

GAP ANALYSIS QUESTIONNAIRE ON APPROVAL OF AVIATION TRAINING ORGANISATIONS

Background

The ASEAN Mutual Recognition Arrangement on Flight Crew Licensing (MRA-FCL) was signed by ASEAN Transport Ministers on 13 Oct 2017 in Singapore. This document lays down the broad principles and framework to facilitate mutual recognition of approvals, certificates and licences related to flight crew licensing.

4 Implementing Protocols (IPs), containing detailed procedures and scope, will be developed in sequence to support the implementation of the MRA-FCL:

1. Qualification of flight simulation training devices (FSTDs)
2. Aviation training organisations
3. Safety oversight capabilities of NAA
4. Conversion of flight crew licences

The questionnaire will identify similarities and differences between regulations and procedures amongst ASEAN Member States on the approval of aviation training organisations. This would support the development of draft standards and procedures for mutual recognition of such training organisations qualified by ASEAN Member States under IP 2.

This gap analysis questionnaire has 11 sections, and will take about 1hour to complete.

For the purpose of this questionnaire, as we are attempting to understand the system in the State as comprehensively as possible, as such, we are differentiating between Flight Training Organisations (FTOs), and Type Rating Training Organisations (TRTOs), where FTOs are organisations that conduct ab-initio training for flight crew, and TRTOs are organisations that conduct type rating training for flight crew.

Section 1: Landscape scan

1. How many training organisations hold the CAA's approval? List the training organisations and the type of training approvals.

TRTO – 13

FTO – 11

Flying Clubs – 7

ELP - 2

2. Do these organisations also hold other State's approvals (e.g. EASA, FAA, other ASEAN Member States)
YES. FOR ATO LOCATED OVERSEAS.
3. What type of training organisations are these? (i.e. FTO, TRTO)
<ul style="list-style-type: none"> a. How many are in the country? How many are overseas? If overseas, where? b. How many are foreign training organisations that hold your state's approval?
<ul style="list-style-type: none"> a. TRTO – 4 IN MALAYSIA (MAB, CAE, AIRBUS HELI and PWN) b. 9 TRTO OVERSEAS: 1 IN AUSTRALIA, 1 IN INDONESIA, 1 IN VIETNAM, 1 IN CHINA, 1 IN FRANCE, 1 IN ITALY, 1 IN CZECH REPUBLIC, 1 IN SINGAPORE, 1 THAILAND c. FTO – 6 IN MALAYSIA d. 5 FTO OVERSEAS: 1 IN AUSTRALIA, 2 IN USA, 1 IN CZECH REPUBLIC, 1 IN TASMANIA. e. 14 FOREIGN ORGANISATIONS HOLD CAAM APPROVAL
4. What type of training approvals does the CAA issue? (e.g. CPL, MPL, IR, A320, A330 etc.)
<p>Certificate of Approvals Sim User Approvals.</p> <p>PPL, CPL, MPL, ATPL, IR, A320, A330, A350, A380, BOEING 737, 757, 767, ATR 42/72, VIKINGS SEP, MEP, HELICOPTERS</p>
5. If the CAA does not issue training organisation approvals, how does the CAA validate other State's training for the purpose of a licence issuance.
<p>ABRIDGE COURSE</p> <ul style="list-style-type: none"> i. Course of flight training with a minimum of 35 hours on ME aircraft ii. Pass all theoretical knowledge papers iii. Pass type technical iv. Pass skill test v. Pass ELPT vi. Pass Medical Class 1

Section 2: Regulations and processes

1. Where are your CAA's regulations for training organisation approval? What other publications are there relating to training organisational approval (include training programmes approval, UPRT, SMS, Quality assurance system etc.)

