

INSTRUCTIONS FOR COMPLETION**TARGETED EXEMPTION: AREA, ROUTE and AERODROME QUALIFICATION
FOR PILOT-IN-COMMAND (ARA)**

A TE form must be submitted by the National Continuous Monitoring Coordinator (NCMC) or authorized user from a Member State.

Part A. ICAO Use only

States **should not complete** any of Part A.

Part A provides a unique reference number for the TE in order that it can be quickly and unambiguously referred to, and to ensure other States are able to easily find the information provided regarding this TE. This includes identifying where concurrent use of TEs is in place.

Details will be added by ICAO on submission of a fully completed TE form that meets the requirements as outlined in the following sections. Completion of this section with the TE reference and cross-referencing for other TEs (where applicable) should be taken as evidence that the TE has been successfully submitted and recorded by ICAO.

TE forms which do not have this section completed have either not been submitted to ICAO, or do not meet the requirements as outlined in the following sections.

Part B. Targeted Exemption Details (To be completed by the NCMC or authorized user only)

Part B provides specific detail on the targeted exemption, including which Standard it relates to, when the TE is applicable and who in the State is to be contacted for more details, if required.

The information in **Part B** is also used to enter the TE details into a searchable database, allowing the TE to be easily found by States, reference number, affected Standard or applicability. This action forms part of the ICAO process following submission of a correctly completed form.

1. State

The State of the Operator (or other responsible State where the State of license issue is not the State of the Operator) will be responsible for providing details of TEs related to Area, Route and Aerodrome recency for operators. This section should be completed with the full name of the State issuing the TE.

2. Notification Date

This date refers to the date on which the TE was completed and submitted to ICAO for publication. *It is not related to the applicability date.*

Notification should be as far in advance of the start date of the TE as is practicable to allow for submission and processing by ICAO, ensuring the TE details will be available to view at the start of the applicability period.

3. Reason for granting TE

A clear and concise description of the need for a TE should be provided here. An example could be as follows:

Basic Airways is operating a significantly reduced schedule and is unable to roster all pilots to ensure meeting the requirements of the area recency Standards.

TEs should only be granted for issues that are the result of restrictions imposed by the COVID-19 pandemic, and not in response to systemic issues.

TEs should be specific to a clearly defined situation and drafted specifically for that situation. It is possible that a State may need multiple TEs in relation to one Standard, for example where multiple operators are based in a State and two or more of these operators have issues with ensuring qualification for the pilot-in-command operating to specified areas. In this case a TE for each operator is required as the risk assessment and mitigations will depend on the complexity of the operation and the maturity of the operators SMS process.

Details regarding the plan for a return to normal operation when the TE expires should also be included here.

4. Associated SARP (Target group)

For Area, Route and Aerodrome (ARA) recency, the references for Annex 6 Part I and Part III are provided. States should indicate which Standard the TE is related to by checking the relevant check box.

5. TE Applicability period

TEs are granted for a specific time period. This must be specified on the form using **From** and **To** dates (in UTC) indicating the start of the TE applicability period and the end date after which it will no longer apply.

Should a TE be required beyond the supplied applicability period, a new TE form will be required to be completed and submitted to ICAO.

Automatic filtering of the database entries for TEs will ensure that only TEs that have not expired (current and future) will be shown to the States when looking for information on existing exemptions.

6. TE approved for use by:

An ARA targeted exemption is aimed at a specific group experiencing an issue with compliance to a Standard (i.e. exemptions that need to be accepted by other States to allow entry into their airspace). ARA TEs should therefore clearly specify to whom they apply. As described above, where there are multiple eligible operators requiring ARA TEs, these must be completed separately since the exact conditions, risk and mitigations relative to each will be different.

This section should aim to describe as accurately as possible which group is affected by the exemption.

Note that:

- a. The ARA TE should only be granted where all other options have been explored and there is no other alternative.
- b. ARA TEs should only apply to a distinct group affected by the issue described in 'Reason for granting TE'. For example, if an operator has 2 aircraft types on their AOC and one of these operates into areas which are specified by the operator as requiring qualification visits in line with Annex 6, the TE should be directed to this group only – it should not apply to the operator as a whole unless required to do so.
- c. Detail provided in this section should be sufficient to identify who is subject to the TE without the need for follow up with the State focal point.

7. Operator accountable person

Following authorization from the State, an accountable person within the affected organization (the operator, in this case) should also provide their details to acknowledge that they have accepted and understood the conditions under which the TE is granted and under which they will continue to operate.

8. State focal point

The State will need to nominate a contact individual who can be contacted by ICAO or another State in the event that additional information is required in respect of the issued TE.

Such questions might include (but are not limited to):

- a. Clarification on the applicability of the TE;
- b. Additional information on the risk assessment conducted by the State before granting the TE;
- c. Additional detail on specific mitigations put in place.

9. State/CAA Accountable person

The TE needs to be authorized by a person of authority within the State. For ARA-related TEs, this could be the equivalent position to the Head of Flight Operations, or if necessary the DG of the CAA.

