

Irish Aviation Authority The Times Building 11–12 D’Olier Street Dublin 2, Ireland www.iaa.ie Safety Regulation Division	Údarás Eitlíochta na hÉireann Foirgneamh na hAmanna 11–12 Sráid D’Olier Baile Átha Cliath 2, Éire Rannán na Rialachán Sábháilteachta	No. PLAM.029 Revision: 01 Area ACW Date: 26/08/2020	
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Requirements for National Flight Training Organisations (NFTO) providing training towards the National Private Pilot Licence (Aeroplane)

1. General

This document is a guidance memorandum setting out the minimum requirements for training aeroplanes and organisations training for the National pilot licences and ratings provided for in IAA Aeronautical Notice P.26. It explains how a Flying Club should apply to the Irish Aviation Authority (IAA) in order to become approved as a National Flight Training Organisation (NFTO) to train towards the grant of a National Private Pilot Licence (Aeroplane). The purpose of the NFTO is to provide a framework for flight training in aeroplanes that fall outside the scope of European aviation regulations (generally referred to as Annex 1 aeroplanes) and that therefore must be provided for by Irish national legislation. The NFTO and the training courses it is approved to teach are designed to effectively replicate the organisational requirements and technical content of the equivalent European flight training requirements. The use of Annex 1 aeroplanes for training is also permitted in an (EU) approved or declared training organisation subject to conditions set out in the (EU) Aircrew Regulation. These conditions are applied in so far as practicable to NFTO training aeroplanes subject to this advisory memorandum.

The privileges of the NFTO may include training for the issue of the following courses:

- (i) National Private Pilot Licence - ICAO PPL(A)
- (ii) National PPL (A) (Restricted) - Equivalent to the European LAPL(A).
- (iii) National Flight Instructor Rating Aeroplane - FI(A).

2. National Flight Training Organisation (NFTO) – Organisation Requirements

- (i) A National Flight Training Organisation (NFTO) approved to provide flight training for the issue of an Irish National ICAO PPL(A) shall be a Flying Club, established as a members’ club as defined in the Irish Aviation Authority (Personnel Licensing) Order, 2000. S.I. No. 333 of 2000.
- (ii) In respect of paragraph (i), it should be noted that the proviso to paragraph (2) of Article 2 of this Order provides that the carriage of a member of a flying club for the purpose of flight instruction by a fellow club member who is a duly authorised instructor, in an aeroplane owned by the club shall not by reason only of payment for such instruction, be deemed to be carriage for remuneration or hire. This means that training flights conducted in an NFTO according to the foregoing conditions, where the flight instructor receives a payment for the provision of flight instruction, are not considered to be for the purpose of “carriage for hire or reward”, which is a prohibitive condition on an IAA issued Flight Permit in all other circumstances.
- (iii) The organisational requirements for a NFTO shall, in so far as is practicable, be equivalent to the requirements for training organisations providing training for an (EU) PART-FCL PPL(A) or LAPL(A) as may be applicable. These requirements are set out in ANNEX VIII to the Aircrew Regulation (PART-DTO). These requirements include a management system, compliance monitoring, and a safety policy. The overall organisation, its processes, procedures, and activities should be set out in the NFTO’s detailed procedures manual.

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3. Aeroplanes used by NFTOs

Aeroplanes proposed for the conduct of flight training in a NFTO must, at least:

- (i) be suitable for use to safely and effectively deliver PPL (A) or LAPL(A) training as detailed in the applicable flight training requirements of PART-FCL, AMC1 FCL.110.A LAPL(A) and AMC1 FCL.210.A PPL(A); and
- (ii) be registered in Ireland in the name of the Flying Club; and
- (iii) Such aeroplanes shall be included in Annex I to (EU) 2018/1139, as amended, and must hold the documentation listed below.

(a) Historic Aeroplanes meeting the following criteria:

Aeroplanes whose:

- 1) Initial design was established before 1 January 1955; and
- 2) Production has been stopped before 1 January 1975.

Such aeroplanes must hold a valid National Certificate of Airworthiness.

(b) Aeroplanes including those supplied in kit form, where at least 51% of the fabrication and assembly tasks are performed by an amateur, or a non-profit making association of amateurs, for their own purposes and without any commercial objective, provided such aeroplanes can demonstrate compliance with the one of the following design standards:

- 1) CS-VLA
- 2) CS-LSA
- 3) ASTM F2245-xxx (Industry Standard) or,
- 4) an equivalent airworthiness standard acceptable to the Authority.

