

The UK IMC Rating Privileges (ANO Schedule 6)

→ Press Briefing on the UK IMC Rating

→ Validity of IMC Rating

- Fly outside CAS in visibility less than 3km but not less than 3 km visibility
- Valid for IMC privileges
- Fly out of sight of the sun
- Take-off
- Normal approach

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**Head of Personnel Licensing Department
Safety Regulation Group**

Background to the IMC rating

- **Lobbied for by the GA Community**
- **Agreed by AIC in 1967 published in Air Navigation Order 1970**
- **Amended in 1980s and 1990s**

The UK IMC Rating

Privileges (ANO Schedule 8)

- ➔ **Fly outside CAS in visibility less than 3km**
- ➔ **Fly special VFR in a control zone in less than 10km but not less than 3 km visibility**
- ➔ **Fly in Class D and E airspace in circumstances requiring flight under IFR**
- ➔ **Fly out of sight of the surface**
- ➔ **Take-off and land in visibility below cloud not less than 1800m**
- ➔ **Normal approach minima; however,**
- ➔ **The UK AIP recommends additions to published DHs/MDHs**

The UK IMC Rating

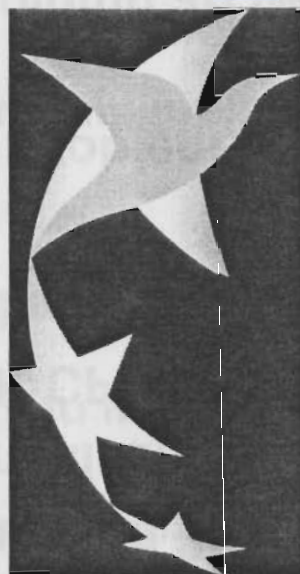
Training Content

- **Ground studies – 20 hours minimum**
 - Physiological factors
 - Flight Instruments
 - Radio Navigation Aids
- **Flying Training – 15 hours to include 10 hrs by sole reference to instruments**
 - Basic full, partial and limited panel flying
 - En-route navigation using 2 aid types
 - 2 approach types including one pilot-interpreted
- **Skill test**

UK Experience

- In total CAA has issued around 25000 IMC ratings
- 23000 still have current medicals
- Includes UK ATPL and UK CPL holders
- Approximately 10000 of these 23000 are PPL holders
- No evidence of particular problems mixing with Commercial traffic
- Safety benefit for pilots holding an IMC rating
 - Only one known CFIT accident to IMC rated pilot in IMC in 1992 (AAIB Report EW/C92/2/2)
- Note: No utilisation data available

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EASA regulation context

European requirements for pilot licensing:

The IMC Rating?

