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Canadian Instrument Recency Requirements and Records, 2026

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Executive Summary

Canadian pilots who hold an instrument rating now work to a **2026 text** of section 401.05 of the Canadian Aviation Regulations (CARs, SOR/96-433), not to the "6-6-6" formula that older guides repeat. Subsection (3) requires a qualifying instrument check within the **24 months** before the flight (laws-lois.justice.gc.ca). Subsection (3.1) then requires **six instrument approaches** within six months before the flight, counted from the first day of the **seventh month** after that check (laws-lois.justice.gc.ca). Subsection (3.2) requires the holder to retain a record of having met the applicable requirements for **three years** (laws-lois.justice.gc.ca). This is a 2026 change: the amendment was published on 17 December 2025 and its delayed commencement provision points to **17 June 2026** (gazette.gc.ca).

The central finding is that four different things are routinely merged into one green or red indicator: a display filter, the underlying approach events, the qualifying check and the three-year record. The regulation names the last three, while a six-month screen shows only a slice of them. A display window cannot, by itself, preserve the older check packet or the source documents that (3.2) refers to. This report therefore proposes a **check-to-approach-to-archive evidence index** and a **source-version checklist** as personal-record tools, not as a determination of whether anyone may fly.

Sources disagree in ways that matter. The former wording required six hours of instrument time as well as approaches and began its window at the 13th month. Transport Canada (TC) Advisory Circular (AC) 401-005, issued in 2016, still describes that regime (tc.canada.ca). Some secondary guides compare Canada with the Federal Aviation Administration (FAA) rules in wording that differs from the current subsection (3.1); the regulation text controls. The RIAS says the final text removes the six-hour requirement (gazette.gc.ca). The Justice Laws "amendments not in force" page still listed the section 4(10) replacement when read on 2 November 2026, while the dated section version shows the new text.

Scope is narrow: Canadian professional pilots whose evidence may sit partly with an employer. The text requires a retained record of having met the requirement; it sets no general retention period for every logbook entry, and CAR 401.08 on personal logs contains none (laws-lois.justice.gc.ca). Device, group, supervision and start-date questions are flagged for a qualified reviewer.

Introduction and Background

This report is written for line pilots and other professional pilots in Canada who audit their own logbooks and the retained instrument-check and approach records behind them. The question it answers is narrow: **when a logbook screen shows an instrument recency summary, can the records behind it still be identified and retrieved under the current Canadian provisions?** It does not decide whether a pilot may depart on a given flight, it does not recommend training, and it does not describe any operator's rostering or tracking system. Every legal statement names the jurisdiction: Canada, under the CARs, unless stated otherwise.

Why 2026 is the year to audit

TC's Advisory Circular 401-005, signed on 26 January 2016 (tc.canada.ca), is an older official explainer written around an exemption: its title still reads "Maintaining Instrument Rating Privileges as stipulated in Exemption NCR 040-2015". The regulation has since been rewritten. The Gazette's Regulatory Impact Analysis Statement (RIAS) says one aim was to address a Transportation Safety Board of Canada (TSB) recommendation on instrument flight rules recency (gazette.gc.ca). The TSB's file for recommendation A16-09 records TC's description of the amendment as shortening the recency period for instrument ratings from 12 months to 6 months (www.bst.gc.ca) and removing the 6-hour instrument time requirement (www.bst.gc.ca).

Law, guidance, history and worksheet: four labels

Four kinds of statement are kept apart, because the source conflicts here come from mixing them. **Law** means CAR 401.05 and CAR 401.08 as published by Justice Canada and the enacted amendment in the Canada Gazette, Part II. **Explanatory material** means the RIAS, which is not the legal text. **Historical guidance** means advisory circulars and exemption-era documents, useful for evidence examples but not current timing. **Suggested worksheet fields** are the columns proposed here, which are review aids and not a claim that CAR 401.05 prescribes each field.

Source edition and access notes

The Justice Laws section 401.05 page, read again on 2 November 2026, shows that the consolidation is current to 2026-09-30 and was last amended on 2026-06-17. The dated version page for the amended text is labelled "Version of section 401.05 from 2026-06-17 to 2026-09-30" (laws-lois.justice.gc.ca), which ends on the consolidation's "current to" date; the live text matches the amended text. TC's regulatory-change page listed no recent Part II amendments (tc.canada.ca), and no TC implementation notice or Gazette correction for this amendment was found; absence of a notice is not proof that none exists. The TSB A16-09 file was read on 2 November 2026; no legal conclusion rests on it alone.

