International Civil Aviation Organization

WORKING PAPER

ASSEMBLY — 36TH SESSION

TECHNICAL COMMISSION

Agenda Item 30: Other safety matters

LANGUAGE PROFICIENCY LEVEL

(Presented by the International Federation of Air Traffic Controllers' Associations)

EXECUTIVE SUMMARY

A lack of English language proficiency among pilots and air traffic controllers has been identified as a contributory factor to aviation accidents and incidents. Subsequent to the ICAO 32nd Assembly, the Air Navigation Commission considered English language proficiency, and strengthened relevant provisions of Annex 1 — *Personnel Licensing* and Annex 10 — *Aeronautical Telecommunications*. Contracting States were obliged to take steps to ensure air traffic control personnel and flight crews operating in airspace where English is required are proficient in speaking and understanding the English language by 5 March 2008. Research indicates many States are not progressing at an acceptable pace with respect to timely implementation of language training.

The International Federation of Air Traffic Controllers' Associations (IFATCA) has expressed its concerns to States and its own Member Associations of the urgent need for cooperation in this project. We have impressed upon employers the need for swift decisions regarding English language proficiency testing for air traffic controllers, in respect of the 5 March 2008 compliance date.

Action: The Assembly is invited to:

a) task ICAO with re-emphasizing to States their responsibility to ensure that English language proficiency training and testing for air traffic controllers complies with ICAO requirements. IFATCA ask that the importance of this programme be reinforced to States and that a method of accountability be established and enforced where States are not compliant with those requirements by 5 March 2008; and

b) request that States not install language deficiency reporting schemes that institute regimes of blame among aviation professionals as this would be counter-productive to aviation safety.

Strategic Objectives:	This working paper relates to Strategic Objectives A: Safety.
Financial implications:	Not applicable.
References:	ICAO Global Aviation Safety Plan

1.   **INTRODUCTION**

1.1   Inadequate language proficiency among pilots and air traffic controllers has played a role in aviation accidents and incidents, which has lead to a review of ICAO language requirements. At the ICAO 32nd Assembly, Resolution A32-16 urged the Council to direct the Air Navigation Commission (ANC) to consider this matter with a high level of priority, and to devise a means of strengthening provisions related to the use of the English language for pilot/controller communications.

1.2   As a first step in achieving its mandate, ICAO in 1998 reviewed its language requirements and by 2003 had new Standards and Recommended Practices (SARPs) concerning language proficiency requirements in place. In addition to strengthening the provisions related to language use in radiotelephone communications, ICAO had also established a language proficiency rating scale delineating six levels of language proficiency ranging from Pre-elementary (Level 1) to Expert (Level 6) across six areas of linguistic description: pronunciation, structure, vocabulary, fluency, comprehension and interactions.

1.3   All States and organizations have a role to play in improving English language communications. The responsibility for ensuring that air traffic controllers and pilots meet proficiency requirements has been allocated to air traffic service providers and airline operators. ICAO requirements are that controllers meet a minimum "Level 4" standard of English competency by 5 March 2008. Proficiency must be demonstrated as required by the State regulator.

1.4   IFATCA has, on many occasions, expressed its concerns to States and its own Member Associations of the urgent need for cooperation in this project. We have encouraged our members to work with their service providers and regulators toward a more meaningful level of involvement in the development of training and testing programme(s).

1.5   Reliable research and surveys have indicated many States are not progressing at an acceptable pace with respect to timely implementation of language training. IFATCA has on several occasions reminded States, service providers and its Member Associations that timing was critical in the developmental process for testing procedures.

2.   **DISCUSSION**

2.1   In 1997, the ANC reviewed ICAO recommendations (A32-16) that minimum performance Standards be developed and adopted which addressed English language skill levels. The matter received priority status with Annex 1 — *Personnel Licensing* and Annex 10 — *Aeronautical Telecommunications* to be strengthened to enable States to take measures to ensure that air traffic control personnel and flight crews were proficient in speaking and understanding communications in the English language.

2.2   In March 1999, the ANC established a study group tasked with developing provisions relating to language testing requirements and minimum skill levels in the common use of English. This was the Proficiency Requirements in Common English Study Group (PRICESG), of which IFATCA was a member.

2.3   In December 2001, the ICAO review of proposals to amend Annex 1, Annex 6 — *Operation of Aircraft*, Part I — *International Commercial Air Transport — Aeroplanes* and Part III —

International Operations — Helicopters, Annex 10, Volume II — *Communication Procedures including those with PANS status* and Annex 11 — *Air Traffic Services* concerning language proficiency for radiotelephony communications resulted in State letter AN 13/48.1-02/1 that detailed the language proposals and invited comment and input from States and international organizations.

2.4   In September 2004, ICAO hosted an international seminar highlighting the work done by the PRICESG, and presenting its recommendations to international delegates. An important conclusion was that States and operators must utilize the "English as a Second Language" option when considering their training and testing methods, and recommended that the greatest chance of success was for States to receive assistance in implementing English language-strengthening activities from ICAO.

2.5   On several occasions, in 2005 and in 2006, IFATCA wrote to States, service providers and its Member Associations re-iterating the urgent need for cooperation in this project. IFATCA had identified that the state of preparedness of States and Providers was at a critical stage for realistic implementation of ICAO requirements for Level 4 language proficiency.

2.6   There has been a perception that a lack of information and clear guidance would hamper many providers in their efforts to meet the March 2008 deadline. Many operators and service providers are relying on external sources for assistance while struggling with the problem of how to create a meaningful and efficient test procedure that is comprehensive and cost effective.

