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AIR TRAFFIC CONTROLLERS' ASSOCIATIONS**

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INFORMATION PAPER

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Participation in ICAO PERSONNEL TRAINING AND LICENSING PANEL (PTLP)

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SUMMARY

The Personnel Training and Licensing Panel (PTLP) established to enable the coordinated review and development of personnel training and licensing requirements within and across technical disciplines.

1. INTRODUCTION

PTLP undertake specific studies and develop ICAO provisions related to aviation personnel training and licensing, including studies to ensure that proposed amendments to the applicable provisions reflect current and emerging requirements, improvements in training tools and technologies, new training methodologies while reviewing automation dependency and possible mitigations.

PTLP's active work programme is defined by the scope of the job cards assigned to it by the ANC.

2. ACTIVE WORK PROGRAMME ITEMS:

PTLP job cards (13):

- **CBTA implementation for all personnel licences**
- Qualification criteria for flight simulation training devices (FSTDs)
- **Air Traffic Controller Licenses and Ratings**
- **Women and minority and ethnic groups in aviation professions**
- Automation Dependency
- Aircraft Maintenance Personnel Licences
- **Electronic Personnel Licence**
- **Simulation training devices (STDs) guidance for ATCO and AMTEM**
- Flight Operations Officer / Flight Dispatcher Licence
- PTLP.014.01 - Language Proficiency Requirements - Job Card for WPE10212
- PTLP.017.01 - Airship training and licensing requirements
- PTLP.018.01 - Single-Pilot certificated aeroplane type rating
- **English Language Proficiency**

3. DISCUSSION

- 3.1. **WG-2 - CBTA** (Competency Based Training implementation for all personnel licences)

Problem statement:

Lack of understanding of the CBTA and differences in CBTA implementation results in licences being issued by States which may not be recognized or rendered valid by other States. Various interpretation of ICAO CBTA provisions and legacy CBTA approved courses led to divergent CBTA implementation, which results in challenges for States to recognize or render valid each other's licences, ratings and certificates

The evolution of training and licensing combined with the need to incorporate adaptive training and assessment practices, while at the same time retaining required levels of standardisation, as a route to licensing should be addressed in a harmonized manner.

PANS-TRG provides a single CBTA methodology which supports States in their obligation to recognize each other's licences, ratings and certificates but this is currently not adequately connected to Annex 1. Additionally, there is limited data available to support consideration of significant changes to licensing SARPs. States should be supported in their efforts in adopting CBTA as detailed in PANS-TRG.

Due to advances in air traffic management and complexities of airspace, current additional practices and needs of the industry in terms of ratings, endorsements, knowledge, experience and privileges are not reflected in Air Traffic Controller (ATC) licensing SARPs which could impair licence recognition.

Impact Assessment:

Specifically in relation to competency-based training and assessment (CBTA):

Problem 1. Annex 1 does not enable CBTA as a methodology for training and licensing of all personnel mentioned in Annex 1. ICAO has published Doc 9868 as a preferred method of training and assessment to achieve improvements in licensing outcomes that are more reliable and globally harmonised.

Problem 2. There is insufficient experience, and in some professional/discipline areas, guidance on implementing and overseeing CBTA. Expertise needs to be developed in most States and training organisations.

Problem 3. The principles of CBTA facilitate shifting the current reliance on prescriptive knowledge, skill and experience standards to reliance on objective descriptive standards of competency, which integrate the knowledge, skill and experience elements that underpin recreational and professional capability to conduct safe and efficient operations. However, there is insufficient evidence of the effectiveness of using the CBTA methodology for training and licensing in many areas that provide an acceptable level of confidence to modify the core requirements of knowledge, skill and experience. Reliable relevant evidence would provide an appropriate basis for such changes.

Opportunity 1. CBTA provides a highly structured, learning-based approach to training and licensing which provides an opportunity to rationalise and facilitate training outcomes that are relevant to roles and provide a platform to adapt to changing requirements. This has the potential to raise the level harmonisation of licensing, globally, while supporting more targeted outcomes for operators in the evolving air transport environment.

Opportunity 2. CBTA enables the use of current and emerging technologies that can legitimately be used to enhance training effective, efficiency and outcomes. While caution is needed, developments in simulation technologies, artificial intelligence, and delivery media are emerging rapidly.