What Pilot Logbook is, and is not, for this question

Pilot Logbook (pilots.landing.aero) is an invitation-only electronic logbook made by a line pilot; readers can request an invite. Its product page describes summaries over chosen periods, flight plan (OFP) attachments kept with a flight, photos and PDFs exported by flight, a full-field spreadsheet export and print layouts matching the paper logbooks of 14 authorities including Transport Canada. These are the vendor's descriptions, not

regulator approval. The page does not describe a Canadian instrument-recency engine, a retained-check record type or automatic three-year compliance, and this report does not imply any. The worksheet below lets a pilot test a sample summary or export from any logbook, paper or electronic, against the regulation.

Key Changes in the Current Source Edition

Change 1: the window now starts in the seventh month

Under the current subsection 401.05(3.1), six instrument approaches must be completed "following the first day of the seventh month after the completion of a test or check referred to in subsection (3)" and within six months before the flight (gazette.gc.ca). The previous version, in force from 17 December 2025 to 16 June 2026, began the window "following the first day of the 13th month" (laws-lois.justice.gc.ca). The RIAS describes the effect as the requirements beginning in the 7th month instead of the 13th (gazette.gc.ca).

For a record audit the point is structural: the older packet that matters is the **check** that starts the clock, and the approach events belong to a window that depends on it. A pilot who stores only recent approaches has kept half of the chain.

Change 2: the six-hour condition is gone and approaches remain

The earlier subsection (3.1) required that the holder had "acquired six hours of instrument time" (laws-lois.justice.gc.ca). The current (3.1) contains no hours condition; it speaks only of six instrument approaches in accordance with the minima specified in the instrument approach procedure (gazette.gc.ca). The RIAS explains that the competency-based approach "removes the six hours of instrument time and focuses solely on skill-based activities, such as instrument approaches" (gazette.gc.ca).

For records, lifetime or period instrument hours do not substitute for approach evidence under the current (3.1), and approach evidence does not substitute for the qualifying check. The CARs define an instrument approach as the orderly positioning of an IFR (instrument flight rules) aircraft from the enroute phase to a position and altitude from which a landing may be completed or a missed approach initiated (laws-lois.justice.gc.ca), a procedure event and not a duration.

Change 3: the contexts in which approaches count are listed

Subsection (3.1) lists four contexts. An approach may be completed in an aircraft in actual or simulated instrument meteorological conditions; in such conditions while acting as a flight instructor conducting training for an instrument rating endorsement; in a Level B, C or D full-flight simulator of the same group as the aircraft indicated on the licence; or in a flight training device under the supervision of a person who holds the qualifications referred to in subsection 425.21(9) of the personnel licensing standards (gazette.gc.ca).

A bare approach count is therefore weak evidence: a row that cannot show which context applies, or which device and group were used, leaves the review question open. Standard 421 states that an instrument rating is issued for aircraft in one of four groups (tc.canada.ca), and whether a given device session met the supervision wording is a case-specific question for a qualified reviewer.

Change 4: a three-year record obligation that names both routes

The current subsection (3.2) reads that the holder "shall retain a record of having met the applicable recency requirements set out in subsection (3) or (3.1) for three years" (laws-lois.justice.gc.ca). The plural "requirements" fits a record that covers both the check and the approaches. The text does not say when the three years start, does not name a format, and does not prescribe an automatic deletion date. Any arithmetic about the start of the period is a matter of interpretation that this report leaves to a qualified reviewer.

Change 5: delayed commencement and a source-version problem

The enacted amendment, SOR/2025-241, replaced subsections (3.1) and (3.2) in its section 4(10) (gazette.gc.ca). Section 38(2) brings that subsection into force on the day, in the sixth month after the month of publication in the Canada Gazette, Part II, that has the same calendar number as the publication day (gazette.gc.ca). The Gazette issue is Volume 159, Number 26 (gazette.gc.ca), published on 17 December 2025, which gives 17 June 2026. The RIAS confirms the six-month delay was intended (gazette.gc.ca).

