



THE NETHERLANDS MILITARY AVIATION REGULATIONS

Flight Simulating Training Devices Acceptable Means of Compliance & Guidance Material

for

Aeroplane, Helicopter and RPAS FSTD
Aeroplane and Helicopter CTD

**NLD-MAR FSTD
AMC & GM**

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Introduction

The purpose of this Acceptable Means of Compliance (AMC) and Guidance Material (GM) is to provide specific and additional/ background information to organisations intending to- or operating Flight Simulation Training Devices (FSTDs) and Crew Training Devices (CTDs) that are part of the Netherlands Military Aviation System (MAS).

GM FSTD.100 Management system requirements

- (a) When an embedded FSTD/CTD organisation adopts an approved MAOC/MATO (integrated) management system the scope of this system shall also cover the complete FSTD/CTD organisation.
- (b) MAA-NLD compliance monitoring programme:
Typical subject areas for MAA-NLD inspections are for example:
 - (1) Actual FSTD/CTD operation;
 - (2) Maintenance procedures/maintenance records;
 - (3) Technical and configuration standards including FSTD/CTD data sheet;
 - (4) Execution of recurrent QTG's;
 - (5) Safety features of the FSTD/CTD system and housing;
 - (6) Documentation storage; and
 - (7) Compliance with the organisation's approved exposition manual or equivalent.
- (c) Internal audit scope
Organisations operating FSTDs/CTDs are required to monitor compliance with the processes and procedures they have developed to ensure the qualified FSTD's/CTD's performance and functions. In doing so, they should as a minimum, and where appropriate, monitor the following:
 - (1) The FSTD/CTD organisation;
 - (2) Plans and objectives in relation to the FSTD/CTD 'systeemplan'¹;
 - (3) Maintenance procedures;
 - (4) FSTD qualification level, FSTD/CTD approved use and FSTD/CTD data sheet, as applicable;
 - (5) Supervision;
 - (6) FSTD/CTD technical status and failure rate;
 - (7) Manuals, logs and records;
 - (8) Defect deferral;
 - (9) Personnel initial and recurrent training;
 - (10) Aircraft or crew station modifications and differences with the FSTD/CTD configuration;
 - (11) FSTD/CTD configuration management; and
 - (12) Regularly programmed FSTD/CTD flight, including subjective and functions checks and compliance verification. This includes uninterrupted flights, spot checks, and approved use evaluations (fly-outs).

¹ a 'systeemplan' describes all necessary information regarding the management of the FSTD/CTD during the lifetime of the system. The 'systeemplan' is managed by the MinDef Materiel and IT Command (COMMIT) organisation.

AMC FSTD.105 FSTD and CTD housing and installations

This AMC identifies those elements that are expected to be addressed, as a minimum, to ensure that the FSTD housing and installations provide a safe environment for all personnel involved under all circumstances.

- (a) Expected elements:
- (1) Adequate fire/smoke detection, warning and suppression arrangements should be provided to ensure safe passage of personnel from the FSTD/CTD.
 - (2) Adequate protection should be provided against electrical, mechanical, hydraulic and pneumatic hazards, including those arising from the control loading and motion systems, to ensure maximum safety of all persons in the vicinity of the FSTD/CTD.
 - (3) Other areas that should be addressed include the following:
 - (i) A two-way communication system that remains operational in the event of a total or main power failure;
 - (ii) Emergency lighting;
 - (iii) Escape exits and escape routes;
 - (iv) Occupant restraints (seats, seat belts etc.);
 - (v) External warning of motion and access ramp or stairs activity;
 - (vi) Danger area markings;
 - (vii) Guard rails and gates;
 - (viii) Motion and control loading emergency stop controls accessible from either pilot and/or instructor seats;
 - (ix) A manual or automatic electrical power isolation switch.
- (b) It is acceptable to develop a procedure that protects elements of the device by shutting them down in advance, in a more controlled manner, provided it can be shown that the procedure still demonstrates the whole device can be shut down by the operation of a single emergency stop button, when required.

GM FSTD.105 FSTD and CTD Installations

- (a) It is recognised that certain checks, such as that of the emergency stop, can have adverse impact on the FSTD/CTD if carried out in full.
- (b) It is advisable that evacuation exercises are performed at a reasonable interval to evaluate the evacuation procedures of any crew during FSTD/CTD operations.

GM FSTD.110 Application for FSTD qualification certificate

- (a) An organisation can only apply for an FSTD qualification certificate when the FSTD organisation is approved by the MAA-NLD.
- (b) The application for an FSTD qualification should also include either the FSTD level requested or the intended use for FCL and/or Ops-purposes as defined by the organisation. The evaluated intended use or the FSTD level will be documented as approved use on the FSTD data sheet after approval of the MAA-NLD.
- (c) When an FSTD organisation is not yet approved, formal MAA-NLD approval to operate an FSTD, other than a qualification certificate, is required. This shall describe what kinds of training, testing or checking may be performed on the FSTD.

