

European licence conversion

Everything you need to know about chopping your licence in for an EASA model explained by Nick Wilcock

Unless you've been living on Mars for the past few years, by now you will undoubtedly be aware that EASA are in the process of inflicting new regulatory

proposals for flight crew licensing of quite Byzantine complexity upon us. There is no safety need for these regulations whatsoever; they are purely the result of Europe's Regulation 216/2008 – the so-called 'Basic Regulation' for flight crew

licensing.

So, please respect Rule 1 – **Don't shoot the messenger!**

Although my own opinion of EASA cannot be printed in a magazine which might be read by those of a sensitive nature, the aim of this article is to try and guide you to a better understanding of the forthcoming changes. The CAA has very helpfully produced its 36-page document entitled European Legislation - The Expected Effects on the Licensing of Pilots in the UK, together with a list of nearly 40 FAQs; however, any document which requires 36 pages to describe the changes due under forthcoming Eurocracy is in itself indicative of the sheer complexity involved in these changes.

I am deliberately restricting the scope of this article to **Private Pilot Licences (Aeroplanes) issued by the UK CAA**, both the old-style 'UK PPL' and the current JAR-FCL PPL. Changes which may affect NPPL holders will be considered in a later article; those affecting FAA licence holders are in such a state of turmoil that at this stage I'm not even going to try.

Do I really need to convert?

At this point in time, the answer is probably 'no'. In any case, it will depend upon the type of licence you hold. JAR-FCL PPLs are issued for five years, whereas UK PPLs and the forthcoming EASA part-FCL PPLs are lifetime licences. The most unlucky person would be someone whose JAR-FCL PPL reaches its five year re-issue date before 8 April 2012 (the earliest date for the issue of part-FCL PPLs) as he or she would have no option but to apply for a five year re-issue. Anyone else can comfortably wait for a while, because you will be able to use your existing licence, including any privilege contained therein, for a few years yet. And no, you will *not* need to convert a UK PPL to a JAR-FCL PPL and then to an EASA PPL. Let me repeat that, **you will not need**

to convert a UK PPL first to a JAR-FCL PPL and later to an EASA PPL!

EASA and non-EASA aircraft

Most light aircraft will become 'EASA aircraft', irrespective of their country of origin or national registration. So a PA28 or Cessna 152 will become an EASA aircraft and you will eventually need an EASA PPL to fly it. However, other aircraft such as ex-military, permit-to-fly homebuilts and others will not. If, for example you *only* want to fly a Chipmunk or a Tiger Moth and you have a UK PPL, you will be able to carry in doing so without any need to convert your licence in any way. The CAA is also intending to amend the Air Navigation Order to allow you to fly both EASA and non-EASA aircraft using an EASA PPL. But they don't have the power to change the ANO to allow you to fly both



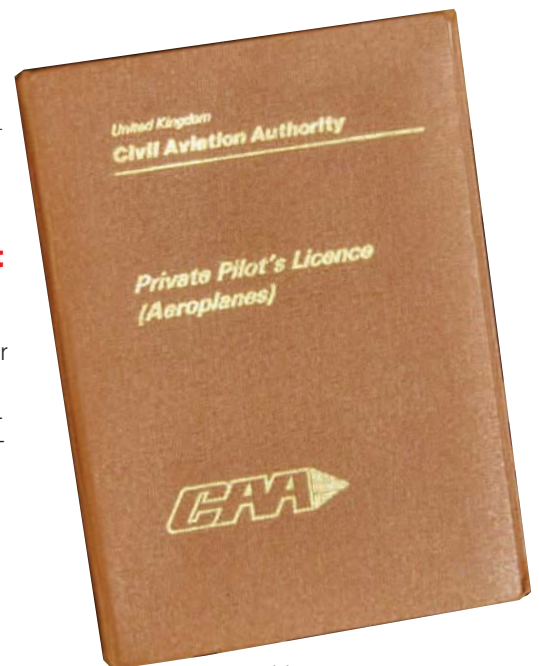
if you only fly a Tiger Moth there is no need to convert your licence

breeds on a non-EASA PPL. If you're not sure whether your favourite aircraft is an EASA or non-EASA aircraft, the easiest way to find out is to look it up on the CAA's G-INFO database.

By when do I have to convert?

The CAA will be able to start issuing EASA PPLs on 8 April 2012, so any JAR-FCL PPL reaching its five year re-issue point after that date will be re-issued as a lifetime EASA PPL. It would be unwise to convert a JAR-FCL PPL until you really need to, because some Ratings which can be included in JAR-FCL PPLs cannot under current proposals be included in EASA PPLs. Also some activities which don't currently require Ratings *will* do so in EASA PPLs. Remember when we were promised that 'nothing would change under EASA'? Hmm....

You will be able to continue to use any existing PPL until 8 April 2014, including any associated Rating privileges. Between then and 8 April 2015, you will still be



able to use any existing PPL, but will be restricted to private use only and to aircraft of less than 2000kg MTOW (or mass if you prefer) and with no more than four POB including the pilot.

