

Guidance material to language assessment and language assessment organisations according to EU 139/2014

1. References

- Commission Regulation (EU) No 139/2014 of 12 February 2014 laying down requirements and administrative procedures related to aerodromes pursuant to Regulation (EC) No 216/2008 of the European Parliament and of the Council and its amendments
- ADR.OPS.B.024 Authorisation of vehicle drivers
- ADR.OPS.B.029 Language proficiency
- ADR.OR.D.010 Contracted activities
- and the AMC related to these items

2. Introduction

The Delegated Regulation (EU) 2020/2148 has introduced new requirements related to language proficiency. The requirements with regards to English language proficiency for Belgian aerodrome operators will be fully applicable from 8 January 2026.

This regulation defines the requirements for the language assessment as well as the criteria for the acceptability of language assessment organisations. This acceptability remains a responsibility of the aerodrome operator.

The BCAA has the objective to develop guidance materials for the national industry to ensure appropriate implementation and consistent performance of language proficiency assessment for aerodrome vehicle driver individuals considering existing language assessment processes.

This document provides guidance on how the BCAA proposes implementation in matters referring to English language proficiency assessment, being the demonstration of an appropriate level of competence with respect to the use of standard phraseology and the English language.

This document is in no way replacing the applicable requirements from the regulation.

This document only covers the activities related to language proficiency assessment. It does not refer to the language training.

3. Language proficiency requirements

3.1. Personnel requiring language proficiency assessment

According to ADR.OPS.B.024 (a), the language proficiency requirements shall apply to any person belonging to the aerodrome operator or to any other organisation where a person:

- intends to drive a vehicle on the manoeuvring area; and
- is required to communicate with air traffic services (ATS) (consider exemption ADR.OPS.B.024 (d)).

3.2. Issuing English language proficiency certificate

According to ADR.OPS.B.029 (c), the certificate shall be issued by the organisation conducting the assessment, attesting the language, the level of proficiency, and the date of the assessment (see also § 3.4 below). The certificate is issued to a person.

BCAA rationale

- *The ELP certificate is issued to an individual. The individual can move from one organisation to another, maintaining the certificate i.e. from one Belgian aerodrome operator to another Belgian aerodrome operator.*

3.3. Credit between ELP certificates

EU regulation specifies that ELP certificates may be issued for pilots, air-traffic controllers and vehicle drivers. Due to the different scenario-based assessments inherent to the function of the language proficiency and particular phraseology, no credits are allowed between the different ELP certificates even if the levels 4, 5 and 6 are defined on a similar basis.

3.4. The ELP certificate

The vehicle driver ELP certificate issued by the organisation shall contain the below information:

- a) Full name and date of birth of the individual to whom the certificate is issued;
- b) Name of the LAO (Language assessment organisation) and reference to the Aerodrome operator for whom the assessment is conducted;
- c) Level of English language proficiency awarded, in accordance with the different levels of language proficiency established by EU 139/2014;
- d) The date the English language proficiency assessment was conducted;
- e) Name and signature of the LAO assessor;
- f) Period of validity of the certificate according to ADR.OPS.B.029 (d).

Due to the coexistence of different ELP certificates, the language assessment organisation must issue specific vehicle driver certificates that avoid any possible confusion with other ELP certificates.

4. Language assessment organisations

4.1. Organisations performing vehicle driver language assessment

EU regulation 139/2014 does not specify any limitation to organisations allowed to assess language proficiency, provided that they are compliant with the requirements defined in AMC4 ADR.OPS.B.029(e) and any other requirement defined by the aerodrome operator in the framework of its contracted activities.

The following organisations may act as language assessment organisation for English language proficiency assessment for vehicle drivers:

- Aerodrome operators directly by applying the implementing rules under ADR.OPS;
- Other organisations via contracted activity (ADR.OR.D.010) for an aerodrome operator.

When referring to language assessment organisations in this document, reference is made to any type of organisations assessing the ELP, including the aerodrome operator itself if applicable.

When language proficiency assessment is contracted, the aerodrome operator shall be responsible to select a language assessment organisation and to verify its continuous compliance with the regulation. EU regulation 139/2014 does not specify prior certification or prior authorisation for the language assessment organisations by the BCAA. Oversight by the BCAA shall only be performed to the aerodrome operator, considering the language assessment organisation as any other contracted activities of the aerodrome operator. Findings stemming from oversight shall be issued against the aerodrome operator.