Opportunity 3. States and ATOs familiar with CBTA could provide leadership and direction on how to implement CBTA from a harmonization and efficiency perspective.

Expected overall benefit:

- ✓ Harmonization of licensing and training practices and methods enabling States to take full advantage of different training and assessment practices, maintaining an overall level of safety and facilitating international licence recognition.

Increased harmonization in the definitions/descriptions of competency that underpin the requirements for the issuance of licences and ratings for aviation personnel should result in an overall positive impact. Increased alignment between initial training methodology and recurrent training methodologies has the potential to positively impact safety outcomes. Relies upon effective implementation of CBTA. SAFETY

- ✓ Harmonisation and efficiency improvements could lead to reduced emissions and reduced noise and congestion. ENVIRONMENT
- ✓ Increased harmonization in training and licencing practices should enable more efficient use of training resources and enable cooperative arrangements between States. CBTA provides opportunities for utilising emerging technologies for training purposes and the potential to reduce use of aircraft where evidence shows that utilisation is empirically beneficial. States may choose more effective and efficient organizational arrangements to address Annex 1 functions due to the clarification that formation of Licensing Authorities is not obligatory or assumed. EFFICIENCY

3.2. WG-7 – ATCOs (Air Traffic Controller Licences and Ratings)

Problem statement:

Due to advances in air traffic management and complexities of airspace, current additional practices and needs of the industry in terms of ratings, endorsements, knowledge, experience and privileges are not reflected in Air Traffic Controller (ATC) licensing SARPs which could impair licence recognition.

The air traffic controller ratings, endorsements, and privileges have not evolved with the increase in complexity of air traffic control in the past two decades. States are implementing work around procedures to address the impact of this complexity on air traffic controller licenses and ratings. There is a potential lack of uniformity in the application of regulations and standards for ATC personnel, as urged by the Chicago Convention Article 37.

Issues highlighted as not reflecting current practices include the use of STDs for training, possible need for ratings for ATC On-the-Job training instructors and Assessors, granularity of ratings, the minimum age limit, minimum experience requirements, knowledge requirements and new methods of training.

Expected Benefits:

Updated SARPs, procedures and guidance material leading to improved harmonization of air traffic controller licensing, training, and privileges which contributes to overall increase in efficiency and licence recognition

Actions of the Panel:

- ✓ Assess the suitability of current SARPs compared with the actual needs of the States regarding ATCO licensing.
- ✓ Assess the impact of emerging instructional technologies (e.g., distance learning) on training and assessment, delivery and methods to determine if amendments are necessary to Annex 1 or Doc 9868
- ✓ Review and update following Docs for consistency with the amendments to Annex 1:
Manual on Air Traffic Controller Competency-based Training and Assessment (Doc 10056)
Procedures for Establishment and Management of a State's Personnel Licensing System (Doc 9379)
Manual of Civil Av. Med. (Doc 8984)

✓ If required, amend Annex 1 to include the use of STDs for ATCO training and licensing. Amend Annex 1 to include provisions on the use of emerging instructional technologies as appropriate

3.3. WG-4 – WMEG (Women, minority and ethnic groups in aviation professions)

Problem statement:

ICAO Assembly Resolution A39-30 proposes to promote activities to support the increase of women in technical aviation jobs. Women and minority and ethnic groups are underrepresented in aviation professions. A study should provide ICAO with the necessary data to analyse the reasons for this.

A comprehensive study to identify why women and minority and ethnic groups are under-represented in aviation professions and to recommend clearly prioritised actions for ICAO to commission in order to mitigate the barriers that deter those groups from seeking jobs in aviation. The scope of the study should include ICAO practices including, for example, a review of existing ICAO competencies to ensure that gender bias has not been inadvertently introduced.

Expected Benefits:

Data set established to enhance visibility of disproportions and provided as a solid basis for further considerations. Clear identification of the most significant actions needed after analyzing the results of the study to ensure that the future demand for aviation professionals can be satisfied with the appropriate personnel.

Actions of the Panel:

- ✓ Women and minority and ethnic groups representation study - Study to identify why women and minority and ethnic groups are under-represented in aviation professions and to recommend clearly prioritised actions for ICAO to commission in order to mitigate the barriers that deter those groups from seeking jobs in aviation. The scope of the study should include ICAO practices including a review of existing ICAO competencies to ensure that gender bias has not been inadvertently introduced.
- ✓ Amendments, if any, to Annex 1 to remove gender bias identified in the women and minority and ethnic groups representation study.

