

# The IMC rating: all hands to the pumps

AOPA is asking all members to get involved in the campaign to save the IMC rating, which will be killed off by the European Aviation Safety Agency unless special measures are taken to allow it to continue. Please read as much of this stuff as you can handle, then write to your MP asking him or her to pose questions to the Department for Transport explaining that the loss of the IMC rating would be a huge blow for safety in UK aviation, that its loss would be due solely to an administrative change, and that simple political steps can be taken to preserve it.

The irony is that EASA does not want to kill off the IMC rating; indeed, its Deputy Head of Rulemaking Eric Sivel has gone to some lengths to try to get a consensus in its favour across Europe. The threat to the IMCR is an unintended consequence of European harmonisation, and a means can and must be found to save it. The problem is that no mechanism has been created by which a national rating, valid in one country or geographical area, can be attached to an EASA licence – and we'll all have EASA licenses after 2012. Such a mechanism must now be created, and it is through your politicians that this can be arranged.

**The IMC rating is one of the major reasons why Britain's general aviation safety rate is so much better than most of the rest of Europe, despite our unpredictable maritime climate. It's difficult to be precise about how much safer Britain is because countries keep statistics differently and don't all have comparable GA industries, but a simple tally of dead pilots is a good rule of thumb. AOPA looked at comparative death rates about three years ago, when it found that in France there were an average of 90 fatalities per year in all forms of GA; in Germany there were about 80, and in Britain the average was 20 to 25. This situation has pertained for some time; more than 20 years ago, writing in the CAA publication *Horizon*, the then Chairman of the CAA Sir Malcolm Field said the CAA's research showed that general**

**aviation in the UK was four times safer than elsewhere in Europe.**

The reasons why the UK is safer are many and various, but one of them is undoubtedly the IMC rating, through which low-time pilots are taught to cope with instrument meteorological conditions and to get their aircraft safely back on the ground. Elsewhere in Europe, VFR minima are lower, and 'VFR on top' is legal without any training in how to get down when you can't find a hole in the cloud. The PPL who finds himself stuck in IMC will very quickly become an accident statistic.

AOPA does not want to foist the IMC rating on the rest of Europe; if for their own reasons they don't want it, that's their own affair, although the evidence shows it would improve their safety rates. But it must not be lost in the UK by default. There has never been any credible suggestion that the IMC rating is anything other than an enormous boost to safety. At a meeting at CAA headquarters in London in January 2008, Ben Alcott, then head of the CAA's Personnel Licensing Department, said that in all the years the rating has been available in the UK, during which some 25,000 people have gained it, only one pilot with an IMC rating and a properly equipped aircraft has been killed in actual IMC. During those 40 years the CAA has been audited at least 20 times by ICAO, and no suggestion has been made that the rating is anything other than a huge improvement on the PPL. As you see from the following pages, the number of pilots who ascribe their survival to the rating is significant.

But the industry working group set up by EASA to advise it on instrument flying, including the IMC rating, has done a hatchet job on the rating, telling EASA that claims that it is safe "are not supported by the facts". The contribution of a Europe Air Sports delegate on this group, called FCL-008, was described in the last issue of *General Aviation* and need not be rehearsed here; suffice it to say that instead of dispelling some of the myths surrounding the IMC rating for the benefit of non-British

members of FCL-008, the forum was used to condemn it.

## No solution

As far as EASA is concerned, FCL-008's briefing document is the GA industry's official position on the matter. It is a peculiarity of European consultation that the industry's advice to EASA should be secret from the industry, but this briefing document is in fact confidential. Eric Sivel believes the rating proposed by FCL-008, the 'En Route Instrument Rating' is, in his words, "the solution to the IMC rating problem." The En Route Instrument Rating (EIR) has been proposed by the same delegate who has attacked the IMC rating. Under it, a pilot who had passed the technical knowledge examinations for the full Instrument Rating would be allowed, after undergoing a flying

## IMC rating – the evidence

The following pages contain the testimony of a large number of pilots who credit the IMC rating with saving their lives, together with letters from people who say the rating has made them better, safer pilots. We also publish the results of a survey on the IMC rating to which there have been more than 1,000 responses.

