


<b>Irish Aviation Authority</b> The Times Building 11–12 D’Olier Street Dublin 2, Ireland <a href="http://www.iaa.ie">www.iaa.ie</a>	<b>Údarás Eitlíochta na hÉireann</b> Foirgneamh na hAmanna 11–12 Sráid D’Olier Baile Átha Cliath 2, Éire	<b>AERONAUTICAL NOTICE</b>  No. P.33 ISSUE 4 DATE 28.10.20	
<b>Safety Regulation Division</b>	<b>Rannán na Rialachán Sábháilteachta</b>		

## **COVID-19 - Extension of validity and other time periods for licence ratings, certificates, for IAA-licensed or certificated flight crew**

(Note: Exemption arrangements for IAA-licensed or certified aircrew subject to the management of a Part-ORO Operator are covered separately in Aeronautical Notice No. 30)

1. Due to implementation of national requirements on social distancing and also the limitation of movement of persons on a global basis because of the COVID-19 crisis, the ability of flight crew licence holders to maintain licences and associated ratings and certificates and for licence applicants and trainees to comply with other specified time periods, is impeded. The Irish Aviation Authority hereby issues the exemptions outlined hereunder.

2. The Irish Aviation Authority pursuant to:-

2.1. Article 71(1) of Regulation (EU) No. 2018/1139, in the case of flight crew licences issued under the following regulations:

Regulation (EU) No 1178/2011, particularly:

- points FCL.025, FCL.055, FCL.060, FCL.140.A, FCL.140.H, FCL.130.S, FCL.140.S, FCL.130.B, FCL.140.B, FCL.220.S, FCL.230.S, FCL.220.B, FCL.230.B, FCL.625, FCL.725, FCL.740, FCL.735.A, FCL.735.H, FCL.805, FCL.810, FCL.815, FCL.825, FCL.830, FCL.815, FCL.940 and FCL.1025
- point MED.A.045 of Annex IV (Part-MED)
- Annex III

Regulation (EU) 2018/395, particularly

- points BFCL.135, BFCL.160, BFCL.200, BFCL.215 and BFCL.360 of Annex III (Part-BFCL)

Regulation (EU) 2018/1976, particularly

- points BFCL.135, SFCL.155, SFCL.160, SFCL.205, SFCL.215 and SFCL.360 of Annex III (Part-SFCL)

2.2. Articles 4 and 36 of the Irish Aviation Authority (Personnel Licensing) Order, (S.I. No. 333 of 2000) (hereinafter referred to as “the Order”), in the case of Irish national flight crew licences issued under the Order

hereby provides an exemption from compliance with the above requirements subject to the limits and conditions detailed below in this Aeronautical Notice.

This Aeronautical Notice is effective with immediate effect and shall remain in force until 30 November 2020 (end date of this exemption) unless otherwise specified in this notice or it is revoked by the Authority.

This Aeronautical Notice replaces Aeronautical Notice P33 Issue 3, which should be discarded.

**Chief Executive  
Irish Aviation Authority**

## Limits and Conditions of this Exemption

### 1. Validity extension of Class, Instrument and Type Ratings

- a. Where an aircraft class or type rating due to expire between 1 March 2020 and 31 July 2020, and the holder has exhausted all attempts to revalidate by conventional means, the rating may be extended for the period specified below subject to the following:
  - i. In the case of type, instrument and class ratings (other than para ii below), by a period of four (4) months (to the end of a whole calendar month), or to the end date of this Aeronautical Notice, whichever occurs first, provided:
    - The licence holder undergoes an assessment by a means acceptable to an appropriate qualified examiner. The assessment should determine that the required level of knowledge to exercise the privileges of the applicable class, instrument rating or type rating is maintained as required by Appendix 7 or 9 of Part-FCL including normal, abnormal and emergency procedures as applicable.
    - When satisfied that the licence holder has maintained the required level of knowledge to exercise the privileges of the applicable class, instrument rating or type rating, the examiner shall:
      - a. Extend the validity period of the rating on the licence holder's certificate of revalidation page (original or scanned copy where the assessment has been carried out remotely);
      - b. Complete IAA Form [RPPL.F.147CV19a](#);
      - c. Return a copy of IAA Form RPPL.F.147CV19a and the rating page to the IAA by email to [licensing@iaa.ie](mailto:licensing@iaa.ie);
      - d. The licence holder shall carry evidence of this exemption and the documents identified in point (c) above.
  - ii. In the case where the holder may revalidate a single engine class and/or TMG rating by experience, or by Licence Proficiency Check (LPC), such rating may be extended by a period of eight (8) months (to the end of a whole calendar month), or to the end date of this Aeronautical Notice, whichever occurs first, provided the applicant meets the requirements of FCL.140.A 'LAPL(A) recency requirements' i.e. within the last 2 years preceding the original expiry date of the class rating, the holder has completed the following:
    - 12 hours of flight time in the relevant class as PIC or flying dual or solo under the supervision of an instructor, including;
    - 12 take-offs and landings, and
    - refresher training of at least 1 hour of total flight time with an instructor