3.4. WG-9 – EPL (Electronic Personnel Licence):

Problem statement:

The uncoordinated development of national Electronic Personnel Licence (EPL) systems and verification tools by States prevents a harmonized implementation of the EPL provisions leading to an inability to realize the benefits of EPL implementation and causing an undue burden on the verifying authority.

Amendment 178 to Annex 1, applicable since November 2022, added the Electronic Personnel Licence (EPL) provision to the Standard. The EPL provisions specify that the verification of an EPL by an authority not affiliated with the licensing authority that issued the licence shall impose no undue burden on the verifying authority.

To avoid the proliferation of various EPL verification systems, commonly agreed EPL verification solution specifications must be developed to enable standardized verification of EPLs without imposing operational or financial undue burden on verifying States. Each State can develop an EPL system customized to its specific needs while being compliant with the EPL provisions, but the way EPL data are to be made available and verifiable by third parties must be harmonized.

To achieve this goal, the Organization should provide to States guidance or provisions (if necessary) to:

- a) establish and maintain common specifications of a globally agreed EPL verification process that enables global interoperability while assuring, to the extent possible, the security, accuracy, integrity and confidentiality of EPL data;
- b) establish a communication platform to foster the sharing of experience and best practices in EPL systems implementation;
- c) leverage the expertise of the community to support the implementation of EPL provisions; and

d) facilitate the adoption of the verification process which may become applicable to other licenses or certificates in aviation.

Expected Benefits:

Standardization of EPL verification tools to enhance security and efficiency of electronic licence verification.

Actions of the Panel:

Review and analyse implementation of EPL provisions to identify potential amendments to Annex 1 where appropriate

Develop guidance to enable implementation of a harmonized EPL verification process

3.5. WG-3 –STD (Simulation Training Devices)

STD feasibility study report for the AMTEM and ATCOs revealed that:

- the use of STDs in ATCO training does not require to define STD qualification criteria but would be useful to develop guidance to assist States with harmonized implementation and use of STDs;
- no qualification requirements for STDs are needed to allow better flexibility in their development and use in training (to be covered by guidance).

3.6. WG-5 – ELP (English Language Proficiency)

PROPOSED AMENDMENT TO DOC 9835 MANUAL ON THE IMPLEMENTATION OF ICAO LANGUAGE PROFICIENCY REQUIREMENTS

Problem statement - inconsistency in implementation and potential gaps in ICAO provisions related to English language proficiency of licenced aviation personnel results in safety issues in certain regions.

The lack of tangible and specific features of language ability in the descriptors of the criteria in the current rating scale resulted in inconsistent application.

While there is a high level of implementation of the language proficiency requirements, several reports/statistics indicate that the same ICAO proficiency rating scale level does not necessarily correspond to the same English language proficiency leading to safety risks during international air transport operations. The English language proficiency assessment outcomes may differ due to the differences in tests and associated methodologies that arise from varied applications of ICAO language proficiency requirements. Consistency of language proficiency assessment for all aviation personnel is necessary to avoid disparities of the ability to speak and understand the language used for radiotelephony communications and mitigate safety risks during international civil air transport operations. Based on first analysis performed by the PTLP, this issue should be explored to propose new or updated criteria defining the necessary components to reach a consistent and harmonized implementation of the English language proficiency requirements. The personnel training and licensing exploratory meeting recommended that the criteria for testing-teams qualification, the language testing organizations require a more detailed specification.

There is evidence to suggest that the features of language ability currently represented in the linguistically informed ICAO rating scale do not fully capture the features of language ability that are pertinent for successful radiotelephony communication.

The linguistically informed ICAO rating scale focuses on linguistic correctness in six distinct areas of language: pronunciation, vocabulary, structure, fluency, comprehension, and interaction. However, the evidence suggests that linguistic correctness will not automatically lead to successful communication.

Several studies point to the need to prioritise the assessment of communicative ability over the assessment of test takers' ability to use well-formed and fully grammatically correct sentences. The current lack of guidance to States for the approval and oversight of language testing organizations is contributing to inconsistent implementation.

Expected benefits:

Improved communication results in increased safety, efficiency, and effectiveness. Improved harmonisation and consistency in the implementation of ICAO Language Proficiency Requirements.