This is necessary in order to dispel the myth that the IMC rating has no safety value. In writing to your MP, please make it clear that the rating is a proven lifesaver, and its loss would have dire consequences for UK pilots. We also need more evidence to back up these facts. If you have direct experience of the positive benefits of the IMC rating, please email your contribution to [info@richmondaviation.co.uk](mailto:info@richmondaviation.co.uk). The more evidence we have, the stronger our case.

## Saving the IMC rating – the salient points

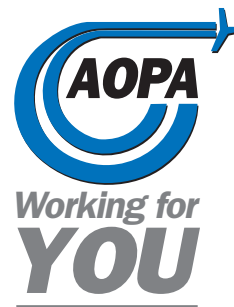
Here are some bullet points to consider when writing to your MP.

- EASA does not want to ban the IMC rating. It has worked to obtain a European consensus on it, but some countries don't agree.
- The IMC rating is one of the significant factors contributing to the UK's high GA safety rate, which is far better than the rest of Europe.
- It is designed to save low-time pilots from the consequences of running into bad weather, a greater problem in the UK than in most of the rest of Europe because of our maritime climate.
- The abolition of the rating is an unintended consequence of an administrative change. It is not a matter of standards or safety – quite the opposite. It is a matter of bureaucratic tidiness, and it calls for a political solution.
- The CAA has been operating the rating for 40 years, during which time it has been audited at least 20 times by the International Civil Aviation Organisation, which has never expressed any concern.
- There is no credible suggestion that it is unsafe, and there is a mountain of evidence that it makes better pilots and has saved many lives.
- The IMC rating is supported by every major aviation organisation in Britain, from the British Air Line Pilots Association to the General Aviation Safety Council and the Guild of Air Pilots and Air Navigators.
- While EASA is still discussing the rating, it cannot adopt it without the unanimous agreement of 27 states. An administrative omission currently prevents the UK from offering the rating to British pilots in UK territory. A device must be created to allow this, and this must be arranged through the political process.

course, to fly on airways in IMC. He would be given no instruction in how to make an instrument approach; if his destination was obscured, he would be required to find an alternate that wasn't. And if there wasn't one, he'd have to think of something else.

Despite what M Sivel says, the EIR does not begin to address the problems that are solved by the IMC rating and it cannot be considered as a replacement. AOPA has told M Sivel that FCL-008 has not fulfilled its allotted task and that its comments on the IMC rating are misleading and untrue. EASA must not be allowed to tell British politicians who seek a way in which the IMC rating can be preserved in Britain that the safety of the IMC rating is in question; it is not true.

The problem is that FCL-008 effectively gets EASA out of a thorny political corner, so there is no incentive for them to do the right thing. In order to avoid a JAA-style mess EASA wants all 27 countries to adopt every rating, and to do so





simultaneously. It says there will be no national ratings after April 2012. In considering some ratings, its task was easy; everyone needed a night rating, and there was no opposition to the mountain rating even from flat countries. But there was significant

opposition to the IMC rating, largely because it was misunderstood to be "equivalent to an IR with 20 percent of the training." As we make clear in this magazine, the IMC rating is no such animal, was never intended to be an 'IR lite' and allows the holder to do nothing more than he can do with a PPL, although it does slightly reduce visibility minima. Through its European affiliates AOPA has attempted to educate the doubters, but has been undermined by those in the UK who have acted to reinforce their prejudices. It has not been possible to get unanimous agreement on the IMC rating – some countries say their airspace structures do not allow flight in IMC outside controlled airspace – and that is why we face being forced to dump one of our most effective safety aids.

### Safety belt

It cannot be allowed to happen. AOPA's Chief Executive Martin Robinson says: "It's as though the British were banned from wearing seat belts because cars in another country didn't have them, and the drivers of a third country thought they were dangerous. This is no way to regulate safety. A sensible approach might have been to look at what worked best from a safety standpoint, and pick the best of that. But that is not EASA's way, so we must create a mechanism by which the IMC rating can be attached to an EASA licence, for use only in UK airspace.

