



Trafi

Liikenteen turvallisuusvirasto

Katsaus: Basic Training Organisation - BTO

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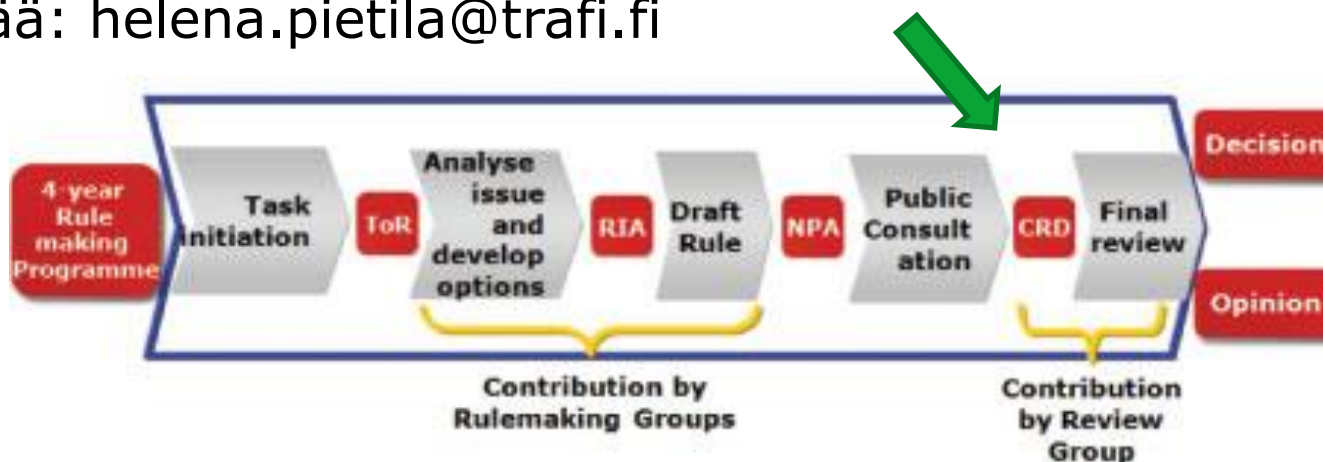
*Vastuullinen liikenne.
Rohkeasti yhdessä.*

NPA 2015-20

<https://easa.europa.eu/document-library/notices-of-proposed-amendment/npa-2015-20>

- The deadline for submission of comments was **29 February 2016**.
- ...CRD & Opinion expected to be published in 2016/Q2
- Kysymyksiä ja kommentteja voi lähettää: helena.pietila@trafi.fi

Esityksen tiedot pohjautuvat kyseiseen NPA:han. Ei valmista määräystekstiä. Muutokset ovat erittäin todennäköisiä...



Overview of the issues to be addressed

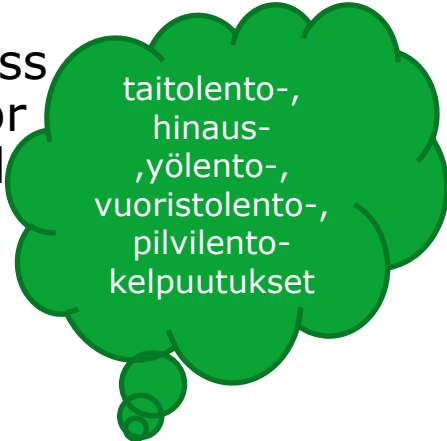
- The major goal of the Agency's General Aviation (GA) Road Map is to work towards simpler, lighter and better rules for GA...
- The current Regulation jeopardises the GA training activity mainly ran by volunteers.
- ...initially proposed the concept of registered training organisation (RTO)
 - the proposed RTO concept was found not to be compliant with the existing Basic Regulation "*a pilot training organisation has to be 'approved' by definition*"
- All proposed BTO requirements are kept to the minimum *in order to limit as much as possible the administrative and financial burdens.*

Objectives

- The overall objective of this task is to develop more proportionate requirements for training towards non-commercial pilot licences and associated ratings and certificates.
- The following types of training need to be considered:
 - theoretical knowledge training for non-commercial pilot licences (LAPL, PPL, SPL, and BPL);
 - flight training for non-commercial pilot licences (LAPL, PPL, SPL, and BPL);
 - training for non-high-performance single-engine piston class ratings (land and sea), for class (hot air, gas) and group for balloons, touring motor gliders (TMGs) and sailplanes; and
 - training for additional ratings (FCL.800, FCL.805, FCL.810, FCL.815, and FCL.830).)