A source-version problem remains. On the version read on 2 November 2026, the Justice Laws "amendments not in force" page still lists section 4(10) (laws-lois.justice.gc.ca), while the dated section page shows the new (3.1) and (3.2) from 17 June 2026. A lagging list is the likelier explanation, but no source resolves it, so the checklist below asks the reader to record which page was read and when.

An exemption also touched this subsection. TC's exemptions register lists global exemption NCR-019-2026 under provision 401.05(3.1), issued 25 May 2026 with an expiry of 18 June 2026, to allow holders to use the hours and instrument approaches flown without supervision in an aircraft in actual or simulated IMC for maintaining recency (tc.canada.ca), as was allowed in previous versions. The entry's heading and body name different earlier exemption numbers. The Canadian Business Aviation Association (CBAA) also listed it in its July 2026 update (www.cbaa-acaa.ca). For records it is history, relevant only to evidence dated before its expiry.

Separating Checks, Approach Events and the Retained Record

The qualifying check is its own evidence class

Subsection (3) offers several routes: an instrument rating flight test in an aircraft or in a Level B, C or D full-flight simulator of the same group; an instrument proficiency check (IPC) whose tasks were representative of sections 1 to 4 of section 5 of Schedule 8 of Standard 428; and, in paragraph (d), listed competency checks or pilot proficiency checks that include a portion on instrument procedures, such as a line operational evaluation from an approved advanced qualification program (laws-lois.justice.gc.ca). The evidence differs by route. An IPC leaves a flight test report and possibly a log entry; an operator proficiency check leaves training or checking records, often held by the employer; a foreign check leaves foreign paperwork. Which route applies to a given pilot is a case-specific question, and the worksheet below records the route rather than deciding it.

Approach events are logbook-level facts

An approach event is a dated, located, procedure-specific fact: which approach, where, in what aircraft or device, in actual or simulated conditions, and under what supervision where the device context requires it. CAR 401.08(2) lists the items every personal-log entry must carry per flight, including the flight conditions with respect to day, night, VFR (visual flight rules) and IFR (laws-lois.justice.gc.ca). That list does not itemise instrument approaches or their count, so how a pilot logs approaches is a matter of personal practice and of what the pilot expects to need to show.

The same section ties the log to the documentation of experience and recency, and limits who may enter data to the holder or a person the holder has authorised, which matters for instructor or supervisor entries.

The record obligation is neither the display nor the check

Subsection (3.2) speaks of "a record of having met" the requirements. A display that summarises approaches in a six-month window answers a current question, but does not by itself hold the check packet that began the window or the earlier events behind previous windows. The text does not say whether a display is the record, which is why this report treats the display as a view and the archive as the thing to audit.

Table 1 below separates the four layers, plus lifetime hours, and names the source for each.

Layer	What it is	Named source	What it can show	What it cannot show by itself
Current display filter	A screen or report limited to a period, such as six months	The logbook or tool in use (not a legal source)	Which approach rows fall inside the period	Older checks, older approaches, or whether any row meets a context condition
Underlying event records	Individual logbook rows for approaches	CAR 401.08(2) log content; CAR 401.05(3.1) contexts	Date, aircraft or device, conditions, place	That the supervision or device-group wording was met
Supporting check record	The flight test, IPC or other check relied on under (3)	CAR 401.05(3)	The date and route of the check that starts the (3.1) window	The later approaches
Archive obligation	The record of having met (3) or (3.1)	CAR 401.05(3.2)	That a record is required for three years	A start date, format or deletion schedule (none is stated)
Lifetime instrument hours	Cumulative instrument time	The personal log	A career total	Approach events or check evidence

The display filter is the only layer that depends on a screen. The others exist independently of it, so a summary that is correct for the display can still sit on top of an archive with gaps. Lifetime hours are included because older wording linked six hours to recency, and a total that once looked relevant no longer answers the (3.1) question.

Implementation Considerations and Process Changes

Build a check-to-approach-to-archive evidence index

The index is a worksheet with one row per evidence item and a fixed set of columns. The columns are suggested worksheet fields, not a claim that CAR 401.05 prescribes each one. They follow from what (3) and (3.1) make relevant: the check route, the event, the aircraft or device and its group, the condition, and the supervision where the device route is used.