"This is not a standards or a safety issue, it is an administrative issue, and it has a political solution. Bureaucratic tidiness cannot be allowed to put pilots' lives at risk."

As well as meeting with Eric Sivel at EASA on this issue, Martin Robinson has discussed it with the new chief executive of the CAA, Andrew Haines. Martin says: "When he was running the CAA, Sir Roy McNulty made great play of the fact that as far as EASA was concerned, the CAA was not going to settle for some low common denominator on safety. There can be no clearer example of

reduction to a low common denominator on safety than the abolition of the IMC rating. Mr Haines was very receptive to my arguments and responded positively."

### Write to your MP

AOPA is usually reluctant to mount write-in campaigns because over-use wears out the batteries and the workload on civil servants can be counter-productive, but in this instance letter-writing is the way forward. Please write to your MP seeking his or her help. Write it in your own words – "cut and paste" letters carry less weight. Try to keep it simple; our safety rate is higher than the rest of Europe partly because of something called the IMC rating, a short flying course which teaches pilots to keep control of their aircraft in cloud (otherwise a big killer) and to return safely to the ground. The European Aviation Safety Agency is harmonising rules across Europe on the basis of unanimous agreement of 27 states, but for various reasons, including lack of knowledge of the rating, or airspace restrictions, some European countries do not want a similar qualification. We do not believe that this should mean that the IMC rating should be banned in the UK, where it has been operating successfully for 40 years and has saved many lives. The IMC rating has the support of the CAA, the British Air Line Pilots Association, the Guild of Air Pilots and Air

**"It's as though the British were banned from wearing seat belts because cars in another country didn't have them, and the drivers of a third country thought they were dangerous"**

## Chief executive's diary:

### Chinese curses and an interesting New Year

There's a well-known Chinese curse that says 'May you live in interesting times!' – the inference being that boring is good and interesting can only spell trouble. Well, I don't remember times as interesting as these. As always, I try to do the greatest amount of good for the largest number of people, but that usually means somebody feels aggrieved. You can't say or do anything in this business without yanking somebody's chain. So be it.

Going back to November 17th when I last wrote this diary, I attended a meeting of the CAA Air Space Strategy Group. Participation in this group is important so as to keep an eye on how the UK plans to integrate with Single European Sky (SES) legislation. By and large this is a positive group which is not too 'interesting' in the Chinese context; it's debating issues like Functional Airspace Blocks, the first of which in the UK is planned roughly on the Liverpool-Dublin corridor.

A slightly more 'interesting' meeting came on the 18th when I sat in on a CAA interview with a member who infringed airspace in the Luton area. This chap was a pilot of many years standing, familiar with the area, who was bewildered at how he'd managed to get distracted and overstep the line in his own back yard. He accepted a caution and a requirement to fly several hours with an instructor in the area, which I think was a fair result.

On the 25th a group of light aircraft engineers meet CAA representative

Jonathan Nicholls at AOPA under an arrangement made by our Chairman George Done for a positive discussion on Part M. Very small LAEs have no real voice and have real concerns about the non-standardised way in which Part M requirements are implemented across the country. Jonathan Nicholls, with whom I'm quite impressed, asked for specifics and will take the matter forward. I'm confident we've started a good dialogue here.

The following day I was in Brussels for a meeting of the so-called Enlarged Committee to discuss Terminal Navigation Charges. Although sub-two-tonne and VFR aircraft continue to be exempted from charges other than in Austria and Germany, the opportunity is there for them to charge and we will watch the situation closely.

The first three weeks of December were very busy. On the 1st I took the train to Brussels for an Industry Consultation Body meeting, where the main topic was SES and the implementation of the first SESAR package, called IP1. This rounds off a number of Eurocontrol initiatives that needed to be resolved before we could move forward. GA's interest is mainly in the extension of 8.33 kHz radio to lower levels. The question in my mind is whether Europe will ever find the money to implement SESAR. Over the next 25 years you're talking €30 billion, which was a lot of money even when the aviation industry is healthy. The airlines are going to be hit with another



€9 billion a year in emissions trading charges soon, traffic is falling – if you were a bank manager and an airline came cap in hand for money to plough into SESAR, what would you say? Whichever way the cookie crumbles, GA has to be in there to make sure we have access to the skies of tomorrow.

