



## **Summary of Consultation on Proposed Regulation / Standards Changes**

### **STANDARDS DOCUMENT – PERSONNEL LICENSING (SD-PEL)**

Amendment 6 to SD-PEL: Requirements for the Issuance of the Airline  
Transport Pilot License (Aeroplanes)[ATPL(A)]

## **1. Purpose of the Proposed Change**

The purpose of the proposed changes is to incorporate Amendment 6 into the Civil Aviation Authority of Fiji's (CAAF) Standards Document – Personnel Licensing (SD-PEL). This amendment updates licensing requirements to enhance regulatory clarity and alignment with international best practices.

## **2. Background of the proposed change**

The CAAF Standards Document for Personnel Licensing (SD-PEL) sets out the standards and requirements governing the licensing of aviation personnel in Fiji.

Amendment 6 introduces revisions to Section 2 – Chapter 5, which outlines the requirements for the issuance of the Airline Transport Pilot Licence (Aeroplanes) [ATPL(A)].

These changes are intended to:

- ➔ Align Fiji's licensing standards more closely with those of the Civil Aviation Authority of New Zealand (CAANZ),
- ➔ Clarify eligibility criteria, and
- ➔ Strengthen the overall regulatory framework for ATPL(A) issuance.

## **3. Summary of Consultation (including summary of comments/feedback received).**

Amendment 6 was published on the CAAF website for public consultation from 3 April 2025 to 2 May 2025, providing industry stakeholders with a four-week period to review and comment.

During the consultation period:

- ➔ Two (2) formal submissions were received via email using CAAF Form QA109.
- ➔ An additional written submission was received prior to the official commencement of the consultation period and has also been taken into account.

All feedback received has been duly considered in finalising the proposed amendment.

## APPENDIX – FEEDBACK RECEIVED

### 1. FIJI AIRWAYS

★ Date of Response: 18/02/2025

PROPOSED AMENDMENT	Fiji Airways comments/proposal	CAAF Comments
<b>5.3 ELIGIBILITY REQUIREMENTS</b>  5.3.1 To be eligible for an ATPL, a person must:-  4. have a minimum of 1500 hours as pilot of aeroplanes. This must include specific flight experience requirements detailed in (5) which must be met in full, and where stated otherwise, hours may be credited, where appropriate, towards more than one requirement. The 1500hours in aeroplanes may be made up of:	i. Minimum 1500 hours remains the same, however, the requirement meet 1500 hours differs. <u>Nil Objection</u> to 1500 hours, however, objection to the requirements (comments below).	i. Noted
a) All dual flight instruction in aeroplanes (single or multi-engine, both day and night).  b) All pilot in command flight experience in aeroplanes (single or multi engine, both day  c) Pilot in command under supervision (PICUS) hours up to a maximum of 500 hours, However, the method of supervision employed must be agreed beforehand and with the Authority. All hours under PICUS must be logged and logbook and training records (available to the CAAF examiner/assessor) maintained by the operator. Any PICUS time logged that does not comply with the requirements cannot be credited toward any experience requirements.	ii. Dual flight instruction not mentioned in current SD unless classified the same as current SD 5.4.2 (e) As a pilot-under-instruction in aeroplanes counted in full. Nil objections.	ii. Dual instruction time is defined as flight time during which a person receives flight instruction from an appropriately authorised pilot who is present on board the aircraft (e.g. an approved flight instructor from a certified flying school). This is distinct from clause 5.4.2(e), which refers specifically to time logged as pilot-under-instruction and is treated under a separate provision. The two are not equivalent and are therefore not classified the same within the Standards Document.

