

# Cutting EASA's Gordian Knot



EASA has been given until next July to come up with internal guidelines on the regulation of general aviation against which it must check all its proposals to see whether they are fit for purpose. The French-led Working Group that has been looking at how EASA got GA regulation so wrong has presented a list of common-sense yardsticks against which regulation must be measured, and if they are adopted there is a real chance that GA will enjoy a better future in Europe.

The document is a 'wish list' which, had it been followed from the inception of EASA, would have avoided much of the trauma that has discredited EASA in the eyes of the industry. EASA has become a by-word for over-regulation, unnecessary rulemaking, prescriptive demands, bureaucratic processes and pointless expenditure.

The million-dollar question is how EASA will react to the change in the landscape. It has in the past paid lip-service to the idea of improving its processes, and even if it is directly ordered by the European Commission to co-operate, it can finesse the issues to the point where there is little or no progress. This would represent a huge

cultural change in the Agency. Furthermore, by the time any such guidelines are adopted much of EASA's regulatory output for GA will be set in stone, and as we have seen with the Part M maintenance requirements, *ex post facto* change, however desirable, is extremely hard to achieve. While the document stresses the need to address problems in regulations already in force, it's an omelette that's difficult to turn back into eggs.

The guidelines from the Working Group, on which IAOPA has been active, have been endorsed by EASA's Management Board, on which the European Commission is represented, so in theory everybody is in agreement – even EASA, which was also represented on the Working Group. The guidelines contain almost everything IAOPA has been asking for since EASA came into being, including seeking changes in the Basic Regulation, the 'bible' which governs everything EASA does. Specific points are as follows:

1. One size does not fit all. GA should be handled separately from CAT and merits a different, proportionate approach based on an acceptable risk hierarchy.

2. Adopt a philosophy of minimum necessary rules, focusing on the main risks.
3. Adopt a risk-based approach to targeted safety initiatives and rulemaking, based on risk assessment, and supported by empirical evidence in the form of good quality accident rate and causal data from which statistically significant trends are identified.
4. Protect 'grandfather rights'.
5. Minimise bureaucracy and apply EU 'Smart Regulation Principles', taking into account the specificities of GA.
6. Make best use of available resources of expertise, and devolve responsibilities and delegate tasks to the level where they can be exercised most efficiently, including to GA organisations.

## Guidelines

The document calls for a set of guidelines which should encompass the following:

1. Recognise that GA does not achieve, nor necessarily aim at reaching, an equivalent level of safety as Commercial →

## Eleventh hour for the IMC rating

Confusion reigns in the CAA over the future of the IMC rating, with Giles Porter, the Authority's General Aviation Programme Manager, having written to Martin Robinson saying he does not believe there is anything further that can be done at this time to save the rating. CAA Chairman Andrew Haines is, however, said to be as unhappy and upset as AOPA at the current situation, which he is said to hope to change.

If the CAA has truly thrown in the towel on the IMC rating, those who get the rating before April 2014 will be the last to enjoy its protection.

Giles Porter's reply has been characterised as "disappointing" by Martin Robinson, given that the CAA has always said it will do everything in it possibly could to preserve the IMC for future generations. The IMC rating has been a proven lifesaver in Britain for more than 40 years, but because of a combination of rules in other countries, misunderstanding and misrepresentation of the rating, EASA said it could not accept it as a pan-European qualification, therefore Britain could not be allowed to keep it.

The IMC rating course, a minimum of 15 hours, teaches low-time pilots to maintain control of aircraft in IMC and to return them safely to the ground. It is seen as one of the

major contributors to Britain's excellent GA safety record – where some 25 pilots a year die, in Germany the figure is about 80 and the French about 90, despite Britain's relatively capricious weather. EASA's rulemaking means that the death rates may be rebalanced to Britain's disadvantage.

Britain had pinned its hopes on the new opportunities that seem to be opening up in EASA rulemaking for national authorities to apply variations to EASA rules. But in his letter to Martin Robinson, Giles Porter says:

'The IMCR did not get into the FCL008 proposal as a European rating due to objections from others. We successfully negotiated that IMCRs granted up to 8th April 2014 can be retained on Part-FCL licences as Restricted Instrument Ratings. In the consultation on FCL.008 various UK commenters asked that the paragraph that was amended to allow the new European forms of the instrument rating to be used be broadened to allow national IRs, such as the IMCR. EASA was firmly against this, citing the Basic Regulation as not allowing national variants.