AMC FSTD.115 Application for CTD qualification certificate

- (a) There is no set of MAA-NLD approved qualification requirements for CTDs. It is the organisation's responsibility to develop a CTD-specific Master Qualification Test Guide (MQTG) to evaluate the fitness of the CTD for its intended use. The MQTG shall be the basis for the recurrent evaluations of the device.

GM FSTD.115 Application for CTD qualification certificate

- (a) An organisation can only apply for a CTD qualification certificate when the FSTD/CTD organisation is approved by the MAA-NLD.
- (b) When an FSTD/CTD organisation is not yet approved, formal MAA-NLD approval, other than a certificate to operate a CTD, is required. This shall describe what kinds of training, testing or checking may be performed on the CTD.
- (c) Crew Training Devices (CTDs) are devices which are used to train crew other than flight crew. They simulate their respective crewstation on board of an aircraft. Examples of CTDs are:
 - (1) Door Gun Simulator;
 - (2) Virtual Sensor Trainer;
 - (3) Loadmaster Trainer;
 - (4) Aerial Refueling Operator trainer;
 - (5) Cabin Crew Trainer; or
 - (6) Etc.
- (b) The application for a CTD qualification should also include the intended use as defined by the organisation for training and checking purposes. The evaluated intended use will be documented as approved use on the CTD data sheet after approval of the MAA-NLD.
- (c) As a guidance whether a device is categorized as a CTD it should be assessed by the organisation whether the crew working at this crewstation directly or indirectly has the potential risk to negatively affect the safety of the aircraft and its crew while performing their tasks.
- (d) When in doubt whether a crewtrainer fits within this category, the MAA-NLD should be contacted for further guidance.

AMC FSTD.120 Modifications or major change into the FSTD or CTD

- (a) The FSTD/CTD, where applicable, should be maintained in a configuration that accurately represents the aircraft or crew station being simulated. This shall be a specific aircraft tail number or a representation of a common standard.
- (b) In order to ensure each device is maintained in the appropriate configuration, the organisation operating an FSTD/CTD should have a process that ensures that all relevant Airworthiness Directives (ADs) are implemented where applicable on the affected FSTD/CTD.
- (c) The FSTD/CTD organisation should put in place a process that ensure all aircraft modifications are reviewed for any effect on training, testing and checking. This can be achieved by reviewing the Military Type Certificate Holder's (MTCH) bulletins.
- (d) When the organisation intends to implement modifications on the FSTD/CTD, an internal acceptance process for modifications should be established.

GM FSTD.120 Modifications or major change into the FSTD or CTD

- (a) Modifications of the FSTD/CTD hardware and software that affect handling, performance and systems operation or any major change of the motion or visual system shall be evaluated to determine the impact on the original FSTD qualification level or approved use. The organisation shall prepare amendments for any affected validation tests.

The following are examples of modifications or changes that could be considered major. This list is not exhaustive and modifications need to be classified on a case-by-case basis:

- (1) Any change that materially affects the QTG general requirements, statements of compliance and objective validation tests compared to those established at the initial qualification. Typically, this will be due to modifications of the FSTD/CTD hardware or aircraft simulation models software (e.g. updated aerodynamic data packages or subjective tuning) that affect flying handling qualities and/or performance. For cueing systems (such as motion, sound and visual display), any major modifications may also affect the original qualification criteria and QTG validation tests for these features;
 - (2) Introduction of new standards of equipment or systems representation such as updated flight management and guidance computer (FMGC) and electronic flight controls or fly-by-wire system packages;
 - (3) Re-hosting (moving any applications from system infrastructure to the cloud without making major changes) of the FSTD/CTD software;
 - (4) Digitally connecting of FSTDs and or CTDs for multi-ship and/or multi type training scenarios. It shall be evaluated by the organisation whether the performance remains within the tolerances defined by the qualification basis;
 - (5) Introduction of features that model new training scenarios; e.g. airborne collision avoidance system (ACAS), enhanced ground proximity warning system (EGPWS);
 - (6) Modifications that could affect the FSTD/CTD qualification level or approved use; and
 - (7) FSTD hardware or software modifications that could affect the handling qualities, performance or system representation. This also applies when separate FSTDs and or CTDs are being connected for multi-ship/type training purposes.
- (b) Operational necessity is a circumstance where the FSTD is required because otherwise scheduled events such as (currency) checkrides or operational training sorties cannot be performed and no substitute FSTD is available.