(A) & (H)



taitolento-,
hinaus-
,yöento-,
vuoristolento-,
pilvilento-
kelpuutukset

Scope

BTO.GEN.120

BTO.GEN.120 — Scope

A BTO may provide the following training:

(a) For aeroplanes:

- (1) theoretical knowledge instruction to LAPL(A) and PPL(A);
- (2) flight instruction towards LAPL(A) and PPL(A);
- (3) training towards class rating for SEP(land), SEP(sea) and TMG; and
- (4) training towards additional ratings: night, aerobatics, mountain, sailplane and banner towing.

(b) For helicopters:

- (1) theoretical knowledge instruction to LAPL(H) and PPL(H);
- (2) flight instruction towards LAPL(H), PPL(H) and associated single engine piston type rating for which the maximal certified seat configuration does not exceed four seats; and
- (3) training towards night rating.

(c) For sailplanes:

- (1) theoretical knowledge instruction to LAPL(S) and SPL;
- (2) flight instruction towards LAPL(S) and SPL;
- (3) training towards extension of privileges to TMG in accordance with FCL.135.S;
- (4) training towards additional launch methods in accordance with in FCL.130.S;
- (5) training towards additional ratings: aerobatics, sailplane towing, sailplane cloud flying rating;
- (6) training towards flight instructor rating FI(S);
- (7) FI(S) refresher seminar;
- (8) standardisation course for FE(S) and FIE(S) examiner certificates; and
- (9) examiner refresher seminar.

(d) For balloons:

- (1) theoretical knowledge instruction to LAPL(B) and BPL;
- (2) flight instruction towards LAPL(B) and BPL;
- (3) training towards class extension in accordance with FCL.135.B;
- (4) training towards class or group extension in accordance with FCL.225.B;
- (5) training towards extension to tethered flight in accordance with FCL.130.B;
- (6) training towards night rating;
- (7) training towards flight instructor rating FI(B);
- (8) FI(B) refresher seminar;
- (9) standardisation course for FE(B) and FIE(B) examiner certificates; and
- (10) examiner refresher seminar.

Application process & approval

- **ARA.BTO.100**

- ... (c) The competent authority shall approve the BTO once it has established that the application complies with **paragraph (a)**, ... within two months from the receipt of the application.



Suomi antanut kommentin

- **BTO.GEN.130**

- ... (d) The BTO may commence the training before having received the approval in accordance with ARA.BTO.100(c).

- (e) The BTO shall notify the competent authority of any changes to the information of the initial application...

- **BTO.GEN.170**

- The BTO's approval shall remain valid for an unlimited duration unless:...

BTO APPLICATION FOR A BTO CERTIFICATE		
N°	Item	Supplementary information
1.	Name of the BTO	
2.	Contact details of the BTO's principal place of activity, and if applicable, the contact details of any other operating sites of the BTO	Address, phone, fax, email, URL
3.	BTO training programme offered	'BTO training programme' reference or attach proposed new BTO training programme.
4.	The type of training provided in accordance with BTO.GEN.120	Theory or flight training
5.	Name of representative	
6.	Name of Head of Training, if applicable	
7.	Name of safety adviser, if applicable	
8.	Description of FSTDs to be used for the training, if applicable, including letter code ^[1]	FFS, FNPT I, II, and III, FTD 1, 2 and 3 and BITD
9.	Date of intended commencement of activities, if later than initial application date	(dd/mm/yyyy)
	Mandatory documents	Newly proposed BTO training programme, if applicable
I, (name of representative), on behalf of (name of BTO) certify that: <ul style="list-style-type: none"> a. all the above-named persons are in compliance with the applicable requirements; b. all the above information provided is complete and correct; c. the training conducted is in accordance with the BTO training programme and safety policy; and d. changes to this application will be notified in accordance with BTO.GEN.130. 		
Date: (dd/mm/yyyy)		
Signature:		

