149.115 or 149.120, or in accordance with the process mentioned in paragraph 149.340(i)—the set of documents as changed; or c. for a balloon transport operator: i the set of documents approved by CASA under regulation 131.085; or ii if the set of documents is changed under regulation 131.095, 131.105 or 131.115—the set of documents as changed.
external load operation	means carrying or towing a load outside an aircraft in flight and includes training for such an operation.

Term	Definition
fireground personnel carriage operation	means an operation: a. conducted by an aerial work certificate holder, for hire or reward, which is tasked by a fireground emergency organisation to carry passengers in a helicopter for the operation: i from a fire helibase in the vicinity of a relevant fireground to the fireground, or from one part of a relevant fireground to another part of the fireground, to carry out a relevant ground activity; or ii from a relevant fireground back to a fire helibase in the vicinity of the fireground, after carrying out a relevant ground activity; and b. that involves carrying passengers in a helicopter, for the operation, in accordance with the task mentioned in paragraph (a); and c. unless an exemption under Part 11 of CASR is applicable to, and being used by, the holder — for which the holder meets the requirements stated in paragraphs 4.02(1)(f) and 5.02(1)(a), and Chapter 17A. Note 1 The passengers are aerial work passengers under section 2.02. *[sic of the Part 138 MOS]* Note 2 An effect of this definition is that if any of the elements of the definition are not met, then the transport of the passengers is either a private operation but only if the aerial work certificate holder is not conducting the operation for hire or reward, or a Part 133 operation, with its attendant obligations, if the holder is conducting the operation for hire or reward. Note 3 Another effect of this definition is that a fireground personnel carriage operation cannot be conducted by a limited aerial work operator. **Explanatory Note (not part of the definition):** The references in this definition to paragraphs and a Chapter are references to elements of the Part 138 MOS. The MOS is not specifically mentioned in the definition because the definition is contained in the MOS. This definition incorporates the use of multiple other defined terms, including *fireground emergency organisation*, *fire helibase*, *fireground* and *relevant ground activity*. These supporting definitions are also contained in the Part 138 MOS.
flight crew member	A crew member who is a pilot or flight engineer assigned to carry out duties essential to the operation of an aircraft during flight time.
flight crew member proficiency check	A flight crew member assessment conducted by an operator in accordance with its training and checking responsibilities under these Regulations of whether a person has the aeronautical skills and knowledge required by the operator. May also be referred to as an operator proficiency check (OPC).
flight simulation training device	means: a. a qualified flight simulator; or b. a qualified flight training device; or c. a synthetic trainer that is approved under Civil Aviation Order 45.0; or d. a device that meets the qualification standards prescribed by a legislative instrument under regulation 61.045; or e. a device that is qualified (however described) by the national aviation authority of a recognised foreign State.
flight simulator	for a specific type (or a specific make, model and series) of aircraft: a. means a simulator that simulates the aircraft in ground and flight operations and comprises:

Term	Definition
	i a full size replica of the flight deck of the aircraft; and ii a visual system providing an out of the flight deck view; and iii a force cueing motion system; and b. includes the necessary software and equipment, and the way that the equipment is interconnected. **Note:** This term is used in the definition of *approved flight simulator* and *qualified flight simulator*.
flight training device	for a specific type (or a specific make, model and series) of aircraft: a. means a device that: i simulates the aircraft in ground and flight operations to the extent of the systems installed in the device; and ii comprises a full size replica of the instruments, equipment, panels and controls in an open flight deck area, or an enclosed flight deck, of the aircraft; and iii does not, in every respect, simulate the aircraft in ground and flight operations; and b. includes the necessary software and equipment, and the way that the equipment is interconnected. **Note:** This term is used in the definition of *qualified flight training device*, which only relates to devices approved under Part 60 of CASR.
Head of Training and Checking	A key person required under the act and described in Subpart 119.D.
initial training	Training provided to a person to introduce the operators' processes for carrying out all activities associated with a person's role.
limited aerial work operation	An aerial work operation that is described in subregulation 138.030 (2) and for which the operator is not required by subregulation 138.030 (1) to be an aerial work certificate holder.[1]
line training	Supervised line or task training on normal operations in a relevant aircraft.
medical transport specialist	A crew member for a flight who carries out a specified function during the flight relating to a medical transport operation, and who is not: (i) a flight crew member for the flight, or (ii) an air crew member for the flight, or (iii) a crew member of a kind prescribed by the Part 119 MOS.
non-normal exercise	means an aircraft flight that involves the simulated failure of a vital system.
operational safety-critical personnel	For an Australian air transport operator, an aerial work operator or a balloon transport operator: a. means personnel carrying out, or responsible for, safety-related work, including:

[1] Effectively this means that a limited aerial work operation is either or both of the following:
(i) spotting or photography where no remuneration is received by the pilot, the registered operator/aircraft owner (as applicable), or the person/organisation on whose behalf the operation is conducted;

(ii) an operation conducted over land owned/occupied by the registered operator/aircraft owner (as applicable) that is not conducted over a populous area or public gathering and is not an external load operation involving carriage of a person as an external load.

Term	Definition
	i personnel carrying out roles that have direct contact with the physical operation of aeroplanes or rotorcraft used in the operator's Australian air transport operations or aerial work operations; and ii personnel carrying out roles that have operational contact with personnel who operate aeroplanes or rotorcraft used in those operations; and iii personnel described as operational safety critical personnel in the operator's exposition or operations manual; b. but does not include personnel who are employed or engaged by the operator (whether by contract or other arrangement) and are engaged in: i the provision of continuing airworthiness management services for aeroplanes or rotorcraft used in the operator's Australian air transport operations or aerial work operations; or ii carrying out maintenance on an aeroplane, rotorcraft or aeronautical product on behalf of an approved maintenance organisation.
operator proficiency check	An assessment conducted by an operator in accordance with its training and checking responsibilities under these Regulations of whether a person has the aeronautical skills and knowledge required by the operator. **Note:** For flight crew in Parts 133 and 135, this may also be referred to as a flight crew member proficiency check (FCMPC).
person/personnel	For this AC, when either 'person' or 'personnel' is mentioned it refers to an individual or group of individuals employed as operational safety-critical personnel.
proficiency	Refers to the level of skill or expertise displayed in performing a task.
qualified flight simulator	a flight simulator that is qualified under Part 60 of CASR.
qualified flight training device	a flight training device that is qualified under Part 60 of CASR.
recognised foreign State	means any of the following: a. Canada; b. Hong Kong; c. New Zealand; d. United States of America; e. the following EASA member States: i Belgium; ii Czech Republic; iii Denmark; iv Finland; v France; vi Germany; vii Ireland; viii Italy; ix Netherlands; x Norway;

Term	Definition
	xi Portugal; xii Spain; xiii Sweden; xiv Switzerland; xv United Kingdom; f. any other foreign country prescribed by a legislative instrument under regulation 61.047. **Note:** At the time of publishing v6.1 of this AC, for regulation 61.047, CASA prescribes Singapore as a recognised foreign state under instrument CASA 38/22, and Japan as a recognised foreign state under instrument CASA 11/25.
recurrent training	Training of the personnel of an aircraft operator, or the operator of a flight simulation training device, that is conducted to ensure that the personnel are competent to carry out their responsibilities.
rotorcraft	means: a. a helicopter, or b. a gyroplane, or c. a powered-lift aircraft.
safety equipment	Equipment installed or carried for use during normal operations for the safe conduct of the flight and protection of occupants.
supervised	Carrying out an activity under the observation and direction of a trainer or checker.
supervising	Observing and directing an activity to assess competence and ensure safety.
task specialist	For an aerial work operation, means a crew member for a flight: (i) who carries out a function for the flight relating to the aerial work operation; and (ii) who is not a flight crew member or an air crew member for the flight.[2]
task specialist operation	means carrying out a specialised activity using an aircraft in flight and includes training for such an activity.
trainer	A person assigned by an operator to deliver training.
unsupervised	Carrying out a duty without a trainer or checker supervising.
vital system	means a system whose simulated failure in flight would adversely affect the safety of the aircraft as compared to normal operation.

[2] Note that the meaning of 'task specialist' can be modified by the Part 138 MOS (refer Chapter 3).