<p>d) Fifty percent of all co-pilot (first Officer) flight experience in aeroplanes that are required, by the aircrafts flight manual to be operated with a co-pilot, may be credited towards this total flight time requirement for an airline transport pilot licence.</p> <p>e) A pilot who is designated as pilot-in-command for the purpose of supervising a pilot undergoing consolidation of operating experience, cannot be credited with the flight time towards the experience requirements for an airline transport Pilot licence if the supervision is carried out in a single-Pilot aircraft.</p>	<p>iii. Less restrictive than current SD 5.4.2 (h), however, this is not in compliance with ICAO ANNEX 1 Personnel Licensing 2.6.3.1.1.1. <u>Objection</u> to crediting only fifty percent (50%) of all co-pilot time due to variation from ICAO and longer progression time for Fiji Airways First Officers especially with the full implementation of CBTA and EBT in Fiji Airways. ICAO gives credit for flight time reduction based on competency-based programme as per ICAO ANNEX 1 2.6.3.1.1.2 (Note)</p>	<p>iv. CAAF notes the concern raised.</p> <p>ICAO Annex 1, paragraph 2.6.3.1.1.2 provides that where an applicant has flight time as a pilot in aircraft of other categories, the licensing authority (CAAF) may determine whether such experience is acceptable and the extent to which it may be credited toward meeting the flight time requirements of paragraph 2.6.3.1.1.</p> <p>The proposed 50% credit for co-pilot time is based on alignment with the CAA NZ's requirements and reflects a balanced approach to ensuring operational readiness while maintaining international consistency. It also improves on the current SD 5.4.2(h), which caps co-pilot time credit at 50% of 400 hours (i.e. a maximum of 200 hours), by removing the upper limit and applying a consistent 50% credit to all co-pilot time.</p> <p>CAAF acknowledges the potential impact on progression timelines and remains open to reviewing this provision in the future, particularly as the CBTA and EBT frameworks are more fully implemented and validated in Fiji.</p>
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<p>f) Fiji does not recognise second Officer or cruise relief flight experience toward a higher licence or rating.</p>	<p>v. As per last meeting with CAAF Licensing, Second Officers time on seat (does not include time in the second officer seat or rest) and signed by PIC can be counted towards Licensing requirements. This is in accordance to CAAF SD APPENDDIX 1 - RECORDING AND LOGGING OF FLIGHT TIME Augmented Crew Operations. <u>Objection</u> - with implementation of CBTA and EBT plus ICAO best practise, second Officers and Cruise Relief pilot go through same training as other crew members. As per current SD, hours are indeed recognized.</p>	<p>v. CAAF acknowledges the feedback and the reference to Appendix 1 regarding logging of flight time under augmented crew operations.</p> <p>However, under the proposed amendment, CAAF is aligning its policy with the CAANZ, which does not recognise Second Officer “time on seat” as meeting the co-pilot experience requirements for licensing purposes. This position reflects a clear distinction between active co-pilot duties and monitoring roles undertaken during cruise segments under augmented crew configurations.</p> <p>Furthermore, CAAF’s current SD does not formally recognise Second Officer time as co-pilot time. While Second Officers and Cruise Relief Pilots may undergo similar training under CBTA and EBT frameworks, the regulatory crediting of flight time must remain consistent with defined operational responsibilities. Monitoring roles, unless conducted in an active co-pilot capacity, do not meet the standard for creditable flight time toward ATPL requirements. CAAF will review this position as CBTA/EBT practices evolve and greater international standardisation is achieved.</p>
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<p>(5) The specific flight experience requirements are: -</p> <p>a) Pilot-in-command: (1) 250 hours in aeroplanes as pilot-in-command including 100 hours of cross-country navigation of which 25 hours is to have been at night.</p> <p>b) Alternatively</p> <p>(1) 250 hours in aeroplanes consisting of 70 hours minimum as pilot-in command and the necessary additional flight time as co-pilot performing, under the supervision of the pilot-in-command, the duties and functions of a pilot-in-command (i.e. pilot in command under supervision - PICUS), provided that the method of supervision employed is agreed beforehand with the authority or counted in full up to maximum of 500 hours.</p> <p>(2) 100 hours of pilot in command cross country navigation of which 25 hours is to have been cross country navigation at night. To meet this requirement:</p> <p>a) 200 hours cross-country navigation as a co-pilot (first Officer) in an aeroplane that is required, by its aircraft flight manual to be operated with a co- pilot, would meet the 100 hours pilot in command cross-country navigation requirement. This flight time may form part of the 250 hours mentioned in paragraph 5.3.1 (b)(1).</p> <p>b) 50 hours of night cross-country navigation time logged as co-pilot performing under supervision of pilot-in-command</p>	<p>vi. Nil Objections to 250hours.</p> <p>vii.<u>Objection</u> to 100 PIC cross-country navigation as this is more restrictive to current SD 5.4.2 (b) and ICAO Annex 1 which provisions the 100hours to be ICUS.</p> <p>viii.<u>Objection</u> to 25hours night cross country been PICUS. As FJ might be able to achieve this requirement utilising flights that operate at night under ICUS, some other carriers who do not operate night flights will have a challenge achieving this. This is also not in line with ICAO Annex 1 2.6.31.1.1 (b) where there is no requirements for night cross country.</p>	<p>vi. Noted. No further action required.</p> <p>vii.CAAF acknowledges the feedback and notes that ICAO Annex 1 does allow for the 100 hours of cross-country flight time to be completed under PICUS.</p> <p>However, the proposed requirement to complete the full 100 hours as PIC aims to ensure that candidates possess a higher level of operational independence and decision-making experience prior to ATPL issuance. This reflects both a safety-focused approach and alignment with CAANZ requirements, which CAAF is adopting to promote regulatory consistency and international recognition.</p> <p>Nonetheless, CAAF is open to reviewing this requirement in future amendments, particularly where operational constraints may limit PIC opportunities, provided the integrity of the training outcomes can be assured.</p> <p>viii. CAAF notes the concern raised; however, the proposed requirement to complete 25 hours of night cross-country flight time as PICUS is intended to strengthen competency in night operations within a supervised framework. ICAO Annex 1 allows states to prescribe additional requirements where deemed necessary for safety assurance.</p>
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<p>c) Instrument time:</p> <p>(1) 75 hours total (which may include approved simulators) which includes at least 45 hours instrument flight time in aeroplanes and an instrument rating (aeroplanes).</p> <p>d) Night flight:</p> <p>100 hours in aeroplanes as pilot in command (single and/or multi engine) or 100 hours as a co-pilot in an aeroplane required by its aircraft flight manual to be operated with a co-pilot.</p> <p>(6) Cross-crediting</p> <p>a) Where an applicant produces logbook evidence Of Piloting experience in aircraft other than in aeroplanes, half the pilot-in-command time experienced within the immediately preceding 12 months, up to the maximums that follow, may be credited towards the 1500 total flight experience required, but not to the specific flight experiences.</p> <p>(1) For helicopters: 60 hours</p> <p>(2) For gliders and powered gliders: 25hours.</p> <p>(3) For the above combined: 60 hours.</p>		<p>The inclusion of this provision reflects the Authority's intent to enhance pilot readiness in more challenging operational environments. While Fiji Airways may have the operational structure to support this, CAAF acknowledges the potential difficulty for smaller operators. As such, this requirement may be subject to review based on further industry consultation and the demonstrated impact on operator training pathways.</p> <p>CAAF does not find sufficient grounds in the current objection to revise the requirement but remains open to future reconsideration should substantive evidence be provided.</p>
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## 2. **FIJI LINK**