Vaatimukset organisaatiolle

- The rule requires the appointment of a (BTO.GEN.200, AMC1 BTO.GEN.200)
 - representative acting as focal point for the CA
 - designated safety adviser
 - Head of Training

it is allowed to combine these functions
- No requirement for an operations or training manual; however, both are highly recommended (GM1 BTO.GEN.190, GM2 BTO.GEN.190)
 - The training manual normally includes the BTO training programme. (GM2 BTO.GEN.190)
 - The BTO shall have BTO training programme(s) to cover the scope of the training provided. (BTO.GEN.230)
 - The BTO training programme should either be an existing BTO training programme already validated by the competent authority or a training programme newly developed by the BTO. (AMC1 BTO.GEN.230)
- Implementation of a safety awareness culture: Safety policy (BTO.GEN.190)
- The safety policy statement should define, in relation to the BTO training programme, at least the means and methods used for (AMC1 BTO.GEN.190):
 - (1) risk identification;
 - (2) risk assessment; and
 - (3) adequacy of the mitigation measures (issuance and enforcement).
- Annual internal review (BTO.GEN.220 & AMC)

Sisällysluettelo-
mallit GM
materiaalissa

ORA.GEN.200 Hallintojärjestelmä

Voimassaolevassa
lentomiehistö-
asetuksessa

- a) Organisaation on perustettava, toteutettava ja pidettävä yllä hallintojärjestelmä, johon sisältyvät
 1. selvästi määritellyt vastuut ja velvollisuudet koko organisaatiossa, myös vastuullisen johtajan suora vastuu turvallisuudesta;
 2. kuvaus organisaation yleisistä turvallisuuteen liittyvistä toimintalinjoista ja periaatteista (turvallisuuspolitiikka);
 3. organisaation toimintaan sisältyvien ilmailuturvallisuusriskien tunnistaminen, niiden arviointi ja riskien hallinta, mukaan luettuina toimenpiteet riskin lieventämiseksi ja niiden tehokkuuden varmistaminen;
 4. henkilöstön tehtävien edellyttämän koulutuksen ja pätevyyden ylläpito;
 5. hallintojärjestelmän kaikkien keskeisten prosessien dokumentointi, mukaan luettuna prosessi, jolla varmistetaan henkilöstön tietoisuus vastuustaan, ja dokumentoinnin muutosmenettely;
 6. toiminto, jolla valvotaan, että organisaatio täyttää asiaankuuluvat vaatimukset. Vaatimustenmukaisuuden valvontaan on sisällyttävä järjestelmä poikkeamahavaintoja koskevan palautteen antamiseksi vastuulliselle johtajalle, jotta voidaan varmistaa tarvittavien korjaavien toimenpiteiden tehokas toteuttaminen; ja
 7. muut lisävaatimukset, joista on säädetty tämän osan ja muiden sovellettavien osien asiaankuuluvissa luvuissa.
- b) Hallintojärjestelmän on vastattava organisaation kokoa sekä sen toiminnan luonnetta ja monipuolisuutta, ja siinä on otettava huomioon toimintaan liittyvät vaarat ja riskit.
- ▼M4 c) Sen estämättä, mitä a kohdassa määrätään, organisaatiossa, joka antaa koulutusta ainoastaan LAPL-, PPL-, SPL- tai BPL-lupakirjoja ja niihin liittyviä kelpuutuksia ja todistuksia varten, edellä a kohdan 3 alakohdassa määritelty **turvallisuusriskien hallinta** ja a kohdan 6 alakohdassa määritelty **vaatimustenmukaisuuden valvonta voidaan toteuttaa organisaation katselmuksella, joka tehdään vähintään kerran kalenterivuodessa.** Organisaation on viipymättä ilmoitettava katselmuksen tuloksista toimivaltaiselle viranomaiselle.
- ▼M4 Komission asetus (EU) 2015/445, annettu 17 päivänä maaliskuuta 2015



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