

	<p style="text-align: center;"><b>REPUBLIC OF SOUTH AFRICA</b></p> <p style="text-align: center;"><b>CIVIL AVIATION AUTHORITY</b></p> <p style="text-align: center;"><b>GENERAL NOTICE # PEL-2023/002</b> Revision 1</p>	<p style="text-align: center;"><b>SACAA</b> Private Bag X 73 Halfway House 1685</p>
<p><b>Tel: (011) 545-1323</b></p> <p><b>E-Mail:</b> <b>niemandj@caa.co.za</b></p>		<p><b>Dated: 16 March 2023</b></p>

**ICAO LANGUAGE PROFICIENCY REQUIREMENTS:**

**AN OVERVIEW OF AVIATION LANGUAGE PROFICIENCY TESTING IN THE RSA**

**1. APPLICABILITY**

- 1.1. This Personnel Licensing (PEL) General Notice is applicable to:
- a. Prospective holders of a South African flight crew, remote pilot or air traffic service (ATS) licence;
  - b. Current holders of a South African flight crew, remote pilot or ATS licence who have a language proficiency rating of less than level 6;
  - c. Aviation Training Organizations (ATOs) that have approval on their training OpSpec certificates to conduct aviation language proficiency testing;
  - d. Language proficiency raters conducting aviation language proficiency testing at ATOs;
  - e. ATOs and prospective language proficiency raters that intend to apply for approval in future to conduct aviation language proficiency testing;
  - f. Instructors and examiners involved with the training or testing of flight crew, remote pilots and ATS personnel and
  - g. Non-aviation language training organizations and personnel that are indirectly involved with or have an interest in aviation language proficiency training and testing.
- 1.2 This General Notice is valid from 16 March 2023 until withdrawn or superseded by an amendment.

**2. PURPOSE OF THIS GENERAL NOTICE**

- 2.1 This General Notice is intended to:
- a. Give background information regarding ICAO Language Proficiency Requirements (LPR) testing in South Africa,
  - b. Reiterate what LPR testing is about,
  - c. Explain recent developments in aviation language proficiency testing in South Africa,
  - d. Provide selective technical information regarding current SACAA aviation language proficiency policy and procedures and
  - e. Give a brief explanation of planned improvements and general changes that may be expected

### **3 BACKGROUND TO ICAO LPR TESTING IN SOUTH AFRICA**

- 3.1 In 1998, the International Civil Aviation Organization (ICAO) took the decision to scrutinize the matter of English language proficiency of pilots and air traffic controllers, following several accidents and incidents where this was either a causal or contributory factor.
- 3.2 In 2007, the ICAO Assembly adopted Assembly Resolution A36-11 (Proficiency in the English language used for radiotelephony communications), effectively introducing LPR.
- 3.3 In consequence, South Africa introduced aviation language proficiency testing for pilots and air traffic controllers shortly after.
- 3.4. With the introduction of Remote Pilot licensing (RPL) in South Africa several years later, language proficiency testing was also mandated for RPL applicants. This was done pre-emptively, before the implementation of this requirement as an ICAO standard.

### **4 WHAT IS ICAO LPR TESTING ABOUT?**

- 4.1 The intention and scope of ICAO LPR is often misunderstood. ICAO Doc 9853 (Manual on the Implementation of ICAO Language Proficiency Requirements) explains that an LPR test should “*assess plain language proficiency in an operational aviation context.*” Simply stated, an LPR test is an aeronautical radiotelephony test with an emphasis on a candidate’s ability to communicate in plain English.
- 4.2 There are several terms commonly used to describe aviation language proficiency testing. Acronyms abound, depending on the specific context, but include ELP (English Language proficiency), LP (Language proficiency) and LPR (Language Proficiency Requirements). In this notice, these refer to the same matter.
- 4.3 ICAO itself explains LPR as follows: “*The ICAO Language Proficiency Requirements (LPRs) refer to the ability to speak and understand the language used for radiotelephony communications. It is important that flight crews and air traffic controllers be proficient in the use of plain language used within the context of radiotelephony communications in order to communicate safely on any operational issue that may arise.*”
- 4.4 While standardized phraseology should always be used in the first instance when communicating an aeronautical radio message, the ability to use plain language in radiotelephony communications remains critical to aviation safety.
- 4.5 During urgent or emergency situations, inadequate plain language proficiency could complicate a flight immensely or even prevent a safe ending. ICAO uses the example of a general aviation incident for which the corresponding series of radio exchanges was analysed. The incident involved a light, general aviation aircraft of which the pilot could not lower the landing gear. An analysis of the ATC-pilot dialogue revealed that 60% of the radio communication needed to resolve the matter required plain language.
- 4.6 Aviation language proficiency testing is consequently classified as an exceptionally high-stakes activity and the corresponding requirements are published as formal standards ICAO Annex 1 to the Convention on International Civil Aviation (Personnel Licensing).