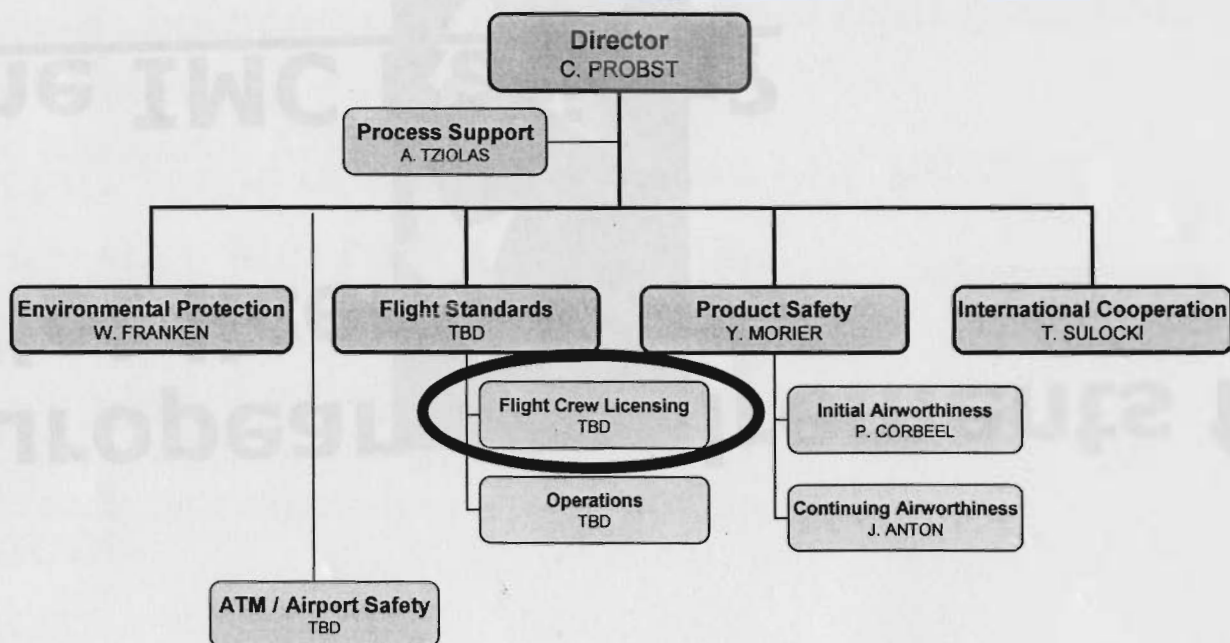
EASA



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The Rulemaking Directorate

Rulemaking Directorate





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EASA regulation context

Basic Regulation
Regulation (EC) 1592/2002 of 15 July 2002

Annex I : Essential Requirements
for Airworthiness

Annex II : Excluded Aircraft

Agency
Opinion

Regulation (EC) 1702/2003 on Airworthiness
and Environmental Certification

Annex (Part 21)

*Section A: Application
Requirements*

*Section B: administrative
Procedures*

Appendices: EASA forms

Regulation (EC) 2042/2003
on Continuing Airworthiness

Annex I (Part-M):
Continuing Airworthiness
Requirements

Annex II (Part-145):
Maintenance Organisation
Approvals

Annex III (Part-66):
Certifying Staff

Annex IV (Part-147):
Training Organisation
Requirements

*Section A: Technical
Requirements*

*Section B: Administrative
Procedures*

Appendices: EASA forms

Agency
Opinion

Guidance
Material

Part 21

Certification
Specifications

AMC 20	CS AWO	CS 22
AMC 21	CS ETSO	CS 23
CS 25	CS Definitions	CS 27
CS 34		CS 29
CS 36		CS VLA
CS E		CS VLR
CS P		
CS APU		