On December 2nd I was at EASA in Cologne for a meeting with Eric Sivel and other EASA Senior Staff to discuss issues like Part M, Annex II aircraft, and ops and licensing including the very 'interesting' UK IMCR. The AOPA group was made up of Mike Watt from Cabair, Cliff Spink of Historic Aircraft Association, Jeremy James of the Helicopter Club of Great Britain, Nick Wilcock of GAPAN, together with AOPA Germany and AOPA Denmark. Good news for the HAA – only those Annex II aircraft involved in commercial operations will be affected by EASA's plans. Eric Sivel made it clear there's no chance of reopening FCL.008 even though it hasn't done its job; the Notice of Proposed Amendment arising from it won't be out until late this year. Whatever the NPA says, we will be seeking a way to preserve the IMC rating in the UK. Europe accepts regional variations in many areas – they're not trying to make us all drive on the right – and they can't harmonise the weather.

On the 3rd I met with Frank Bannister of Besso and our legal adviser Tim Scorer to finalise issues surrounding the Mentoring Scheme. Two days later they presented their plans to the AOPA Members Working

Navigators, the General Aviation Safety Council, the Aircraft Owners and Pilots Association, the RAF Flying Clubs Association and others. The loss of this vital qualification is an unintended consequence of European harmonisation, because no provision has been made to allow national ratings to be attached to EASA pilots' licences. This is an administrative oversight which must be remedied in the interests of safety. Please ask Transport Minister Sadiq Khan why this should be necessary, and how the DfT's European counterpart DGREN can repair the damage.

You could use Martin Robinson's seat belt analogy, which is easily understandable and very apt. You must mention that while EASA is still deliberating over ratings, this is a wider issue of the unintended consequences of an administrative change in the way Europe deals with pilots licences, which can only be addressed on a political level.

Please also write to your MEP seeking support in the European



Parliament for an administrative change by EASA. If you live in Yorkshire and the Humber you're in luck – your MEP is Timothy Kirkhope, a GA pilot with an IMC rating. Tell your MEP that if he or she wants clarification, they should talk to Mr Kirkhope. ■

**Left: MEP Timothy Kirkhope, a GA pilot with an IMC rating**

## IMC survey establishes the facts

Up to last year there has been little research on the IMC rating and its users. But an online survey conducted by Steve Copeland of the AOPA Working Group has produced some data which, while far from definitive, is much better than anything on which the advice to EASA has been based, and gives a clear picture of how the rating is used in the real world.

Respondents were asked a series of questions designed, among other things, to establish what purpose their IMC rating

served. They were asked to describe their use of the rating with five tick-box options: to get you home in bad weather; primarily for climbing through cloud to fly VFR on top; for IFR touring around the UK; for business travel; and for improved SVFR privileges in controlled airspace. Percentages do not add up to 100 because people could tick more than one box.

The survey included IMC rating students, PPLs who are considering an IMC rating, professional pilots, and pilots who are exercising the privileges of the IMC rating on

the basis of a non-UK instrument rating. Of 1,011 responses, 468 who held a current IMC rating answered this 'usage' question. A total of 379, just over 80 percent, said they considered the IMCR to be a 'get you home' rating for use in bad weather; 323, or 69 percent of respondents, used it to climb through cloud to fly VFR on top. 207, or 44 percent, said they used it for IFR touring in the UK, and 90 – just under 20 percent – used the IMC rating for business flying. 214 pilots, or 45 percent, said they used it for the

Group, some of whom had underestimated the amount of effort that's gone into making this Scheme work and were surprised at the outcome. On the 6th I was a guest of the British Women Pilots Association and handed out their awards. They're a great organisation, and they do a lot to support women in aviation. Some BWPA members like Caroline Gough Cooper and Pauline Vahey also give practical help to AOPA.