The requirement for refresher training of at least 1 hour of total flight time with a flight instructor (FI) or a class rating instructor (CRI) or a class rating proficiency check (i.e. revalidation by LPC) may be satisfied where the licence holder undergoes an assessment by a means acceptable to an appropriate qualified examiner or flight instructor specifically authorised by the IAA or EASA Member State under FCL.945.

The assessment should determine that the required level of knowledge to exercise the privileges of the applicable class is maintained as detailed on the appropriate Licence Proficiency Check form including normal, abnormal and emergency procedures as applicable.

When satisfied that the licence holder has maintained the required level of knowledge to exercise the privileges of the applicable rating, the examiner or instructor shall:

- a. Extend the validity period of the rating on the licence holder's certificate of revalidation page (original or scanned copy where the assessment has been carried out remotely);
  - b. Complete IAA Form RPPL.F.147CV19a;
  - c. Return a copy of IAA Form RPPL.F.147CV19a and the rating page to the IAA by email to [licensing@iaa.ie](mailto:licensing@iaa.ie);
  - d. The licence holder shall carry evidence of this exemption and the documents identified in point (c) above.
- b. Where the licence holder is employed by a third country commercial air transport (CAT) operator and holds a validation of an Irish pilot licence to exercise privileges on aircraft registered in that third country, the refresher training and assessment may consist of the procedures and requirements implemented by the competent authority of that country in order to issue and maintain validations in accordance with ICAO Annex I (Personnel Licensing) of the Chicago Convention.
- c. In all cases, the licence holder acting under the arrangements in (a) and (b) above shall inform the competent authority of that third country of the class or type rating renewal or revalidation requirements achieved in order to ascertain that such arrangements are acceptable for the continued exercise of the licence privileges in aircraft registered in that country.
- d. The provisions detailed in paragraphs a to c are not available for an aircraft class or type ratings that have expired after 31 July 2020.

## **2. Extension to Validity Period of Instructor & Examiner Certificates**

- a. Instructor and Examiner certificates due to expire between 1 March 2020 and the 31 July 2020, may be extended up to a period of eight (8) months from such expiry date or to the end date of this Aeronautical Notice, whichever occurs first, without formality.
- b. Instructors and Examiners availing of this provision shall retain a copy of this exemption with the certificate.
- c. The provisions detailed in paragraphs a to c are not available for an instructor and examiner certificates that have expired after 31 July 2020.

## **3. Extension of Acquisition Periods and Validity Acceptance Periods for Theoretical Knowledge Examinations**

### **a. Acquisition Periods for Theoretical Knowledge Examinations**

Where, between 1 March 2020 and 30 June 2020, an examination applicant is within the 18-month period allowed for the acquisition of all examinations, the termination date of the 18-month period particular to that applicant shall be extended for a period of a maximum of 6 months (to the end of a whole calendar month). However, the foregoing extension shall not alter the rules concerning the maximum number of attempts per subject or the maximum number of examination sittings allowed during the acquisition

period. This provision does not apply to an examination applicant who commences the 18-month period allowed for the acquisition of all examinations since 1 March 2020.

Where, between 21 October 2020 and 30 November 2020 but not between 1 March 2020 and 30 June 2020, an examination applicant is within the 18-month period allowed for the acquisition of all examinations, the termination date of the 18-month period particular to that applicant shall be extended for a period of a maximum of 2 months (to the end of a whole calendar month). However, the foregoing extension shall not alter the rules concerning the maximum number of attempts per subject or the maximum number of examination sittings allowed during the acquisition period. This provision does not apply to an examination applicant who commences the 18-month period allowed for the acquisition of all examinations since 21 October 2020.

Where an 18-month period allowed for the acquisition of all examinations by an examination applicant spans the date period, 1 March 2020 and 30 November, the 18-month period particular to that applicant shall be extended for a period of a maximum of 6 months (to the end of a whole calendar month).