MCAR reg 64, FOD – FCL, FOD – ORA, FOD – Flying Clubs

Manuals: Organisation Manual (if any)
Training and Procedures Manual (TPM)
Quality Manual
FSTD Manual (If any)
SMS Manual (applicable for aircraft operations)
AFM
Student Training Manual/Student Study Guide
Instructor Training Manual/Instructor Training Guide
SOP

2. What is the validity period of a training organisation approval?

12 Months

3. What are the fees and charges for a training organisation approval? Please describe in the following table.

	RM3000
FTO (initial)	RM3000
FTO (renewal)	RM50
FTO (addition of training approval)	RM3000
FTO (addition of geographical training location)	RM3000
TRTO (Initial)	RM3000
TRTO (renewal)	RM50
TRTO (addition of training approval)	RM3000
TRTO (addition of geographical training location)	

Section 3: Requirements on the organisation

1. Does the CAA have requirements on aspects such as the organisational structure of the training organisation, key appointment holders, minimum qualification of these appointment holders, instructor to student ratio?

Grd school 1:24

Flying 1:6

FOD – ORA

2. Does the CAA have requirements for instructors? Please describe in the following table.

Instructor	Minimum qualification	Qualification process
Ground instructor	CPL/ATPL	
Flight instructor - CPL	CPL	FOD-FCL 900
Flight instructor – MPL Phase 1 to 4	CPL	MPL Instructor training course FCL.925
Flight instructor – Type rating	CPL	FCL.905
Synthetic flight instructor – MPL phase 2 to 4	CPL	FCL.905 section 6
Synthetic flight instructor – Type rating	CPL	FCL.905

FOD-ORA

Ground instructor possesses background qualification in ATPL subjects

Flight Instructor CPL FOD-FCL.900

Section 4: Manuals and Documentation

1. What manuals or documentation does the CAA require the training organisation to have? E.g. operations manual, training manual, quality manual, SMS manual.

See list of manuals in checklist as per FOD – ORA.

Section 5: Training programme requirements

1. State the training requirements for each type of training approval, including experience requirements and mandatory training, such as UPRT, MPL Phases of training etc.

Type of training	Training requirements
CPL	FOD-FCL
CPL with IR	FOD-FCL
MPL	FOD-FCL
Type rating training	FOD-FCL

Section 6: Training facilities, equipment, aircraft requirements

1. What type of simulators are being used for training? What are the credits given for the training/ test?

Type of Training/ Tests	Type of FSTD used	Credits given for training/ tests conducted in the FSTD	Type of Approval given to the FSTD (e.g. Qualification, User Approval, Approved through the training org)
CPL		FOD-FCL.035	
IR		FOD-FCL.035	
MPL – Phase 1		Not avail	
MPL – Phase 2		Not avail	
MPL – Phase 3		Not avail	
MPL – Phase 4		Not avail	
Type Rating Training		Not avail	User approval/ATO

<p>2. What are the CAA's requirements for training facilities such as classroom, briefing rooms?</p> <p>a) Flight Planning Room with suitable facilities including:</p> <ul style="list-style-type: none"> i. appropriate current maps and charts, ii. current AIS information, iii. current meteorological information, iv. suitable communications between ATC and the Operations Room, v. maps showing standard cross-country routes, vi. maps showing current Danger/Restricted and Training areas. <p>(b) Briefing Rooms/Cubicles of sufficient size and number equipped with a whiteboard, table, chairs and model aeroplane or other appropriate training aids. Briefing rooms should be well ventilated, lighted and soundproofed to avoid distractions.</p> <p>(c) Classrooms: The conduct of ground school and its associated facilities shall be situated within or close to the boundaries of the base flying aerodrome. The lecture room accommodation collectively shall be such as to accommodate 60% of the entire student body at any one time with the proviso that, in the event of cancellation of the flying programme on an integrated course of approved training, other accommodation is available for the conduct of consequential ground training for the students scheduled for flying. Lighting and ventilation of the ground school accommodation should have regard to the relevant recommendations made by CAAM. Classroom 1:24.</p> <p>(d) Suitably sized and furnished crew-rooms for instructors and students.</p> <p>(e) Reference Library: Shall be provided, containing sufficient publications to give adequate coverage of the syllabus.</p>	
Section 7: Examiners	
<p>1. What are the CAA's requirements for qualifying to be an examiner? E.g. CAA examiner, examiner appointed in industry, single pilot examiner, multi pilot examiner. What are the experience requirements for each examiner?</p>	
<p>FOD-FCL AE Handbook</p>	
<p>2. What is the CAA's qualification process of an examiner?</p>	
<p>FOD-FCL AE Handbook</p>	