GM FSTD.135 FSTD or CTD data sheet

The initial issue of the FSTD/CTD data sheet as part of the qualification certificate is the responsibility of the MAA-NLD. Thereafter the organisation shall update the FSTD/CTD data sheet as necessary to reflect the actual technical specifications of the FSTD/CTD. This can for example be after MAA-NLD approved modifications or FSTD/CTD soft-or hardware updates.

GM FSTD.140 Interim qualification for FSTD or CTD

It should be considered by the organisation to limit the intended use to the minimum required for the organisation's needs. The rationale behind this is that prior or during this interim period the FSTD or CTD is not thoroughly evaluated, thus introducing the risk of negative training.

AMC FSTD.145 Maintaining the qualification for FSTD-A/H

- (a) When the FSTD-A/H is designed for automated (QTG) testing, especially FSTDs built by civil contractors, the complete QTG should preferably not be done in a single test run prior to the yearly evaluation. As a minimum, the validation tests which define the QTG should be run in at least four approximately equal 3-monthly blocks on an annual cycle. Each block of validation

tests should be chosen to provide complete coverage of the MQTG. In this way the total system performance will be continuously monitored during the current year.

- (b) It is acceptable for the organisation to use the FSTD-A/H even when there are limitations on the approved use. A Minimum Equipment List (MEL) (FSTD.160) clarifies what parts of the approved use may still be performed.

GM FSTD.145 Maintaining the qualification for FSTD-A/H

- (a) Part of maintaining the FSTD-A/H qualification is to have satisfactory records of regulatory audits. This is when:
- (1) No level 1 findings have been issued;
 - (2) All corrective actions have been implemented within the time period accepted or extended by the MAA-NLD;
 - (3) The organisation has continuously demonstrated in accordance with NLD-MAR-FCL ORA.GEN.130 and FSTD.120 that it has full control over all changes;
 - (4) The organisation operating the FSTD-A/H has demonstrated an effective identification of safety hazards and management of associated risks.
- (b) It is not only the FSTD-A/H system/performance that shall be checked yearly, but also all additional training systems that are needed for the total simulation environment in relation to the qualification basis and approved use such as virtual reality or augmented reality systems.

GM FSTD.146 Maintaining the qualification for FSTD-R

- (a) Part of maintaining the FSTD-R qualification is to have satisfactory records of regulatory audits. This is when:
- (1) No level 1 findings have been issued;
 - (2) All corrective actions have been implemented within the time period accepted or extended by the MAA-NLD;
 - (3) The organisation has continuously demonstrated in accordance with NLD-MAR-FCL ORA.GEN.130 and FSTD.120 that it has full control over all changes; and
 - (4) The organisation operating the FSTD-R has demonstrated an effective identification of aviation safety hazards and management of associated risks.
- (b) It is not only the FSTD-R system/performance that shall be checked yearly, but also all additional training systems that are needed for the total simulation environment in relation to the qualification basis and approved use such as virtual reality or augmented reality systems.

GM FSTD.147 Maintaining the qualification for CTD

- (a) Part of maintaining the CTD qualification is to have satisfactory records of regulatory audits. This is when:
- (1) No level 1 findings have been issued;
 - (2) All corrective actions have been implemented within the time period accepted or extended by the MAA-NLD;
 - (3) The organisation has continuously demonstrated in accordance with NLD-MAR-FCL ORA.GEN.130 and FSTD.120 that it has full control over all changes; and
 - (4) The organisation operating the CTD has demonstrated an effective identification of aviation safety hazards and management of associated risks.
- (b) It is not only the CTD system/performance that shall be checked yearly, but also all additional training systems that are needed for the total simulation environment in relation to the qualification basis and approved use such as virtual reality or augmented reality systems, etc.

GM FSTD.150 Oversight interval FSTD-A/H

The MAA-NLD may vary the oversight interval for only one, several, or all the FSTD-A/Hs depending upon prior results of oversight on the organisation operating the FSTD-A/H or upon the outcome of the separate FSTD-A/H evaluations.

GM FSTD.151 Oversight interval FSTD-R

The MAA-NLD may vary the evaluation period for only one, several, or all the FSTD-Rs depending upon the results of the oversight on the organisation operating the FSTD-Rs or upon the separate FSTD-R evaluations.

GM FSTD.152 Oversight interval CTD

The MAA-NLD may vary the evaluation period for only one, several, or all the CTDs depending upon the results of the oversight on the organisation operating the CTDs or upon the separate CTD evaluations.