(c) aeroplanes having measurable stall speed or the minimum steady flight speed in landing configuration not exceeding 35 knots calibrated air speed (CAS), having two seats and a maximum take-off mass (MTOM), as recorded by the Member States, of no more than:

	Aeroplane	Amphibian or floatplane	Airframe mounted total recovery parachute
Two - Seater	450 kg MTOM	Additional 45 kg MTOM	Additional 25 kg MTOM

Such aeroplanes shall comply with the airworthiness standard requirements of;

- 1) BCAR section ‘S’, or,
- 2) DAeC LFT-UL, or,
- 3) Czech LAA UL-2, or,
- 4) an equivalent airworthiness standard acceptable to the Authority

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4. Flight Permits:

Aeroplanes listed on an NFTO Approval Certificate subject to paragraphs 3 (b) & 3 (c) shall:

- (i) Hold an IAA issued Flight Permit valid for no more than one year which may only be issued or re-issued by the Authority on a recommendation from an organisation approved pursuant to Article 8(4) (a) of the Irish Aviation Authority (Personnel Licensing) Order, 2000 (S.I. No. 333 of 2000) following an aeroplane inspection performed by an aircraft maintenance engineer authorised for this purpose.
- (ii) continuously comply with the maintenance recommendations prescribed by the airframe, engine, and propeller manufacturers/designers, as applicable; and,
- (iii) not be modified in any way that does not comply with the above standards or recommendations.

5. Aeroplane Evaluation Process

The following section follows the general guidance in the (EU) Aircrew Regulation for the evaluation of Annex 1 training aeroplane when used in an EASA ATO or DTO (ORA.ATO.135 AMC2 ORA.ATO.135). It is intended as a guide when evaluating Annex 1 aeroplanes.

(i) Proposed NFTO training aeroplanes shall:

- (a) undergo an evaluation process by the Authority to confirm a level of safety comparable to the one defined by the essential requirements laid down in Annex II to Regulation (EU) 2018/1139. The minimum basis for this evaluation shall be the aforementioned design standards, as applicable (see paragraph 3 (b) & 3 (c) above).
- (b) be inspected on a case by case basis for suitability for the proposed training course by an IAA flight operations inspector.
- (c) be listed on an NFTO approval certificate as approved training aeroplanes.

(ii) Two cases for the evaluation process of ANNEX I aeroplanes are distinguished:

(a) ANNEX 1 aeroplanes that hold a National Certificate of Airworthiness

- 1) To support the evaluation process and provide the Authority with sufficient data related to the aeroplane in question, the NFTO Chief Flying Instructor (CFI) or a qualified instructor nominated by the CFI should assess that the aeroplane is appropriately equipped and suitable for the training courses provided.
- 2) The evaluation process should consider if the evaluated aeroplane(s) provide a level of safety comparable to that required by Annex II to the Basic Regulation
- 3) The result of this assessment should be submitted to the Authority and may be included in the application process.

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(b) Annex-I aeroplanes that hold a National Flight Permit

- 1) To support the evaluation process of aeroplanes holding a National Flight Permit and provide the Authority with sufficient data related to the aeroplane in question, the NFTO Chief Flying Instructor (CFI) or a qualified instructor nominated by the CFI should assess that the aeroplane is appropriately equipped and suitable for the training courses provided. The assessment should take into account control forces, flight deck environment, pilot workload, and other human factors (HF) considerations, depending on the phase and duration of flight.
 - 2) The result of this assessment should be submitted to the Authority and may be included in the application process. The evaluation report should consider all of the following criteria as applicable:
 - 1) the national airworthiness requirements on which the Flight Permit was issued.
 - 2) aeroplane similarities to a certified variant aeroplane with a satisfactory in-service experience as training aeroplanes.
 - 3) a simple and conventional aeroplane design.
 - 4) aeroplanes that do not have hazardous design features or details, judging by experience.
 - 5) operable aeroplane systems, equipment, and appliances that do not require exceptional skills or strength.
 - the aeroplane should be safely controllable and manoeuvrable under all anticipated operating conditions, including engine failure.
 - the aeroplane should allow for a smooth transition from one flight phase to another without requiring exceptional piloting skills, alertness, strength, or workload under any probable operating conditions.
 - the aeroplane should have sufficient stability to ensure that the demands made on the pilot are not excessive, considering the phase and duration of flight.
- (iii) Only aeroplanes specifically listed on an NFTO Approval Certificate may be used for flight training.

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6. NFTO – Application Requirements

- (i) Applicants for an NFTO Approval Certificate shall be required to provide to the Authority with the following details:
- (a) NFTO name and address of the Flying Club;
 - (b) The name and qualification(s) of the Head of Training (HT);
 - (c) The name(s) and qualification(s) of ground and flight instructor(s);
 - (d) NFTO Operations and Training Manuals;
 - (e) An Aircrew Regulation equivalent compliance checklist for the training course(s) that includes both ground school (theoretical knowledge) and flight training syllabi signed by the HT;
 - (f) A list of training aeroplane and FSTD(s); and
 - (g) Aerodrome(s) and operating site(s);
- (ii) Flying Clubs wishing to apply for a NFTO Approval Certificate should contact the Irish Aviation Authority Flight Operations Department at fod@iaa.ie to request a pre-application meeting for an NFTO.

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