1.3 References

Legislation

Legislation is available on the Federal Register of Legislation website https://www.legislation.gov.au/

Table 4: Legislation references

Document	Title
Part 60 of CASR	Synthetic training devices
Subpart 119.E of CASR	Training and checking for operational safety-critical personnel
Subpart 121.N of CASR	Flight crew
Subpart 121.P of CASR	Cabin crew
Subpart 133.N of CASR	Flight crew
Subpart 133.P of CASR	Crew other than flight crew
Subpart 135.N of CASR	Flight crew
Subpart 135.P of CASR	Crew other than flight crew
Subpart 138.P of CASR	Air crew members and task specialists
Division 138.B.5 of CASR	Training and checking
Part 60 MOS	Part 60 Manual of Standards 2019
Part 121 MOS Chapter 12	Flight crew training and checking
Part 121 MOS Chapter 13	Cabin crew training and checking
Part 133 MOS Chapter 12	Flight crew member training and checking
Part 133 MOS Chapter 13	Cabin crew member training and checking
Part 133 MOS Chapter 14	Air crew member training and checking
Part 133 MOS Chapter 15	Medical transport specialist training and checking
Part 135 MOS Chapter 12	Flight crew member training and checking
Part 135 MOS Chapter 13	Air crew member training and checking
Part 135 MOS Chapter 14	Medical transport specialist training and checking

Document	Title
Part 138 MOS section 3.01AA	Other operations included in definition of *aerial work operation*
Part 138 MOS Chapter 23	Flight crew member training and checking
Part 138 MOS Chapter 24	Air crew member training and checking
Part 138 MOS Chapter 25	Task specialist training and checking
CAO 45.0	Flight crew standards—Synthetic trainers—General
CASA 11/25	Prescription of Japan as a Recognised Foreign State Instrument 2025
CASA 38/22	Prescription and Approval of Singapore as a Recognised Foreign State Instrument 2022
CASA EX12/24	Transitional Training and Checking Requirements for Crew Members in Part 121 Operations – Exemption Instrument 2024 (No. 1)
CASA EX68/24	Part 119 of CASR – Supplementary Exemptions and Directions Instrument 2024
CASA EX69/24	Part 121 and Part 91 of CASR – Supplementary Exemptions and Directions Instrument 2024
CASA EX70/24	Part 133 and Part 91 of CASR – Supplementary Exemptions and Directions Instrument 2024
CASA EX71/24	Part 135, Subpart 121.Z and Part 91 of CASR – Supplementary Exemptions and Directions Instrument 2024
CASA EX72/24	Part 138 and Part 91 of CASR – Supplementary Exemptions and Directions Instrument 2024
CASA EX73/24	Flight Operations Regulations – SMS, HFPNTS and T&C Systems – Supplementary Exemptions and Directions Instrument 2024
CASA EX74/24	Part 121 – Single Pilot Aeroplane (MOPSC 10-13) Operations – Exemptions and Directions Instrument 2024
CASA EX77/24	Transitional Training and Checking Requirements for Crew Members in Part 133 Operations – Exemption Instrument 2024
CASA EX78/24	Transitional Training and Checking Requirements for Crew Members in Part 135 Operations – Exemption Instrument 2024
CASA EX79/24	Transitional Training and Checking Requirements for Crew Members in Part 138 Operations – Exemption Instrument 2024

International Civil Aviation Organization documents

International Civil Aviation Organization (ICAO) documents are available for purchase from http://store1.icao.int/

Many ICAO documents are also available for reading, but not purchase or downloading, from the ICAO eLibrary (https://elibrary.icao.int/home).

Table 5: ICAO references

Document	Title
ICAO Doc 9995	Manual of Evidence-based Training
IATA	Evidence-based Training Implementation Guide

Advisory material

CASA's advisory materials are available at https://www.casa.gov.au/publications-and-resources/guidance-materials

Table 6: Advisory material references

Document	Title
AMC/GM Part 119	Australian air transport operators — certification and management
AMC/GM Part 121	Australian air transport operations—larger aeroplanes
AMC/GM Part 133	Australian air transport operations—rotorcraft
AMC/GM Part 135	Australian air transport operations—smaller aeroplanes
AMC/GM Part 138	Aerial work operations
AC 1-02	Guide to the development of expositions and operations manuals
AC 1-03	Transitioning to the flight operations regulations
AC 11-04	Approvals under CASR Parts 91, 103, 119, 121, 129, 131, 132, 133, 135, 138 and 149 (including MOS)
AC 60-02	Flight simulator approvals
AC 60-04	Flight training devices
AC 61-07	Flight instructor training
AC 61-08	Teaching and assessing non-technical skills for single-pilot operations
AC 61-09	Competency-based training and assessment for flight crew
AC 61-09 Annex A	Recognition of prior learning candidate application
AC 119-01	Safety Management Systems for air transport operations
AC 119-07 and 138-03	Management of change for aviation organisations
AC 119-12	Human factors principles non-technical skills training assessment for air transport operations
AC 121-03	Upset prevention and recovery training
AC 138-01	Part 138 core concepts

Document	Title
CAAP 5.23-1	Multi-engine aeroplane operations and training
CASA resource kit	Safety behaviours: human factors for pilots **Note:** This kit consists of 10 separate booklets and multiple videos.
	Head of training and checking guide
	Part 133, Part 135 and Part 138 sample training and checking manuals and associated guide **Notes:** 1. This package consists of 3 documents: the Part 133, Part 135 and Part 138 sample training and checking manual (contains content relevant to multiple kinds of crew members), the Part 133/135/138 sample training and checking manual (limited to flight crew member content only) and the Guide to Part 133/135/138 sample training and checking manuals. 2. These documents are available on the CASA webpage 'Industry compliance templates'.

1.4 Forms

CASA's forms are available at http://www.casa.gov.au/forms

Table 7: Forms

Form number	Title
	Application - Aerial Work Operations (CASR Part 138)
	Application - Air Operator's Certificate / Associated Approvals (CASR Part 119)
	Notification - Non-significant changes (CASR Parts 119, 131 and 138)

2 Introduction

2.1 Reading this AC

2.1.1 This AC applies to Part 121, 133, 135 and 138 operators who are required to have a training and checking system.

> **Note:** Chapter 3 of this AC provides an explanation of a training and checking system.

2.1.2 This AC:

- broadly discusses key training and checking system concepts
- contains specific guidance about:
  - specific Part 121, 133, 135 and 138 training and checking events
  - the personnel who can conduct training and checking events for the different kinds of personnel of an operator under Parts 121, 133, 135 and 138.

2.1.3 This AC does not contain guidance on training and checking obligations arising from other CASR Parts, even though an operator may have obligations to conduct training and checking of their personnel[3] in relation to the following matters:

- Part 119 requirements for operational safety-critical personnel to complete the operator training and assessment program in human factors principles and non-technical skills (guidance can be found in AC 119-12)
- Part 92 dangerous goods training requirements
- Part 99 drug and alcohol management plans
- CAR and CASR pilot-conducted aircraft maintenance.

2.1.4 This AC is divided into 5 chapters (Chapters 1 through 5), 3 appendices (Appendices A through C), and 3 annexes (Annexes A, B and C).

2.1.5 Operators are recommended to read the chapters, appendices and annexes that apply to their operations, as outlined in the list below:

- All operators:
  - Chapters 2, 3, 4 and 5
  - Appendices A, B and C
- Part 121 operators:
  - The chapters and appendices for all operators
  - Annex A
- Part 133, 135 and 138 operators:
  - The chapters and appendices for all operators
  - Annexes B and C.

2.1.6 This AC should be read in conjunction with the following other documents:

[3] As an example of a training and checking system needing to cover more than just the matters directly related to the operation of an aircraft, see paragraph 119.170(2)(a) of CASR.

- AMC/GM entries relating to training and checking regulations in the Part 119, 121, 133, 135 and 138 AMC/GM documents
- For Part 121 operators:
  - training and checking related exemptions in CASA EX68/24 and EX69/24
  - for operators who used the training and checking system exemptions in Parts 7 or 7A of CASA EX87/21: the training and checking related recognition of prior events instrument CASA EX12/24[4]
  - for operators who did not use the training and checking system exemptions in Parts 7 or 7A of CASA EX87/21: the training and checking related recognition of prior events instrument CASA 91/21[5].
- For Part 133 and 135 operators:
  - training and checking related exemptions in CASA EX68/24, EX70/24, EX71/24 and EX73/24
  - for operators who used the training and checking system exemptions in Parts 8 or 9 of CASA EX87/21 or EX73/24: the training and checking related recognition of prior events instruments CASA EX77/24 and EX78/24
  - for operators who did not use the training and checking system exemptions in Parts 8 or 9 of CASA EX87/21 or EX73/24: the training and checking related recognition of prior events instruments CASA 92/21 and 93/21[6].
- For Part 138 operators:
  - AC 138-01
  - training and checking related exemptions in CASA EX72/24 and EX73/24
  - for operators who used the training and checking system exemptions in Part 10 of CASA EX87/21 or EX73/24: the training and checking related recognition of prior events instrument CASA EX79/24
  - for operators who did not use the training and checking system exemptions in Part 10 of CASA EX87/21 or EX73/24: the training and checking related recognition of prior events instruments CASA 94/21[7].

[4] CASA EX12/24 applies to Part 121 operators that transitioned to full compliance with the training and checking Part 119 and 121 regulations and MOS when they ceased using the exemptions in Parts 7 and 7A of CASA EX87/21. For operators that transitioned to full compliance immediately on the commencement of Part 121 on 2 December 2021 - see instrument CASA 91/21.

[5] CASA 91/21 applies to Part 121 operators that transitioned to full compliance with the training and checking Part 119 and 121 regulations and MOS on 2 December 2021. For operators that only transitioned to full compliance when they ceased using the exemptions in Parts 7 and 7A of CASA EX87/21 - see CASA EX12/24.

[6] CASA 92/21 and 93/21 apply to Part 133 and 135 operators, respectively, that transitioned to full compliance with the training and checking Part 119, 133 / 135 rules on 2 December 2021. For operators that will only transition to full compliance with the training and checking Part 119 and Part 133/135 regulations and the respective MOS when they cease using the exemptions in Parts 8 and 9 of CASA EX73/24 - see instruments CASA EX78/24 and EX79/24.

[7] CASA 94/21 applies to Part 138 operators that transitioned to full compliance with the training and checking Part 138 regulations and the MOS on 2 December 2021. For operators that will only transition to full compliance when they cease using the exemptions in Part 10 of CASA EX73/24 - see CASA EX79/24.