GM FSTD.160 Minimum Equipment List

A Minimum Equipment List should be regarded as a temporary possibility to operate the FSTD/CTD with some limitations regarding the approved use. The organisation shall have a process in place that addresses the shortcomings and solve the issues leading to the limitations.

GM FSTD.165 Difference list for the FSTD or CTD

When it is determined that there are differences between the configuration of the aircraft and the FSTD/CTD, an assessment shall be made whether additional or difference training is needed to assure safe (flight) training or operations.

This documented training can consist of:

- (a) Difference briefings by digital presentation or an instructor;
- (b) A (partial) training on other FSTD/CTD or aircraft; and/or
- (c) Other means of training.

GM FSTD.170 Transferability of an FSTD or CTD qualification

- (a) If the FSTD/CTD has a certificate already issued by the MAA-NLD no further qualification procedures are required. However, organisational requirements and continuation qualification requirements shall still be adhered to.
- (b) The MAA-NLD may adopt an existing FSTD/CTD certificate if the prior Certifying Authority is recognised by the MAA-NLD.
- (c) If the FSTD is transferred from outside the MAS as a Full Flight Simulator (FFS) with level D qualification, it may be fully qualified by the MAA-NLD for use within the scope of the NLD-MAR-FCL after review of all the documentation required for initial qualification.
- (d) Any FSTD qualification below FFS level D standard shall be evaluated to determine the fitness of the FSTD for the intended use.
- (e) When the organisation intends to use the transferred FSTD within the scope of the MAR-OPS it should be noted that the FSTD might require an additional evaluation for these training tasks.

AMC FSTD.175 Record-keeping

Record-keeping may be either digitally or by hardcopy, but must be stored in such a manner that the information is easily retrievable by the organisation and MAA-NLD.

- (a) FSTD/CTD records to be kept should include the following, for the lifetime of the device:

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- (1) The Master QTG (MQTG) of the initial evaluation;
 - (2) The qualification certificate of the initial evaluation; and
 - (3) The initial evaluation report.
- (b) FSTD/CTD records to be kept (in paper or electronic format) should include the following, for a period of at least 5 years:
- (1) Recurrent QTG runs;
 - (2) Recurrent evaluation reports;
 - (3) Reports of internal functions and subjective testing;
 - (4) Technical log;
 - (5) Difference list;
 - (6) Audit schedule;
 - (7) Evaluation programme;
 - (8) Assessment of additional equipment;
 - (9) Management evaluation reports; and
 - (10) Obsolete procedures and forms.

GM FSTD.180 Crediting of FSTD training time as flying time

- (a) Training time within the scope of the approved use and performed in a fully functional FFS level D is credited as flying time.
- (b) Training events performed in an FSTD other than an FFS and rated as 'TP' may be logged as flying time. For example: if a sortie consists of 80 % of the training events qualified as 'TP', 80% of the FSTD training time may be logged as flying time.

AMC FSTD.210 FSTD-A/H Qualification basis

- (a) As a basis for FSTD qualification the following data should be used for performance comparison (in order of preference):
- (1) Flight test data;
 - (2) Flight manual data;
 - (3) Engineering analysis; and
 - (4) Subjective opinion by subject-matter expert(s).
- (b) When an organisation does not seek an FSTD-A/H qualification level but instead opts to evaluate an FSTD-A/H for the intended use, the level of fidelity of the separate FSTD-A/H features still needs to be evaluated against the latest issue of the EASA regulation CS-FSTD (A) and (H) and/or ICAO doc 9625 – 'Manual of Criteria for the qualification of Flight Simulating Training Devices', Volume 1 or 2. This evaluation shall determine whether the MAA-NLD will qualify the FSTD-A/H for (parts of) its intended use.
- (c) When an FSTD-A/H submitted for initial qualification cannot (completely) be evaluated against the in FSTD.210 (b) and (c) mentioned Certification Specifications due to the level of confidentiality of the device, the absence of built-in test protocols or the absence validation data, etc., other means to qualify needs MAA-NLD approval.
- (c) It is permitted to use footprint data where flight test data is not available. Only when all other alternative possible sources of data have been thoroughly reviewed without success may a footprint test be acceptable, subject to a case-by-case review with the MAA-NLD, and taking into consideration the level of qualification or intended use sought for the FSTD. Footprint test data should be:

- (1) Constructed with initial conditions and FSTD-A/H set up in the appropriate configuration (e.g. correct engine rating) for the required validation data;
- (2) A maneuver representative of the particular aircraft being simulated;
- (3) Manually flown by a SME pilot who is type rated, has recent and sufficient experience¹ and is acceptable to the MAA-NLD²;
- (4) Constructed from validation data obtained from the footprint test maneuver and transformed into an automatic test;
- (5) An automatic test run as a fully integrated test with pilot control inputs; and
- (6) Automatically run for the initial qualification and recurrent evaluations.