## **5 DEVELOPMENTS REGARDING AVIATION LANGUAGE PROFICIENCY TESTING**

- 5.1 Within the SACAA, the Personnel Licensing (PEL) department is responsible for the oversight of ICAO Annex 1 requirements. Since 2018, the PEL department has been formally reviewing its LPR approval and monitoring procedures. During this project, much effort has been invested to make sure that the SACAA's regulation of this safety-critical matter is fair, correct, accurate and thorough.
- 5.2 In the process, the PEL department has:
- a. Taken a fresh look at ICAO LPR Standards and Recommended Practices, as well as associated technical information,
  - b. Investigated the suitability and continued relevance of the current governing Regulations,
  - c. Published technical guidance material, implemented an LPR oversight report and revised the existing LPR test report,
  - d. Taken a coordinated intra-departmental approach to LPR testing matters, involving the Examinations, Training and Licensing sections,
  - e. Conducted regular dedicated and specialized LPR / ELP audits and oversights countrywide on ATOs which have ELP as part of their training OpSpec,
  - f. Conducted internal training and familiarization with technical and administrative SACAA staff,
  - g. Conducted random sampling of licence applications involving LPR testing,
  - h. Re-audited existing LPR approvals and mandated corrective action where necessary and
  - i. Used a multi-disciplinary approach to review new LPR approval applications.
- 5.3 The PEL department has taken a constructive approach to the monitoring and improvement of LPR testing standards at ATOs. Where possible, a non-punitive style was used. PEL has worked to provide useful and appropriate technical assistance and input where required.
- 5.4 An aim of this project was also to gain a deep understanding of the LPR-related challenges faced by candidates, ATOs, examiners, ATS personnel, operators and SACAA administrative staff. Very useful feedback from many segments of the industry has been obtained.
- 5.5 During the 2022-2023 financial year, an LPR briefing, combined with a Q&A session, was presented to all Designated Flight Examiners to help them gain a better understanding of this field.
- 5.6 The SACAA is pleased that LPR testing is understood much better countrywide than at the start of the review project. A greater awareness is observable, as well as a progressive general increase in the standard of LPR testing in South Africa.

## **6 TECHNICAL INFORMATION REGARDING SACAA AVIATION LANGUAGE PROFICIENCY POLICY AND PROCEDURES**

- 6.1 The PEL department, too, has learnt much regarding the state and practicalities of LPR testing in South Africa. Possible areas of weakness are better understood and are preemptively targeted during audits and oversights. Typically, the following elements are closely scrutinized:
- a. The listing of all raters in an ATO's TPM,
  - b. The clear and structured description of an ATO's testing process in the TPM,
  - c. The academic qualifications and practical language teaching experience of the linguistic expert,

- d. The required international awareness of experience of the subject matter expert (SME),
  - e. If the SME is a pilot, that this rater holds a civilian licence,
  - f. The informed application and correct interpretation of the criteria described in the ICAO LPR rubric,
  - g. The accuracy of the grading and the ultimate LPR level assigned,
  - h. The quality of the recordkeeping and administrative processes of the ATO and
  - i. The quality, accuracy, thoroughness and relevance of the test design, as well as proper execution of the test.
- 6.2 While South African legislation closely mirrors ICAO requirements, there is a need for additional practical, clear-cut directives to ATOs. The following have been identified as areas where unambiguous guidance is required:
- a. The publicising of the Annex 1 holistic descriptors as the intended “Target area” of an LPR test,
  - b. Which academic qualifications for linguistic experts are acceptable,
  - c. The recommended structure and minimum contents for an LPR test,
  - d. The sequencing of an LPR test within a PPL training program,
  - e. Reasonable interpretations of the roles which LPR raters fulfil during a test,
  - f. The practical ins-and-outs of the voice-only component of an LPR test,
  - g. How to deal with candidates that achieve an LPR rating of less than Level 4,
  - h. Identifying the linguistic characteristics often displayed by English speakers below an operational LPR level and
  - i. The distinction between scholastic and LPR English tests.
- 6.3 The PEL department has received several queries regarding the type of licence required if the SME rater is a pilot. Although it is preferable to hold at least a CPL with flight instructor rating, this is not mandatory. However, a crucial aspect to emphasize is that any pilot or air traffic controller that does not hold a civilian licence (i.e. which has military experience only) is automatically disqualified from conducting LPR tests.
- 6.4 The SACAA has also received a few isolated queries about the possibility of online (i.e. remote electronic platform) LPR testing. Concerningly, despite the clear-cut test interview requirements published in Document SA-CATS 61.01.7, the SACAA has identified during an audit a case of unauthorized online LPR testing using a social media platform. It is consequently confirmed that such a practice is in contravention to the current Regulations, which require a face-to-face interview. An online test will not be accepted. The ATO and raters expose themselves to enforcement action.


## **7 PLANNED IMPROVEMENTS AND EXPECTED GENERAL CHANGES**

- 7.1 Although significant progress has been made, the SACAA intends to further improve the efficiency, consistency, and quality of LPR testing in the near future by various mechanisms. These include the publication of updated guidance material and the streamlining of processes to make them more user-friendly. Legislative amendments may also be expected.
- 7.2 The anticipated changes are planned for the second half of 2024 and include at least the following:
- a. Clear guidance on LPR test design,
  - b. The inclusion of a mandatory simulated radio exchange in all LPR tests,
  - c. For flight crew, restricting an LPR test to after the candidate’s first solo flight,
  - d. The removal of the alternative language certification provisions,
  - e. A clearer description of the acceptance of foreign CAA language certification,

- f. Improvement of the LPR test and oversight reports and
  - g. Replacement of Appendix 1.5.2 to SA-CATS 61 (ICAO Aviation English qualifications) with clear-cut lists and criteria.
- 7.3 This PEL General notice will be updated with preliminary feedback and replaced by an Aeronautical Information Circular (AIC).

**8. INVITATION TO COMMENT OR PROVIDE FEEDBACK**

- 8.1 The PEL department welcomes constructive and factual input from the industry regarding this notice, the planned changes and general LPR matters.
- 8.2 Such feedback or comments may be directed to Theo Odendaal at the following address:
  - [odendaalt@caa.co.za](mailto:odendaalt@caa.co.za)

<b>Issued by the South African Civil Aviation Authority (SACAA)</b>		
	<b>J NIEMAND</b>	<b>16 MARCH 2023</b>
<b>SENIOR MANAGER: PERSONNEL LICENSING</b>	<b>NAME IN BLOCK LETTERS</b>	<b>DATE</b>