Any licence used to fly an 'EASA aircraft' must physically have become an 'EASA' licence by April 2017 – which would be the last date on which a five year JAR-FCL PPL issued or re-issued in April 2012 could still be valid.

Conversion process

JAR-FCL PPL holders will simply need to apply for a re-issue at the five year point exactly as they do currently, under the requirements stated in Form SRG1102, together with Form SRG1187 and by paying the fee. For UK PPLs, the CAA have indicated that the current system for converting a UK PPL into a JAR-FCL PPL will be the same when converting a UK PPL into an EASA PPL. The current process is as follows:

Eligibility: You need to hold a valid UK PPL, to have at least 70 hrs total time on aeroplanes and to 'Demonstrate the use of radio navigation aids to the satisfaction of a Chief Flying Instructor.' Once you've met these requirements, there is some paperwork to complete, consisting of Form SRG1104 and, predictably, Form SRG1187 plus the inevitable fee (Remember Rule 1!). There is no theoretical knowledge exam, you'll be pleased to know, but there is a box to tick on Form SRG1104 which requires you to declare that you have studied the 'relevant parts' of AMC FCL 1.125. 'Relevant' is clearly a subjective term, so I leave it to you to decide quite how you choose to



meet this requirement.

Radio Navigation: There are a number of methods by which you can achieve the required logbook endorsement:

● **IMC Rating.** Clearly if you hold, or have held, a UK IMC Rating you will have already demonstrated adequate radio navigation skills to the Examiner. There's no time limit for this, so all you should need to do is to provide proof to your favourite CFI and hand him or her a pen.

● **Revalidation 'training flight' with an instructor.** One of the routine requirements for revalidation by experience is to complete a 1 hr training flight with an instructor. This isn't a 'check ride', it's an opportunity to refresh your skills and to learn new ones. So, why not ask the instructor to give you some instruction in radio navigation? Don't forget though that, as stated in LASORS, the instructor must also *'select suitable items of general handling to fulfil the purpose of the JAR-FCL requirement and brief how these will fit into the profile for the purpose of the applicant's revalidation request.'* If you've previously considered navigation by electricrky to be cheating or rather too twentieth century for your tastes, it might be wise to take some ground instruction as well.

● **AOPA Mentor Scheme.** If you already have some knowledge of radio navigation, but perhaps lack confidence of using the aircraft equipment competently, then the AOPA Mentor Scheme is a good option. As a 'mentee', you would fly as PIC with a more experienced mentor who will be able to give you assistance and confidence in the art of radio navigation. Or perhaps you might also be unfamiliar with the spangly new Garmin wonder-box fitted in your aeroplane and may simply need a mentor to show you how to use it. The Mentor will be able to suggest whether you should take some formal instruction, but any good CFI should be able to decide whether the mentor's opinion of your radio navigation abilities is sufficient to enable him or her to

endorse your logbook. Full details of the AOPA Mentor Scheme may be found on the AOPA website <http://www.joinaopa.com>

● **AOPA Radio Navigation Course.** This course was designed to encourage PPL pilots to obtain formal training in radio navigation procedures for use under VFR in accordance with the privileges of their licences. It consists of at least five hours of instruction with an FI and includes a short flight test with an Examiner. One advantage of the course is that it will give you a credit of up to five hours towards the UK IMC Rating. You should also be able to arrange for the flight test to be included in Section 3A of a SEP Class Rating revalidation LPC, which may prove a cost-effective revalidation option for some. Full details of the AOPA Radio Navigation course may also be found on the AOPA website.

Medical: The minimum requirement for a UK PPL, JAR-FCL PPL or EASA part-FCL PPL is a JAA Class 2 Medical Certificate; this will become an EASA part-MED Class 2 Medical Certificate upon revalidation or renewal.

Application: Once you've met all the conversion requirements, you will need to complete the paperwork and send it to the CAA, together with your Medical Certificate, Evidence of Identity and Personal Flying Logbook(s) – and the fee, of course. However, the CAA website states that 'same day' processing is available for UK National to JAR-FCL flight crew licence conversion, provided that you present your documentation to the Public Counter at Gatwick before 1200 local.

English Language Proficiency

If you haven't yet had an assessment of English language proficiency at 'Level 6 – Expert' included in your PPL, you should do so without delay. The simplest way to do this is to ensure that the Examiner who completes the paperwork for your next SEP Class Rating revalidation or renewal also

remembers to sign Section 6 of your Form SRG 1119.

Alternatively, if for some reason the Examiner feels unable to sign Section 6, language proficiency may also be assessed by other means acceptable to the CAA. These include informal assessment at FI seminars and CAA safety presentations; at the time of writing AOPA is seeking approval to extend this to formal AOPA presentation sessions.