¹ In this context, 'recent and sufficient' refers to the pilot experience on the aircraft such that the pilot is capable for the required tasks.

² The same pilot should sign off the complete test as being fully representative.

- (d) Contrary to civil regulations where a qualified FFS level D is required to perform 'zero flight time' FCL training and checking, fixed base FTDs representing single seat airframe aircraft only are exempt from this requirement. The rationale is that because of absence of a dual seat airframe, no instructor or examiner can directly assess the trainee or examinee.
- (e) It is acceptable to the MAA-NLD that certified external (civil) contractors develop the MQTG and evaluate the FSTD-A/H.

GM FSTD.210 FSTD-A/H Qualification basis

- (a) A lot of information regarding acceptable qualification standards, training tasks vs fidelity level and test procedures are published in internationally recognised manuals such as:
 - (1) The latest issues of EASA CS-FSTD (A) and (H);
 - (2) Royal Aeronautical Society; Aero plane Flight Simulator Evaluation Handbook; and
 - (3) ICAO doc 9625 'Manual of Criteria for the Qualification of Flight Simulating Training Devices' Volume I and II.
- (b) Many FSTD-A/H systems in use within the NLD MAS are not solely designed for NLD-MAR-FCL purposes but also for operational training tasks. As a result, these FSTDs are in some cases designed and built by the (military) aircraft manufacturer because of type-specific (classified) data, systems and components. This may result in an FSTD not designed for evaluation and testing in accordance with EASA or other civil-international standards. Although these standards are the primary and preferred qualification basis accepted by the MAA-NLD, the MAA-NLD may as a consequence accept other qualification standards resulting in non-civilian compliant (M)QTGs as the qualification basis. An MQTG does not need to have a specific layout or format but must be easy interpretable. However, any FSTD-A/H shall have test protocols, specific test software (when available), checklists and/or procedures to evaluate its suitability for the intended/approved use and monitor its quality.
- (c) Footprint test data are derived from a subjective assessment carried out on the actual FSTD requiring qualification. The assessment and validation of these data are carried out by a SME pilot acceptable to the MAA-NLD. The resulting data are the footprint validation data for the FSTD concerned.
- (d) A clear rationale should be included in the (M)QTG for each footprint test. These rationales should be added to and clearly recorded within the validation data roadmap (VDR).

- (e) Where the number of footprint tests is determined by the MAA-NLD to be excessive, the maximum level of qualification may be affected.
- (f) For recurrent evaluation purposes an essential match (result within tolerance) is to be expected. Validation tests using footprint data which do not provide an essential match, should be justified to the satisfaction of the MAA-NLD.

AMC FSTD.220 Initial FSTD-A/H evaluation procedure

- (a) Assessment process leading to the issue of an FSTD-A/H qualification.
 - (1) FSTD-A/Hs require evaluation leading to qualification. The required process should be accomplished in two distinct steps. First, a check should be made to determine whether or not the FSTD-A/H complies with the applicable requirements. The second step should be the grant (or refusal) of an FSTD-A/H qualification.
 - (2) When checking compliance with the applicable requirements, the MAA-NLD shall ensure that the following steps are taken:
 - (i) Once an FSTD-A/H is contracted to be built, the organisation that is to operate the FSTD-A/H should ensure that the regulatory standard upon which the FSTD-A/H will eventually be qualified against is acceptable to the MAA-NLD.
 - (ii) During initial evaluations it is necessary to conduct the complete set of tests as described in the Validation Data Roadmap (VDR). However, after consultation the MAA-NLD may accept other means to validate the performance of the FSTD-A/H. There may be occasions where all tests cannot be completed but arrangements should be made for all the planned tests to be completed within a reasonable time.
 - (iii) Following an evaluation, it is possible that a number of defects are identified. Serious defects, which affect flight crew training, testing and checking, could result in an immediate limitation of the qualification level or approved use until the defects are rectified.
- (b) Composition of the evaluation team.
 - (1) The organisation should compose a team of SMEs with specific knowledge to evaluate an FSTD-A/H in accordance with a structured routine. Therefore the organisation shall take good notice of the composition of the evaluation team. The team should normally consist of at least the following:
 - (i) An EASA qualified FSTD-A/H evaluator;
 - or
 - A qualified and type rated test pilot or flight test engineer who completed an FSTD-A/H evaluators course acceptable to the MAA-NLD (GM FSTD.210); and
 - (ii) A TRI current on type. This TRI should be able to perform the function- and subjective test profiles including the fly-out profiles; and
 - (iii) For all types, sufficient support staff to assist with the running of tests and operation of the Instructor Operator Station (IOS).
 - or:
 - (iv) In case the organisation intends to- or operates an FSTD-A/H with classified systems, components, software, performance, etc., and therefore the FSTD-A/H is only accessible for military personnel with specific clearance, an approval by the MAA-NLD for an alternative composition of the evaluation team is required.
 - (2) When the organisation with an FSTD-A/H as mentioned in (iv) above does not have a type rated test pilot or flight test engineer, other type rated pilots with sufficient knowledge (GM FSTD.210) regarding FSTD-A/H evaluations may be assigned by the organisation to conduct these FSTD-A/H evaluations.