On December 7th I was at the Airspace Infringements Working Group, where the perennial problem of GA infringements was discussed. More good work is needed; GA must try much harder to reduce the overall level of infringements. Some participants in AIWG do not like our involvement – perhaps we ask too many questions. I think that headline-grabbing numbers that disguise the true safety picture are counter-productive, and if that yanks somebody's chain, so be it.

On the same day I was a guest of the Aerodrome Operators Association at their conference and awards dinner. AOPA was invited to nominate and present an award for the best GA aerodrome and chose Michael Bletsoe-Brown's Sywell. Bletsoe-Brown has spent years and a lot of money battling his local authority to get his hard runway down. Now he's managed it, and Sywell can diversify to offer a range of operations. Hats off to him.

On the 9th and 10th I was back in Cologne for the EASA Advisory Body meeting, discussing how EASA evolves its rulemaking in Europe. This body advises the Board of Management on EASA's budget and doesn't get involved much in specifics; I spoke on deficiencies in the way rulemaking was managed, and the need to base it on risk assessment and cost-benefit analysis. Before

the JAA took over we were told that European harmonisation would make flying easier in Europe, create job opportunities and have all sorts of beneficial effects, few of which ever materialised. In the UK we have a legal requirement to go back after a period and look at whether a new regulation had the desired effect. There is no such requirement in Europe. And there's a basic dichotomy between regulators and industry – to the former, creating and enforcing regulation is a full-time job and an end in itself. To industry, it's mostly a peripheral side issue and a costly distraction.

December 16th took me to a CAA Directorate of Airspace Policy discussion on the future of Class F airspace which has been created up the east coast and around the Vale of York to facilitate commercial movements. Class F is effectively mandatory radio and radar airspace, but ICAO has pulled the CAA up on it because it's only supposed to be used as a temporary fix, and something permanent needs to be devised. This was formerly the Open FIR – do they go to a higher airspace classification, or revert to Class G? The discussion continues.

We all had a break over Christmas and the New Year, then on January 4th I travelled to Gloucester to meet David Roberts and Jim Thorpe of Europe Air Sports. I'd asked for a meeting to see if we could find some common ground on saving the IMC rating, but after several hours of discussion we ended up back where we started.

On the 6th George Done and I met with the new Chairman of the CAA, Dame Deidre Hutton, and Chief Executive, Andrew Haines. This was more positive as far as the IMC rating was concerned, and indeed many other GA topics. Dame Deidre is politically

astute and wise in the ways of quangos and mandarins; Andrew Haines is a refreshing new CEO who comes from outside aviation and carries no baggage, is not hidebound by tradition for its own sake, and wants to ensure that everybody gets a fair hearing. George and I came away thinking they've got the right people in the right jobs. We told them we'd like to see the CAA go into bat more forcefully in Europe when it has a solid safety case. There seems to be an attitude that speaking up somehow makes us poor Europeans. Let's take what's best from Europe, but if we think we have the right tools in the UK, let us use them.

On the 8th I met with Ofcom to discuss the current consultation on VHF Spectrum Charging. There's a full story on this elsewhere in these pages, so I'll just say they're trying to use market disciplines to regulate a market that doesn't exist.

On the 12th I presented some views to GAPAN, the Guild of Air Pilots and Air Navigators, on issues facing GA. GAPAN and AOPA have many members in common and many issues on which we agree. We are both concerned that the self-improver route is fading away, that Europe wants instructors to have commercial licenses, which increases cost and reduces quality, and many other issues. I was well received and I look forward to building relations with the Guild.

Ahead of me at time of writing are meetings of the Industry Consultation Body, EASA Advisory Body and CAA departments, and I'm sure that a lot of these meetings are going to be 'interesting'. Happy New Year!

**Martin Robinson**

→ improved SVFR privileges in CAS.

The numbers put down by a minority of people would tend to indicate that bad weather is nothing more than an



inconvenience for them and not much gets in the way of their flying, but Steve Copeland spoke to a number of airfields which might be considered as good destinations in poor conditions, including Birmingham, Coventry, Cambridge, Southend and Cranfield.

Everywhere the story was the same – when visibility drops below VFR minima, GA traffic vanishes.

