



## Remote Pilot Training, Qualification & Examination in France

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### Situational Update

The entry into force of the UAS European regulation requires France to adapt its existing national regulatory framework, and training, qualification and examination of remote pilots still need to be adjusted in this perspective.

Although the avant-gardist French standard scenarios, in place since 2012, have widely inspired the European Commission when defining the outlines of the European standard scenarios (STS), France now faces the challenge of implementing a so-called operation centric, proportionate, performance and risk-based regulatory concept, while its operators and remote pilots are still used to perform their unmanned flights according to a purpose-based approach.

In fact, one may perceive such a change of mindset effort, combined with a new regulatory scheme, that often appears as theoretical oriented only, as a try to force a square through a circle.

### Fly Your Drone Wherever & Whenever You Want

Weren't you aware of that, dear reader? Of course, you did not see the well-known, magic sentence "Special terms and conditions apply" written in Arial Narrow, 0.1pt, under this promising title. You may smile reading the beginning of this paragraph, but that is exactly the great improvement claimed by the European Aviation Safety Agency (EASA) when they announced a new categorization system ('Open', 'Specific' and 'Certified' categories).

This promise is true, and the associated terms and conditions are only mitigations to be put in place. Indeed, an unmitigated scheduled UAS operation poses a certain number of risks, might it be to uninvolved people and infrastructures on the ground (i.e. ground risk) and/or to other airspace users (i.e. air risk). This initial (unacceptable) risk level needs to be reduced to an acceptable level, via mitigating measures, in order to reach a common, predefined target level of safety so that the intended operation can be conducted safely. Prima facie, it seems the regulator has developed a fool-proof system with consistent rules. However, when it comes to remote pilot training requirements, this apparently comprehensive landscape becomes misty.

### Sit Back, Relax, Follow The Cabin Crew Instructions & Rely On Providence That All Remote Pilots Are Adequately Trained

Without rapid improvements in terms of remote pilot training requirements, we should recommend airlines to

advise their crew members adding this announcement on all flights departing from French airports. To define a global strategy from a high-level perspective is one step, which in our specific case has incredibly been well achieved by EASA in a record time. To provide relevant stakeholders –i.e. National Aviation Authorities (NAA), UAS operators and remote pilots– with the adequate set of tools and resources is another. Both actions are essential and complementary in order to implement the said strategy and to reach the associated objectives. In particular, this second step is actually missing from the drones regulatory flight path.

Among the most glaring examples are the absence of model operational documents (e.g., progress booklets, assessments reports) and the lack of harmonized remote pilots training and examination syllabi. How can we ensure that remote pilots trained in different EU Member States are harmoniously trained while harmonized training guidelines and material have not been published? As a consequence, how can we ensure that the desired target level of safety is harmoniously and permanently reached on an EU level? For the moment, we cannot.

### Instructors & Examiners Wanted! Prerequisites: None

Let's imagine you are flying a DR 400 aircraft for the first time as a student pilot who is preparing for his private pilot license. Would you find acceptable that your instructor is a freshly-licensed private pilot, without proven instructional skills nor significant previous flying experience? Besides, should your final test be supervised by a pilot who is not officially recognised as a flight examiner? These are rhetorical questions, of course. Such fantasy however becomes a reality in the context of drones; remote flight instructors and examiners roles have not been defined in defiance of common sense and in ignorance of the experience we have with manned aviation.

Moreover, the International Civil Aviation Organization (ICAO) has just published associated recommendations in the 2020 edition of its Procedures for Air Navigation Services – Training (Doc 9868 a.k.a. PANS-TRG). Indeed, chapter 8 of the PANS-TRG describes the "Competency-based Training and Assessment for Remote Pilot Licence (RPL)", and section 8.4 is dedicated to the "RPAS Instructor and RPL Examiner Qualifications". What are we waiting for to use the expertise contained in this reference document and implement it in Europe?

### Remote Pilot: Job or Skill?

When the Captain and First Officer of an Airbus 320 are safely bringing you and the other 185 passengers

from Paris to Nice, you certainly consider that their activity is a job called "Pilot", itself made of competencies (knowledge, skills and attitudes). When an (adequately trained and qualified) person operates a drone and flies it from point A to point B, do you consider his activity is to be a job called "Remote Pilot"?

Without a doubt, the overwhelming majority of respondents to such a question would consider that the tasks and responsibilities of an airliner pilot are not the same as for the remote pilot of a two-kilograms unmanned flying machine. Albeit, what allows us to say that? Here, we are deliberately provocative for the sole purpose of initiating a work of serious, precise, documented and argued exchanges in order to provide a credible answer to this essential question.

### **Let's Make European (unmanned) Aviation Safe Again!**

Europe does not have to be ashamed of its aeronautical background compared to other continents. Beyond the few sarcastic statements contained in this article, and which aim above all to humbly awaken minds, it is essential to continue believing in a strong and competitive

Europe in terms of unmanned aviation, which must necessarily pass by a continuity of the work already well initiated by EASA. Without rapid corrective actions from the regulator, this lack of tools and guidelines in terms of remote pilot training, qualification and examination will definitely have an impact on flight safety. And we all know it is a top priority and a well-established adage in aviation: We never compromise on safety.



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