- **Check type, date and source document:** the route under (3), the date, the report or record that proves it, and who holds the original.
- **Applicable provision:** (3)(a), (3)(c), (3)(d) or (3.1), as a label to be confirmed by a reviewer.
- **Event date, procedure and location:** the approach as flown, with airport and procedure name.
- **Aircraft or device identity, group and condition:** registration or device identifier, instrument rating group, and actual or simulated conditions.
- **Supervision or instructor evidence:** who supervised a device session or instructed, with their qualification basis where it applies.
- **Row identifier and source-copy location:** a stable ID so the display can be traced back, and where the supporting document lives.
- **Export coverage and unresolved fields:** whether the row, the attachment and the link between them survive an export, and anything left blank.

The historical AC examples support this kind of index. AC 401-005 says the pilot is to record and maintain accurate records providing proof of having met the instrument rating recency requirements (tc.canada.ca), and lists a log book entry of the last instrument flight test or IPC (tc.canada.ca) among the ways to show it. That is historical documentary context; the timing formulas in the same AC must not be copied into a current worksheet.

Table 2 below shows a **(Hypothetical Example)** index for the synthetic review described in the next subsection. It is not a real pilot's record, and its status column describes a review of documents, not a legal conclusion.

Item	Type and provision label	Date	Procedure and place	Aircraft or device, group	Condition	Supervision or examiner	Row ID	Source copy	Export coverage	Review status
C1	IPC, (3)(c) label	On report	n/a	Group per rating	n/a	Examiner authority on report	LR-C1	Scanned report	Row only	Supported
A1	Approach, (3.1)	As logged	Named	Registration, group	Actual IMC	n/a	LR-A1	Flight record	Row only	Supported
A2	Approach, (3.1)	As logged	Named	Registration, group	Simulated IMC	n/a	LR-A2	Flight record	Row only	Supported

Item	Type and provision label	Date	Procedure and place	Aircraft or device, group	Condition	Supervision or examiner	Row ID	Source copy	Export coverage	Review status
A3	Approach, (3.1)	As logged	Named	Simulator level, group	Simulator	Session record	LR-A3	Training record	Row only	Supported
A4	Approach, (3.1)	As logged	Named	Registration, group	Actual IMC	n/a	LR-A4	Flight record	Row only	Supported
A5	Approach, (3.1)	As logged	Named	Registration, group	Simulated IMC	Instructor entry	LR-A5	Instructor entry	Row only	Supported
A6	Approach, (3.1)	As logged	Named	Device named; group not recorded	Device	Supervisor missing	LR-A6	Not located	Row only	Unresolved
C0	Older IPC packet, (3) label	Before display	n/a	Group per rating	n/a	Examiner authority on report	LR-C0	Archive folder	Row only	Retrievable in archive

The table is meant to be read across: the middle columns let a reviewer answer the contextual questions of (3.1), and the last two record what a display and an export would lose. Row C0 shows why the archive column matters: it sits outside the six-month view yet remains the evidence that the check clause was satisfied, and a screen that lists only approaches would never show it.

Map each displayed event to a supporting row and document

A mapping step ties what the screen shows to what the archive holds. The steps are a suggested process.

1. **Freeze the view:** record the date the screen was read, the filter, and the tool version, so the summary can be reproduced.
2. **List the displayed events:** copy each row identifier, not only the count.
3. **Locate the check:** identify the check that began the window and where its source document lives.
4. **Link each event:** attach to each row the flight record, simulator record or instructor entry that supports it.
5. **Classify gaps:** mark each row supported or unresolved for this review, with the missing field named.
6. **Archive the packet:** store the check packet and event evidence together, outside any rolling display.

Synthetic review: six displayed events, five supported

(Hypothetical Example) A pilot's filtered view shows six approach rows, A1 to A6. Rows A1 to A5 link to complete source evidence. Row A6 records a flight training device session, but the device group is not recorded and the supervisor's name is missing. The correct report is: **six displayed events, five supported for this review and one unresolved**. It does not label the pilot current or non-current, because that depends on legal conditions the screen does not show.

Two cautions apply. A missing attachment is not automatically proof that an approach never occurred; the record may be unscanned, held by an employer, or entered by an authorised person on a different document. And an event count is not proof that every legal condition was met, since (3.1) ties each approach to the procedure minima and to one of four contexts. Separately, the older check packet C0 falls outside the six-month display yet remains retrievable from the archive.