3. What is the CAA's appointment term for an examiner?

3 years

4. What is the CAA's re-appointment criteria for an examiner?
AE Handbook. FOD-FCL
5. How does the CAA oversight the examiners?
<p>AE Handbook</p> <p>AE surveillance</p> <p>AE initial/renewal</p>
Section 8: Record keeping system
1. What are the CAA's requirements for record keeping? Please state what records need to be kept, and for how long?
<p>Shall establish a system of record keeping that allows adequate storage and reliable traceability of all activities developed, covering on particular all the elements indicated in FOD-ORA from damage, alteration and theft.</p> <p>Training files – at least 3 years after the completion of the training comprises of (a) details of ground, flight and simulated flights given to individual students (b) detailed and regular progress reports from instructors including assessments and regular progress flight tests and grd exams (c) information on the licences and associated ratings and certificates of the students including the expiry dates of the medical cert and ratings.</p> <p>FSTD records – (a) all documents describing and proving the initial qualification basis and level of the fstd for the duration of the fstd lifetime (b) any recurrent documents and reports related to each fstd and to compliance monitoring activities for a period of at least 5 years.</p>
Section 9: Quality Assurance System
1. Does the CAA require the training organisation to implement a Quality Assurance System?
Yes FOD-ORA.

2. What are the CAA's key requirements for the Quality Assurance System?
<p>(a) Objective. The objective of a QA system is to ensure the achievement of results that conforms to the standards set out in the AFTO's manuals and in requirements and documents issued by DCA, thus promoting continual improvement of the quality of training provided.</p> <p>(b) Basis. The basis for quality is to establish standards, to plan activities and document procedures to support standards, to train the personnel involved before implementing the documented procedures, and to measure the outcomes of activities to ensure that they meet standards and expected results. If any non-conformities are found, corrective actions are taken to improve processes and procedures.</p> <p>(c) QA Elements. In a QA system, the following elements should be clearly identifiable:</p> <ul style="list-style-type: none"> a. organization's training policy; b. training and flight safety standards; c. allocation of responsibility; d. resources, organization and operational processes; e. system to ensure conformance of training with the policy and flight safety standards; f. system for identifying deviations from policy and standards and taking corrective action; and g. evaluation and analysis of experiences and trends concerning policy, training and flight safety standards, in order to provide feedback into the system for the continual improvement of the quality of training.
Section 10: Safety Management System
1. Does the CAA require the training organisation to implement a Safety Management System?
For ATO that uses aircraft in their training.
2. What are the CAA's criteria for a Safety Management System?
Directly involve in aircraft operations. FOD-ORA.
Section 11: CAA oversight
1. Does the CAA implement a safety oversight programme on the training organisations who hold your approval? E.g. surveillance programme.

No. But this has been pointed out by the COSCAP TAM recently.

2. How often does the CAA conduct safety audits/ inspections on an organisation?
One yearly
3. How does the CAA address safety/ training issues by the training organisation? Is there a difference in procedure for major vs minor safety issues?
Yes base on Audit checklist
4. Does the CAA have an enforcement policy in handling non-compliance?
Not comprehensice and under development

Please complete this questionnaire prior to the ARISE Plus 4th MRA FCL workshop scheduled for 3 – 5 March in Bangkok, Thailand. States would be invited to present their answers to the questionnaire, at the workshop. Should you have queries regarding the questionnaire, please feel free to contact Ms Nicole Benny or Mr Clyde Ong ([Nicole Benny@caas.gov.sg](mailto:Nicole_Benny@caas.gov.sg) or [Clyde Ong@caas.gov.sg](mailto:Clyde_Ong@caas.gov.sg)) .