2.2 Regulatory overview

> **Note:** See paragraph 2.1.3 for a non-comprehensive list of rules with training and checking obligations that are not discussed in this AC.

2.2.1 All Part 121, 133 and 135 operators are required to have a training and checking system. This system must cover all aircraft used by the operator.

> **Note:** Some operators are permitted by exemptions in CASA EX73/24 to temporarily not have a training and checking system for some aircraft.

2.2.2 Some Part 138 operators are required by regulation 138.125 of CASR to have a training and checking system.

> **Note:** Some operators are permitted by exemptions in CASA EX73/24 to temporarily not have a training and checking system for some aircraft.

2.2.3 Key points relating to the interpretation of regulation 138.125 of CASR are:

- Although regulation 138.125 of CASR requires an operator who meets one of the triggering events in this regulation, or section 4.02 of the Part 138 MOS as empowered by the regulation, to have a training and checking system for ALL of their aerial work operations, an exemption in section 8 of CASA EX72/24 changes this regulation so that:
  - the training and checking system is only required for the specific aerial work aircraft and/or aerial work operations covered by the triggering events in regulation 138.125 of CASR or section 4.02 of the Part 138 MOS
  - is not required for other aircraft or operations of the operator.
- Operators can then also voluntarily choose to place particular operations under their training and checking system, providing further flexibility - see the next paragraph after the Example below.

Example (relates to the effect of the general exemption in section 8 of CASA EX72/24)

An operator using a turbine-engine jet aeroplane and a single-engine piston-engine aeroplane is only required, due to the effect of the exemption in section 8 of CASA EX72/24, to use a training and checking system for the flight crew and other operational safety-critical personnel directly associated with the jet aeroplane and not the single-engine piston-engine aeroplane.

2.2.4 Part 138 operators can elect, by applying for a CASA approval, to voluntarily use a training and checking system, with its associated requirement for the operator to fill the additional key person position of Head of Training and Checking. Refer to sections 4.03 and 4.04 of the Part 138 MOS.

Notes:

1. Using a training and checking system alters how the crew member training and checking obligations contained in Chapters 23, 24 and 25 of the Part 138 MOS. Some operators may decide that these differing obligations better suit their operations.
2. Additional guidance on the different kinds of obligations regarding crew member training and checking can be found in AC 138-01 Part 138 Core Concepts.

2.2.5 Individual regulations within Subparts 121.N, 121.P, 133.N, 133.P, 135.N, 135.P, 138.N and 138.P of CASR require crew members to complete specific training events and checking events.

2.3 Approval under regulation 61.040 of CASR

Notes:

1. Operators do not need to read this section if they do not intend to apply for a 61.040 approval relating to the mentions of 'training and checking system' in Part 61 of CASR.
2. These 61.040 approvals are a different matter compared to an operator obtaining the 121.010 approval mentioned in Annex A to this AC. The 61.040 approval permits the operator training and checking system to substitute, in the manner outlined in the relevant Part 61 regulations, for an individually conducted Part 61 event. The 121.010 approval mentioned in Annex A of this AC permits an operator to vary certain Part 121 training and checking requirements in Subpart 121.N or 121.P of CASR.

2.3.1 The pilot training and checking requirements under Part 61 of CASR are separate from the training and checking requirements of Parts 119, 121, 133, 135 and 138 of CASR.

2.3.2 Operators can use individual training and checking flights to achieve multiple CASR Part outcomes, generally using one of the following methods:

- use a training or check pilot that satisfies the requirements of the multiple CASR Parts applying to the combined outcomes.
- for certain Part 61 recency, flight review and proficiency check requirements, apply for, and receive, a regulation 61.040 approval permitting the operator's training and checking system to substitute for the relevant Part 61 requirement.

2.3.3 The regulation 61.040 approval can apply to any of 22 different regulations under Part 61 of CASR. It enables flight crew members to meet their Part 61 obligations through successfully participating in an operator's training and checking system (the *approved system).* The operator's approval will list the regulations to which the regulation 61.040 approval applies. The relief provisions provided by the approval do **not** provide relief from the recency requirements of Parts 121, 133 and 135 of CASR.

2.3.4 A person is successfully participating in an operator's *approved system* if[8]:

- the person is employed by the operator
- the operator's training and checking system covers the operation
- the person has met the requirements under the system for entry into the *approved system*

[8] Regulation 61.010 of CASR.

- the person is permitted under the system to be assigned by the operator for duty for the operation.

2.3.5 The *approved system* will ensure the flight crew member continues to meet the competencies required to exercise the privileges of their licence and ratings and is therefore taken to have a valid Part 61 proficiency check and flight review. As the way the flight crew member achieves the required safety outcomes is specific to the operator, flight crew members are only authorised to conduct flight operations for that operator.

> **Note:** Operations conducted for the operator can include Part 91 operations, for example a ferry flight. In this case, the flight crew member is participating in the training and checking system.

2.3.6 If the flight crew member wishes to fly aircraft for another operator, or for personal recreation or other activities, then the flight crew member must comply with the relevant Part 61 requirements for that external activity.

2.3.7 The *approved system* must demonstrate compliance with the recurrent training and proficiency checks required by the FOR.

Example

The *approved system* will need to demonstrate how it complies with regulation 121.575 of CASR (Holding a valid Part 121 proficiency check).

2.3.8 The training and checking activities of the *approved system* do not require the training and checking personnel to hold Part 61 authorisations such as instructor or examiner ratings.

2.3.9 Check pilots can be authorised by the training and checking system to conduct training and checking activities. However, the training and checking system must include standards for and procedures to train and check the personnel involved in the activities in lieu of the Part 61 standards. Consideration should be given to the instructor and examiner competencies for the equivalent personnel.

2.3.10 Check pilots operating under the *approved system* are not required to use the CASA Flight Test Management System, nor to follow the Flight Examiners' Handbook. Instead check pilots must comply with the policies and procedures detailed in the operator's exposition or training and checking manual. Additionally, these check pilots do not make entries in the flight crew member's licence indicating a flight review or proficiency check has been conducted. Instead, the operator is required to issue evidence of ongoing proficiency[9] to exercise the privileges of the licence, which must be carried by the flight crew member. An example of a proficiency check record is at Appendix B of this AC.

2.3.11 An operator must demonstrate to CASA how its program of training and checks ensures proficiency in the competencies required by the Part 61 MOS relevant to the rating and the operation to gain an approval under regulation 61.040 of CASR for the training and checking system. Operators may develop a series of training and checks to be completed over a defined period to ensure flight crew proficiency is maintained rather than having just the required proficiency checks. The approved system allows operators to develop training and checks that are designed to meet specific operational needs. This flexibility can provide for a proficiency check that covers competencies from several ratings conducted over a defined period.

2.3.12 Typically, an *approved system* will be designed to raise the proficiency of flight crew members through training. Although the checks are a necessary element, the emphasis should be on

[9] Section XIII Conditions/Licence remarks in FCL.

training to improve the proficiency of flight crew. An example of a Part 121 recurrent training program is at Annex A of this AC.

2.3.13 To be effective, an *approved system* should contain the following elements:

- a grading system that provides greater granularity on proficiency
- word pictures that relate to each grading score to support inter-rater reliability
- check pilot training in the use of the word pictures and grading system
- the ability to collect and use the data from flight crew performance to continuously develop the system
- a system to identify underperforming flight crew and provide additional training to improve proficiency
- input from the SMS to identify areas where additional training can improve proficiency; the SMS should then provide feedback on the effectiveness of that training
- feedback from flight crew and check pilots on the effectiveness of the approved system.

2.3.14 To be granted an approval under regulation 61.040 of CASR, the operator's exposition or training and checking manual, in addition to the items listed in section 3.6 of this AC, must detail policies and procedures to ensure flight crew are *successfully participating* in the *approved system*. By successfully participating in the *approved system* the flight crew member is taken to satisfy the applicable Part 61 flight review, proficiency check and recent experience requirements until the flight crew member exits the system.

2.3.15 CASA considers the flight crew member as exiting the *approved system* once the flight crew member ceases to be employed by the operator or commences employment with another operator (including a secondment). The approved system must also manage periods of absence from line flying duties and ensure the proficiency of flight crew members prior to their return to line operations following an absence.

2.4 Contracted training and contracted checking

2.4.1 The defined terms *contracted training* and *contracted checking* refer to a situation where the Part 121, 133, 135 or 138 operator **contracts out** the delivery of training and checking that is the responsibility of the operator to another operator (see the following paragraph), as opposed to **contracting in** an individual instructor or examiner to conduct a specific training and checking event.

Notes:

1. The AOC or AWC holder who contracts a person or operator to conduct some training and checking activities always retains the obligation and responsibility to ensure that the personnel are competent to perform their assigned roles.
2. Although the obligation for completing Part 61 training or tests rests with individual pilots, some operators pay and arrange for the completion of Part 61 events as part of pilot employment packages. In the situation where a Part 121, 133, 135 or 138 operator contracts, for example, a Part 141 operator to conduct Part 61 training or tests for their pilots, this is not contracted training or contracted checking.

2.4.2 *Contracted training* and *contracted checking* are both defined to be a *Part 142 activity*. Regulation 142.015 of CASR defines that there are 3 different kinds of Part 142 activities, each of which is required to be specifically authorised. If a Part 119 or 138 operator desires to use a Part 142 operator for contracted training and/or contracted checking, operators are reminded to ensure that the Part 142 operator holds the specific authorisation to conduct the contracted training or contracted checking.

