

# Whither the IMC rating?

Members have been seeking information from AOPA and the CAA on the future of the IMC Rating. **Nick Wilcock** provides an update.

There are basically three areas of concern:

## 1. Is there a deadline by which time I need to have completed my IMC Rating training and testing?

The answer to this 'No!' Our CAA friend Cliff Whittaker has stated: "It will be possible to add or renew an IMC rating on a UK non-JAR/non-EASA licence into the future, but within a few years those licences will no longer be valid for EASA aircraft". The CAA website already indicates that those of you who do not hold a 'UK non-JAR/non-EASA' licence will shortly be able

to apply for a supplementary United Kingdom licence, within which your new IMC Rating may be included. However, under current EASA proposals, as Cliff has said, within a few years the IMC Rating may not (unless 'grandfathered') be valid for use on EASA aircraft.

## 2. Will I be able to 'grandfather' my existing IMC Rating?

EASA admits that it cannot remove any existing privileges from those so qualified. So the likely effect of this is that anyone who 'holds or has held IMC Rating privileges' before a certain date will be able to have these privileges included in an EASA pilot licence, probably as an 'Instrument Rating (Restricted UK)' which, despite the description (and anything else you might have read elsewhere), will be identical to the existing IMC Rating. This will be valid on both EASA and non-EASA aircraft. But as yet, neither we nor the CAA know this date. The CAA has written to EASA seeking clarification, but must await the outcome of the Agency's discussions with the European Commission before it can commit further. If, despite further chasing up, EASA fails to respond, there will come a point when the Authority will be obliged to declare at least an interim position. However, for them to do so prematurely poses clear risk.

## 3. What will happen to the IMC Rating under EASA?

The €64,000 question! You may be aware that EASA published its *Notice of Proposed Amendment 2011-16 'Qualifications for flying in Instrument Meteorological Conditions'* for consultation at the end of last year. Regrettably, despite earlier assurances, this NPA failed to include a suitable proposal for the future of the IMC Rating. Consultation responses have therefore been raised accordingly. Members will already have noted the AOPA

(UK) response on this website; however, following our initiative, the CAA has responded in a similar vein:

### Comment:

JAR-FCL 1.017 allowed for national ratings not included in JAR-FCL to be added to JAR-FCL licences and used in the airspace of those countries only, as follows:

*JAR-FCL 1.017 Authorisations/Ratings for special purposes*

*Authorisations/Ratings for special purposes associated with a licence (e.g. IMC flying, towing, aerobatics, dropping of parachutists, etc.) may be established with the Authority in accordance with the requirements of that JAA Member State for use solely within that Member State's airspace. The use of such an authorisation/rating in another JAA member State's airspace requires the prior agreement of the State(s) visited, except where a bilateral agreement exists.*

Retaining a similar requirement in Part-FCL would satisfy the needs of UK pilots wishing to gain the UK IMC Rating in the future.

### Justification:

It is noted that Article 4 of the Aircrew Regulation was amended at the EASA Committee to make provision for member states to allow pilots to exercise limited privileges within the airspace of the

member state concerned before qualifying for a LAPL.

The UK IMC Rating may be regarded as an interim step towards obtaining the EIR or the modular IR. It is proposed therefore that by analogy a similar provision may be made for national ratings for flight under IFR to be exercised within the airspace of the relevant country only.

### Proposed Text:

FCL.600 IR - General

- (a) Except as provided in FCL.600(b) and FCL.825, operations under IFR of an aeroplane, helicopter, airship or powered-lift aircraft shall only be conducted by holders of a PPL, CPL, MPL and ATPL with an appropriate to the category or aircraft or when undergoing skill testing or dual instruction.
- (b) In member states where national legislation permits flight in accordance with IFR under specified circumstances, the holder of a pilot licence may fly under IFR in the airspace of that member state only, provided that the pilot holds the national qualification of that member state appropriate to the circumstances of the flight.

Members should note that AOPA and other aviation organisations have been working closely with the CAA to formulate a largely coordinated UK response to EASA concerning the future of the UK IMC Rating. We will bring you further news when it becomes available. ■



## Regional airlines back GA

Excellent news from Cologne, where the regional airlines have unequivocally come round to the view that it's not in their interests for EASA to strangle GA with charges. It's taken us years of work to get this point, and we're grateful to the European Regions Airline Association for stating clearly that EASA's proposed charges would have serious implications for airlines which rely on GA to provide the pilots of the future.

It may seem obvious to us, but in Britain it is not accepted that GA feeds pilots to the airlines. In its last Strategic Review, the CAA stated that it does not – but that's because they were following the British Airways line, which is that BA only poaches pilots from other airlines so it considers GA to be an irrelevance. The regional airlines from which BA takes its pilots have a different view, and now they are setting it out clearly.

At the December meeting of the EASA Advisory Body I made the point yet again that GA cannot afford EASA's charges, which are set at €246.38 an hour for any work they do. EASA's massive overheads, big offices and crowds of staff are not there for GA, but for the airlines. We don't need highly-paid Airbus engineers overseeing PA28s. It is illogical that GA should pay

