

Pilot Proficiency Check (PPC): Simulator Training Travel Bubble (STTB)

COVID-19 CCRD:

COVID-19 Contingency Related Differences (CCRD's) - Temporary differences to the ICAO SARPs – referred to as Alleviations, are facilitating continued operation of many airlines, especially in relation to extensions of pilot licences, medicals, and certificates.

Alleviations will be withdrawn on the 31st March 2021, after which all States are expected to return to pre COVID ICAO SARP compliance.

SAFETY IMPLICATIONS:

For the continuation of operations following extended periods of reduced flying, and/or restricted movement of flight crews, the need to ensure adequate flight crew training and proficiency checking is of paramount importance in maintaining an acceptable level of safety.

Noting many States do not have direct access to training facilities, such as simulators and other training devices, it is essential to consider flight crew as a key element in maintaining aviation safety, this can only be assured if flight crew are availed the benefit from specific Public Health Corridor initiatives when provide travel to access such facilities.

Flight crew travel facilitation between States for training and conduct of PPC's is essential to continue and/or re-establishing operations as Alleviations and the 31st March 2021 cut-off date approaches.

PILOT PROFICIENCY CHECK (PPC):

In the case of commercial air transport operations as referenced in ICAO Annex 6 Part I Chapter 9 Section 9.4.4.1, requires Pilots to complete regular PPC's twice within any one-year period. These checks are predominantly carried out in Simulators. Pilots are not permitted to fly if these checks cannot be completed.

The PPC CCRD has provided relaxation to the extent that a regulated PPC can be extend for a period of 12 months, or 31 March 2021 whichever occurs first, after which a regulated simulator PPC is required.

State regulators have been managing the risk of pilots not having completed a PPC within one year in accordance the ICAO guidance. Implementing further relaxation of the CCRD PPC requirements has been acknowledged as an unacceptable risk and as such no further changes are expected to the current PPC Quick Reference Guide (QRG).

SIMULATOR TRAINING:

Several States do not have "in-country" simulator training facilities and as such pilots have no option than to travel overseas in order to carry out their PPC's. COVID -19 has restricted travel to the extent where pilots have been unable to travel to their usual "out of country" simulator facilities.

Many operators have several pilots who are approaching the limiting period of one year since their previous regulated simulator PPC. This leaves operators with two options:

1. Arranging travel of pilots to simulator facilities and conduct simulator training,
2. Step down pilots, or in the worst-case scenario cease operations.

FACILITATE SIMULATOR TRAINING- PPC:

It is recommended a “*Simulator Training Travel Bubble*” (STTB) is established for pilots to travel to simulator facilities for the sole purpose to conduct simulator training. The STTB is recommended for a controlled group of pilots to travel to a simulator facility with reduced or exempted quarantine requirements. In order to mitigate the risk of COVID infection strict travel requirements are recommended.

The initiative could be considered for cross border travel domestically dependant on State Government approvals.

Advance bilateral communication, coordination, and planning between operators, aviation stake holders and relevant responsible authorities will be essential in facilitating travel to simulator facilities.

The STTB will be necessary after 31 March 2021 as all the COVID- 19 Temporary differences will be withdrawn and States will be expected to revert to Pre-COVID SARP compliance, i.e. all exemptions and alleviations against the ICAO SARP’s will be cancelled.

SIMULATOR TRAINING TRAVEL BUBBLE – FOUNDATION CONTROLLING ELEMENTS

The following is a list of recommended foundation elements that could be adopted to justify a *Simulator Training Travel Bubble*. These include elements that have been adopted to facilitating the travel of flight crew to Australia for the sole purpose of conducting simulator training. This is broken down into four elements: **Prepare, Protect, Prevent, and Follow up**

Prepare: Prior to travel for simulator

1. Two weeks prior to travelling the crew monitor their health for COVID symptoms and if necessary are tested in accordance with COVID testing protocols to ensure pilots are COVID free before travel.

Protect: Public Health Corridor

2. On day of arrival in host State pilots travel directly from the airport in company arranged transport to company supplied accommodation.
3. Pilots must not leave employer provided accommodation except when required to attend simulation training or if an emergency occurs.
4. Pilots are required to travel directly to and from the simulator training facility in company supplied transport.
5. Pilots to leave host State as soon as practicable on completion of simulator training.
6. On day of departure Pilots are to travel directly to the airport in company arranged transport from company supplied accommodation.

Prevent: Comply with COVID plan

7. Simulator training facility must have COVOD safe plan in place.

8. Pilots are always required to comply with all aspects of simulator centre COVID safe plan and directions of staff at simulator facility.
9. Pilots own Airline shall have a COVID safe plan.
10. Pilots to comply with own Airline COVID safe plan.

Follow-up: If infection occurs

11. After returning from simulator training a follow up process is complied with where the pilots self-monitor for COVID symptoms and if tested positive within that time frame – (two weeks) follow COVID Contact tracing protocols.

States may further expand these processes depending on the “equivalence” of infection rates of the countries involved and mutual confidence level as decided by Government Health Departments.

RECOMMENDATION:

It is recommended that Government Authorities, NAA’s, Public Health Authorities, aircraft operators and airports establish effective communication channels to establish processes and procedures in order to facilitate the travel of pilots for the sole purpose of conducting simulator training and PPC’s.

The elements in this document could serve as a framework for harmonized public health measures implemented by States in order to facilitate the travel for pilots to simulator facilities, in accordance with ICAO SARP’s, the CART report, applicable modules contained in the CART “Take-off” guidance document and the WHO and other public health recommendations.

Reference to State Letter AN5/28-20/97 *Facilitating passenger flights, including repatriation flight, using public health corridors during the COVID-19 pandemic* provides the following key elements for consideration in addition to those mentioned above:

1. Applying a multilayer strategy to implement Public Health Corridors
2. Components of the multilayer strategy in aviation
3. General hygiene
4. Physical distancing
5. Use of face masks
6. Self-screening
7. Self-declarations
8. COVID testing
9. Contact tracing in the case of infection
10. Communication and information sharing
11. Similar to the Seafarer case – ensuring rapid authorisation travel bubble for training

In line with the content of this paper consideration be given to the development of harmonized guidance to facilitate simulator training travel bubbles using public health corridor protocols.

Miles Gore-Brown

ACCRPG SSG

25th September 2020 Version 2