# EHA Briefing – November 2025

*European Helicopter Association – Regulatory & Policy Overview*

## 1 Proactive Regulation – Rotorcraft & VTOL Framework

EHA advocates for a proactive, safety-led regulatory model where industry and regulators anticipate emerging risks rather than reacting post-incident. The Association proposes the establishment of a dedicated Rotorcraft & VTOL Champion within EASA to coordinate foresight, harmonisation, and scheduled regulatory cycles. This shift would ensure every rulemaking initiative has a demonstrable safety rationale, provide predictable release schedules, and reduce administrative churn. EHA urges that this framework be adopted as a collaborative roadmap between EASA, Member States, and industry stakeholders to enable safe innovation in both rotorcraft and Advanced Air Mobility (AAM).

## 2 FCL.710 – Bell 206 Training Anomaly

EASA's current FCL.710 implementation requires differences training between the Bell 206 JetRanger and LongRanger solely due to seating capacity, despite identical handling. EHA proposes amending the TR&LEL and GM to FCL.710 so that differences training is based only on Operational Suitability Data (OSD) or genuine technical variations. This would remove redundant administrative barriers, ensure consistency, and uphold FCL.710's competence-based training intent.

## 3 FCL.725 – OSD Clarification

Ambiguity between FCL.725 and Operational Suitability Data – Flight Crew Data (OSD-FCD) has caused inconsistent type rating course approvals. EHA supports proposed amendments clarifying that OSD-FCD takes precedence over generic Part-FCL provisions. This alignment strengthens regulatory coherence, ensures type-specific training mirrors certified aircraft data, and promotes harmonised oversight.

## 4 TRI/TRE Medical Certification

Differences across Member States on medical requirements for Type Rating Instructors/Examiners (Class 1 vs Class 2) create unnecessary restriction. EHA recommends permitting Class 2 medicals for non-commercial instruction, harmonising with Flight Instructor (FI) rules. This would retain experienced instructors, improve consistency, and sustain training capacity without compromising safety.

## 5 AMC1 SPA.HEMS.151 – Tracking Clarification

Some NCAs interpret AMC1 SPA.HEMS.151 to require real-time deviation alerts along a straight-line track, exceeding its intent. EHA proposes clarifying the AMC so that tracking

ensures situational awareness and timely alerting, not continuous deviation monitoring. This approach maintains ICAO Annex 6 safety objectives while removing impractical and costly system requirements.

## 6 Flight Risk Assessment Tools (FRAT) – Standardised Approach

EHA proposes an EASA-endorsed Flight Risk Assessment Tool (FRAT) framework to strengthen pre-flight risk management across all helicopter missions. Three tailored FRAT models are defined: a Generic FRAT for most operations, a Reactive FRAT for HEMS/SAR/police, and a simplified GA FRAT for training and private flights. Each applies weighted risk categories (Pilot, Aircraft, Weather, Terrain, Operation, Airspace) with clear Green/Amber/Red gates. EHA recommends EASA adopt this as an Acceptable Means of Compliance (AMC) to standardise proactive risk assessment across the rotorcraft community.

## 7 NVIS Line-Check in Simulator

EHA supports allowing the NVIS portion of the annual line check to be conducted in NVIS-capable Full Flight Simulators (FFS). This aligns with SPA.NVIS.130 and ORO.FC.230, enabling safe, scenario-rich assessment through a Line-Oriented Evaluation (LOE). Benefits include safer evaluation of NVIS competencies, improved CRM performance, and reduced operational disruption while maintaining full regulatory compliance.

## 8 NVIS Applicability – Operator Categories

Clarifies which operator types may conduct NVIS operations: only CAT and SPO operators may hold SPA.NVIS approvals, with ATOs eligible if compliant. EHA encourages competent authorities to harmonise NVIS approval guidance and enable ATO-level authorisations where safety standards are met.

## 9 Dangerous Goods Simplification ('DG Lite')

Full-scale DG regulation is disproportionate for small rotorcraft operations. EHA proposes a simplified 'DG Lite' framework allowing self-declaration, one-hour awareness training, simplified documentation, and ICAO-compliant exemptions for limited quantities. This maintains safety while easing compliance and reducing administrative burden.

## 10 Proportional First Aid Kit (FAK) for Small Helicopters

Existing FAK AMC contents are airline-oriented and impractical for small helicopters. EHA recommends accepting vehicle-standard first aid kits compliant with DIN 13164 or BS 8599-2, removing medication requirements, and allowing external stowage with placards. This proportionate solution ensures basic trauma and hypothermia protection without excess weight or complexity.

Collectively, these initiatives represent EHA's proactive regulatory strategy—emphasising proportionate, risk-based, and harmonised regulation for the European rotorcraft and VTOL community. Each proposal maintains safety while streamlining compliance, supporting innovation, and ensuring the regulatory environment evolves predictably alongside technology and operational needs.