BCAA rationale

- *The EU basic regulation and aerodromes regulation do not foresee requirements for the certification of language assessors or the approval of language-testing organisations by the national competent authority. Language proficiency assessment is only defined in the ADR.OPS part directly applicable to certified aerodromes only.*
- *The aerodromes regulation allows for the contracting of activities within the aerodrome operator's scope in accordance with the terms of the certificate that are performed by other organisations either itself certified to carry out such activity or if not certified, working under the aerodrome operator's approval.*

5. Criteria for the acceptability of a language assessment organisation

The criteria for acceptability of language assessment organisation are defined in AMC4 ADR.OPS.B.029(e).

5.1. Clear and documented separation between the language proficiency assessment and language training

From AMC4 ADR.OPS.B.029(e), §(a): if the language assessment organisation also provides language training, there should be a **clear and documented separation** between the two activities.

From AMC3 ADR.OPS.B.029(e) § (c): an assessor may not conduct language proficiency assessment of a person to whom he/she has provided language training. Furthermore, an assessor may not conduct language proficiency assessment of any person to whom his/her objectivity may be affected.

Training scenarios shall not be the same as the assessment scenarios.

5.2. Sufficient number of qualified interlocutors and language proficiency assessors

From AMC4 ADR.OPS.B.029(e), § (b): the language assessment organisation should employ a **sufficient number of qualified interlocutors and language proficiency assessors** to administer the tests. The organisation shall maintain an up-to-date list of assessors.

The assessors shall be either aerodrome operational specialists with an ELP level 6 or, language specialists (bachelor or master degree in language related matters, such as translator, language teacher...) with additional aerodrome operational related experience. Both shall have effective knowledge of standard radiotelephony phraseology.

5.3. Assessment documentation

AMC4 ADR.OPS.B.029(e), § (c) provides details on what should be included in the assessment documentation. The assessment document should be included in a manual, defined by the LAO and kept up-to-date.

The technologies used for the assessment should allow a formal identification of the trainee.

The LAO needs to clearly define the system of rating for the assessment, including the way to determine the global average ELP level.

According to ADR.OPS.B.029 (e), the method of assessment shall contain: the process by which an assessment is done; the qualifications of the assessors conducting assessments of language proficiency (see § 4.2.2 above); the appeal procedure.

The appeal procedure must describe arrangements for managing feedback, dispute or complaint by a candidate regarding his/her language proficiency assessment. The objective of the appeal procedure is to guarantee the objectivity of the assessment procedure. This includes the appraisal whether the assessment was based on a clear grading scheme that was adopted in a consistent manner to all candidates, including a clear communication about the assessment demands.

5.4. Record keeping

From AMC4 ADR.OPS.B.029(e), § (d): the assessment documentation and records should be kept for a period of time determined by the Competent Authority and made available to the Competent Authority upon request.

The records shall be kept for a duration of 5 years. They must be easily accessible and available under request by the competent authority.

The candidate's record should contain the following documents:

- a) Individual candidate's reference number;
- b) Copy, or scan of a proof of identity (with picture): identity card, passport or drivers' license;
- c) Audio/video records of the assessment;
- d) Privacy statement, signed by both the LAO and the candidate and agreement with the terms and conditions of the LAO (including the agreement with the appeal procedure);
- e) Grading record of the various sections of the language proficiency assessment;
- f) Copy of the language proficiency certificate; and
- g) Any other documents relevant to the assessment.

5.5. Standardisation of assessors

According to AMC3 ADR.OPS.B.029(e), the language proficiency assessors shall be suitably trained, including in the requirements specific to the language proficiency assessment and shall undergo regular refresher training on language assessment skills.

The initial training and the recurrent standardisation aim at establishing standards avoiding individual interpretation and inequality between candidates and shall include training to the grading systems.

5.5.1. Initial training

The initial training should include the following elements:

- Highlights in language proficiency assessment in aviation and its importance for aviation safety;
- Highlights of the applicable legislation;
- EASA rating scale and related LAO grading system;
- LAO manual containing the assessment documentation, as described in § 5.3 above;
- Who to contact in case of doubts/questions.

Records of training should be kept by the LAO.

5.5.2. Recurrent standardisation training

The recurrent standardisation training should be required for all the assessors every 24 months. Records of attendance should be kept by the LAO.