- (c) During an evaluation of an FSTD-A/H, a series of functions and subjective tests should be conducted, that together with the objective tests complete the comparison of the FSTD-A/H with the aircraft, the class of aeroplane or type of helicopter;
- (d) The FSTD-A/H should provide adequate flexibility to permit the accomplishment of the desired and required tasks while maintaining an adequate perception by the flight crew that they are operating in a real aircraft environment. Additionally, the IOS should not present an unnecessary distraction from observing the activities of the flight crew whilst providing adequate facilities for the tasks; and

GM FSTD.220 Initial FSTD-A/H evaluation procedure

- (a) To obtain sufficient knowledge as an evaluator the contents of an acceptable FSTD-A/H evaluator's course shall cover:
 - (1) The origin, development and transition to current regulations and standards;
 - (2) All related documentation for the evaluation and qualification of an FSTD;
 - (3) The regulatory document format and the use of its parts for all items including the intent of the Regulations;
 - (4) The requirements and standards for all initial and recurrent testing of an FSTD including validation, function and subjective tests;
 - (5) The Qualification Test Guide (QTG) requirements and their relationship to Acceptance Test Guides;
 - (6) The process and good practices for running QTGs;
 - (7) The planning of a qualification evaluation;
 - (8) The actual conduct of both pilot-flown (manual) and automatic QTG tests¹;
 - (9) The analyses and rationalisation of the results of both manual and automatic QTG tests;
 - (10) The requirements and performance of function and subjective tests with the use of profiles;
 - (11) Visual systems and how they are tested using test patterns and equipment;
 - (12) The requirements of a Quality Management and Compliance Monitoring system;
 - (13) Location and comprehension of FSTD Data requirements: "flown" data, substitute data, engineering data;
 - (14) The regulatory requirements for updating or modifying FSTDs; and
 - (15) ICAO doc 9625 issue 3 purpose, its implications, and what must be done to adopt these guidelines.

¹ (a) (8) above is not required for evaluators of single seat only fighter aircraft and operators of RPAS systems.

- (b) The main focus of objective testing is the MQTG. In order to avoid time being wasted during the initial qualification process, the content and acceptability of the validation tests contained in the MQTG data package should be verified well in advance of the evaluation date. The acceptability of all tests depends upon their content, accuracy, completeness and recency of the results.
- (c) Functions tests verify the acceptability of the simulated aircraft systems and their integration. Subjective tests verify the fitness of the FSTD-A/H in relation to training, checking and testing tasks.
- (d) It is important that the organisation operating an FSTD-A/H understands what to expect from the routine of FSTD-A/H functions and subjective tests. Part of the subjective tests routine for

an FSTD-A/H should involve an uninterrupted fly-out comparable with the duration of typical training sessions in addition to assessment of flight freeze and repositioning.

- (e) Organisations unfamiliar with the evaluation process may contact the MAA-NLD.

AMC FSTD.230 Changes, upgrades of the qualification level or expansion of the approved use to the qualified FSTD-A/H

Updating and upgrading of a qualified FSTD-A/H.

- (a) If a change to an existing device would imply that the performance of the FSTD-A/H could no longer meet the requirements at the time of initial qualification, but that the result of the change would, in the opinion of the MAA-NLD, clearly mean an improvement to the performance and training capabilities of the device altogether, then the MAA-NLD might accept the proposed change as an update while allowing the device to retain its original qualification level.
- (b) Qualification of new technology or systems.
Where an update to an FSTD-A/H involves a change of technology or the addition of a new system or equipment that is not covered by the qualification basis used for the existing qualification, an evaluation of such changes may not be possible using this original qualification basis. For these cases, the specific changes can be qualified by using newer Certification Specifications that apply to these changes, without affecting the overall qualification of the FSTD-A/H. This approach should be documented.
- (c) Expansion of the approved use requires specific additional testing to evaluate the FSTD-A/H's integrated performance for the additional required task(s).
- (d) The application for a change, including appropriate extracts from the MQTG indicating proposed amendments should be submitted to the MAA-NLD. This application should be submitted no later than 30 days before the date of intended change, unless otherwise agreed with the MAA-NLD.

