



Transport Canada Civil Aviation
Pilot Training and Licensing

Communication document - Changes to CAR 421.34

Transport Canada (TC) recognizes that there are questions regarding the recent standards amendment to Standard 421.34 and we would like to explain these changes, the rationale for them and what they mean for Airline Transport Pilot Licence - Aeroplane (ATPL-A) applicants.

Background

Canada has had a longstanding issue of non-compliance with ICAO Annex 1 Standards and Recommended Practices (SARP) regarding the skill test for the ATPL. For reference, below is a comparison of the ICAO SARP concerning the ATPL skill test and the previous CAR Standard.

ICAO Annex 1

2.6.1.3 Skill

2.6.1.3.1 The applicant shall have demonstrated the ability to perform, as pilot-in-command of an aircraft within the appropriate category required to be operated with a co-pilot, the following procedures and manoeuvres:

- a) pre-flight procedures, including the preparation of the operational flight plan and filing of the air traffic services flight plan;
- b) normal flight procedures and manoeuvres during all phases of flight;
- c) abnormal and emergency procedures and manoeuvres related to failures and malfunctions of equipment, such as engine, systems and airframe;
- d) procedures for crew incapacitation and crew coordination, including allocation of pilot tasks, crew cooperation and use of checklists; and
- e) in the case of aeroplanes and powered-lifts, procedures and manoeuvres for instrument flight described in 2.7.4.1 a) to d), including simulated engine failure.

2.6.1.3.1.1 In the case of an aeroplane, the applicant shall have demonstrated the ability to perform the procedures and manoeuvres described in 2.6.1.3.1 as pilot-in-command of a multi-engined aeroplane.

CARS standard

421.34 (Last amended 2005/06/01)

(5) Skill

(a) Within the 12 months preceding the date of application for the licence, an applicant shall demonstrate in a multi-engined aeroplane with no central thrust configuration and fitted with instruments and equipment suitable for IFR flight in controlled airspace, familiarity with and the ability:

(i) to perform both normal and emergency flight procedures and manoeuvres appropriate to the aeroplane in which the flight test is conducted; and

(ii) to execute all manoeuvres and procedures set forth in Division XIV for issue of a Group 1 instrument rating.

(b) For issue of the Airline Transport Pilot Licence - Aeroplane, the Minister shall only endorse a Group 1 Instrument Rating on the licence.

ICAO SARP non-compliance

The previous CAR standard did not meet the ICAO requirements for two main reasons:

1. The skill test was not required to be demonstrated as Pilot-in Command.
2. The skill test was not required to be done on a two-crew airplane.

The rationale for these ICAO requirements is based on the unique privilege associated with the ATPL licence. The sole difference between the ATPL and Commercial Pilot Licence (CPL) is that the ATPL holder may act as PIC of a certified two-crew airplane. Since this privilege is granted to the holder of the ATPL, ICAO requires that the pilot demonstrate this prior to being awarded the licence.

As Canada has been non-compliant with this ICAO SARP, we have had a longstanding difference filed in the [Aeronautical Information Publication \(AIP\)](#) (Section Gen 1-27) in order to inform member states of the non-compliance. However, filing a difference

does not absolve an ICAO contracting state of non-compliance and it is expected that the state will rectify the non-compliance when able. Failure to meet ICAO SARPs for licencing has implications for the acceptance of Canadian pilot licences around the world.

Transport Canada has had inquiries in the past from foreign Civil Aviation Authorities (CAA) questioning the validity of our ATPL as logbook reviews have revealed that the skill test on which they were granted a Canadian ATPL was not compliant with the ICAO standard nor indicated on the licence. Transport Canada takes these concerns very seriously and it is imperative that our ATPL is accepted by the international community. Additionally, non-compliance with ICAO SARPs can lead to issues during ICAO audits of Transport Canada, which can erode ICAO member state acceptance and trust in Canada's aviation industry.

To respond to this issue, Transport Canada drafted a Notice of Proposed Amendment (NPA) to address the non-compliance. [NPA 2024-11](#) was sent out for industry consultation on October 22nd, 2024. During the consultation process, Transport Canada received many comments from industry on the proposed standard amendment to 421.34. The standard was rewritten in response to these comments and then published as [NSA-2025-008](#). This NSA took effect on December 17th, 2025 and was published in the Standards in January 2026. To allow the industry some time to adjust, ATPL applications will still be processed according to the old standard until and including March 31, 2026.

Implications of the changes

As the skill test requirements have been changed, some previous skill tests that were used to obtain an ATPL will no longer be accepted. The following are some examples of skill tests that can or cannot be used to satisfy the requirements of the new 421.34 standard.