Example

A Part 133 operator contracts with a Part 141 operator for them to provide, on request, a flight instructor to the Part 133 operator to conduct a Part 133 flight crew member proficiency check for the Part 133 operator, using the Part 133 operator's operational procedures, training procedures and training documentation.

The Part 141 operator does not have any involvement in the activity, aside from the provision of the flight instructor.

In addition to holding the appropriate flight instructor rating and endorsement, and being able to exercise the privileges of this rating and endorsement, the flight instructor must meet any experience and entry control requirements, any recency or proficiency requirements, and completed any training required by the Part 133 operator's exposition before conducting the activity.

The Part 133 operator retains the obligation to ensure that the flight instructor meets the Part 133 operator exposition requirements. As a proficiency check is not an air transport flight, and the flight instructor is the pilot in command (PIC), the flight instructor has the obligation to ensure the flight complies with the requirements of Part 91.

This example does not require the Part 141 operator to hold a Part 142 authorisation.

The Part 141 operator is effectively a labour hire company and has no other involvement in the activity.

2.4.3 Part 121, 133 and 135 flight crew checking activities for aeroplanes or rotorcraft with a maximum operational passenger seat configuration (MOPSC) of more than 30 seats, or maximum payload capacity of at least 3 410 kg, must[10] be conducted by the Part 121, 133 or 135 operator and cannot be contracted out to a Part 142 operator.

2.4.4 Multiple kinds of training and checking activities can be contracted out to third-party training providers that do not hold a Part 142 authorisation. Examples include those related to the following:

- any operational safety-critical personnel training or checking where the personnel are not flight crew members
- dangerous goods training (regardless of whether a flight crew member)
- human factors and non-technical skills (HF and NTS) training (regardless of whether a flight crew member)
- emergency and safety equipment training (regardless of whether a flight crew member)
- refresher training (regardless of whether a flight crew member).

2.4.5 Training and checking activities conducted by a contracted third-party provider (including a Part 142 operator) must be conducted in accordance with the originating air operator's exposition or training and checking manual. The originating air operator is responsible for providing a current copy of the relevant sections of the exposition or training and checking manual to the contracted third-party provider.

2.4.6 If the operator contracts out a training and checking activity to a Part 142 operator, the 142 operator is required to hold a Part 142 authorisation permitting the contracted training (defined term in regulation 142.020 of CASR) or contracted checking (also a defined term in regulation 142.020 of CASR) in the aircraft or flight simulator.

2.4.7 If the operator contracts out a training and checking activity to a Part 142 operator, the Part 142 operator has responsibility for the safety of the flight and the conduct of the training or check.

[10] See subregulation 119.170(6) of CASR.

However, the training or check must be conducted in accordance with the originating operator's training and checking system.

2.4.8 See Chapter 3 of this AC for information on the recommended training and checking related content of an exposition or training and checking manual.

2.4.9 The HOTC (for flight crew) and the CEO (for all other operational safety-critical personnel) must[11] ensure that all training and checking is conducted in accordance with the operator's exposition or training and checking manual.

2.4.10 If the operator has a contract with a Part 142 operator for the conduct of training and checking activities for flight crew, in addition to ensuring that all the originating operator processes and procedures are followed before, during and after a training and checking events, the HOTC must specifically ensure that:

- each person who conducts training and checking is authorised under Part 61 to conduct those activities
- they tell the Part 142 operator, in writing, of any change in the exposition or training and checking manual relating to the training and checking activities the Part 142 operator conducts under the contract.

[11] See paragraphs 119.130(e) and 119.150(c) of CASR.

3 Training and checking system basics

3.1 Reading this chapter

3.1.1 All operators are recommended to read section 3.2.

3.1.2 Low complexity small operators are recommended to read section 3.3.

3.1.3 All other operators are recommended to read sections 3.3 to 3.8. These sections contain guidance to assist larger operators that have a diverse range of aircraft, operations, and training and checking needs.

3.2 What is it?

3.2.1 Simply put, a training and checking system specifies the WHO, WHAT, WHEN, WHERE and HOW of an operator's obligations relating to training and checking.

WHO is required to complete a training and checking event.

WHO is used to deliver a training and checking event.

WHEN must training and checking events be done.

WHERE will training and checking events be conducted.

WHAT training and checking resources will be used to conduct a training and checking event.

HOW (specifically) will an individual training and checking event be conducted.

3.2.2 For an operator that hasn't been previously required to have a training and checking system, they have already been thinking about the WHO, WHAT, WHEN, WHERE, WHAT and HOW above.

3.2.3 For example, under the old pre-2 December 2021 rules, charter or aerial work operators who were **not** required to have a CAR 217 training and checking organisation often had requirements for new pilots to be 'trained' in the operator's processes and procedures before conducting a flight and do a 'check' flight under supervision by a senior pilot before conducting a charter or aerial work flight without supervision. Operators generally used only particular personnel to conduct this 'training' or 'check' and these personnel knew what kinds of things they would do during the event.

3.2.4 By formalising, standardising and documenting these matters, the effectiveness and consistency of these events is increased.

3.3 CASA's sample training and checking manual

3.3.1 CASA has produced 2 sample training and checking manuals, and an accompanying Guide to these samples, to assist operators with meeting their training and checking system requirements.

3.3.2 These 3 documents are available at this link - Industry compliance templates.

3.3.3 The sample manuals have been developed primarily for smaller Part 133 and 135 operators where the scope of their operations is limited, and they may not have the resources nor needs to maintain dedicated personnel managing the training and checking system. They provide these smaller operators with practical processes and systems that meet the criteria mentioned in section 3.1 of this AC.

3.3.4 Larger operators with a diverse range of aircraft, operations, and training and checking needs are likely to find that CASA's sample training and checking manuals do not have sufficient detail to be easily adapted to suit their needs. These operators are recommended to read sections 3.3

through 3.8, amongst other material in this AC, to help construct their system and documentation.

3.3.5 These manuals can be used as a standalone training and checking manual, or as a volume of an exposition. They can be used by operators outside the defined scope as a basis for developing a manual that meets their more complex needs, especially for operators close to the scope of operator described in the Guide to the samples.

3.3.6 Operators who have limited numbers of personnel, or conduct a limited range of activities, for example an operator with just one aeroplane and pilot, do not need complex structures and systems to manage their training and checking requirements. The scalable and outcomes-based nature of the regulations mean that these operators need only provide documentation that suits their particular circumstances.

Example

A VFR operator with one type of aircraft and two pilots chooses to use an external Part 61 flight instructor for all of their training and checking activities.

In this instance, the management of this operator's training and checking system is straightforward since it would amount to one check event per year per pilot, and this could be carried out without significant infrastructure, processes or administrative focus from the operator.

3.4 Things to consider when developing a training and checking system

3.4.1 For operators whose training and checking needs cover a greater span and require more detail and structure than the sample manual provides, it is expected and reasonable for an operator's training and checking system to be developed in consideration of the size, nature, and complexity of their air operations. Scalability considerations include the:

- number and kinds of aircraft
- number and nature of activities conducted
- size and experience levels of the operator's workforce
- location and distribution of the operation and organisation.

3.4.2 The primary role of a training and checking system is to ensure that operational safety-critical personnel are proficient in the required competencies to support air operations.

Note: *Competency* is defined as a combination of skills, knowledge and attitudes required to perform a task to the prescribed standard, whereas proficiency refers to level of skill or expertise displayed.

3.4.3 The training and checking system will need to:

- identify the required skills, knowledge and attitudes required for a particular operator's operation
- ensure that the persons encompassed by the system have achieved the required level of competency.

3.4.4 For an operator to successfully achieve their training and checking objectives, they will need to have:

- an appropriately designed system to manage the training and checking

- adequate facilities and resources
- personnel who are appropriately authorised and capable of delivering the training and conducting the assessments.

3.4.5 Operators should carry out an analysis of their activities to determine the appropriate level of resources to manage the system.

3.4.6 Where applicable, SMS[12] processes should support a risk-based approach to training and checking. An SMS can provide valuable input through training needs analysis into shaping training and checking to meet operational needs and improve performance.

3.4.7 Major components of a training and checking system may include:

- WHO:
  - is responsible for the system (normally the Head of Training and Checking (HOTC)) (see section 3.3)
  - administers the processes of the system (depends on the scale of the operator, might be dedicated administration staff, might be dedicated training staff, might be the HOTC)
  - will conduct training and checking events (may require task analysis to determine the competencies of training and checking personnel and the number of them required to support the operator's operations; how will these people be selected, trained and their competency maintained) (see section 3.4).
- WHEN / WHERE / WHAT:
  - training organisation structure (see section 3.5 below)
  - management processes (including contracted training and/or checking management if this applies to the operator)
  - (not mandatory) objectives of the system (such as 'to produce measurable evidence of improvement in the proficiency of operational safety-critical personnel' and 'to ensure that all operational safety-critical personnel have undertaken the required training and checking within the required timeframe')
  - training facilities (classrooms, computer-based training systems (CBT), flight simulation training devices (FSTD), aircraft, etc)
  - if a 61.040 approval is held: a policy detailing when a person is participating in the training and checking system, and detailing method for re-entry when not participating.
- HOW: (see section 3.6)
  - instructions for the conduct of training and checking events
  - criteria for achievement of competency by personnel under training and check
  - instructions for recording training and checking outcomes and expiry dates.
- HOW will the operator determine the system is working? (see section 3.7 below)
  - procedures to review training and checking records to identify trends
  - management review methodology
  - procedures for review and revision of the training and checking processes and procedures
  - feedback loops, for example, the relationship between flight data analysis program (FDAP) and SMS, and revisions to training and checking policy and programs.