★ Date of Response: 03/02/2025

PROPOSED AMENDMENT	Fiji Link comments/proposal	CAAF Comments
<p>NOTE: Amendments 6 to SD-PEL affects the following section only:</p> <p>Section 2 – Chapter 5 – Requirements for the Issue of an Airline Transport Pilot License (Aeroplanes): ATPL(A).</p> <p>This amendment does not affect SD-PEL, Section 1 – Standards &amp; Practices, S1/Chapter 1, 1.1 Definitions which is aligned with ICAO Annex 1:</p> <p><b>Aircraft required to be operated with a co-pilot.</b> A type of aircraft that is required to be operated with a co-pilot, as specified in the flight manual or by the air operator certificate.</p>	<p>ANNEX 1 1.1 Definitions</p> <p><b>Aircraft required to be operated with a co-pilot.</b> A type of aircraft that is required to be operated with a co-pilot, as specified in the aircraft flight manual (AFM) or by the air operator certificate (AOC).</p>	<p>CAAF agrees with the submission from Fiji Link. The definition of co-pilot time will be expanded and aligned with ICAO Annex 1, 1.1, to reflect that co-pilot time must be acquired on an aircraft that is required to be operated with a co-pilot, as specified in the Aircraft Flight Manual (AFM) or the Air Operator Certificate (AOC).</p> <p>This amendment will ensure consistency with international standards and enhance clarity in the application of licensing requirements.</p>

## 3. **FALPA**

★ Date of Response: 26/02/25

PROPOSED AMENDMENT	FALPA comments/proposal	CAAF Comments
<p>All amendments made to SD-PEL on ATPL requirements.</p>	<p>If there's a propensity to align with neighbouring ICAO member states ( Australia &amp; New Zealand ) standards, we kindly implore your high office to give greater weight to realigning with Annex 1, Chapter 2.6.3. before accepting alignment efforts to neighbouring states.</p>	<p>CAAF appreciates FALPA's emphasis on adherence to ICAO Annex 1 provisions, which remain the foundation of Fiji's regulatory framework.</p> <p>In adopting Amendment 6, CAAF has carefully considered both ICAO Annex 1, Chapter 2.6.3, and the implementation practices of other ICAO-compliant jurisdictions, particularly those in the region such as Australia and New Zealand.</p>



		<p>Alignment with neighbouring states, who themselves comply with Annex 1, supports harmonisation, facilitates mutual recognition, and strengthens regional mobility and safety oversight consistency.</p> <p>That said, CAAF remains committed to upholding the intent and minimum standards set out in Annex 1. Where additional or more specific requirements are introduced, these are guided by a risk-based approach and take into account both national operational realities and international best practice.</p> <p>The Authority will continue to review the impact of such alignments and welcomes ongoing industry input to ensure that Fiji's licensing standards remain both globally credible and locally achievable.</p>
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All comments received have been carefully considered. Relevant feedback that enhances the proposed changes will be incorporated into the final instrument. CAAF acknowledges and appreciates the valuable contributions from industry, which have helped inform and strengthen the consultation process.