Skill tests on single crew aeroplanes

Currently, some applicants obtain an ATPL by completing an Initial Group 1 Instrument flight test, a Group 1 Instrument Proficiency Check (IPC) or a Pilot Proficiency Check (PPC) conducted in a single pilot aircraft. The candidates taking these tests are either PIC, or if the Pilot Examiner (PE)/Approved Check Pilot (ACP) is PIC, it may be designated as dual time. Either way the candidates are doing all the flying and performing all duties as the sole pilot. The PE/ACP is observing the performance and directing the exercises when needed. Since the ICAO requirement is not that the candidate is PIC but that they are 'demonstrating the ability to perform as PIC'. The

candidate in the case of a single pilot aeroplane would meet this ICAO definition. However, since the aircraft is single-pilot these flight tests would not meet the ICAO requirement to have the test conducted in an aeroplane operated two-crew.

To address comments in the NPA regarding this issue, Transport Canada added the following section to the standard to allow the issuance of the ATPL based on skill tests that are not done on two-crew aircraft

421.34

(6) Restricted Licence

(a) Where the applicant has not completed the skill test in an aeroplane required to be operated with a co-pilot as specified in subsection (9), the licence shall be issued with the remark, “Skill test does not meet ICAO requirements.”

(b) Where the applicant completes the skill test in an aeroplane required to be operated with a copilot as specified in subsection (9), upon request to the Minister the remark shall be removed from the licence.

(effective 2025/12/17 – [NSA 2025-008](#))

Note: Transport Canada recognizes that the word ‘Restricted’ does not best reflect the nature of the remark that is added to the licence. Transport Canada is considering a change to this terminology in the standard.

Application process for the ATPL to be issued with the remark

There is no difference or change in the application process. When reviewing your ATPL application, Transport Canada will check the skill test that you are using to meet the standard. If it is a Canadian skill test that is ICAO compliant, then the ATPL will be issued without a remark. If it is not done in a two-crew aircraft as defined in 421.34 (9), it will be issued with the remark ‘*Skill Test does not meet ICAO requirements*’.

Privileges of the ATPL issued with the remark

There are no changes to the privileges that a pilot may exercise if they hold an ATPL with the remark. As always, pilots must complete the training and testing requirements under subpart 604/Part VII.

Note: Pilots and operators are warned that operating outside of Canada with an annotated ATPL may cause problems with foreign inspectors who may not accept the licence. Anytime a licence is issued without compliance to ICAO SARPS, acceptance by foreign CAAs is a concern. The entire purpose of this

standard change was to address foreign CAA's concerns with the Canadian ATPL's ICAO compliance.

Process for removal of the remark

When the holder of a ATPL containing the remark "Skill test does not meet ICAO requirements" completes a skill test on a two-crew aeroplane that meets 421.34 (5) they can notify Transport Canada to have the remark removed. If the skill test has already been submitted to Transport Canada, they can email their regional service team at [Civil aviation contacts and offices](#) and the remark will be removed and a new label will be issued. There is no fee for the removal of the remark.

Two crew skill tests as second-in-command

Another skill test that Canadian pilots have often used to obtain the ATPL are First Officers employed with Subpart 604/Part VII Operators, completing SIC PPCs. These skill tests are typically done on aircraft that meet the definition of the new standard *421.34 (9) Required to be operated by a co-pilot*.

A Second-in-Command (SIC) or co-pilot skill test is not ICAO compliant. To avoid receiving a refusal to issue, ATPL applicants should complete a PPC as PIC (see the section on 'Acceptable ATPL Skill Tests' in this document for more information.)

Although pilots have previously been able to obtain an ATPL without having done a PIC skill test, Part VII regulations have long required that a PIC PPC be done prior to a pilot acting as PIC in a certified two-crew aeroplane. Under the new standard, this is the skill test that pilots will now be using to obtain the ATPL.

Acceptable ATPL skill tests – subpart 604/Part VII pilots

Considering the changes to the standard, applicants should be aware of their options when considering an ATPL application. Following this guidance will ensure that the skill test is accepted and that the ATPL can be issued without complications.

Subpart 604 & Part VII skill tests

For pilots operating in a Subpart 604 or Part VII environment, they are likely already operating a two-crew aircraft as defined in the new standard 421.34 (9.) To comply with ICAO SARPS these pilots will need to do their ATPL skill test as PIC. CPL pilots who are currently operating as SIC and planning on being upgraded to PIC by their operator should work to obtain their ATPL requirements in advance as they have always done.

This means getting the required experience and completing written tests, so they are in a position where the only outstanding requirement is the two-crew PIC skill test. When the applicant is selected for a command course, they will complete the training which ends with their PIC PPC.