Preserve evidence beyond what the display shows

A rolling display drops rows as time passes, and an export taken over a narrow period drops them too. The text says a record of having met the requirement must be retained for three years, and does not say how that period is counted. The steps below are suggestions for personal evidence, not statements of what the regulation compels.

- **Keep the check packet whole:** the flight test report, IPC report or competency record, and any examiner log entry.
- **Keep device records:** session records showing the device, its group context and any supervisor.
- **Keep the link:** a row identifier tying each approach to its document.
- **Keep export snapshots:** a dated full export, so a summary can be reconstructed.
- **Do not generalise:** the three-year wording in (3.2) is not a retention period for every Canadian logbook entry, and CAR 401.08 states none.

What a personal-logbook export can retrieve

An export test is the simplest way to check what an archive would lose. Vendor pages show that tools differ, and none of the pages read states Transport Canada approval of its product.

- **MyFlightbook:** its import template defines Approaches as a whole number per flight (myflightbook.com), with a free-text name suggested in a format such as 2 ILS approaches to runway 17 at KOLM (myflightbook.com); its CSV download adds a unique flight identifier (myflightbook.com); and its currency page says being current does not mean being legal (myflightbook.com).
- **ForeFlight Logbook:** its automatic export article says the CSV excludes signatures, endorsements, photos and track logs (support.foreflight.com); reimporting a CSV imports all entries again (support.foreflight.com); and instrument currency is tied to approaches and holds logged within the last six months (support.foreflight.com), with currency details described by reference to FAA requirements (foreflight.com).
- **LogTen Pro:** only the quantity of approaches is required (support.logten.com), in a quantity, approach type, runway and airport format (support.logten.com); its exporter covers every field available (support.logten.com), but the spreadsheet export is not a complete backup (support.logten.com) and excludes signatures and other images (support.logten.com).
- **Safelog:** it can keep photos, notes, documents and, on supported platforms, signatures (www.dauntless-soft.com); it has built-in analysis tools for currency under the Canadian Aviation Regulations (www.dauntless-soft.com), with a footnote that regulatory analysis features depend on configuration and platform (www.dauntless-soft.com); and it lists a Transport Canada logbook style for printing (dauntless-soft.com).

- **ZuluLog:** its help page describes creating a CSV file from the print screen (www.zululog.com).
- **Smart Logbook:** its App Store listing says it includes rules for FAA, EASA and Transport Canada requirements (apps.apple.com) and exports flights to a CSV file (apps.apple.com).
- **Pilot Logbook:** per the publisher's product description, which is not independently verified, it offers summaries over chosen periods, flight-plan PDFs kept with the flight, photos and PDFs exported by flight and a full-field spreadsheet export. Whether an approach-level export carries event dates and source links is something a reader should test on a sample, since the page does not document it.
- **Paper logbook:** a bound log has no export, so the archive and the view are the same object, but the source documents still have to be filed separately.

Across these vendor pages, rows and counts are commonly exportable, while signatures, attachments and the link between a row and its supporting document are less often described. That gap is what Table 2 asks a reader to test. TC says applicants can email an e-logbook or a scanned paper logbook with a licence, permit or rating application (tc.canada.ca); that concerns applications, not the CAR 401.08 personal log, and is not approval of any format for recency evidence.

Employer-held evidence and leaving an employer

Some check evidence is created and held by an operator. TC's bulletin on the earlier IFR recency regime noted that tracking of qualifications may be handled by an air operator's crewing department or other administrative means (tc.canada.ca). Operator record rules are separate from the pilot's duty: CAR 705.127 requires an air operator to retain a record of each pilot proficiency check for at least three years (laws-lois.justice.gc.ca). That period binds operators, not the pilot, and does not equal the duty under (3.2).

An employer's status display, even a green one, is the employer's view of its own tracking, and a pilot's personal evidence may need documents it does not hold. No provision read here addresses access after leaving an employer, so a copy of the check report taken while access exists is safer. AC 401-004 notes that an IPC examiner keeps the original only until the next monitoring event (tc.canada.ca).

