Position Paper – Accelerating the Transition to Competency-Based Training (CBT) and Evidence-Based Training (EBT) for Rotorcraft Operations

Executive Summary

The European Helicopter Association (EHA) proposes that EASA accelerate the wider adoption of Competency-Based Training (CBT) and Evidence-Based Training (EBT) across rotorcraft operations to reduce the regulatory burden and improve the safety value of recurrent training.

Current training and checking structures in European rotorcraft regulation remain heavily influenced by legacy prescriptive models that emphasise repetitive manoeuvre-based checks in both the ground and flight environment. These requirements are often administratively burdensome and deliver limited marginal benefit, especially for experienced pilots and instructors operating in stable organisational environments.

CBT and EBT methods—already proven in fixed-wing and long accepted by ICAO—offer a more effective and proportionate approach to pilot development. They focus training resources on actual operational risks, human performance, and competence progression, rather than on rigid annual repetition of tasks that have little relationship to the causal factors behind most helicopter accidents and incidents.

EHA believes that a faster regulatory transition would lead to a more efficient, evidence-based, and safety-enhancing training ecosystem for European rotorcraft operators.

1. Introduction

Rotorcraft operators across Europe face rising training and regulatory costs associated with prescriptive, manoeuvre-centric training and checking requirements. These legacy structures require repetitive ground school refreshers and annual proficiency checks, regardless of an operator's risk profile, operational context, or proven competence.

At the same time, data from EASA, national authorities, and the rotorcraft industry consistently show that the root causes of accidents lie predominantly in decision-making, energy management, environmental assessment, workload management, and situational awareness—areas better addressed through competency-based methods than through repeated manoeuvre demonstrations.

This position paper outlines the case for a structured but accelerated transition to CBT and EBT for rotorcraft, aimed at achieving a more proportionate, risk-based, and operationally relevant training system.

2. Background and Regulatory Context

2.1 Current regulatory model

Current recurrent training and checking requirements for helicopter pilots under Part-FCL, Part-ORO, and associated acceptable means of compliance (AMC/GM) centre on prescribed manoeuvres, fixed training sequences, and periodic proficiency checks.

2.2 Growing regulatory and industry recognition

CBT and EBT principles are increasingly recognised as best practice. Within commercial fixed-wing aviation, EBT is well established, and ICAO has endorsed the approach through Annex 1, Doc 9995, and subsequent guidance.

Rotorcraft oversight has not kept pace. Despite interest from authorities and operators, regulatory pathways remain slow, fragmented, and limited in scope.

2.3 Training burden with limited marginal benefit

Operators report:
- high administrative overhead,
- limited scheduling flexibility,
- repetitive checks of manoeuvres rarely associated with accident causation,
- training hours consumed by compliance rather than competence development.

For instructors and examiners, this model constrains the ability to deliver scenario-based training that addresses actual operational risks.

3. Rationale for a Faster Transition to CBT and EBT

3.1 Proportionate, risk-based training

CBT/EBT enables training programmes tailored to:
- the operator's mission profile,
- pilot experience level,
- operational risk assessment,
- previous training performance.

This contrasts with one-size-fits-all recurrent requirements.

3.2 Focus on real safety drivers

The most frequent causal factors in helicopter occurrences involve:
- poor decision-making,
- degraded situational awareness,
- inadvertent IMC,
- CFIT,
- human-factor-related breakdowns.

CBT/EBT prioritises these competencies rather than repeated autopilot failures, tail rotor failures, or other rarely-encountered contingencies.

3.3 Enhanced training efficiency

CBT/EBT allows:
- reduced unnecessary repetition of basic manoeuvres,
- more effective scenario-based learning,
- better use of simulator time,
- better alignment of training with operator-specific risks.

3.4 Administrative simplification

A transition to operator-designed curricula under a CBT/EBT model reduces:
- paperwork,

- examiner scheduling requirements,
- annual repetitive checking structures.

Oversight shifts from prescriptive task lists to outcome- and performance-based metrics.

4. Proposed EHA Recommendations to EASA

4.1 Establish a dedicated regulatory pathway for rotorcraft CBT/EBT

EHA recommends a clear regulatory roadmap, including:
- new AMC/GM for rotorcraft CBT and EBT programmes,
- streamlined approval mechanisms for operators adopting CBT-aligned syllabi,
- dedicated guidance for instructors, examiners, and authorities.

4.2 Permit crediting and reduction of repetitive manoeuvres

EASA should authorise:
- partial or full substitution of annual manoeuvre sets with scenario-based, competency-driven training,
- crediting for previous performance to reduce repetition,
- multi-year training cycles based on risk and competence trends.

4.3 Expand the use of FSTDs and scenario-based environments

This includes:
- greater acceptance of lower-level FSTDs for competence-based scenarios,
- encouragement of virtual and mixed-reality tools,
- alignment with industry best practice for simulated environmental challenges (e.g., degraded visual environments).

4.4 Enable operator-specific curricula under oversight

Operators should be empowered to tailor their programmes provided they demonstrate:
- data-driven risk analysis,
- structured competency frameworks,
- instructor standardisation processes,
- safety management integration.

4.5 Promote harmonisation with international standards

EASA should align rotorcraft CBT/EBT developments with:
- ICAO Doc 9995,
- EBT Manual guidance material,
- leading national initiatives, to avoid fragmentation and simplify implementation for cross-border operators.

5. Benefits for Operators, Pilots, and Safety Outcomes

5.1 Improved training quality

CBT/EBT focuses on real operational competencies and pilot judgement, improving overall safety and decision-making resilience.

5.2 Cost and time efficiency

Less time spent on repetitive, low-value tasks allows more time for training that genuinely improves performance.

5.3 Regulatory and administrative simplification

Operators and authorities benefit from:

- reduced repetitive checking,
- clearer compliance pathways,
- outcomes-based oversight.

5.4 Better alignment with modern helicopter operations

Dynamic, mission-specific operations demand flexible, adaptive training programmes—precisely what CBT/EBT is designed for.

6. Conclusion

The rotorcraft sector should no longer be constrained by legacy prescriptive training frameworks that generate disproportionate burden with limited safety gains.

EHA urges EASA to prioritise and accelerate a structured transition to Competency-Based Training and Evidence-Based Training for rotorcraft pilots. This will modernise the regulatory framework, support proportionality, and significantly improve training relevance and safety outcomes across the European rotorcraft community.

EHA stands ready to support EASA through technical input, working group participation, and data from operators to facilitate this transition.