[12] For further advice on SMS refer to AC 119-01 – Safety management systems for air transport operations.

3.5 Training and checking key personnel

3.5.1 Parts 119 and 138 of CASR allow one individual to fulfil multiple key personnel positions depending upon the complexity of the operation. Part 138 of CASR requires the operator to hold an approval under regulation 138.025 of CASR if the HOTC position is to be held by the CEO and/or HOO. This difference is due to the increased probability of operations and activities that require a HOTC under Part 138 being of higher complexity than air transport operations under Part 119.

3.5.2 Operators who only carry out a limited number of training and checking events are likely to have only one key person available to occupy the roles of HOFO/HOO and HOTC. CASA's sample training and checking manual separates these roles since their responsibilities are different. However, provided the single individual can carry out both sets of responsibilities there is no reason why these key positions cannot be occupied by the same person.

3.5.3 It is preferable for the HOTC to be qualified to act as a training and/or checking pilot on at least one of the operator's main types, but this is not a regulatory requirement. However, the HOTC must be capable of effective supervision of all the activities of the training and checking system.

3.5.4 The regulations require that the HOTC is responsible for flight crew training and checking. However, this does not preclude the HOTC also being the HOFO or being appointed as the responsible manager for other training and checking activities such as cabin crew, air crew, or other operational safety-critical personnel.

3.5.5 For larger operators with multiple key personnel, the operator should demonstrate that clearly defined reporting and communication lines exist between key personnel, and for its training and checking functions, management, supervisors, and other personnel (including contractors) involved in the training and checking activities.

3.5.6 AMC and GM for Parts 119 and 138 of CASR provide information on organisational structures to support air transport and aerial work operations.

3.6 Persons conducting training and checking events

3.6.1 CASA must be satisfied that the operator has sufficient suitably qualified, experienced and competent personnel to ensure that training and checking activities can be conducted safely and effectively[13].

> **Note:** The expected level of qualifications, experience and capability will vary according to the scope and complexity of the activities.

3.6.2 The operator's exposition or training and checking manual should include:

- for all training and checking personnel:
  - a detailed job description, including the activities authorised
  - a description of their responsibilities/accountabilities
  - minimum capability and experience requirements
  - training, authorisations and qualifications
  - recency/requalification requirements.

[13] For AOC holders, see subparagraph 28(1)(b)(iii) of the Civil Aviation Act 1988. For AWC holders, see paragraph 138.040(1)(c) of CASR.

- a description of how the operator will ensure the standardisation of training and checking personnel.

3.6.3 When determining the relevant manual content relating to training and checking personnel, it is recommended that operators consider the following:

- number of different aircraft types flown by the operator
- number of required training and checking activities
- projected aircraft and simulator hours to be flown
- ground course theory subjects to be delivered
- rostering arrangements for the training and checking personnel (whether they will be available on a full time, part time or casual basis).

3.6.4 Consistency amongst training and checking personnel is an important factor in the success of a training and checking system. However, the greater the number of training and checking personnel, the greater the risk of differing standards across the group.

3.6.5 Simple training and checking systems may only require the use of a standardisation proficiency check (SPC) conducted by the HOTC. Larger, or more complex, training and checking systems, in addition to an SPC, may track the scoring of checking events and compare those across the group of training and checking personnel to determine the level of inter-rater reliability.

3.6.6 Inter-rater reliability is defined by ICAO[14] as "The consistency or stability of scores between different raters." Put another way, it is the extent to which two or more raters (training and checking personnel) are likely to agree, and it addresses the issue of consistency of the implementation of a rating system such that:

- High inter-rater reliability values indicate a high degree of agreement between two or more training and checking personnel.
- Low inter-rater reliability values indicate a low degree of agreement between two or more training and checking personnel.

3.7 Training and checking organisational structure

3.7.1 The operator must[15] demonstrate that it has sufficient resources and capability, whether internal or external, to adequately conduct the training and checking activities. However, this does not mean that an operator is required to have redundancy in its training and checking staff or its key personnel. How much redundancy is held by the operator is an operator decision, made in the awareness by operators of the consequences of not being able to conduct training and checking activities in required timeframes.

3.7.2 Properly supervising, managing and conducting training and checking activities in large, complex operators may require multiple layers of management, whereas very small, non-complex operators might only require a HOTC.

3.7.3 Some training and checking activities may be provided to the operator under a contractual arrangement. However, the obligation to maintain a training and checking system is always the responsibility of the operator.

3.7.4 For more larger and more complex operators, it may be useful to illustrate the managerial and supervisory positions involving in oversighting an operator's training and checking system by a diagram of the organisational structure.

[14] See ICAO Doc 9995.

[15] Regulations 119.130 and 138.085 of CASR.

3.7.5 If all or part of the training and/or checking activities are contracted to a third party, the operator's exposition or training and checking manual processes and procedures should illustrate or explain how, and by whom, the third party activities are oversighted.

3.8 Exposition or training and checking manual

3.8.1 These documents describe the WHAT, WHO, WHEN and HOW of the training and checking system.

3.8.2 The operator may choose to include all training and checking activities in one volume, or they may have multiple volumes covering different operational safety-critical personnel.

3.8.3 The following should be included in the documents[16]:

- training and checking system objectives
- training and checking organisational structure
- nominated and appointed training and checking personnel related information, such as:
  - their duties and responsibilities
  - their prerequisite qualifications and experience
  - which training and checking activities they are permitted to conduct
  - of training and checking personnel.
- for each training or checking event, information such as:
  - description of administrative processes
  - syllabus
  - course outline
  - lesson plans
  - methods of assessment used to grade the performance of operational safety-critical personnel
  - procedures for the conduct of assessments (such as theory examinations and practical competency assessments), and managing knowledge deficiencies
  - method for remediating unsatisfactory performance (whether knowledge or practical deficiencies)
  - facilities or equipment used for the event, including describing when the facility or equipment is considered unserviceable for the event and how personnel report facility or equipment unserviceabilities.
- description of facilities and equipment to support training and checking activities, such as:
  - location of facilities
  - aircraft
  - FSTD (including which activities can be conducted in an FSTD, any differences between an FSTD and the aircraft, and how differences will be managed from a competency assessment perspective) (see example below)
  - cabin training devices and emergency exit trainers
  - briefing and debriefing rooms

[16] Regulatory requirements for inclusions in a training and checking system are specified in regulations 119.170, 138.130 and 138.135 of CASR (as applicable to the operation).

  - CBT programs
  - other training aids.
- training and checking records management[17]
- details of the management of the Part 142 organisation (or foreign equivalent) providing contracted training and/or contracted checking (if any), including:
  - details of the individual conducting the training and checking
  - what activities are covered by the contract
  - the method used by the operator to oversight the contractor.
- system review and continuous improvement (quality assurance).

Example (linked to the FSTD bullet point above)

'*FSTD A'* located in Australia represents a different variant of a type to the specific aircraft used by the operator.

The operator would like to use '*FSTD A'* for one of their annual proficiency checks.

The following differences are listed:

- '*FSTD A'* has a L+C+R HYD SYS, whereas the aircraft has a L+R HYD SYS.
- '*FSTD A'* has PW4000 engines with 63 000 lbs of thrust, whereas the aircraft has PW2040 engines with 40 100 lbs of thrust.
- All other systems are similar.

Based on the differences, the operator determines that:

- the HYD systems are too different to conduct effective training and checking activities involving hydraulic faults or failures
- a 20% derate on the PW4000 engine thrust produces similar performance to that of the PW2040-engined aircraft.

The operator therefore:

- records the outcome of this assessment into its lesson plans and list of suitable facilities to ensure that HYD system events are not conducted in FSTD A

and

- requires one proficiency check in '*FSTD A'* per annum, with a second proficiency check in '*FSTD B',* which is qualified by a recognised foreign State, and based on the same variant as the operator's aircraft.

3.8.4 If emergency and safety equipment training and checking is conducted in an aircraft, the operator is recommended to consider the following matters when designing their training and checking processes and procedures such that the aircraft will remain airworthy following the conclusion of the training and checking:

- If emergency and safety equipment is removed from its stowage position and used for training and checking activities, the operator should detail how that equipment will be handled safely and indicate who is responsible for ensuring the equipment is restowed and serviceable.

[17] Regulations 119.225, 119.230 and 138.170 of CASR.

- If emergency and safety equipment is removed from its stowage position and replaced with 'dummy' equipment, then an entry should be made in the aircraft technical log. Following the training and checking activity, the technical log must be certified once the equipment is correctly restowed and serviceable.
- If emergency exits are operated, the procedures will need to ensure that the activity is conducted safely and with no damage to the aircraft.
- Where escape slides/rafts can be armed for automatic deployment, the procedure will need to include how the system is made safe to prevent accidental deployment. In this instance, approved maintenance staff may need to be involved in deactivating and reactivating the system.

3.9 How to determine your training and checking system is working

3.9.1 An essential element in any system is the measurement of system performance.

3.9.2 The exposition or training and checking manual must[18] detail how the operator ensures that the training and checking system is meeting their operational needs.