To refine the IFR figures respondents were asked: “With regard to flight planning, is every flight in which the IMCr is exercised a fully-planned IFR flight with the correct approach plates, MSA, fuel and diversion planning

carried out?” 454 people answered this question, with 298 – 65 percent – saying they did full IFR preparation, and 156 saying they didn’t.

Some 825 respondents filled in the section covering the number of hours they flew each year. Of these, 103, or 12.5 percent, flew 25 or fewer hours a year. Another 272, or 33 percent, flew between 26 and 50 hours a year, while 256 – 31 percent – flew between 51 and 100 hours annually. 77 pilots, 9.3 percent, said they flew between 101 and 150 hours a year, while 98, just under 12 percent, flew more than 151 hours each year.

The majority of respondents, 810 out of 1,011, also calculated the number of hours they flew in IMC every year. 673 pilots, just over 83 percent of the total, flew less than 25 hours. 89 pilots (11 percent) flew between 25 and 50, 20 (2.5 percent) flew between 50

and 100 hours, and seven (less than one percent) flew between 100 and 150 hours. 21 pilots, (2.6 percent) flew more than 150 hours.

Reviewing the results, AOPA’s Chairman Prof George Done said: “Looking at the responses, it’s clear that 93% have their validity up-to-date, 97% plan to keep the rating current, 94% would be concerned if the IMC rating ceased to exist. The majority of IMCR holders make only little use of the privileges in terms of flying approaches and full instrument flight, but since the stats also show that 80% of respondents regard the rating as a ‘get you home option’, then it is clear that the rating represents a valuable extra safety reserve, to be called upon if necessary. I would equate this to being a safer and hence a better pilot.

“Most IMCR holders that I have spoken to, and this includes instructors, agree that the training, whilst not equal to that necessary for an IR, sharpens up one’s flying skills, particularly in the areas of holding headings and altitudes more accurately, providing better situational awareness, and better weather appreciation, allowing a greater range of strategies available to cope with the unexpected, such as weather deterioration.

“It’s also worth pointing out that instructors at AOPA’s Flight Instructor Refresher Seminar at Booker in November 2009, when asked how the potential loss of the IMCR would affect them, indicated it would have a significant effect. The ability to conduct training away from an airfield subject to adverse visibility or low cloud cover was one factor, the other being simply loss of business. One CFI I have spoken to didn’t see the prospective EIR generating much future business.” ■



Keith Wilson

Above: instructors will be affected by the loss of the IMC rating and don’t see the En Route Instrument rating as filling the gap

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## The genesis of the IMC rating

The IMC rating came about in 1967 because AOPA's Ron Campbell – author of many flight instruction books still in use today – believed that the gap between the PPL and the full Instrument Rating was too great, and that the vast majority of GA pilots needed enough basic skills to ensure their survival in bad weather. There had been a spate of accidents involving PPLs scud-running into masts, trees and hillsides. Ron Campbell told the AOPA Instructor Committee that the vast majority of GA pilots would never attain an Instrument Rating and proposed the IMCR as a method by which they could save their own lives when the inevitable happened.

There was an outcry from professional aviation bodies and others who feared that such a rating would encourage the unqualified to launch into conditions for which they did not have the skills. To their credit, the Civil Aviation Department of the Board of Trade backed Ron Campbell; it was difficult to argue that the IMC rating might be a danger to life when people were so obviously dying for the want of it. The syllabus was written by Ron Campbell and Peter Skinner on a golfball typewriter at Ron's home near Guildford.

The Board of Trade's AIC setting out the thinking behind the IMC Rating, dated November 27, 1967, stated: "Inexperienced pilots when attempting to exploit the capabilities of modern well-equipped aircraft have frequently run into trouble, sometimes with fatal results, in weather conditions that have imposed on them a task beyond their experience and training. A further consideration is that the Special VFR Clearance which permits private pilots to fly in Control Zones without complying with Instrument Flight Rules, is at present granted to a pilot

irrespective of his own experience and piloting skill, and it is left to him to decide whether the weather will permit him to navigate safely. This has led to pilots getting into difficulties in areas of heavy traffic density.