Source-version checklist

Use this checklist whenever a summary is cited, shared or relied on for a records review:

- **Section edition:** record the Justice Laws version label, the consolidation "current to" and "last amended" dates shown on the page, and the date read.
- **Amendment status:** note whether the "amendments not in force" page still lists SOR/2025-241 section 4(10), and treat a mismatch as unresolved rather than as a decision.
- **Exemptions:** check TC's register for any exemption on 401.05 covering the dates in question.
- **Guidance age:** record the issue date of any advisory circular used, and do not copy timing formulas from one that predates June 2026.
- **Secondary sources:** treat flight-school pages, guides and forum posts as pointers to the regulation, not as law.
- **Jurisdiction:** confirm the page is Canadian, not FAA, EASA or another authority.
- **Unresolved items:** list device, supervision and start-date questions for a qualified reviewer.

Data Analysis and Evidence

The quantitative core of this topic is a small set of numbers whose meaning depends on the edition read. The numbers are the 24-month check window, the six-month approach window, the month in which that window starts, the count and context of approaches, the removed hours condition and the three-year record. *Table 3* below lays the versions side by side, with the Canadian authority named in every row.

Source and edition (Canada unless stated)	Check window	Approach or hours condition	When the window starts	Record wording	Status for a records review
CAR 401.05, version 2025-12-17 to 2026-06-16	Within 24 months	Six hours of instrument time and six approaches	First day of the 13th month	Record of the "requirement" for three years	Historical for dates before 17 June 2026
CAR 401.05, version from 2026-06-17	Within 24 months	Six instrument approaches, four contexts	First day of the seventh month after the check	Record of the "requirements" for three years	Controlling text read for this report
SOR/2025-241, Gazette Part II, 17 December 2025	Unchanged here	Replaces (3.1) and (3.2)	In force on the date set by section 38(2)	Same replacement	Enacted amendment
RIAS, same Gazette issue	Not a legal text	Hours removed	Seventh month instead of 13th	Explanatory only	Explanatory, not law
TC exemption NCR-019-2026	n/a	Unsupervised hours and approaches	n/a	n/a	Expired 18 June 2026 per the register
TC AC 401-005 (2016)	24-month skill event	Six hours and six approaches	13th month	Pilot to keep accurate records	Historical examples only
FAA 14 CFR 61.57(c) (United States)	Not comparable	Six approaches plus holding and tracking	Six calendar months before the month of flight	Logged under 14 CFR 61.51	Different jurisdiction; do not reuse

Two of the seven rows (the superseded 2025-12-17 version and the 2016 advisory circular) reflect the earlier timing and hours rules, and the FAA row is a different legal system. Any summary built from a row other than the second or third should therefore carry a visible edition label. The exemption row is included because it applied only in the weeks around commencement, and a record dated then may need a reviewer to confirm which text applied.

Where secondary sources diverge

Secondary guides use differing wording, and the regulation text controls over any of them. A Canadian flight-school page dated 21 March 2023 describes the earlier requirement of 6 hours of instrument time and 6 approaches (flygenesis.ca), and an undated one says the same (compassflying.com). The TSB file likewise describes the former rule as requiring 6 hours of instrument flying after 12 months (www.bst.gc.ca). AC 401-005 was signed in January 2016 and still shows the earlier formula (tc.canada.ca).

The RIAS also contains a transition statement: pilots who are past the six-month period have until the first day of the 13th month following their last proficiency check to comply (gazette.gc.ca). That is explanatory text, and the regulation text read for this report contains no matching transitional paragraph. A reader with a pre-June 2026 evidence trail should treat it as an unresolved question for a qualified reviewer and must not carry the 13th-month trigger forward as a general rule.

Contrast with the FAA

The FAA instrument experience rule requires, within the six calendar months preceding the month of the flight, specified tasks and iterations (www.law.cornell.edu). When instrument time is logged to meet it, the United States logbook must record the location and type of each instrument approach (www.law.cornell.edu), and device time counts when a logbook or training record specifies the training device (www.law.cornell.edu). Canada's CAR 401.08(2) has no matching approach field. The comparison is offered only to explain why FAA calendar-month logic and FAA logging conventions should not be assumed to transfer.

Implications and Future Directions

Evidence has to be organised around a chain rather than a counter: the qualifying check, the approach events in a window that starts after it, and the retained record. A logbook that shows only the last six months of approaches serves the middle of that chain.