GM FSTD.230 Changes, upgrades of the qualification level or expansion of the approved use of the qualified FSTD-A/H

- (a) An upgrade is defined as the raising of the qualification level of an FSTD-A/H, which can only be achieved by undergoing an initial qualification according to the latest applicable requirements. An update is a result of a change to the existing FSTD-A/H where it retains its existing qualification level. The change may be certified through a recurrent inspection or an extra inspection if deemed necessary by the MAA-NLD according to the applicable requirements in effect at the time of initial qualification.
- (b) As long as the qualification level of the device does not change, all changes made to the device should be considered to be updates.
- (c) An upgrade, and consequent initial qualification according to the latest applicable requirements, is only applicable when the organisation requests another qualification level (recategorisation) for the FSTD-A/H.

AMC FSTD.310 Qualification basis of the training tasks

Since there are no MAA-NLD adopted Certifying Specifications for training tasks, the evaluation programme is the responsibility of the organisation. The organisation shall develop an (M)QTG as

the qualification basis for all intended training tasks. The tests as laid out in the MQTG shall be performed during subjective and functions testing. This shall determine the fitness of the FSTD-A/H for the operational training, testing and checking tasks.

GM FSTD.320 Initial evaluation of the training tasks

It is recommended that the evaluation team consists of experienced SMEs such as type rated test-pilots, flight test engineers, weapon instructors or SMEs with specific knowledge and (flight) authorisations.

AMC FSTD.410 FSTD-R Qualification basis

- (a) The construction of an MQTG requires specific knowledge within the organisation. If the organisation lacks this knowledge, it is acceptable to the MAA-NLD that external (civil) contractors with sufficient knowledge develop the MQTG and evaluate the FSTD-R.
- (b) The MQTG shall describe the standards for the hardware, software and configuration used in the FSTD-R for which qualification is sought. The evaluation shall determine for which training, checking or testing the FSTD-R is suitable without introducing negative training.
- (c) In general, the complexity of the RPAS system and its intended use determine the scope of the MQTG.

GM FSTD.410 FSTD-R Qualification basis

It is the organisations responsibility to develop an MQTG which evaluates the fitness of the FSTD-R for the intended use within the scope of this subpart. The intent of this MQTG is to validate the performance of the actual RPAS related to the presentations on the FSTD-R.

AMC FSTD.420 Initial FSTD-R evaluation procedure

- (a) Assessment process leading to the issue of an FSTD-R qualification.
 - (1) FSTD-Rs require evaluation leading to qualification by the MAA-NLD for the intended use. This evaluation is performed to determine how realistic the FSTD-R simulates the actual RPAS's systems and performance.
 - (2) The organisation which develops the MQTG shall ensure that the following steps are taken:
 - (i) The MQTG is acceptable to the MAA-NLD.
 - (ii) During initial evaluation it is necessary to conduct the complete set of tests as described in the MQTG. There may be occasions when all tests cannot be completed but arrangements should be made for all tests to be completed within a reasonable time.
 - (iii) Following an evaluation, it is possible that a number of defects are identified. Serious defects, which affect (flight) crew training, testing and checking, could result in an immediate limitation of the approved use until the defects are rectified.
- (b) Composition of the evaluation team of RPAS ≤ 150kg:
 - (1) The organisation should compose a team of SMEs with specific knowledge to evaluate an FSTD-R in accordance with a structured routine. Therefore the organisation shall take good notice of the composition of the evaluation team. The team should normally consist of at least the following:
 - (i) An instructor current on type. This instructor should be able to perform the function and subjective test profiles including the fly-out profiles;
and:
 - (ii) Support staff including system operators to assist with the running of tests and operation of the instructor's station (IOS).

- (c) Composition of the evaluation team of RPAS > 150kg:
- (1) The organisation should compose a team of SMEs with specific knowledge to evaluate an FSTD-R in accordance with a structured routine. Therefore the organisation shall take good notice of the composition of the evaluation team. The team should normally consist of at least the following:
 - (i) A qualified and type rated test pilot or flight test engineer who completed an FSTD-A/H evaluators course acceptable to the MAA-NLD (GM FSTD.210);
 - (ii) An instructor current on type. This instructor should be able to perform the function and subjective test profiles including the fly-out profiles; and
 - (iii) Support staff including system operators to assist with the running of tests and operation of the Instructor Operators Station (IOS).

or

 - (iv) When the organisation operating an FSTD-R does not have a type rated test pilot or flight test engineer, other composition of the evaluation team with sufficient knowledge regarding FSTD evaluations may be approved by the MAA-NLD.
- (f) It is important that the organisation operating an FSTD-R understands what to expect from the routine of FSTD-R functions and subjective tests. Part of the subjective tests routine for an FSTD-R should involve an uninterrupted fly-out comparable with the duration of typical training sessions in addition to the assessment of flight freeze and repositioning.

