

Lengthening the retesting interval may increase administrative efficiency, but it also raises safety concerns.

English Proficiency Level Bust

BY PHILIP SHAWCROSS

The European Aviation Safety Agency (EASA) has submitted a draft proposal to the European Commission, for consideration this November, to extend the current license validity for pilots with International Civil Aviation Organization (ICAO) operational Level 4 language proficiency from the three years recommended by ICAO to four years.

EASA reasons that this is a more convenient time frame for license renewal. Although the three-year interval between retesting is an ICAO recommendation and not a standard, it is a minimum that is universally applied, with some states in South America and the Baltic having even legislated for a two-year validity.

The arguments against such an extension merit serious consideration.

Such a decision would introduce two norms within Europe: a four-year cycle for pilots and a three-year cycle for air traffic controllers. And it hardly seems compliant with EASA's own Basic Regulation 216/2008 "to assist member states in fulfilling their obligations under the Chicago Convention, by providing a basis for a common interpretation and uniform implementation of its provisions" and "establishing appropriate

cooperation with third countries and international organizations."

A safety-related decision should not be taken on grounds of administrative convenience. No evidence has been advanced that a longer retesting cycle would enhance safety. With the ICAO endorsement process not yet in place, the language testing environment is still immature, with tests of varying standards and levels, "test shopping" highlighted by the recent European Civil Aviation Conference report and many documented cases of malpractice.

While many pilots regularly flying international routes have prolonged and extensive opportunities to practice their English, a purely routine use of English through standard phraseology for standard procedures and with limited social contact only maintains a restricted core of the language that might be inadequate for managing unexpected and abnormal situations.

Research shows that language proficiency erosion, or language attrition, occurs rapidly over time; the lower the initial level, the faster the rate of erosion, unless systematic strategies and a high degree of motivation counter this trend.

Moreover, it is well documented that one's language and communicative

proficiency, even in one's native language, deteriorates sharply under stress. If we combine gradual language proficiency erosion with sudden stress-related factors, our "Level 4"-endorsed speaker may actually be functioning effectively at a low Level 3 or high Level 2.

Finally, if the four-year retesting cycle were to be introduced, Europe, which has high standards in so many fields, would be setting an example of less than best practice for the world. This could threaten levels of safety in regions where language proficiency is less robust than in Europe and undermine the safety principles behind the ICAO Language Proficiency Requirements.

The aviation community owes it to itself and the traveling public to have an open and well-informed discussion before any such legislation is adopted. ➤

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