"There will always be private pilots who wish to fly only in fine weather for recreation purposes, and for these, the existing qualifying standards for the licence are adequate. However, many pilots wish to use their more sophisticated aircraft mainly as a means of all-weather transport and it is evident that the standards for the private pilots licence do not provide adequate training for this kind of flying.

"Private pilot accident surveys have reflected these trends and co-ordinated efforts to improve matters by educational methods through the flying clubs and private pilots organisations have not been wholly successful.

"After detailed consultation with all interested parties, it was agreed that the time had come to introduce more direct measures to ensure the instrument flying competence of those private pilots who wished to fly in all weather conditions. By improving the standards of a private pilot's instrument flying, the safety of his passengers would also be safeguarded as well as the safety of other users of the same airspace and people on the ground.

"It was considered that it might be too restrictive to require a full instrument rating for flights in IMC outside controlled airspace, but nonetheless it was agreed that pilots who undertook flights in IMC should be trained in instrument flying."

The document outlined some of the factors that had been taken into account when deciding what measures should be introduced. The idea of a certain amount of compulsory

instrument training in the PPL was rejected because it was discouraging to those who wished to fly only in fine weather. Pilots with PPLs would be restricted to flights under VFR and in conditions of reasonable visibility, and they would no longer be permitted to fly on an SVFR clearance in a Control Zone in IMC. It goes on:

"An instrument flying qualification (to be called the IMC Rating) would be introduced to supplement the basic licence, and it would confer on the holder the bad weather flying privileges not available to pilots holding only the basic licence."

The IMC rating was enshrined in an amendment to the 1966 ANO and came into force on January 1st 1968. The change to instrument flying requirements was phased over two years to allow time for instructors to be trained and for basic PPL holders to get their ratings.

At a meeting at CAA headquarters in January 2008, to which EASA's Eric Sivel and Daniel Hoeltgen came to outline the coming battle on the IMC Rating, the then head of the Personnel Licensing Department at the CAA, Ben Alcott, said that since 1968 some 25,000 IMC ratings had been achieved, and of the holders, some 23,000 pilots still had valid medicals. Around 10,000 holders were PPLs. In almost 40 years, he added, the CAA had been able to trace only one instance of an IMC rated pilot being involved in a fatal accident in IMC.

When Ron Campbell conceived the IMC rating, there were some 2,000 GA aircraft on the UK register, and they were becoming more sophisticated. Today there are 8,000, and it's worth reflecting what the accident figures might have been like had it not been for the IMC rating. As we move into the glass cockpit era, we are once again seeing aircraft become more sophisticated. The IMC rating has never been needed as much as it is today. ■

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# IMC: The European dimension

Since early 2008, when EASA's Deputy Head of Rulemaking Eric Sivel came to London to explain why the IMC rating was under threat, AOPA has been working across Europe to increase understanding of the rating, and through that, acceptance. As M Sivel explained at CAA headquarters in Kingsway, EASA itself did not want to ban the rating. However, it needed to avoid the situation the Joint Airworthiness Authorities had got itself into, when each state was allowed to pick and choose what it adopted and when. The JAA was Europe's first attempt at pan-European regulation, but the resulting mess was an embarrassment to all. EASA wanted to ensure that all ratings were valid across Europe, and were adopted simultaneously – there would be no national ratings after 2012. For some ratings, like the Swiss mountain rating, there was unanimity – even where there were no mountains, there was no opposition. However, the IMC rating was wrongly perceived as a “poor man's instrument rating” which would allow less-qualified pilots to impinge on commercial operations, and for that reason groups like the European Cockpit Association expressed opposition. In some countries, notably Germany, the airspace structure did not allow for flight in IMC outside controlled airspace.

Mr Sivel said that at a last resort, the UK could appeal for a derogation which would allow the IMC rating to be adopted. It was not made clear until much later, however, that any such derogation would have to be agreed unanimously and would mean the IMC rating would be adopted across Europe – and why would those who held out against it in the first place change their position on appeal?