GM FSTD.420 Initial FSTD-R evaluation procedure

- (a) The FSTD-R should provide adequate flexibility to permit the accomplishment of the desired and required tasks while maintaining an adequate perception by the entire crew that they are operating at their respective crew station. Additionally, the IOS should not present an unnecessary distraction from observing the activities of the crew whilst providing adequate facilities for the tasks.
- (b) Functions tests verify the acceptability of the simulated RPAS's systems and their integration. Subjective tests verify the fitness of the FSTD-R in relation to training, checking and testing tasks.
- (c) The main focus of objective testing is the MQTG. In order to avoid time being wasted during the initial qualification process, the content and acceptability of the validation tests contained in the MQTG data package should be verified, well in advance of the evaluation date. The acceptability of all tests depends upon their content, accuracy, completeness and recency of the results.
- (d) Organisations unfamiliar with the evaluation process may contact the MAA-NLD.

AMC FSTD.510 CTD Qualification basis

- (a) The construction of an MQTG requires specific knowledge within the organisation. If the organisation lacks this knowledge, it is acceptable to the MAA-NLD that external (civil) contractors with sufficient knowledge develop the MQTG and evaluate the CTD.
- (b) The MQTG shall describe the standards of the hardware, software and configuration used in the CTD. The evaluation shall determine for which training, checking or testing the CTD is suitable without introducing negative training.

GM FSTD.510 CTD Qualification basis

It is the organisations responsibility to develop an MQTG which evaluates the fitness of the CTD for the intended use within the scope of this subpart.

AMC FSTD.520 Initial CTD evaluation procedure

The evaluation shall determine for which training, checking or testing the CTD is suitable without introducing negative training.

(a) Process leading to the issue of a CTD qualification:

- (1) CTDs require evaluation leading to qualification by the MAA-NLD for the intended use. This evaluation is performed to determine how realistic the CTD simulates the actual crew station's systems and performance.
- (2) The organisation which develops the MQTG shall ensure that the following steps are taken:
 - (i) The MQTG is acceptable to the MAA-NLD.
 - (ii) During initial evaluation it is necessary to conduct the complete set of tests as described in the MQTG. There may be occasions when all tests cannot be completed but arrangements should be made for all tests to be completed within a reasonable time.
 - (iii) Following an evaluation, it is possible that a number of defects are identified. Serious defects, which affect crew training, testing and checking, could result in an immediate limitation of the qualification level or approved use until the defects are rectified.

(b) Composition of the evaluation team of the CTD:

The organisation should compose a team of SMEs with specific knowledge to evaluate a CTD in accordance with a structured routine. Therefore the organisation shall take good notice of the composition of the evaluation team. The team should normally consist of at least the following:

- (i) An instructor current on type/station. This instructor should be able to perform the function and subjective tests; and
- (ii) Support staff including system operators to assist with the running of tests and operation of the Instructor Operator Station (IOS).

GM FSTD.520 Initial CTD evaluation procedure

- (a) The CTD should provide adequate flexibility to permit the accomplishment of the desired and required tasks while maintaining an adequate perception by the entire crew that they are operating at their respective crew station. Additionally, the IOS should not present an unnecessary distraction from observing the activities of the crew whilst providing adequate facilities for the tasks.
- (b) Function tests verify the acceptability of the simulated CTD systems and their integration. Subjective tests verify the fitness of the CTD in relation to training, checking and testing tasks; and
- (c) Organisations unfamiliar with the evaluation process may contact the MAA-NLD.

FINAL CLAUSES

NLD-MAR FSTD AMC & GM – Netherlands Military Aviation Regulations Flight Simulation Training Devices together with its Acceptable Means of Compliance (AMC) and Guidance Material (GM).

This Netherlands Military Aviation Regulation shall enter into force from the day after the date of issue on the MAA-NLD intranet/internet.

This Netherlands Military Aviation Regulation will be binding in its entirety and directly applicable to all (Military) Aviation Organisations who are involved in any way with or are acting within the Netherlands Military Aviation System (NLD-MAS) and need to be compliant no later than 1 year after the date of issue.

The Hague, 10 March 2026

For the Minister of Defence,
The Director of the Military Aviation Authority - The Netherlands

A handwritten signature in blue ink, consisting of a stylized 'A' with a horizontal line through it and a vertical line extending upwards.

A.A.W.K. Appels, LLM, Msc,
Air Commodore