The content of the recurrent standardisation training should include: a review of the changes in the applicable regulation; a reminder of the EASA rating scale and the LAO grading system; a reminder of the LAO manual containing the assessment documentation, as described in § 4.2.3 above, highlighting the possible changes.

6. Assessment methodology

6.1. General

Each assessment should include the following three elements:

- listening: assessment of comprehension;
- speaking: assessment of pronunciation, fluency, structure and vocabulary; and

- interaction.

The assessment should challenge plain language with both standard and non-standard radiotelephony phraseology.

The assessment should allow for differentiation of language proficiency levels 4, 5 and 6. The assessment must enable evaluation and recording of all 6 elements as described in AMC1 ADR.OPS.B.029(b), being: pronunciation, structure, vocabulary, fluency, comprehension, and interaction.

6.2. Scenarios for assessment

According to ADR.OPS.B.029 (b) & AMC1 ADR.OPS.B.029(e), the language proficiency assessment should be designed to reflect a range of tasks undertaken by vehicle drivers with special focus on the knowledge of the language rather than knowledge of the operational procedures.

The assessment should determine the applicant's ability to:

- communicate effectively in voice-only and in face-to-face situations;
- communicate effectively using standard radiotelephony phraseology;
- communicate on common and work-related topics with accuracy and clarity;
- use appropriate communicative strategies to exchange messages and to recognise and resolve misunderstandings in a general or work-related context;
- deliver and understand messages in plain language in both usual and unusual situations that necessitate departure from standard radiotelephony phraseology;
- deal with an unexpected turn of events and solve apparent misunderstandings;
- handle successfully the linguistic challenges presented by a complication or unexpected turn of events which occurs within the context of a routine work situation or communicative task with which they are otherwise familiar; and
- use a dialect or accent which is intelligible to the aeronautical community.

BCAA rationale

The assessment scenarios shall include:

- *voice-only or face-to-face situations;*
- *common, concrete and work-related topics for vehicle drivers.*

It is of high importance that:

- *assessments focus on language competences only;*
- *the scenarios use both radiotelephony phraseology and plain English;*
- *the scenarios include normal and abnormal situations;*
- *the scenarios use a variety of accents.*

As an example, assessment scenarios could consist of:

- candidate background/aviation interests (to encourage fluency to be assessed, discourse markers, connectors, varying speech flow...);
- aviation or aerodrome related pictures descriptions e.g. non-standard events, emergency, general aviation activities, ground handling incidents, etc.;
- listening comprehension with recall based on aviation event/transcript(s);
- a simulated ATC based environment with:
 - events scripted to require the candidate to handle the linguistic challenges presented by a complication or unexpected turn of events that occur within the context of a routine work situation or,

- communicative task with which they are otherwise familiar, this requires comprehension and encourages interaction from the candidate.

More information and guidance about the assessment can be found in GM1 ADR.OPS.B.029(e) and in the scenarios in this document.

7. Examples of assessment scenarios

The below scenarios allow for the assessment of three key elements: listening, speaking, and interaction. The scenarios reflect a range of tasks undertaken by vehicle drivers with special focus on the knowledge of the English language. The scenarios are selected to have standard radiotelephony phraseology, usual and unusual situations with deviation from standard radiotelephony phraseology, unexpected turn of events and solve apparent misunderstandings.

These scenarios can be used in different ways:

- as role playing where the assessor performs ATC and the person under assessment acts as vehicle driver,
- to allow the person under assessment to describe the given situation in the picture,
- by filling in blanks from a given scenario,
- after listening or reading a scenario, explain the turn of events, etc.

7.1. Scenario 1a, report an observation of abnormal situation near a runway

Driver: ADR GND, SUP385, I just saw a drone near THLD Runway 25L.

ATC: SUP385, can you confirm you saw a drone?

Driver: Affirm, I am sure that it was a drone, SUP385.

ATC: SUP385, is the drone moving?

Driver: Affirm, the drone is now moving towards the North, SUP385.

ATC: SUP385, thank you, we will inform Airside Inspection.



7.2. Scenario 1b, report an observation of abnormal situation near a runway

Driver: ADR GND, SUP385, I just saw a drone near THLD Runway 25L.

ATC: SUP385, can you confirm you saw a dog?

Driver: Negative, I saw a drone, a drone, near the THLD Runway 25L.

ATC: SUP385, is the drone moving?