2.7   A very slow uptake in training and testing for the new language proficiency requirements is worrisome. However, through various workshops and seminars that have been held, States and organizations should now be fully aware of their responsibilities. Many reliable and well established language institutions with good reputations have come forward with their "solution" to the problem of training and testing of both controllers and pilots.

2.8   To further support States, ICAO published the *Manual on the Implementation of ICAO Language Proficiency Requirements* (Doc 9835) and also arranged seminars in preparation for the introduction of the language proficiency requirements. These seminars highlighted the disparate status existing among States, operators and air traffic service providers. Some larger operators and civil aviation authorities have some sort of programme in place or finalized, however many smaller organizations are still trying to obtain more information and guidance material on establishing a test programme.

2.9   An on-line survey addressed to Civil Aviation Authorities, ANSPs, air operators and training institutions was conducted in 2005. One hundred and fifteen organizations were represented by replies from one hundred and twenty-three respondents from forty-seven (25 per cent) of one hundred and eighty-nine Contracting States. The numbers from this survey of one hundred and fifteen organizations from the forty-seven States participating, indicated that approximately 170 000 pilots and 40 000 air traffic controllers needed to be tested, with thirty-three organizations saying that 100 per cent of their controllers/pilots needed testing.

2.10   Regulators/CAAs are most frequently involved in the administration of language proficiency testing services. They are followed by language testing services, institutions, ANSPs and operators. Fourteen per cent of respondents did not know who will administer tests in their State and were looking to guidance from the regulator. Eighteen per cent said that proficiency tests are available; thirteen per cent said they would be available by the end of 2005; twenty-five per cent said by the end of 2006; and fifteen per cent by the end of 2007. Amazingly, twenty- per cent said they have no information as to when they would be available. Fifteen organizations replied that their pilots / ATCOs have been tested

with eighty-three indicating testing will be complete by the end of 2007, and eleven organizations expecting difficulties meeting the deadline of 5 March 2008. A majority of respondents indicated that they had participated in regional ICAO language proficiency seminars and used the *Manual on the Implementation of ICAO Language Proficiency Requirements (*Doc. 9835).

2.11   So what does this mean? It provides a fairly accurate indication of how the industry has progressed in terms of its commitment to the language proficiency issue. We saw then that we are nowhere near the point where we could expect a satisfactory progression leading to the 2008 deadline. By all indications, it would appear as though the situation has not improved. The compliance date will not change, and we fear many organizations are not, and will not be, ready.

2.12   With time a critical factor, in April of 2006, IFATCA reminded both States and regulators of their obligation and responsibility to ensure that language testing is made available for current controllers of all English language abilities to enable them to meet the basic Level 4 requirement of ICAO. Even at this late date it would appear that some States are not taking this issue seriously, despite the fact they have been aware of the recourse(s) available, in particular that of ICAO in order that appropriate action could be taken.

2.13   The second ICAO Aviation Language Symposium held in Montréal in May 2007 presented models of implementation of the provisions and initiatives that support quality aviation language training and testing, and provided participants with tools to develop implementation plans of the language proficiency requirements within their respective organizations.

2.14   Despite the efforts of ICAO and others it remains the view of IFATCA that there is too little progress being made on a global scale prompting our concerns relating to the potential negative effects on those who may not be able to attain the required Level 4 competency. We have scant information as to what action(s) many providers and/or CAAs have taken so far; and how they plan to contribute to the training process between now and March 2008, but reliable research indicates States are in one of three categories concerning language training:

        a)   they have no idea of how to proceed;

        b)   they have little idea of how to proceed and no plan in place; and

        c)   they know best and will "go it alone".

2.15   Nevertheless, it remains the responsibility of each State to ensure that no matter who or what organization actually performs the testing procedures, they will comply with ICAO Annexes and that there exists a high level of compatibility amongst all national programmes. How will this be possible if States do not take some control?

2.16   IFATCA is wary of the "safety impact" a diverse introduction of language proficiency could have in the various countries. Not only does IFATCA foresee that the level of education might be disparate due to various reasons, but we have concerns that some air traffic controllers will not be able to continue to be operational on grounds of late training by States and Air Navigation Service Providers.

2.17   IFATCA is as well concerned that there could develop an atmosphere of accusation in the form of "blaming" reports among States, airline operators and/or Air Navigation Service Providers being

started, which would be counterproductive if air traffic controllers and/or pilots were required to report deficient language proficiencies of other parties.

3.   **CONCLUSION**

3.1   The introduction of the English language proficiency requirements, and their implementation date of January 2008, is an ambitious undertaking. The need for a strategy for the development of an English language standard for air traffic control communications has been addressed (ICAO SL AN 13/48.1-02/1) and basic procedures for competency levels and testing requirements are now contained in ICAO Annexes. The PRICESG has done its job identifying requirements and recommending a course of action for States and others to follow.

3.2   Proficiency training and testing for air traffic controllers of all language abilities must be made available in a sufficient time to allow the acquisition of ICAO Level 4 prior to the implementation date of March 2008. Continuation (recurrent) training should be provided as appropriate so as to maintain or improve the achieved standards of English competency.

3.3   IFATCA, once again, encourage service providers and regulators to act without further delay to ensure that an English language proficiency training and testing programme is in place in their State and that the English language proficiency of all operational air traffic controllers is fully tested and rated not later than 5 March 2008.

— END —