

Comment-Response Document NPA-FCL 9

	Comment	No. /from	MSC 99/1
3.040 (b)	... or use <u>receive</u> any other treatment ...	9.002 / Sweden 7.005 same comment	use <u>undergo</u> (FCL/C)
3.040 (a), (b)	... Holders of medical certificates <u>Student pilots and licence holders</u> ... (both paragraphs)	9.007 / UK 7.074 same comment	rejected. A medical certificate is not required for a person undertaking a trial lesson, or a passenger carried in the right hand seat, and both may have taken medication prior to flight, therefore not applicable to student pilots prior to first solo flight. FCL/C)
3.040 (c)	shall, without undue delay <u>within three days</u> , seek the advice	9.014 / Germany	rejected
3.040 (d)(a)	...shall, <u>within three days</u> , inform the Authority ...	9.013 / Germany	rejected
3.040.(d)(5)	in case of pregnancy ...(see JAR-FCLand 3.315 (c) and articles 10 and 42 of Council Directive 96/Euratom) and ...	9.008 / ECA	rejected. Protection of pregnancy and unborn child is not a licensing issue. Industry has to observe Euratom.
IEM 3.040 (3)	... the regular use of medication. <u>Consideration should be given to allowing the occational use of short term (short-acting) hypnotic drugs such as tamazepam.</u>	9.010 / Britannia Airways, UK	rejected
IEM 3.040 (4)	add sentence: <u>Where coffee intake does not offer sufficient stimulation and further stimulants would be used then an individual is not fit to fly.</u>	9.003 / Sweden	rejected
IEM 3.040 (4)	editorial line 2. del sentence Overdosage cause headaches... <u>The use of any stimulants other than tea or coffee is not permitted. If fatigue is still present then an individual is not fit to fly.</u>	9.016 / IFALPA	editorial accepted change rejected

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IEM 3.040 (4)	editorial line 2: surpress <u>suppress</u> del. sentence: The use of pep pills	9.009 / ECA	deletion of sentence rejected spelling error: editorial
IEM 3.040 (9)	Many <u>analgetic</u> preparations.... ...any new echange medication ... If in <u>any</u> doubt ask a doctor in the AMS, an <u>AMC</u> or <u>any</u> AME.	9.009 / ECA	Many preparationsany new <u>echange</u> in medication... In cases of doubt pilots should consult an AME, an AMC or the AMS.
IEM 3.040 (9)	see above, same comment	9.017 / IFALPA	covered by comment on 9.009
IEM 3.040 (11)	Ins. in line 1: <u>Some forms of treatment e.g.</u> <u>radiation therapy, hemodialysis and surgery have</u> <u>adverse effects that could interfere with the safe</u> <u>exercise of the priviledges of the applicable</u> <u>licence(s).</u>	9.004 / Sweden	rejected
IEM 3.040 (12) (c)	It may be prudent for a pilot to abstain from alcohol at least 24 hours before flying.	9.018 / IFALPA	rejected
IEM 3.040 (12) (e)	Disagreement with mentioning 0,2 ‰ in the text	9.015 Finland	No change of text. A crewmember shall not exercise the privileges of his licence while the blood alcohol concentration is elevated. Attention is drawn to OPS requirements.
IEM 3.040 (12) (e)	amend text: <u>When regulations of JAA States</u> <u>prohibit any blood alcohol level at all, then this rule</u> <u>is obligatory as the limit for aircrew as well.</u>	Czech Republic	covered by previous comment
IEM 3.040 (13)	Further details <u>are given</u> in: ...	9.005 / Sweden	accepted, editorial
3.100 (f)(2)	Medical information supporting this denial will not be released without prior consent of the applicant.	9.012 / Germany	rejected

Comments No. 9.006, 9.011 and 9.019 indicated "no comment"