For **pilot-held evidence**, the actionable item is the archive layer. Because the text sets no start date or format for the (3.2) record, a conservative personal practice is to keep the check packet, device records and a dated export together and to note the regulation edition read. That is a suggestion, not a statement of what TC requires. For **employer-held evidence**, an operator's tracking is a view of the operator's own records, and a copy of a check report taken while access exists is more durable. For **logbook tools**, vendor pages show attachments and signatures often sit outside the export (support.foreflight.com). A pilot evaluating Pilot Logbook, or any logbook, can pick six displayed rows, trace each to a source copy and note which fields survive an export. That tests fit for the reader's own records and is not a claim that any product computes Canadian instrument recency.

Open questions for a qualified reviewer, such as an examiner, a TC inspector or an operator's training department:

- **Device and supervision:** whether a device session met the (3.1) wording.
- **Start of the three years:** how the (3.2) period is counted for a given record.
- **Transition:** how the RIAS statement on the 13th month applies to pre-June 2026 records.
- **Exemption period:** which text applied to evidence dated near NCR-019-2026's expiry.
- **Guidance:** whether TC will update AC 401-005, which still carries its 2016 issue.

Frequently Asked Questions (FAQs)

What are the Canadian instrument recency requirements in 2026?

Under CAR 401.05 in Canada, the holder must have completed a qualifying flight test or check within the 24 months before the flight, and, following the first day of the seventh month after that check and within six months before the flight, six instrument approaches in an accepted context. This report explains the records, not whether a particular pilot may fly.

Is it still "6 approaches and 6 hours" in Canada?

No. The current (3.1) contains the six approaches and no hours condition. The earlier version required six hours of instrument time as well, and older guides and the 2016 AC still show that wording.

What must a pilot keep under CAR 401.05(3.2)?

It requires the holder to retain a record of having met the applicable recency requirements in (3) or (3.1) for three years. The text states no start date, format or deletion schedule, and it is not a retention rule for every logbook entry.

How should instrument approaches be logged in Canada?

CAR 401.08(2) lists per-flight entries such as the flight conditions but not an approach count. A pilot can add approach, location, condition and device fields as personal practice using the worksheet above; those fields are suggestions, not prescribed content.

Is an instrument rating renewed in Canada in 2026?

AC 401-005 says TC would no longer process renewals for instrument ratings (tc.canada.ca), and the current (3) conditions the privileges on a qualifying check within 24 months. Which route fits a given pilot is a question for an examiner or the operator.

How does an IPC appear in a pilot's logbook?

AC 401-004 (2019) describes an examiner entry in the candidate's log book certifying completion (tc.canada.ca), and states that the pilot must be able to provide evidence when requested. That AC predates the 2026 amendment, so its timing language should not be used.

Does Transport Canada accept an electronic logbook?

CAR 401.08 requires a personal log in accordance with subsection (2) and the personnel licensing standards and mentions no format. A vendor FAQ describes downloading a CSV version of the logbook (myflightbook.com). TC says applicants can email an e-logbook or a scan with a licence application. No page read states approval of a specific application, and vendors state their own limits, for example that being current does not mean being legal (myflightbook.com).

Does a six-month display preserve older evidence?

Not by itself. A display shows a window, whereas (3.2) refers to a record of having met the requirements in (3) or (3.1). The older check packet and earlier event evidence need to be filed outside the view, and an export should be tested for what it loses.

Conclusion

The current Canadian text distinguishes a qualifying check, a count of approaches in a defined window and a retained record, and a display is a view, not an archive. The practical output of this report is a worksheet, not a determination: a check-to-approach-to-archive evidence index, a source-version checklist and a short list of open questions for a qualified reviewer.

Three principles carry through: cite the regulation and its edition, not a snippet or a title with a year in it; keep the older check packet and event evidence where no rolling filter can hide it; and treat each approach row as a claim needing device, group, condition and supervision fields, recording a missing attachment as unresolved rather than as proof either way. Any logbook, including Pilot Logbook, can be tested against this worksheet, and the vendor's product page does not claim to automate Canadian instrument recency. The law named here is Canadian, was read as at 2 November 2026, and does not replace an examiner's decision, an operator's approved procedures or the authority.

Source links

Links cited in this article, in order of first appearance. Full addresses are provided for readers using extracted text.

1. https://laws-lois.justice.gc.ca/eng/regulations/SOR-96-433/section-401.05.html
2. https://gazette.gc.ca/rp-pr/p2/2025/2025-12-17/html/sor-dors241-eng.html
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