Pilots who are unsure if the PPC/PCC that they are doing will be accepted as an ATPL skill test can ask their ACP prior to the test. If the test will be designated as PIC on the PPC/PCC form, and it is conducted as two-crew then it will be accepted.

In some cases, it may be possible for pilots to complete a PIC PPC while they are still operating as a First Officer. If so, an applicant could ask to do a PIC PPC in advance of the upgrade by the operator and use this skill test for the ATPL application.

There is applicable guidance in section 6.26 (3)(b)(iii) of the [Approved Check Pilot Manual TP6533E](#).

6.26 (3)(b)

(iii) PPCs in Support of an ATPL Application

(A) Holders of a Commercial Pilot Licence who intend to use a PPC in support of an ATPL application may be designated pilot-in-command (PIC) during a PPC with prior Transport Canada Issuing Authority coordination and approval.

Pilots currently operating as SIC and wanting to do a PIC PPC should talk to their employer. Air operators determine what type of PPC that their pilot will do. If the air operator determines that a co-pilot is to do a PIC PPC, they should coordinate this through their company's Principal Operations Inspector (POI) to ensure all Part VII requirements are met.

Early assessment of ATPL requirements – subpart 604/Part VII pilots

One effect of the PIC skill test requirement is that Subpart 604/Part VII First Officers who do SIC PPCs may not be able to get the required ATPL skill test before their Captain upgrade. Once they have finished their command course, they will have the PIC skill test completed but they will still need to wait for Transport Canada to process their ATPL application before they can act as Captain. To speed up processing time, Transport Canada will allow ATPL applicants to submit for assessment the ATPL requirements that they have already met, barring the skill test. This will allow the TC service team to assess the logbook and other requirements in advance. The service team will then send an email to the applicant informing them that they meet all ATPL requirements except the skill test. Once the pilot completes the skill test, **they must email the service team as soon as possible informing TC that the skill test has**

been completed. Transport Canada may already have a copy of the test on file. Applicants should ask the ACP if the skill test is being submitted to Transport Canada digitally. If it is, applicants do not need to send a copy. If the skill test is completed on a paper form, the applicant should include a scanned copy of the test in their email.

Steps for ATPL application using the early assessment

1. Email your regional [TC service team](#) – mention you are requesting an early ATPL assessment, or attach a cover letter along with this same information with your application and hard copy logbook(s) if sending via mail/courier.
2. Include the following:
 - a. full scan or submission of all logbook(s)/copy of e-logbook(s)
 - b. completed and signed [application form](#) (**'Part B, 5. Skill' should be left blank**)
 - c. PICUS letters/PICUS forms if required
 - d. Proof of payment (pay using the [Online payment system](#) and include receipt number or receipt copy in email or mail.)
3. Wait to receive results from the early assessment. The service team will contact you if more information is needed or if you have been deemed to meet the 421.34 requirements except for the skill test.
4. Complete skill test and email the service team.
5. Service team will confirm the skill test meets the standard and issue the ATPL.

Applicants should only follow the above process if you are time constrained in receiving your ATPL. Pilots who already meet all the requirements in 421.34 should apply with via the traditional method.

For applicants using the early assessment process the official application date for the licence will be the date when Transport Canada receives the skill test for the licence, not when the application form is signed.

As always, applicants must be cognizant that written exams must be completed within 24 months of the application date as per [CAR 400.03](#).

To allow TC to complete your ATPL early assessment, we recommend that ATPL applicants request it 90 calendar days before the expected date of their skill test.

Any inquiries regarding this document can be directed to pilotlicensing-licencesdepilote@tc.gc.ca. Andrew Armstrong, Program Manager, Flight Crew Licensing, Pilot Training and Licensing.

Summary table – ATPL applications

Skill Test Used	Licence Issued	Considerations
PIC PPC/PCC in a type certified two-crew, multi engine aeroplane or equivalent level C or D full flight simulator. PIC PPC/PCC in a single-pilot certified multi engine aeroplane or equivalent level C or D simulator which is operated as two-crew by a Subpart 604 operator, Part VII operator or the Royal Canadian Airforce (RCAF).	Airline Transport Pilot Licence – Aeroplane	N/A
Group 1 Instrument Rating Flight Test, Group 1 IPC or PPC/PCC operated single pilot in a certified single pilot, multi engine aeroplane. Single pilot skill test conducted by RCAF	Airline Transport Pilot Licence – Aeroplane Remark: 'Skill test does not meet ICAO requirements'	Remark can be removed when holder completes the required two-crew PIC skill test
SIC PPC/PCC in a type certified two- crew, multi engine aeroplane or equivalent level C or D full flight simulator. SIC PPC/PCC in a multi engine aeroplane or equivalent level C or D simulator which is operated as two-crew by Part VI or VII operator or RCAF	No licence issued	N/A