**b. Examination Validity Acceptance Period for Obtaining the Issue of a Flight Crew Licence**

Where, on the publication date of this notice, a flight crew licence applicant has passed the entire suite of examinations appropriate to the licence or rating sought, the termination date of the normal validity acceptance period particular to that applicant (24-months in the case of a LAPL, PPL, SPL, BPL and 36 months in the case of a CPL and/or Instrument Rating or the requirements to retain ATPL theoretical knowledge credit) shall be extended for a period of 6 months (to the end of a whole calendar month). This provision does not apply to a flight crew licence applicant who has passed the entire suite of examinations appropriate to the licence or rating sought since 1 March 2020.

**4. Extension of Validity Period of English Language Proficiency (ELP) Licence Endorsements**

- a. Where an English Language Proficiency (ELP) licence endorsements for any licence expires between 1 March 2020 and 31 July 2020 such endorsement is deemed to be extended up to a period of eight (8) months from such expiry date or to the end date of this Aeronautical Notice, whichever occurs first, without formality.
- b. The above sub-paragraph is without prejudice to the duty of an examiner, where in the course of conducting an English Language Assessment (ELA) it is found that a licence holder's ELP falls below ICAO ELP Level 4, to downgrade the licence holders ELP level accordingly.
- c. Licence holders availing of this provision shall retain a copy of this exemption with the licence.
- d. The provisions detailed in paragraphs a to c are not available for English Language Proficiency (ELP) licence endorsements that have expired after 31 July 2020.

## 5. Extension of The Validity of Medical Certificates – Flight Crew

Where a Class 1 medical certificate holder is unable to complete a medical assessment with any appropriately certified Aeromedical Examiner, the validity of the certificate is extended for a period of 4 months or to the end date of this Aeronautical Notice, whichever occurs first, subject to the following:

- a. The holder shall hold a current medical certificate appropriate to the licence held, which is without restrictions, other than visual;
- b. The validity period of the certificate expires between 1 March and 31 July 2020;
- c. The holder shall make a declaration of fitness on IAA Form Number [RPPL.F.DCV19d](#) (available on the IAA website – [www.iaa.ie](http://www.iaa.ie)) declaring that their medical fitness has not decreased since the issuance of the current medical certificate;
- d. The holder shall retain a copy of this declaration when exercising the privileges of the associated flight crew licence.
- e. The provisions detailed in paragraphs a to d are not available for Class 1 medical certificates that have expired after 31 July 2020.

## 6. Further extensions

- a. The time period of the following is extended as follows:
  - i. by 4 months or to the end date of this Aeronautical Notice, whichever occurs first, whichever period of time is shorter, in the case of validity periods of a mountain rating that expire between 1 March 2020 and 31 July 2020;
  - ii. until the end of the application of this Exemption, in the case of validity periods or time periods, as applicable, of all of the following:
    - a. recommendations for taking theoretical knowledge examinations, issued by a DTO or by an ATO in accordance with point FCL.025(a)(3) of Part-FCL, point BFCL.135(b)(3) of Part-BFCL and point SFCL.135(b)(3) of Part-SFCL and before 1 April 2020 that were current on the publication date of this Aeronautical Notice;
    - b. theoretical knowledge examinations for the purpose of licence issue as per points (c)(1) and (c)(2) of point FCL.025 of Part-FCL, point BFCL.135(d) of Part-BFCL and point SFCL.135(d) of Part-SFCL;
    - c. the time periods specified in point FCL.725(c) of Part-FCL with regard to all of the following:
      - i. the time period between the commencement of the type rating training course and the pass of the skill test;
      - ii. the time period between the pass of the skill test and the application for the issue of the class or type rating;
    - d. the time period specified in all of the following, provided that the regular time period ended during the application period of this Exemption:
      - i. point FCL.735.A(b) - MCCI Aeroplane;
      - ii. point FCL.735.H(b) - MCCI Helicopter;