AMC &
Guidance
Material

Part M, 145,66,147

Agency
CS ,
AMC &
GM

☐ Parliament and Council

☐ European Commission

☐ EASA



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Extension of Competences

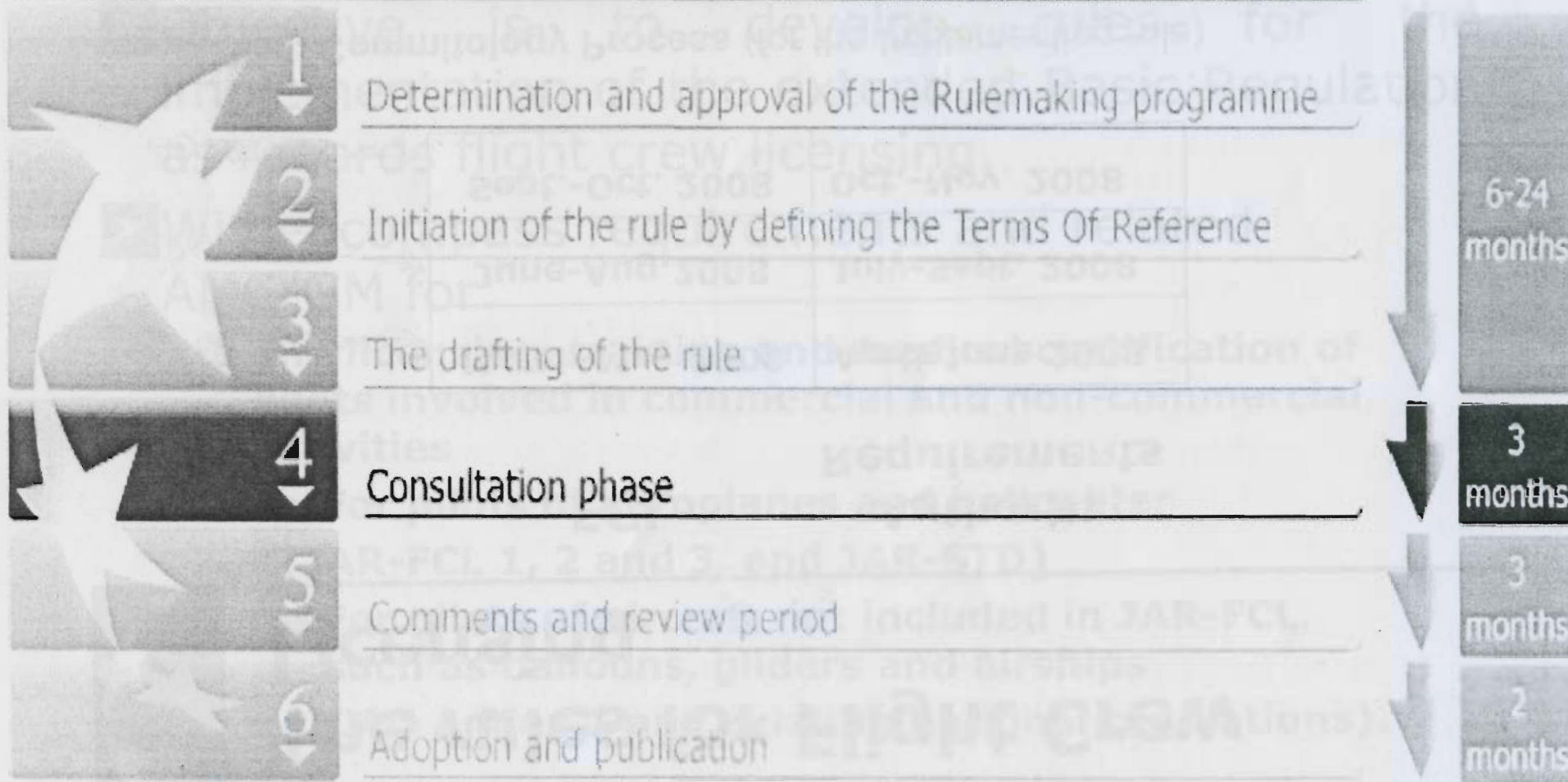
- A Commission proposal for the extension of the EASA Regulation to air operations, pilot licensing and third country aircraft was discussed by the European Parliament and the Council, under the co-decision process. The extension of the Basic regulation should be published in the near future.
 - The adoption of the implementing rules (NPA + commitology) may last until beginning 2009.
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Rulemaking process

Agency rulemaking process





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The rules for Flight Crew Licensing

FCL

**Authority
Requirements**

CONSULTATION →	March-May 2008	April-June 2008
REVIEW →	June-Aug. 2008	July-Sept. 2008
ADOPTION →	Sept.-Oct. 2008	Oct.-Nov. 2008

Then: **Commitology Process** (for the Implementing rule)



Planning subject to changes!