AOPA asked the British Airline Pilots Association, which is a member of the European Cockpit Association but which strongly supports the IMC rating, to attempt to influence the ECA. Balpa did so, but was unable to change any minds. Since the IMC rating was adopted 40 years ago, European Cockpit Association members have flown into the UK literally millions of times, and there has been no suggestion that the IMCR had any bearing on the safety of those flights. Nonetheless, the ECA is adamant that no pilot without a full Instrument Rating should be flying in IMC.

At the first IAOPA-Europe Regional Meeting of 2008, AOPA-UK sought backing from the rest of Europe for the IMC rating, and delegates gave their support unanimously. Some of their comments are appended below.

The issue of national ratings was to be thrashed out by an EASA Working Group called FCL-001, but because of the difficulties of dealing with instrument flying matters, a second Working Group called FCL-008 was set up to debate the situation, with special reference to the UK IMC rating. The deliberations of FCL-008 were dealt with fully in the last issue of *General Aviation* and there's no point rehashing them here. Suffice it to say that the official brief of FCL-008 to EASA is damning of the IMC rating, and says claims that it enhances safety “are not supported by the facts”.

There is more widespread support for the IMC rating in Europe than its most vociferous opponents – sadly, British – will admit. Here are some of the comments from IAOPA delegates around the Continent:

**Marlies Campi, vice president, AOPA Spain:**

I fully support your efforts to keep the IMC Rating you have in the UK and as an active pilot flying most of the time in Europe I would be more than happy to have this same IMC rating in all the other European countries. Why should the aeronautical authorities want to suppress something that has been working well for decades? I can't find a logical answer.

**Torgny Bramberg, AOPA Sweden**

I certainly support the UK IMC Rating. I wish we had it here these early winter months. From an air safety perspective the EU should make the threshold for higher levels of training significantly lower. The accident rate would certainly go down if more pilots were trained to handle IMC better. What is the point of the abolition of the UK IMC rating? Is there any objective data supporting the abolishment at all?”

**Jacob Pedersen, AOPA Denmark**

AOPA Denmark can fully support the IMC rating in the UK. AOPA Denmark also supports

the initiative to make the full IFR rating more accessible for the private pilot, for instance by removing theoretical knowledge requirements which are not directly relevant for the instrument rating. The AOPA Denmark board has expressed great concern over the recently proposed en-route IFR rating which seems to completely miss the point.

**Massimo Levi, AOPA Italy**

We know you have been fighting a lot to save the IMC rating. We are in favor and we are ready to support you in writing. We will be writing to our CAA to ask them to support you, too.

**Kitty Cronin, AOPA Ireland**

AOPA Ireland strongly supports the campaign to oppose the abolition of the UK IMC rating. Since its introduction it can be credited with saving many lives, and much confusion. In Ireland, this rating was neither recognised nor introduced, and, because of that, there were obviously some souls that never returned. The ONLY reason any educational course should ever be abolished is when it is no longer needed and no longer serves any purpose. To do so otherwise, is a denial of a person's right of knowledge which is necessary in order to survive.

**Dr Michael Erb, AOPA Germany**

AOPA Germany fully supports the continuation of the IMCR in the UK. You have the excellent safety statistics, thousands of trained pilots and the relevant airspace structure, so you need to continue with this successful system.

**Chris Leontopoulos, AOPA Cyprus**

We support AOPA UK in trying to keep the IMC rating and would like it to be available to ourselves.

**Ivaylo Dermendjiev, President, AOPA Bulgaria**

On behalf of AOPA Bulgaria we fully support you in your efforts to preserve existence of the UK IMC. It would be a very sufficient way for flying in difficult condition for the rest of EU countries, including Bulgaria. ■



## The insurance broker's view

“Any pilot who goes on to improve himself in terms of ratings such as the IMC should be applauded. From an insurance broker's point of view we always make it quite clear to underwriters what ratings a particular pilot may have. I know for a fact that underwriters regard ratings such as IMC to be a plus point in safety considerations and I cannot believe that anyone can think otherwise.” – Frank Bannister, Managing Director, Aviation Division, Besso Group, insurance brokers

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