EHA Position Paper

Clarification of Link Between FCL.725 and OSD-FCD for Helicopter Type Ratings

1. Executive Summary

This Position Paper presents the views of the European Helicopter Association (EHA) regarding the clarification of the regulatory link between FCL.725 and Operational Suitability Data – Flight Crew Data (OSD-FCD) for helicopter type ratings. EHA supports the proposed amendments under the referenced NPA, which aim to ensure that type-specific training requirements defined in OSD-FCD take precedence over generic provisions of Part-FCL, thereby improving consistency between type certification, training course design, and licensing.

2. Background

Practical inconsistencies have been observed in the implementation of Operational Suitability Data – Flight Crew Data (OSD-FCD) for helicopters, leading to divergent interpretations of FCL.725 and Appendix 9 provisions among competent authorities and Approved Training Organisations (ATOs). The proposed NPA introduces targeted amendments to Part-FCL, its AMC/GM, and Appendix 9 to resolve these ambiguities and to establish clearly the hierarchy between FCL.725 and OSD-FCD data.

3. Problem Definition

The absence of an explicit reference to OSD-FCD in Appendix 9 (General) has resulted in inconsistent application of type-specific training requirements and limited enforceability of OSD-FCD content. Consequently, minimum aircraft training times and manoeuvre requirements are not harmonised for helicopters, creating disparities in ATO course approvals and undermining regulatory alignment with type certification data.

4. EHA Position and Recommendations

EHA supports the NPA's objective to establish a clear legal and operational relationship between Part-FCL and OSD-FCD. The proposed regulatory text ensures that helicopter training requirements are directly linked to approved aircraft design data. EHA recommends adoption of the following amendments as drafted in the NPA:

AMC2 FCL.725(a)(b) — FSTDs

The training shall be conducted in accordance with Appendix 9 to this Part, unless otherwise foreseen in the Operational Suitability Data (OSD) established in accordance with Annex I (Part 21) to Commission Regulation (EU) No 748/2012.

Appendix 9 — Section A (General)

The type rating training course shall include theoretical knowledge and flight training appropriate to the type of aircraft, as described in this Appendix and, where applicable, in the

approved OSD established under Annex I (Part 21) to Commission Regulation (EU) No 748/2012 (OSD-FCD). Where there is any difference between this Appendix and the applicable OSD-FCD, the provisions of the OSD-FCD shall take precedence for that aircraft type.

Appendix 9 — Item 17 (Aircraft Flight Training)
The minimum training time, specific manoeuvres, and exercises to be performed on the aircraft shall be as defined in the applicable OSD-FCD for the type, where such data are established.

Appendix 9 — Items 1c–1e (Non-complex Helicopters)
Note: For non-complex helicopters, the alleviations provided in Items 1c to 1e shall apply unless otherwise specified in the applicable OSD-FCD.

New GM — Relationship Between Part-FCL and OSD-FCD
Where differences exist between the generic provisions of Part-FCL and the OSD-FCD, the OSD-FCD shall take precedence for that aircraft type. This ensures training reflects the aircraft's approved design and handling characteristics as part of the type certification process.

5. Expected Impact

The proposed clarifications are expected to deliver a positive safety and proportionality impact with minimal administrative burden. They will ensure that helicopter type rating training is directly aligned with certified design data, facilitating more efficient oversight and improved training consistency across Member States.

6. Conclusion

EHA supports the adoption of the proposed amendments as set out in this NPA. The changes will provide long-needed legal and operational clarity between FCL.725 and OSD-FCD, ensuring that helicopter pilot training accurately reflects certified aircraft characteristics while maintaining consistency across the European regulatory framework.