3.9.3 An operator's audit program should include the following elements:

- training and checking records capture and data analysis
- effective communications protocols
- procedures for review and revision of the exposition or training and checking manual
- data management (sources, collection, storage, analysis, use)
- feedback loops, for example, relationship between FDAP and SMS and revisions to training and checking policy and programs
- facilities, for example, classrooms, CBT, FSTDs
- training and checking of personnel such as checkers and check pilots
- management of change processes
- oversight of third-party training providers
- organisational procedures such as meeting schedules, minutes, attendance lists, agenda management, record keeping.

[18] Regulations 119.170, 138.130 and 138.135 of CASR.

4 Training and checking facilities

4.1 General

4.1.1 Training and checking activities may be conducted in aircraft, FSTDs, cabin training devices, emergency exit trainers, or any other device used for training and checking provided it is suitable for the purpose.

4.1.2 When selecting a device, the potential for negative training outcomes must be considered. An element of the ongoing suitability of a device is ensuring the device is maintained in good order.

4.2 Training and checking in an aircraft

4.2.1 Division 91.D.11 of CASR contains general rules relating to causing or simulator the failure of aircraft equipment during a flight. Some exemptions apply to the regulations within this Division. For specific exemption references, read the GM entries for these regulations in the Part 91 AMC/GM document which is available on the CASA website.

4.2.2 Specific rules relating to when a flight simulator must be used include the following:

- Regulation 91.745 of CASR limits which aeroplanes are permitted to be used for in-aircraft simulated engine failures for all operations.
- Regulation 121.510 of CASR requires certain training and checking for a Part 121 operation to be conducted in an approved flight simulator.
- Section 12.13 of the Part 133 MOS requires certain training and checking for a Part 133 operation to be conducted in an approved flight simulator.

4.2.3 Training and checking may be carried out on air transport flights provided the exposition supports the activity, no abnormal or emergency activities are conducted, and the flights are compliant with the regulations within Division 91.D.11 of CASR (regulations 91.715 to 91.775 inclusive), and regulation 121.510 of CASR. The trainer or checker must be pilot-in-command and will need to satisfy operator entry control, training and checking, and recency requirements such as non-command seat training and check requirements.

4.2.4 If the conditions in the previous paragraph are not met, then the flight must be operated under Part 91; no passengers may be carried.

4.2.5 Risks such as harm to personnel and damage to aircraft must be effectively mitigated by policies and procedures detailing the WHO, WHAT, and HOW for the conduct of training and checking activities.

4.2.6 The operator must consider the heightened risk associated with in-aircraft training and checking involving the following:

- inappropriate management of complex aircraft systems
- conducting flight operations at low level (such as engine failures after take-off)
- conducting operations at or near VTOSS, VMCA or VS0 with an engine inoperative
- inadvertent mismanagement or errors
- vortex ring state
- over pitching.
- asymmetric operations including:
  - inadequate pre-take-off planning and briefing
  - poor decision making

  - poor aircraft control
  - inadequate performance awareness and management
  - operations at idle power, flight idle, flat propeller pitch or automatic torque sensing systems activated
  - missed approaches and go-arounds
  - unstable final approach and landing
- performance states in the vicinity of stalling

4.2.7 Risk mitigation strategies are recommended to include detailed information for at least the following items:

- weather
- environmental conditions
- traffic
- task saturation
- fatigue
- who the handling pilot is and well-defined protocols for the transfer of control
- method by which a simulation is initiated (announcement, which control is moved etc.)
- operating restrictions, including minimum altitude/speed and aircraft configuration
- use of checklists and touch drills
- circumstances requiring termination of the activity.

4.2.8 For any proficiency checks conducted in an aircraft the operator must ensure that the training and checking personnel are trained in the competencies required to safely conduct the activity. The operator can achieve this by:

- ensuring that training and checking personnel hold the (valid) Part 61 qualifications required to conduct the activity

  or

- for personnel who do not hold the relevant Part 61 qualification, providing training to the person which enables the training and checking activities to be conducted at a safety level is at least equivalent to that achievable by a Part 61 qualified person.

4.2.9 Subpart 121.Z, Part 133, Part 135 and Part 138 operators (which also includes operators operating under a combination of Part 135 and the 10-13 seat exemption CASA EX74/24) who intend to train persons to conduct a training or checking event involving the conduct of non-normal exercises, without the person holding an appropriate Part 61 instructor rating, an examiner rating, or a 61.040 approval to conduct the activity, are required to hold an approval of the relevant aspects of their training and checking system[19]. Refer to Annex B for specific information on these matters.

4.2.10 The definition of a non-normal exercise is contained in the instruments referred to in the previous paragraph. This definition, and its supporting definition of *vital system*, is repeated below:

non-normal exercise means an aeroplane flight that involves the simulated failure of a vital system.

[19] The requirement for an approval to be held is in section 20B of CASA EX70/24 (for Part 133 operators), section 20A of CASA EX71/24 (for Part 135 and Subpart 121.Z operators), and section 17 of CASA EX72/24 (for aerial work certificate holders).

vital system means a system whose simulated failure in flight would adversely affect the safety of the aeroplane as compared to normal operation.

4.3 Training and checking in a FSTD

4.3.1 A flight simulation training device (FSTD) is defined as a:

- qualified flight simulator
- qualified flight training device
- synthetic trainer that is approved under Civil Aviation Order 45.0
- device that meets the qualification standards prescribed by a legislative instrument under regulation 61.045
- device that is qualified (however described) by the national aviation authority of a recognised foreign State.

4.3.2 The following rules specifically require some training and checking events to be conducted in a flight simulator:

- Regulation 91.745 of CASR limits which aeroplanes are permitted to be used for in-aircraft simulated engine failures for all operations.
- Regulation 121.510 of CASR requires certain training and checking for a Part 121 operation to be conducted in an approved flight simulator.
- Section 12.13 of the Part 133 MOS requires certain training and checking for a Part 133 operation to be conducted in an approved flight simulator.

Note: Other rules in Division 91.D.11 of CASR relate to the simulation of equipment failures. These rules might also determine whether a training and checking activity can be conducted in an aircraft.

4.3.3 However, CASA encourages operators and aircraft owners to maximise their use of qualified FSTDs, as they are shown to improve the quality of training and checking activities.

4.3.4 An operator wishing to use an FSTD qualified under Part 60 of CASR to conduct training or checking activities will require approval under regulation 60.055.

4.3.5 An operator wishing to conduct training and checking in an FSTD qualified by a recognised foreign State, as defined by regulation 61.010, will need to provide CASA with a copy of the qualification certificate and include details of the device in their exposition or training and checking manual, and how the operator ensures the device continues to be qualified by the regulator of the foreign State.

4.3.6 AOC holders who purchase their own FSTD generally have the device mirror their specific fleet of aircraft, whereas FSTDs provided by third party simulator operators will be designed to mirror the original equipment manufacturer (OEM) standard or generic tail number (white tail aircraft).

4.3.7 Regardless of which country qualifies an FSTD, operators can expect CASA will seek to understand how the operator has determined that the FSTD is suitable to support their training and checking activities. FSTDs that are not suitable can result in 'negative training'. Operators are recommended to consider the following matters when assessing the suitability of an FSTD:

- significant differences between the operator's aircraft and the FSTD systems
- the design layout of the flight deck
- instrumentation package, i.e. Garmin vs. Proflight
- flight management computer software and functionality

- engine configuration and thrust
- availability of a suitable database to support training and checking.

4.3.8 In cases where the FSTD is **not qualified** for all activities, such as a device that is not qualified to adequately simulate the take-off or landing of the aircraft, the operator would need to conduct these elements of their training and checking activities in an aircraft.

4.4 Training devices that are not FSTDs

4.4.1 The effectiveness of crew member training and checking can be enhanced using cabin training devices, emergency exit trainers, underwater escape trainers, and fire-fighting training devices, etc.

4.4.2 Practical training in emergency and safety equipment may be conducted using representative training devices instead of the actual aircraft and equipment.

4.4.3 There is no formal approval process for the use of such devices.

4.4.4 Training and checking personnel who use the device need to be appropriately trained by the operator to use the devices.

5 Training and checking activities

Refer to Annex A for detailed guidance about Part 121 training and checking.

Refer to Annex B for detailed guidance about Part 133, 135 and 138 training and checking.

5.1 General

5.1.1 An operator's training and checking activities need to comply with the operational Part (121, 133, 135 or 138) under which they conduct their operations. If the operator conducts operations under more than one Part, options include, but are not limited to, having all crew members comply with the most stringent requirements provided they can be shown to cover all individual Part-based requirements[20], have crew members comply with separate requirements for each Part, or elect to allocate crew to a specific operational Part. Whichever requirements the operator chooses, they have an obligation to ensure personnel are competent with the applicable requirements before being assigned a duty.

5.1.2 Competency is normally expected to be assessed on the job, that is in the workplace or simulated workplace, under normal workplace conditions, thereby enabling the assessor to observe behaviours that demonstrate the relevant knowledge, skills and attitudes to carry out their assigned duty competently. A check that does not allow such an assessment to be made is not a competency assessment.

5.1.3 Training and checking activities are either non-recurrent or recurrent. Refer to the relevant Part based regulations and MOS content for which activities are contained in each category.