Licence Privileges

After all the cost and effort involved in converting the PPL which has served you perfectly well for decades into an EASA part-FCL PPL, you might well ask whether you will gain any new privileges. At this stage I can only say 'Perhaps'. As PPL holders will undoubtedly be aware, their VFR privileges are restricted by the ANO. UK PPL and JAR-FCL PPL holders without instrument qualifications may not fly out of sight of the surface and must have at least 3 km of flight visibility outside CAS in order to fly under VFR. However, there is no indication that this will apply to the EASA PPL, so you might be able to operate to ICAO VFR limits. Not only do these permit you to fly in VMC out of sight of the surface, but they also permit you to fly in as little as 1500m flight visibility if below 3000 ft amsl, clear of cloud, in sight of the surface and flying at less than 140 KIAS. Which means that if you were to meet yourself coming the other way head-on in such conditions, you might have as little as 11 seconds to see and avoid a collision!

IMC Rating

I've managed to avoid mentioning the IMCR in any detail so far, but cannot really put it off any longer. The IMCR is a proven instrument qualification which has enhanced the UK's GA safety record immeasurably; it also removes the ANO VFR restrictions which apply to pilots without instrument qualifications. Currently the CAA issues some 350-400 IMCRs per year, but the future of the IMCR is by no means assured. EASA has promised to take the IMCR into European Regulation, but has yet to indicate how it

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intends to deliver on this promise. The CAA will continue to issue the IMCR, but as it currently could only be used on suitable non-EASA aircraft, you would need an additional 'United Kingdom' PPL within which the IMCR could be included. The ANO is being amended to make provision for this; however, it is possible that EASA might yet have an attack of reality and adopt the existing provisions of JAR-FCL 1.175(b), which state "In JAA Member States where national legislation requires flight in accordance with IFR under specified circumstances (e.g. at night), the holder of a pilot licence may fly under IFR, provided that pilot holds a qualification appropriate to the circumstances, airspace and flight conditions in which the flight is conducted. National qualifications permitting pilots to fly in accordance with IFR other than in VMC without being the holder of a valid IR(A) shall be restricted to use of the airspace of the State of licence issue only." We will have to wait for EASA's much-delayed FCL.008 Notice of Proposed Amendment (due for release in September 2011) before learning what the eurocrats actually intend, but rest assured that AOPA will fight tooth and nail to secure the best deal for the future of the IMCR, certainly within UK airspace.

However, since you may continue to use any privileges contained within a UK PPL or JAR-FCL until April 2015, it would be most unwise to convert your licence until policy concerning the IMCR has been agreed. EASA have again been reminded

that existing IMCR privileges cannot be taken away, so they must propose appropriate legislation accordingly. Watch this space, as they say!

Night Rating / Qualification

Rule 20, as I'm sure you will be aware, requires all night flying in the UK, apart from SVFR flight in Class D CTRs, to be under IFR. However, EASA FCL.600 requires that to fly under IFR you must hold an Instrument Rating. As was indeed the case under JAR-FCL 1.175(a). But whereas JAR-FCL 1.175(b) gave suitably flexible provision to meet both ANO and JAR-FCL requirements, EASA does not. So there will either need to be a suitable ANO amendment to include 'night VFR' or the CAA will have to sort out a General Exemption, for which they will have fewer powers after April 2012. Again, watch this space!

Aerobatics

Currently, there is no such thing as an Aerobatic Rating. Pilots who wish to indulge in aerobatics are not even required to take any formal training; however, those without any previous aerobatic experience are well advised not to attempt to teach themselves. AOPA and the British Aerobatic Association currently offer suitable courses, details of which are on the AOPA website.

However, the eurocrats have decided that, by April 2015, an Aerobatic Rating will be required for any pilot who wishes to perform aerobatics in EASA aircraft. The requirements for the rating are broadly similar to those for the AOPA Basic

Aerobatic Certificate, but with one huge difference. Currently EASA propose that a pilot must have achieved not less than 40 hours as PIC since licence issue before applying for an Aerobatic Rating after completing the training course. IAOPA, the BaeA and the FAI's International Aerobatic Commission view this prerequisite as wholly unreasonable and intend to fight it as best they can.

And finally...

Congratulations if you're still with me and haven't simply turned puce with justifiable rage. I sympathise with everyone who queries the sanity of EASA and its proposals; as an example of the absurdity which might well result, consider the situation of a private pilot of the near future who wishes to fly some aerobatics above cloud from an airfield blanketed by low stratus at 800 ft, with tops of 1500 ft. If he flies a Bulldog, he'd just need an IMC rating and a valid PPL with SEP Class Rating. But if he flies a Pup, a less complex aeroplane with broadly similar performance, under current EASA proposals he'd need an EASA Instrument Rating, an EASA Aerobatic Rating and a valid EASA PPL with SEP Class Rating. Where's the sense in that? Clearly there isn't any. Was there really anything wrong with the old lifetime PPL and 13 month logbook stamp?

I reckon if Orville and Wilbur had ever suspected that an organisation such as EASA would be created, they'd have stuck to fixing bikes!

And thanks for not shooting the messenger! ■



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AOPA is working with its members to reduce the number of infringements. It is every pilot's duty of care to plan a flight and fly properly.

GA must take responsibility to reduce the unacceptable level of infringements.

It is counter-productive if pilots think a transponder identifies them for CAA investigation. Pilots should realise that a transponder could save their lives and should be switched to ALT mode.

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