By completing and submitting the TE form, along with the accountable person details, the State is officially recognizing that they are granting an exemption to the operator and that they have satisfied themselves that:

- a. A risk assessment has been conducted to identify the potential risks to the operation resulting from the TE
- b. Suitable mitigations have been considered (see **Part C** below) and put in place to maintain an acceptable level of safety performance.
- c. Continued oversight on the part of the State will be conducted for the duration of the applicability period to ensure the operator is complying with the requirements specified in the TE.

TE forms received by ICAO that are not authorized by a suitable individual from the issuing State will be returned for completion.

Part C. Targeted Exemption Elements

Part C of the TE form is intended for the State to outline the additional measures associated with the use of the ARA TE that have been put into place to maintain the acceptable level of safety. Additional measures will depend on the specific circumstances that the ARA TE is addressing. Below, additional guidance on potential measures is provided which should be considered carefully by States.

1. Maximum interval

In this section, the State should indicate the different time interval to that required in the Standard for recency trips as a pilot member of the flight crew, or as a check pilot, or as an observer in the flight crew compartment.

In determining this new time interval, the following should be noted:

- The interval defined here is the elapsed time between the last trip and the subsequent trip as operating pilot, check pilot or observer on the flight deck.
- A 6-month extension of the qualification requirement is considered the longest acceptable interval between two successive trips. This would result in the maintenance of pilot's qualification on the area, route or aerodrome within 18 months of the last recorded trip.
- The exemption only applies to pilots that have previously qualified on the area, route or aerodrome.
- The extended interval between successive trips should reflect the experience of the pilot-in-command, co-pilot or other assigned flight crew members. It should also consider the operators overall performance and risk profile (e.g. SMS maturity, training standards) and any combination factors of other TEs also authorized by the State of the Operator.

2. Specific Mitigations

States should ensure that appropriate controls and oversight are in place to adequately review operator risk assessments (including access to SMEs where appropriate). In assessing individual operator targeted exemption risk assessments, States must be cognisant of the impact of other exemptions being applied by that operator or in the aviation system applicable to that operator.

The operator risk assessment, reviewed by the relevant State (typically this would be the State of the Operator but not always), should include details of any and all mitigations intended to ensure an acceptable level of safety performance while the TE is valid.

Section 2 should specify all such mitigations that have been put in place, in sufficient detail to provide evidence that the proposed mitigations have adequately addressed any additional safety risks associated with the use of the TE.

The following guidance represents possible mitigations that could be considered by an operator:

a. Alternative training requirements

- i. Substituting ARA qualification normally acquired as a flight crew member in an aeroplane or in an approved FSTD, with an alternative ground training device (e.g. not qualified in accordance with State Standards but still deemed fit for purpose by the State) provided that negative training is prevented.
- ii. Use of distance learning to provide refresher training of knowledge and SOPs including specific normal and non normal operations into the specific ARA.

b. Operating limitations

When operating under a TE it may be necessary to reduce the operating limitations to ensure that the crew, who have not had the opportunity to maintain their normal qualification in the specific area where particular conditions may exist (terrain, high traffic loads, minimal infrastructure etc.), do not operate in extreme conditions that could present a safety hazard.

The extent of the mitigating measures should be reviewed to take into account the period of time the PIC has not operated into the specific ARA.

Care should be taken that these operating limitations do not, in themselves, present an additional hazard to safe operations and are only imposed where the safety risk assessment indicates a genuine need to limit potential exposure.

Potential operating limitations that could be considered are:

- Requiring flight into the specific ARA with a current pilot assuming the role of pilot flying;
- Increasing operating minima in operations with significant terrain and minimum safe altitudes;
- Avoiding 2D approach operations, where possible;
- Reducing maximum crosswind / tailwind limitations;
- Increasing operating minima of operation in contaminated runways / severe weather;
- Using of higher approach and/or departure minima;
- Operating with increased crew complement;
- Operating with reduced duty periods or other options limiting fatigue;
- No operational MEL items that may unacceptably increase pilot workload, taking into account the specific ARA conditions.
- Restricting the conduct of operations based on specific approval items (such as RNP AR), where these require specific training and checking during the course of the normal proficiency check/training cycle.

c. Restricted Crew Composition

- i. Crew composition should include at least one flight crew member, who has made a trip to the area, route or aerodrome within the previous 12 months.
- ii. Subject to the operator risk assessment the flight crew could be composed of crew with no qualifying visit in the past 18 months, as long as they have 5 or more years of continued experience operating on the same fleet to the area, route or aerodromes specified.

- iii. Rostering more experienced flight crew members on flights with a PIC that has expired ARA recency should also be considered.

d. Dispatch process

- i. Operator implements enhanced dispatch procedures that track ARA changes and implements feedback from other pilots operating in the area/route and/or aerodromes to provide a more comprehensive dispatch briefing.
- ii. Operator to provide flight crew with increased time to enable more comprehensive pre-flight preparation and planning.

e. Other

Any other mitigations not included in the above, but which are conditions of the TE, should be specified here.

3. Document to be issued

In this section, any State-issued documentation that provides confirmation that crew are operating under a State approved TE, should be identified. Such documentation can be presented on ramp inspection in another State, where necessary. Where the TE form is presented as the document, it must include a completed Section A to verify that it has been received by ICAO.