5.1.4 The development of a training and checking matrix can be a useful tool when planning training and checking activities for flight crew. An operator should consider the following when developing a matrix for training and checking activities:

- the training and checking requirements of the relevant Part
- flight review and proficiency check requirements under Part 61
- other training and checking requirements, such as:
  - extended diversion time operations training
  - land and hold short operations training
  - precision radar monitored approach training
  - low visibility operations training
  - night vision imaging system operations training
  - specialised low-level operation training
- intervals between recurrent training and checking events.

5.1.5 A related requirement for Part 119, 121, 133 and 135 operators, not included in the main training and checking regulation 119.170 of CASR, is for operators to have a program of training and assessing all operational safety-critical personnel in human factors principles and non-technical skills (HFP&NTS). Conducting joint HFP&NTS training for flight and cabin crew optimises the outcomes that can be achieved. Joint training enhances communication,

[20] Regulation 135.010 of CASR specifically permits Part 121 rules to be complied with for a Part 135 operation instead of a Part 135 rules. For guidance on how CASA expects this regulation to be complied with, read the GM 135.010 entry in the Part 135 AMC/GM document.

coordination and teamwork while promoting a better understanding of each other's roles and responsibilities.

5.1.6 Exemptions are in force for certain operators to defer the implementation of HFP&NTS training and operators should refer to the terms of the exemptions as they apply to their circumstances if they wish to take advantage of these deferrals[21].

5.2 Flight crew proficiency checks and flight reviews

5.2.1 Under the FOR, proficiency checks are required before commencing unsupervised line operations for an operator, and as part of recurrent training and checking. The purpose of the proficiency check is to confirm that a flight crew member is competent in the activities they perform for the operator.

5.2.2 In addition to the FOR, Part 61 requires a flight crew member to have a valid proficiency check for the operational rating they will be exercising the privileges of. They include instrument proficiency check (IPC), night vision imaging system proficiency check (NPC), aerial application proficiency check (APC), instructor proficiency checks (FPC) and examiner proficiency check (EPC).

5.2.3 Part 61 also requires flight crew members to have a valid flight review to exercise the privileges of a class or type rating they hold. Flight reviews are required for aircraft ratings and low-level rating (note the private IFR rating flight review is not relevant to these kinds of operations). Flight crew members holding a relevant proficiency check are taken to have a valid flight review[22].

5.2.4 Pilots participating in an operator's training and checking system who hold a current valid and relevant OPC will not need to carry out flight reviews due to the effect of the regulations mentioned in 5.2.3 of this AC, for flights for the air operator. If they wish to exercise the privileges of their licences and ratings outside of the air operator (apart from their IPC), they would need evidence of completion of their OPC. Operators should ensure such evidence is available to their crew members when needed.

5.2.5 Proficiency checks conducted under the FOR and those required by Part 61 can be conducted concurrently, provided that both sets of requirements are satisfied. Operator proficiency checks can satisfy the requirement for a flight review in many circumstances, so a separate activity may not be required.

5.2.6 Operators and pilots should be aware that only individuals who hold the privilege of being able to renew the pilots' flight review can make the entry on the pilot's licence. No entry can be made by a check pilot who does not hold the privilege, even though they may be able to carry out an OPC.

5.2.7 Proficiency checks and flight reviews are required to assess competency for normal, abnormal and emergency operations. The requirement for normal operations will vary depending on the scope of operations. For example, an operator who assigns flight crew duties at night should include night operations within their training and checking program.

5.2.8 Proficiency checks may not need to be carried out in each type of aeroplane a pilot will operate, provided the operator's processes satisfactorily ensure competence on all types. This can allow competencies demonstrated on one type to be credited as demonstration of the same competencies on a similar type. For these situations, an operator’s exposition or training and checking manual will need to explain how a training or check event conducted on more than one date will be accounted for in the operator’s record of when the event was conducted. The exposition or training and checking manual would also need to list which competencies on one type apply to other types.

[21] Refer to the appropriate section of CASA EX73/24.

[22] Regulations 61.745 and 61.800 of CASR.

5.2.9 Operators of R22 and/or R44 helicopters need to be aware that CASA 62/20 requires a pilot to have completed a flight review in either an R22 or R44 helicopter. In other words, even if a pilot had completed a flight review in any other single-engine class-rated helicopter, it would not be valid for the R22 or R44.

5.3 Line operations training and checking

5.3.1 Supervised line flying, line training and line checks are used to expose flight crew, cabin crew and air crew to the operator's authorised operations, and to enable them to gain real time experience conducting authorised activities on the aircraft over the operator's route structure. For this reason, it is not suitable to conduct supervised line flying, line training or line checks in an FSTD.

5.3.2 This type of training is not Part 61 flight training and is not a Part 141 or 142 training activity. Therefore, the training and subsequent check may be conducted by a person trained by the operator and appointed in the operator's exposition/operations manual. The person is not required to hold a Part 61 flight instructor and/or flight examiner qualification.

5.3.3 Since supervised line flying and training, and line checks, are conducted during normal operations, the exposition/operations manual must include policies and procedures to confirm:

- the crew complement, including identification of the pilot in command (PIC), and notification of supervised line training in the cabin
- no simulated instrument flight allowed
- no abnormal/emergency exercises to be conducted on the flight (this does not preclude discussion items)
- actions in the event of an actual abnormal/emergency event
- maintenance of workload management, to ensure questions and discussions occur at an appropriate time in the flight
- for cabin crew and air crew, cabin seating arrangements.

5.3.4 Supervised line flying and training does not meet the requirements of a Part 61 flight review or proficiency check.

5.4 Non-recurrent and recurrent training and checking – part-time employees

5.4.1 If an operator uses part-time or seasonal employees to meet their operational needs, the exposition/operations manual must demonstrate how the training and checking system will ensure their competency. The training and checking matrix could, depending on absence period, determine what recurrent training is required.

5.4.2 For a Part 121 operator, an approval under regulation 121.010 may be granted to allow the operator to accept a Part 121 proficiency check (121PC) conducted by another operator. The approval[23] can only be granted if the maximum certificated passenger seating capacity is 19 or less. To assess a request, CASA may take into consideration things such as:

- aircraft type and variant
- same (or very similar) SOPs (this could be achieved by following the OEM SOPs)
- whether or not the 121PC satisfies the operational needs of the operator, i.e., low visibility operations (LVO), land and hold short operations (LAHSO), PRM etc.

[23] Subregulation 121.575(2) of CASR.

- the process by which the HOTC maintains oversight of the 121PC to ensure that the content of the 121PC is satisfactory, e.g., if the 121PC is conducted by a flight examiner and satisfies the requirements for an IPC
- the process by which the records of the 121PC are provided to the operator.

5.4.3 Parts 133, 135, and 138 do not provide for a similar process of approval under the regulations. However, if two operators utilise the same Part 142 operator for the provision of flight crew member proficiency checks (PCs) and a PC is conducted by a flight examiner, then the operator could take that PC as meeting its requirements. The operator's exposition or training and checking manual would need to detail the circumstances under which this could occur.

5.4.4 For part-time employees, operators may accept dangerous goods certificates, emergency/safety equipment training completion certificates, and such, issued by another operator if the HOTC and CEO are satisfied that the training and checking that has been conducted by the other operator meets their training and checking system requirements.

5.5 Requalification training and checking

5.5.1 The exposition or training and checking manual should detail the requirements for requalification when circumstances (such as leave or other absence) result in the flight crew member no longer being available for operations. The requalification process may vary depending on the time absent from the system, from a line check through to a full conversion training program.

5.5.2 For flight crew, the HOTC is responsible for determining what training and checks are required considering the operator's requirements as well as Part 61 recency requirements and the FOR requirements. The training and check checking system might prescribe more restrictive requirements than the Part 61 or FOR recency requirements based on their SMS.

For example:

An operator may consider that after a 45-day absence a line check is required before a pilot conducts unsupervised line flying.

5.5.3 For cabin crew, refer to the refresher training information in Annex A to this AC.

5.5.4 An example of a requalification matrix is at Appendix C of this AC.

5.6 Evidence-based training

5.6.1 The aim of an EBT program is to identify, develop and evaluate the competencies required by pilots to operate safely, effectively and efficiently in a commercial air transport environment, by managing the most relevant threats and errors, based on evidence collected in operations and training.

5.6.2 EBT programs are intended to be applied as the means of assessing and training key areas of flight crew performance in a recurrent training system, in accordance with ICAO Annex 6, Part I, 9.3, Flight crew member training programs, and 9.4.4, Pilot proficiency checks.

5.6.3 The EBT program considers the differences between aircraft generations by tailoring the recurrent training program to the particular aircraft generation.

5.6.4 Implementation of EBT is designed to result in a more effective and efficient training program, with associated improvements in operational safety. The minimum requirements considered necessary prior to implementation of EBT[24] are as follows:

- development of a competency framework with associated assessment and grading system (refer to Appendix A for an example grading system)
- training of instructors, including standardisation and inter-rater reliability assurance; specialised EBT instructor training programs should stress fault-analysis techniques and the effective training and assessment of the appropriate core competencies
- provision of information to pilots regarding the principles and methodology of the program, the performance criteria that are being applied, and the assessed core competencies
- ongoing evaluation of the training system performance.

[24] For further guidance refer to ICAO DOC 9995, Manual of Evidence-Based Training.