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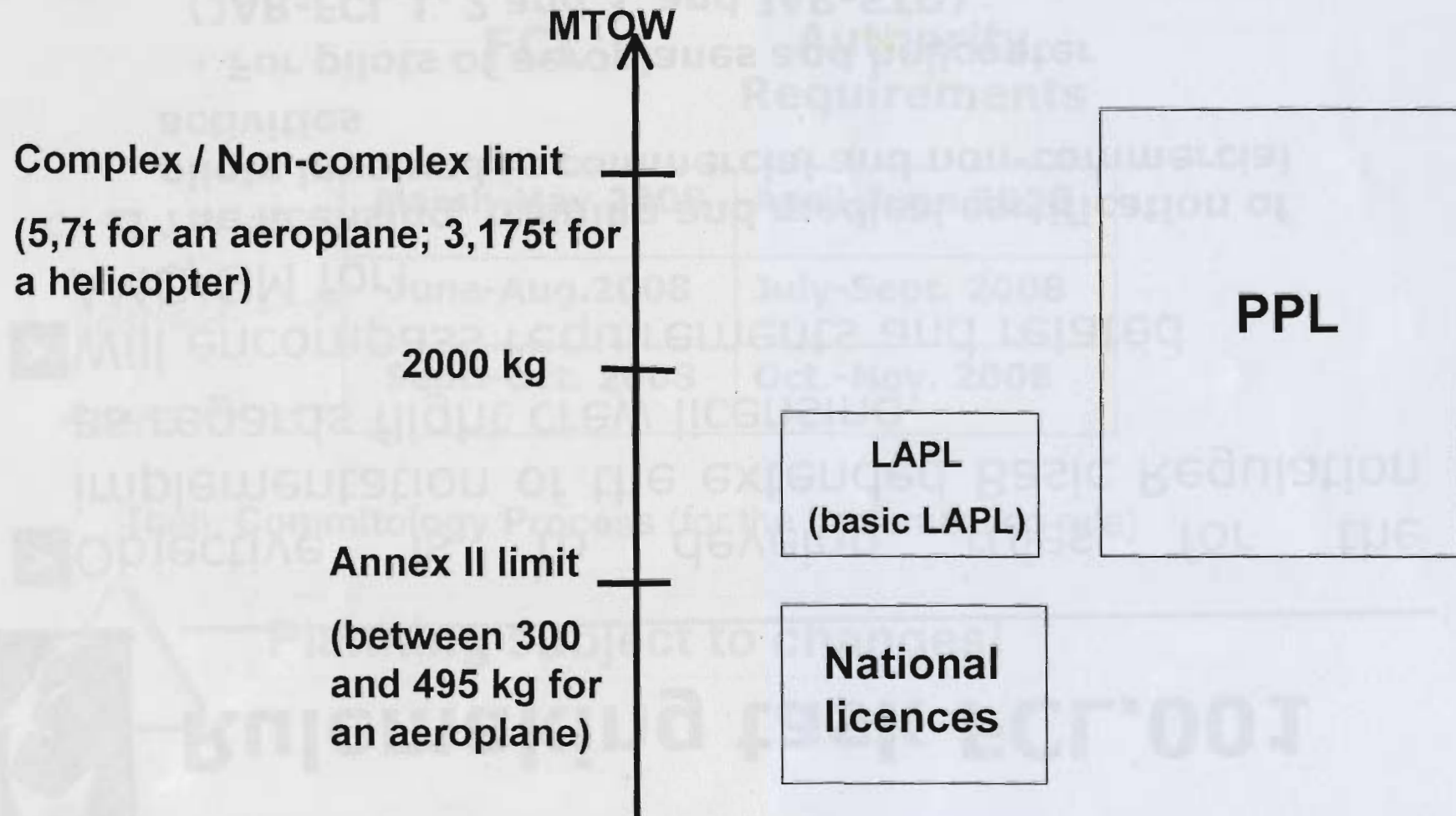
Rulemaking task FCL.001

- Objective is to develop rules for the implementation of the extended Basic Regulation as regards flight crew licensing.
 - Will encompass requirements and related AMC/GM for:
 - ✦ **The licensing, training and medical certification of pilots involved in commercial and non-commercial activities**
 - ➔ **For pilots of aeroplanes and helicopter (JAR-FCL 1, 2 and 3, and JAR-STD)**
 - ➔ **For pilots of aircraft not included in JAR-FCL, such as balloons, gliders and airships (ICAO Annex 1 and existing national regulations).**
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Non complex non-commercial: different licences (draft)





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Privileges (draft)

PPL

- ✧ act without remuneration as pilot-in-command or co-pilot of aeroplanes/helicopters/airships engaged in non-commercial operations.

LAPL

- ✧ act without remuneration as pilot-in-command within the appropriate aircraft category engaged in non-commercial operations.
 - ✧ fly single engine piston aeroplanes or TMG with a maximum certificated take off mass of 2000 kg or less, carrying a maximum of 4 passengers, such that there are never more than 5 persons on board of the aircraft.
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Commitology Process

A democratic process

But

**It makes the adoption of national
variants complicated**

And...



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IMC rating

Though it has strong support in the UK

**There is little or no support for the IMC
rating**

OTHER SECTORS OF
In the industry

In other Member States



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The way forward

During transition period of up to 4 years

➤ **Allow the UK IMC rating to continue ~~in the short term.~~**

➤ **During that time**

✕ **Studies will start to check whether the IFR rating is adapted to PPL and to address the issue of a possible European IMC rating.**

← SIMPLIFIED IR OR A

✕ **Work to convince opponents throughout Europe**



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OBJECTIVE

**Find a European solution to the
issue before the end of the
transitions period.**

The CAA perspective

- EASA-FCL consultation in March 2008
- CAA will explore with EASA avenues to protect the privileges of current IMC rating holders
- CAA will support EASA rulemaking group to review potential for a European solution