EHA Position Paper – Rotorcraft Class Rating Proposal

Executive Summary

This paper proposes the introduction of a rotorcraft class-rating system within EASA Part-FCL, aligned with FAA practice, with CS-27 rotorcraft forming the upper boundary of the class-rating applicability. CS-29 rotorcraft would retain full type-rating requirements. The proposal aims to reduce training and administrative burdens, improve pilot mobility, and ensure proportionality in regulatory oversight while maintaining safety through structured differences training and endorsement pathways.

1. Introduction

EASA currently mandates individual type ratings for nearly all turbine and complex rotorcraft. This contrasts with systems used elsewhere, including the FAA and EASA GA aeroplanes, which employ broader class ratings supplemented by make/model endorsements. A harmonised, risk-based alternative would benefit operators, pilots, and training organisations across Europe.

2. Proposed Class-Rating Framework

The proposed system establishes a 'Rotorcraft – Helicopter (CS-27)' class rating, covering non-complex single- and multi-engine rotorcraft certified under CS-27. CS-29 rotorcraft, along with rotorcraft featuring high-risk automation, complex avionics suites, or fly-by-wire systems, remain under individual type ratings.

Key elements:

- Base class rating for CS-27 rotorcraft
- Endorsements for turbine, multi-engine, IFR, FADEC, and complex automation
- Retention of type ratings for CS-29 rotorcraft
- EASA-managed differences training matrix

3. Advantages

• Reduced administrative burden
• Increased pilot mobility
• Economic benefits for operators and ATOs
• Facilitated entry for new rotorcraft designs and AAM platforms
• Improved alignment with international regulatory systems

4. Disadvantages and Mitigations

• Potential oversimplification risks → mitigated via mandatory differences training
• Increased operator responsibility → mitigated via standardised EASA differences matrix
• Complexity boundary disputes → mitigated by firm CS-27/CS-29 demarcation

5. Justification

The proposal supports proportionality, harmonisation, innovation, and market access. It preserves high safety standards for complex rotorcraft operations while enabling more efficient licensing for smaller fleets.

6. Draft Bow-Tie Analysis

Top Event: Pilot operates a CS-27 rotorcraft without adequate type-specific competence.

Threats:
- Insufficient differences training
- Over-reliance on class privileges
- Inadequate operator oversight

Consequences:
- Loss of control
- System mismanagement (engine/rotor limits exceeded)
- Increased accident rate

Threat Barriers:
- Mandatory endorsement syllabus
- Tutor-supervised OJT
- EASA differences matrix (levels A–D)

Consequence Barriers:
- Recurrent competency checks
- Operational procedures (checklists, SOPs)
- Simulator-based scenario training

7. Conclusion

A CS-27 rotorcraft class-rating system offers a balanced path to modernise pilot licensing within Europe. It maintains high safety standards, respects helicopter-specific complexity and supports industry growth.