Appendix A
Example grading system

A.1 Example of grading system for regulation 61.040 approved systems

A.1.1 The example grading system has been adapted from ICAO Doc 9995, Manual of Evidence-based Training and IATA's Evidence-based implementation guide. Although only some operators will plan to implement an EBT program, the grading system is a useful tool which provides a level of granularity to support a training and checking system approved under regulation 61.040. To be effective, training and checking personnel will require training in how to apply the grading system.

> **Note:** Operators who do not require a regulation 61.040 approval for their training and checking system may still find the example useful.

A.1.2 Two examples of grading word pictures have been provided. The detailed grading word pictures in Table 1 use a 1 to 5 score which allows for granular data collection and analysis. The less detailed word pictures in Table 2 are suitable for a less complex training and checking systems or activities but still provide the level of standardisation required. Some operators may choose to have both the detailed and less detailed grading systems in place for different training and checking activities.

A.1.3 The grading word pictures in Tables 1 and 2 are supported by the behavioural indicators in Table 3. For each of the nine competencies there are a number of behavioural indicators that should be observed by the assessor. The assessor will observe what behaviours were present for each competency and assign a grade. Not all competencies need to be assessed for each event; the exercise being conducted will determine what competencies are assessed.

A.1.4 By adopting the detailed grading word pictures, (Table 1) the data collected would be suitable for use as the base line EBT implementation program as detailed in ICAO Doc 9995 Chapter 4 if the operator chooses to move to an EBT program in the future[25].

Table 8: Grading word pictures (detailed)

1	2	3	4	5
Ineffective performance, rarely demonstrating **any** of the behavioural indicators when needed, which resulted in an **unacceptable reduction in safety margin**.	**Acceptable performance, occasionally** demonstrating **some** of the behavioural indicators when needed, resulting in a **safe operation**.	**Suitable performance, regularly** demonstrating **most** of the behavioural indicators when needed, **resulting in a safe operation**.	**Effective performance, regularly** demonstrating **the required** behavioural indicators when needed, **enhancing the safety margin**.	**Exemplary performance, always** demonstrating **the required** behavioural indicators when needed, which **significantly enhanced safety and efficiency**.

[25] Refer to ICAO Doc 9995 for guidance.

Table 9: Grading word pictures (less detailed)

Not proficient	Proficient with debrief	Proficient
Ineffective performance, rarely demonstrating **any** of the behavioural indicators when required, which resulted in an **unacceptable reduction in safety margin**.	**Minimum acceptable performance, occasionally** demonstrating **some** of the behavioural indicators when required, which **did not result in an unsafe operation**.	**Adequate performance, regularly** demonstrating **most** of the behavioural indicators when required, **resulting in a safe operation**.

A.2 Behavioural Indicators (BI)

Table 10: Behavioural indicators

Behavioural indicators
Application of Procedures (APK)
d. Follows SOPs unless a higher degree of safety dictates otherwise. e. Identifies and applies all operating instructions in a timely manner. f. Correctly uses aircraft systems, controls and instruments. g. Safely manages the aircraft to achieve best value for the operation, including fuel, the environment, passenger comfort and punctuality. h. Identifies the source of operating instructions.
Communication (COM)
a. Knows what, how, where, when, how much and with whom he or she needs to communicate. b. Ensures the recipient is ready and able to receive the information. c. Conveys messages and information clearly, accurately, timely and adequately. d. Confirms that the recipient correctly understands important information. e. Listens actively, patiently and demonstrates understanding when receiving information. f. Asks relevant and effective questions and offers suggestions. g. Uses appropriate body language, eye contact and tone, and correctly interprets non-verbal communication of others. h. Is receptive to other people's views and is willing to compromise
Aircraft Flight Path Management – Automation (FPA)
a. Controls the aircraft using automation with accuracy and smoothness as appropriate for the situation. b. Detects deviations from the desired aircraft trajectory and takes appropriate action. c. Contains the aircraft within the normal flight envelope. d. Manages the flight path to achieve optimum operational performance. e. Maintains the desired flight path during flight using automation whilst managing other tasks and distractions. f. Selects appropriate level and mode of automation in a timely manner considering phase of flight and workload. g. Effectively monitors automation, including engagement and automatic mode transitions.

Behavioural indicators
Aircraft Flight Path Management – Manual (FPM)
a. Controls the aircraft manually with accuracy and smoothness as appropriate to the situation. b. Detects deviations from the desired aircraft trajectory and takes appropriate action. c. Contains the aircraft within the normal flight envelope. d. Controls the aircraft safely using only the relationship between aircraft attitude, speed and thrust. Manages the flight path to achieve optimum operational performance. e. Maintains the desired flight path during manual flight whilst managing other tasks and distractions. f. Selects appropriate level and mode of flight guidance systems in a timely manner considering phase of flight and workload. g. Effectively monitors flight guidance systems including engagement and automatic mode transitions.
Knowledge (KNO)
a. Demonstrates practical and applicable knowledge of limitations and systems and their interaction. b. Demonstrates required knowledge of published operating instructions. c. Demonstrates knowledge of the physical environment, the air traffic environment including routings, weather, airports and the operational infrastructure. d. Demonstrates appropriate knowledge of applicable legislation. e. Knows where to source required information. f. Demonstrates a positive interest in acquiring knowledge. g. Is able to apply knowledge effectively.
Leadership and Teamwork (LTW)
a. Understands and agrees with the crew's roles and objectives. b. Is approachable, enthusiastic, motivating and considerate of others. c. Uses initiative, gives direction and takes responsibility when required. d. Anticipates other crew members' needs and carries out instructions when directed. e. Is open and honest about thoughts, concerns and intentions. f. Gives and receives both criticism and praises well, and admits mistakes. g. Confidently says and does what is important for safety. h. Demonstrates empathy, respect and tolerance for other people. i. Involves others in planning and allocates activities fairly and appropriately to abilities.
Problem Solving and Decision Making (PSD)
a. Identifies and verifies why things have gone wrong and does not jump to conclusions or make uninformed assumptions. b. Seeks accurate and adequate information from appropriate sources. c. Perseveres in working through a problem without reducing safety. d. Uses appropriate, agreed and timely decision-making processes. e. Applies essential and desirable criteria and prioritises. f. Considers as many options as practicable. g. Makes decisions when needed, reviews and changes them if required. h. Considers risks but does not take unnecessary risks. i. Improvises appropriately when faced with unforeseen circumstances to achieve the safest

Behavioural indicators
outcome.
Situational Awareness (SAW)
a. Is aware of the state of the aircraft and its systems. b. Is aware of where the aircraft is and its environment. c. Keeps track of time and fuel. d. Is aware of the condition of people involved in the operation, including passengers. e. Develops “what if” scenarios and plans for contingencies. f. Identifies threats to the safety of the aircraft and people and takes appropriate action.
Workload Management (WLM)
a. Is calm, relaxed, careful and not impulsive. b. Plans, prepares, prioritises and schedules tasks effectively. c. Manages time efficiently when carrying out tasks. d. Offers and accepts assistance, delegates when necessary and asks for help early. e. Reviews, monitors and cross-checks actions conscientiously. f. Ensures tasks are completed. g. Manages interruptions, distractions, variations and failures effectively.

Appendix B
Proficiency check record for 61.040 approvals

B.1 Example of proficiency record for systems approved under regulation 61.040

B.1.1 The pilot proficiency check record is required to be carried by the flight crew licence holder.

B.1.2 The following example proficiency check record (figure 1) has been developed to comply with Part 121. Parts 133, 135 and 138 have different requirements for proficiency checks, and operators will need to modify the instructions accordingly.

EXAMPLE AIRLINES Pty Ltd		**Initial qualification date:**			
Name:		**121PC date**	**Valid to date**	**Check pilot name/ARN**	**Check pilot signature**
ARN:	**Year 1**				
Rank: ..... **Aircraft type:**					
Instructions:	**Year 2**				
Proficiency check "valid to" date is the initial qualification date + 8 months and thereafter the earliest of: • check date + 8 months, or • most recent previous check date + 12 months.					
Note: The initial qualification is the date the person completed their first proficiency check or the date of requalification.	**Year 3**				
	Year 4				

Figure 1: Example Airlines proficiency check record card

Appendix C
Requalification matrix

C.1 When requalification is required

C.1.1 Requalification is required when a flight crew member does not meet the recency requirements of Part 61 or the relevant Part 121, 133, 135 or 138 requirements. In addition, the flight crew member must meet the recurrent training requirements before a return to line operations, as outlined below.

C.1.2 Part 121 operators:

- hold a valid proficiency check
- hold a valid line check
- hold a valid refresher check
- hold a valid annual emergency and safety equipment check
- hold a valid 3-yearly emergency and safety equipment check
- dangerous goods training (if required)
- DAMP training.

C.1.3 Parts 133, 135 and 138 operators:

- hold a valid flight crew member proficiency check
- hold a valid annual general emergency check
- hold a valid 3-yearly general emergency check
- dangerous goods training (if required)
- DAMP training.

C.2 Example requalification program

Table 11: Example Airways - Requalification Matrix

Absence period	Training and checking required
≤ 45 days	Nil.
> 45 days < 90 days	Line flight under supervision of a check/training pilot.
> 90 days < 6 months	*Proficiency check including at least three take-offs and landings, and three instrument approach operations.
> 6 months	*Proficiency check including at least three take-offs and landings, and three instrument approach operations. Four sectors of line training followed by a line check.

* If night operations are conducted, then the three take-offs and landings must be conducted at night.