- iii. for points 1 to 2 above, the licence holder shall have received additional training, if deemed necessary by the ATO or the DTO, in consultation with the Authority.
- b. For the application of all of the following requirements of Part-FCL, the time period is extended as follows:
  - i. to the last 300 days, in the case of point FCL.060(a) (balloon pilot recency for commercial air transport and the carriage of passengers);
  - ii. to the last 2 years and 8 months, in the case of point FCL.140.A(a) (LAPL(A) recency);
  - iii. to the last 32 months, in the case of all of the following:
    - a. points FCL.130.S(c) and FCL.220.S (sailplane launching methods);
    - b. points (a) and (b)(1) of point FCL.140.S as well as point FCL.230.S (sailplane pilot recency);
    - c. points FCL.140.B and FCL.230.B(a) (balloon pilot recency)
    - d. point FCL.805(e) (towing rating recency);
    - e. point FCL.830(d) (sailplane cloud flying recency).
    - f. The time period may only be extended when the period to be extended includes the period between 1 March 2020 and 31 July 2020.
  - v. Holders of licences who wish to extend validity periods detailed in points (a), to (c) of this paragraph, shall have received, in advance of exercising the privileges, a briefing from an instructor who holds relevant instructional privileges. The purpose of the briefing is to refresh the required level of theoretical knowledge to safely operate the applicable aircraft and to carry out the relevant manoeuvres and procedures, as applicable.
 

That briefing shall include specific abnormal and emergency procedures, as appropriate to the category, class and type of aircraft as well as to the relevant kind of privileges, as applicable. The licence holder shall retain evidence of completion of the briefing with the associated licence.
- c. For the application of all of the following recency requirements of Part-BFCL, the time period is extended as follows:
  - i. to the last 30 months, in the case of all of the following:
    - a. points (a)(1)(i), (a)(2) and (f)(1) of point BFCL.160 (balloon pilot recency);
    - b. point BFCL.215(d)(2) (commercial operation rating recency);
    - c. to the last 56 months, in the case of point BFCL.160(a)(1)(ii) (balloon pilot recency);
    - d. to the last 300 days, in the case of point BFCL.215(d)(1) (commercial operation rating recency);
    - e. to the last 3 years and 8 months, in the case of point BFCL.360(a)(1) (balloon instructor recency).
    - f. The time period may only be extended when the period to be extended includes the period between 1 March 2020 and 31 July 2020.
    - g. Holders of licences who wish to extend validity periods detailed in points (a), to (d) of this paragraph, shall have received, in advance of exercising the privileges, a briefing from an instructor who holds

relevant instructional privileges. The purpose of the briefing is to refresh the required level of theoretical knowledge to safely operate the applicable aircraft and to carry out the relevant manoeuvres and procedures, as applicable.

That briefing shall include specific abnormal and emergency procedures, as appropriate to the category, class and type of aircraft as well as to the relevant kind of privileges, as applicable. The licence holder shall retain evidence of completion of the briefing with the associated licence.

- d. For the application of all of the following recency requirements of Part-SFCL, the time period is extended as follows:
- i. to the last 2 years and 8 months, in the case of all of the following:
    - i. point SFCL.155(c) (sailplane launching methods);
    - ii. point SFCL.205(f) (sailplane towing or banner towing rating);
    - iii. point SFCL.215(e) (sailplane cloud flying rating);
  - ii. to the last 30 months, in the case of points (a) and (b) of point SFCL.160 (sailplane pilot recency).
  - iii. to the last 3 years and 8 months, in the case of point SFCL.360(a)(1) (sailplane instructor recency).
  - iv. The time period may only be extended when the period to be extended includes the period between 1 March 2020 and 31 July 2020.
  - v. Holders of licences who wish to extend validity periods detailed in points (a), to (c) of this paragraph, shall have received, in advance of exercising the privileges, a briefing from an instructor who holds relevant instructional privileges. The purpose of the briefing is to refresh the required level of theoretical knowledge to safely operate the applicable aircraft and to carry out the relevant manoeuvres and procedures, as applicable.

That briefing shall include specific abnormal and emergency procedures, as appropriate to the category, class and type of aircraft as well as to the relevant kind of privileges, as applicable. The licence holder shall retain evidence of completion of the briefing with the associated licence.

- e. In the case of point FCL.060(c)(1) (Specific requirements for commercial air transport), the 120-day period is extended to 180 days under the same conditions as specified in that point where the calculation of recency includes the period between 1 March 2020 and 31 July 2020.
- f. In all cases where an exemption has been availed of, the licence holder shall retain a copy of this exemption with the affected licence.

### **Explanatory Notes:**

1. The Authority is aware that licence holders may face difficulties in maintaining various validity periods by established means during the COVID-19 public health emergency. The Authority has issued this package of exemptions as an interim support to those licence holders.

2. The Authority will keep this Exemption under constant review and will amend the scope as required by the developing situation.
3. It is the intention of the Authority to resume normal licensing requirements as soon as the situation permits.