Driver: Affirm, the drone is now moving towards the North, SUP385.

ATC: SUP385, thank you, we will inform Airside Inspection.



7.3. Scenario 2a, report uncertainty of position on the manoeuvring area requesting to vacate manoeuvring area

Driver: ADR GND, INS265, uncertain of current position.

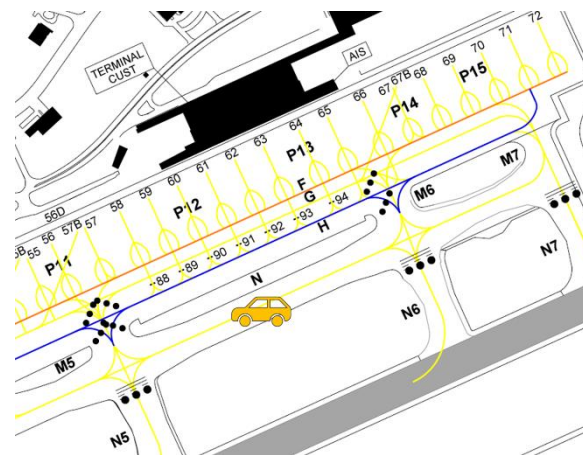
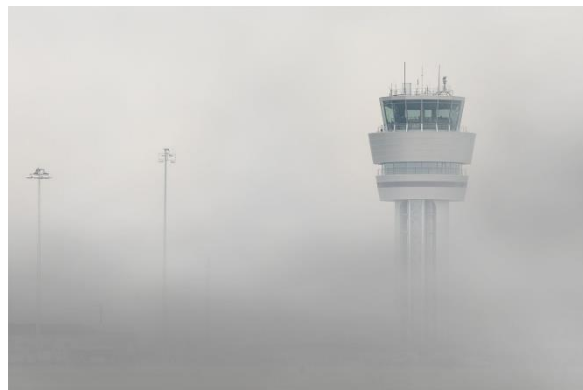
ATC: INS265, current position is N between N5 and N6.

Driver: Request to vacate the manoeuvring area via the nearest service drive, INS265.

ATC: ADR GND, INS265, continue N to M5 and vacate the manoeuvring area via the service drive abeam M5.

Driver: Continue N to M5 and vacate manoeuvring area via service drive abeam M5, INS265.

ATC: ADR GND, INS265, I will track your movement until vacating the manoeuvring area.



7.4. Scenario 2b, report uncertainty of position on the manoeuvring area

Driver: ADR GND, INS265, uncertain of current position.

ATC: INS265, current position is N between N5 and N6.

Driver: Request to vacate the manoeuvring area via the nearest service drive, INS265.

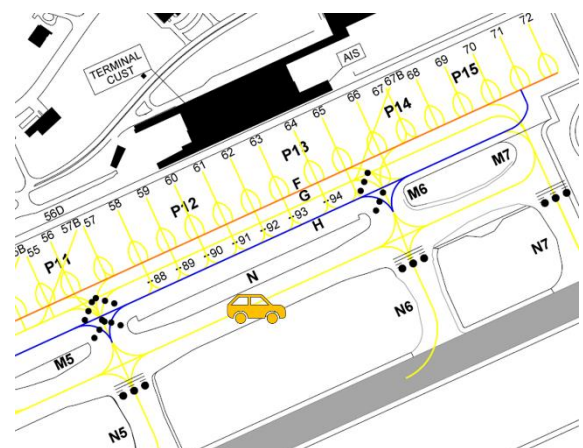
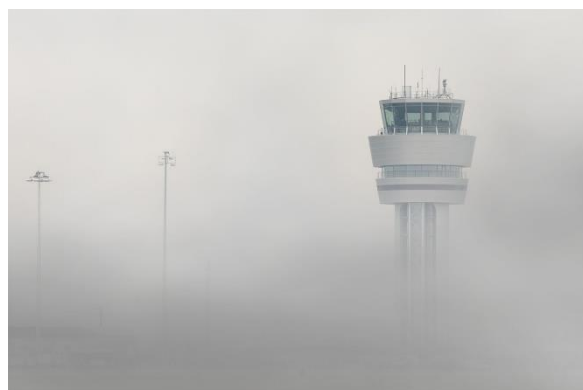
ATC: ADR GND, INS265, continue N to M5 and vacate the manoeuvring area via the service drive abeam M5.