PTLP study report:

As several researchers have already investigated extensively the implementation of the ICAO LPRs in general, and the ICAO rating scale specifically, it was decided that WG5 would conduct a study on the impact of the ICAO rating scale. To this end, some of these researchers were invited to present their work to the working group.

During last PTLP panel meeting working group presented a report on the results of a study on the impact of the lack of tangible and specific features of language ability in the descriptors of the current rating scale in ICAO Annex 1 – *Personnel Licensing*. The outcome of the study suggests that the current ICAO rating scale does not support the accurate assessment of air traffic controllers' and pilots' ability to communicate safely and effectively on the radiotelephony frequency. Pertinent features of aeronautical radiotelephony communication are absent from the current ICAO rating scale. Inversely, there is evidence to suggest that some of the criteria in the current scale are largely inappropriate to measure communicative competence on the radiotelephony frequency.

The outcome of the study suggests that the ICAO rating scale in its current form is unsuitable to infer air traffic controllers' and pilots' operational readiness, in the sense of their ability to communicate safely and effectively on the radiotelephony frequency. Comments made by presenters fell into three broad categories:

a) the lack of validity evidence to support the current ICAO rating scale,
 b) evidence of the inadequacies of the criteria in the current ICAO rating scale, and
 c) descriptions of the target language use domain and the pertinent features of aeronautical radiotelephony communication.

- 1) The lack of validity evidence for the current ICAO rating scale: several presenters expressed their concern that information on the development history of the ICAO rating scale was missing. They raised into question whether the ICAO rating scale had been properly validated before it was published in Annex 1. It was also pointed out that the way the ICAO rating scale had been developed and subsequently introduced subverted best practice in language test development. Subsequently, tests that adapted to the scale had to be developed. Consequently, several tests that have been developed to meet the ICAO LPRs tend to encourage language behaviors that are undesirable for use on the radiotelephony frequency. As a result, the test score interpretations cannot fully inform on air traffic controllers' and pilots' operational readiness and their ability to communicate effectively and safely on the radiotelephony frequency.
- 2) The second category of comments made in the expert presentations referred to evidence pointing to the inadequacies of the criteria in the current ICAO scale. It was reported that assessors trained to administer tests that had been developed to meet the ICAO LPRs struggled with the lack of definition in the six criteria of the current ICAO rating scale. It was also reported that the lack of clearly defined and measurable criteria in the descriptors in the current scale meant that assessors tended to make their rating decisions based on connoisseurship rather than the criteria in the ICAO rating scale. This

leads to considerable variability and subjectivity in test score interpretations. As a result, the test score interpretations based on the criteria in the current ICAO rating scale cannot fully inform on air traffic controllers' and pilots' operational readiness and their ability to communicate effectively and safely on the radiotelephony frequency. Details on the criteria that were deemed most problematic can be found in the study report in Appendix A to this WP.

- 3) The third category of issues refers to descriptions of the target language use domain and the pertinent features of aeronautical radiotelephony communication. It was found that the criteria in the current ICAO rating scale are oriented to the assessment of linguistic correctness in the traditional sense.

While it cannot be argued that a basic stock of English language skills is indispensable to be able to communicate, it must also be acknowledged that aeronautical radiotelephony communication is a context of language use for specific purposes and as a *Lingua Franca* (the term *Lingua Franca* describes interactions in which speakers from different cultural and linguistic backgrounds default to using a common language of which they may or may not be native speakers). The ICAO rating scale in its current form does not give due consideration to the status of aeronautical radiotelephony communication as a *Lingua Franca* context. As a result, test score interpretations based on the current ICAO rating scale cannot fully inform on air traffic controllers' and pilots' operational readiness and their ability to communicate effectively and safely on the radiotelephony frequency.

The net result is that test score interpretations that are based on the ICAO rating scale in its current form are unable to inform on air traffic controllers' and pilots' operational readiness in the sense of their ability to communicate safely and effectively on the radiotelephony frequency.

Consequently, it is proposed that a new study, to address a revised ICAO rating scale focusing the assessment on the inclusion of features of performance that are operationally relevant to the air traffic controller and pilot professions and emphasize test takers' interactional and communicative competence, in the sense of their ability to communicate safely, efficiently, and expediently on the radiotelephony frequency, should be considered and requested by the ANC to the PTLP.

4. RECOMMENDATIONS

- 4.1. It is recommended that this report be accepted as information paper.

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