



MPPD 29 - RPAS Pilot in Command

MAAC RPIC Pilot Qualification requirements and limitations

The MAAC RPIC program is unique to MAAC and is based on the MAAC SFOC approval guidance contained in IPB 2021-03 (in support of SI 903-002) which relates to the qualifications of crew members operating heavier RPA under VLOS. In addition to the pilot qualifications, each site must be assessed individually as there are site specific variables mostly related to controlled airspace requirements. Consult site rules for the MAAC RPIC stipulations.

From the Aeronautics Act (s.3 (1)), “pilot-in-command” means, in relation to an aircraft, the pilot having responsibility and authority for the operation and safety of the aircraft during flight time.

The PIC requirements listed are only for the person assigned as PIC for the RPAS operation and do not constitute the requirements for the pilot physically controlling the aircraft. There may be multiple pilots assigned flight duties on a particular RPAS operation but there shall only be one PIC (at a time). The PIC may be the pilot operating the controls of the RPAS or they may be directing other pilots at the controls of the RPAS.

Relevant Terms in increasing order

Non-certificate holder – whether a MAAC member or not, is any person who does not possess or does not have in their possession, all required, current and valid RPAS operator certificates – regardless of ratings.

- Example 1 – a non-MAAC member who attends a fun fly and wants to receive a demonstration flight using a members model. This is perfectly allowable under the RPIC program in all airspace scenarios.
- Example 2 - a US citizen coming to Canada to operate an RPA at an event who has written and passed the appropriate Transport Canada RPAS certification tests but forgets a key document at home. They cannot legally operate an RPA independently. They can however take full advantage of the RPIC program and enjoy the hobby while in Canada.
- Example 3 – A long time MAAC member who used to conduct flight reviews but allowed all of their Transport Canada RPAS documentation to lapse and does not have any type of Pilot License. They may not provide direct supervision under the RPIC program until they renew their Transport Canada RPAS documentation but may still enjoy flying under another members RPIC direct supervision provisions.

Basic RPAS Certificate holder – is a MAAC member who possesses a current and valid Transport Canada issued Basic RPAS operators certificate.

Advanced RPAS Certificate holder – is a MAAC member who possess a current and valid Transport Canada issued Advanced RPAS Operators Certificate. The technical requirements of the RPA (manufacturer declaration, SFOC) to operate in some advanced scenarios are not tied to the person and must also be met.

RPAS Flight Reviewer status – is any MAAC member, whether affiliated with a Transport Canada recognized RPA Flight school or not, who possesses a current and valid Transport Canada issued Flight Reviewer certificate.

Restricted Operator Certificate Aviation (ROC-A) – A current and valid ROC-A may be required in certain circumstances such as to maintain 2-way VHF communication with other airspace users or ATC. This requirement, where applicable, can be met by any person as outlined in the Site rules, or MAAC Crew roles and responsibilities policy. An RPIC(s) may be assigned any communication responsibility. Note - VHF monitoring does not require ROC-A and can be accomplished by any member consistent with site rules, however no student shall be assigned any communication requirements.

Private Pilot License or higher (PPL+) – any MAAC member who has been issued a Canadian Pilot **License** by either Transport Canada or the Royal Canadian Air Force (RCAF/DND) can act as RPIC with the following notes:

- a. Expired PPL+ qualifies for RPIC provided the document was not rescinded or revoked by Transport Canada/DND for regulatory infractions etc.
- b. Pilot Permits, ATC Licenses or Aircraft Maintenance Engineer (AME) or similar do **not** qualify for RPIC.
- c. Foreign pilot licenses, of any rating, do **not** qualify for RPIC under the MAAC program.

For clarity, any person (member or not) who **only** holds a PPL+ shall not:

- a) be allowed to independently operate an RPAS at any MAAC site.
- b) provide direct supervision to another PPL+ **only** holder, at least one person/member must have an RPAS certificate of some kind.

Basic Site/scenario – is any site where the RPAS pilot only requires a Basic RPAS operators certificate **and** the RPA does not require compliance with any Manufacturer Declaration (i.e. not in controlled airspace, within 3nm/1nm airport/certified heliport, below 400', less than 25kg etc.).

Advanced Site/scenario – is any site where either the RPAS pilot requires an Advanced RPAS operators certificate, **or** the RPA is required to meet a Manufacturer Declaration, **or** both.

The following explains the options for any MAAC member to provide RPAS Pilot in Command (RPIC) direct supervision to another person. These rules in full shall be listed in all RPIC approved site rules:

1. **Basic RPAS Certificate Holder - Direct Supervision options** – any MAAC member with a current and valid Basic RPAS certificate may perform RPIC duties as follows:
 - a. supervise a **single** non-certificate holder at a Basic site
 - b. Shall not supervise a group of other people regardless of any certificates.
 - c. Shall not supervise any other member in any “advanced scenario”.
2. **Advanced RPAS Certificate Holder - Direct Supervision options** – any MAAC member with a current and valid Advanced RPAS Certificate may perform RPIC duties as follows:
 - a. supervise a **single** non-certificate holder at **any site** or Basic scenario,
 - b. supervise a **single** Basic Certificate holder in **controlled airspace**, all scenarios.
 - c. supervise up to 5 “Basic” Certificate holders in **uncontrolled airspace** advanced scenarios, as outlined in Appendix C.
3. **PPL+ with no RPAS Certificate - Direct Supervision options** - any MAAC member with a current or expired PPL, may perform RPIC duties as follows:
 - a. supervise a **single** non-certificate holder at any Basic site,
 - b. supervise a **single** Basic Certificate holder in **controlled airspace**, all scenarios.
 - c. supervise up to 5 Basic Certificate holders in **uncontrolled airspace** advanced scenario, as outlined in Appendix C.

Notes:

 - d. PPL+ cannot supervise a non-certificate holder in **controlled** airspace – at least one person must have a valid RPAS operators certificate.
 - e. PPL+ only holders may not independently operate an RPAS in basic or advanced scenarios unless supervised by an appropriately rated RPAS Certificate holder
 - f. A PPL+ only holder cannot supervise another PPL+ only holder while in **controlled** airspace – at least one person must have at least a valid basic RPAS operators certificate.
 - g. If the PPL+ has a valid and current RPAS operators certificate, then the higher of either provisions apply.
4. **RPAS Flight Reviewer – Direct Supervision options** – any MAAC member with a current and valid Flight reviewer Certification may perform all the duties of an Advanced RPAS Certificate holder. RPIC does not affect the Transport Canada flight reviewer program or CAR regulations associated with it.

I hereby declare that I have read and understand the pilot qualifications to be a MAAC RPIC.

Name of RPIC: _____

Type or Title of Aviation Document(s): _____

License number: _____

RPAS Certificate number if applicable: _____

Email Address: _____

Signature: _____

Date: _____

This declaration once completed must be kept and made available by the RPIC anytime they are performing RPIC duties.