Driver: Continue N to M5 and vacate manoeuvring area via service drive abeam M5, INS265.

ATC: INS265 hold position, M5 is the other way, turn 180°, M5 is first on the right.

Driver: Turning 180°, will vacate manoeuvring area via service drive abeam M5, INS265.

ATC: ADR GND, INS265, I will track your movement until vacating the manoeuvring area.



7.5. Scenario 3a, ATC using a wrong callsign

Driver: ADR TWR, L159, at holding point S2 request to cross the runways via C2 to N2.

ATC: ADR TWR, L155 hold position, I will come back to you.

Driver: L159 at S2, ADR TWR, confirm call sign?

ATC: Correction L159 hold position, I will come back to you.

Driver: Holding position, L159 at S2.



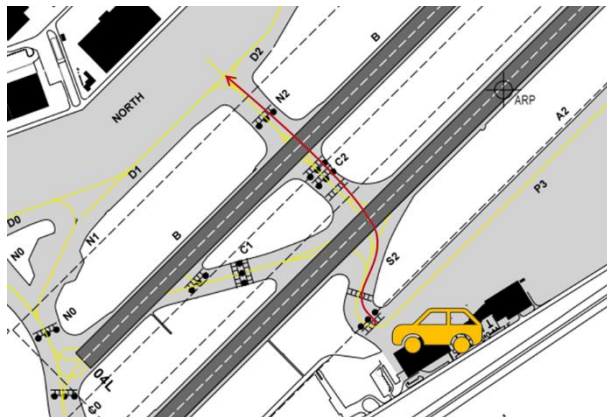
7.6. Scenario 3b, driver using a wrong callsign

Driver: ADR GND, L159 at holding point S2 request to cross the runways via C2 to N2.

ATC: L159 this is ADR TWR frequency, what are your intentions?

Driver: Correction ADR TWR, L159 at holding point S2, request to cross the runways via C2 to N2.

ATC: L159, ADR TWR, crossing approved, proceed to N2 via C2.



7.7. Scenario 4a, dead animal on the runway

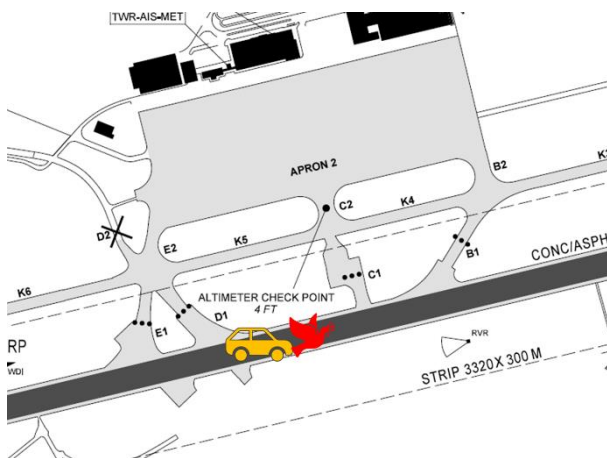
Driver: ADR TWR, INS478.

ATC: INS478, ADR TWR.

Driver: INS478, on the runway between D1 and C1, a dead pigeon on the runway.

ATC: INS478, can you remove the pigeon?

Driver: Negative, send bird control to remove it, INS478.



7.8. Scenario 4b, driver hits animal on the runway

Driver: ADR TWR, INS201, I hit something and my windshield is broken.

ATC: INS201, what is your position?

Driver: On the runway between D1 and C2, INS201.

ATC: INS201, what help do you need?

Driver: Send rescue and firefighting to assist me off the runway.



7.9. More examples of scenarios

- Driver – ATC: ADR GND, INS157, is stuck in the shoulder of TWY N2.
- Driver – ATC: ADR GND, SUP258, The towbar of OO-ABC is still attached and his anticollision light is on.
- Driver – ATC: ADR TWR, BCU358, uncertain of my position, last known position is RWY08 intersection S5.
- Driver – ATC: ADR GND, SUP541, just noticed an oil spill at the holding N1.
- Driver – ATC: ADR GND, SUP258, at Apron1 and a person is trying to climb the fence.
- ATC – Driver: INS874, ADR GND, you have entered C2, hold position and give way to the aircraft in front.
- ATC – Driver: BCU541, ADR TWR, confirm abeam THLD RWY06? (cycle transponder, transponder U/S).