'CAA suggested that EASA leave their response open pending delivery of the report on GA regulation to the Management Board and any subsequent direction from the MB. EASA agreed, but said they could only wait for

as long as the FCL.008 timescale allowed. As it turns out the report to the MB was not specific about which licensing rules were recommended for change and so there was no advice to EASA to be more flexible over national variants in licensing. Time has now passed and the FCL.008 CRD has been published, rejecting the proposed provision for national IRs. It follows that from 2014 and with the embodiment of the change there will only be: the standard IR, Modular IR, En-route IR, Cloud Flying Rating and, for UK pilots, the legacy IR(R)/IMCR obtained prior to 8/4/14.

'We do not believe there is anything further that can be done at this time. In the future, the outcome of the GA review may lead to a complete re-writing of the rules for this sector, including making provision for the IMCR; but that is speculative.'

After receiving the news Martin Robinson said: "It seems that 'safety' comes in the form of words on paper, to be sacrificed in the name of harmonisation. The CAA must continue to fight this issue, and work with us right up to the last throw of the dice."

Subsequently CAA Chief Executive Andrew Haines indicated that the cause was not entirely lost, and AOPA now pins its hopes on him as the last line of defence for a vital lifesaver for British pilots. ■



Air Transport (CAT) and ensure this is understood by all GA participants.

2. Do not start work from existing regulation which has essentially been designed for CAT, but take a fresh approach by establishing whether and what regulations are most appropriate to GA in all fields: initial and continuing airworthiness, licensing, operations, airports, and air traffic management.

The basic principle should be that rules should be kept to an absolute minimum. The document goes on:

1. Draft regulations on a 'minimum necessary' and 'focused on the main risks' basis from the relevant activity, starting from the simplest cases in terms of design and operations, and adding 'building blocks' as necessary to cope progressively with more complex issues and environments, and possible interfaces with other aviation users.
2. Where GA can interact with CAT, develop appropriate measures, including regulations as necessary, to prevent undesired events.
3. Consider favourably new proposed technologies by OEMs and

manufacturers, and demonstration of enhanced safety through an innovative approach.

4. Always consider alternative means to regulation, including the 'do nothing' option, based on robust risk assessment and cost benefit analysis methodologies specific to the sector.
- Grandfather rights should always be respected. The paper goes on to say: "Give specific attention to transitional arrangements, so that no activity is stopped, including unexpected specific cases, if it had not raised a safety issue prior to the implementation of the new rules. Rely on proven competencies, and on NAAs' oversight and reporting to the Agency for transparency and sharing of good practice."

And importantly, it stresses that geographical and local differences must be respected, saying: "Accept flexibility for continuation of specific local activities under NAA responsibility when they have not proven harmful to safety, to fair competition or to free circulation."

The document points up the need to minimise bureaucracy and urges that EASA regulation be measured against the European Union's own 'Smart Regulation' principles.

Dialogue with industry should be improved, and appropriate explanations should be given in response to industry concerns, especially when they're rejected. EASA, it says, should have more confidence in GA participants to 'do the right thing' and should reduce the multiple layering of *a priori* safety nets that often characterise EASA rulemaking. It should focus more on 'declarative processes and individual commitment for managing safety, subject to appropriate downstream oversight by the NAA'.

Lack of clarity in proposed regulation must be avoided, the paper says, and there should be more emphasis on 'soft' rather than 'hard' law. Rules should be limited to required objectives, and industry standards, certification specifications or acceptable means of compliance should be supported by detailed guidance material, in consultation with users. Best global practices for GA should be taken into account, whether from inside or outside the EU. A more comprehensive 'competency based' approach should be adopted for personal licensing. While it might be thought it should go without saying, the paper says there should be no inappropriate pressure to build new regulations, and all necessary time should be given for a sound rule-making process in

## Chief executive's diary:

# More taxes, less business

As we go to print the Chancellor is considering another 3p rise in fuel duty, which will again increase the price of avgas. No doubt Mr Osborne sees this rise as part of the Government's 'Save the UK' campaign. At the same time the House of Commons calls for a cut in the EU budget. AOPA believes that duty on avgas should be frozen or, better still, reduced in order to help our struggling industry. It is interesting to note that the British film industry has a similar GDP value to the UK that GA has – approximately £1.5 billion (according to Government sources). Yet the Government provides the UK film industry with numerous tax benefits and grants. GA received nothing, even though 11,000 people rely upon GA for their livelihood.

IAOPA Europe has begun to raise the profile of GA across Europe (as reported in the October issue of *General Aviation*) through a Brussels-based lobbyist, Lutz Dommel. To provide an overview of the Brussels system Lutz attended the AOPA Bonus Day in Duxford on 23rd October. Even though the weather was unkind 90-plus members managed to get to Duxford for the event. I enjoy the day because I'm able to meet and talk to you, the members, and to thank you for your support. Cliff Spink began the event with a review of his life in flying so far! Nick Wilcock gave an

update on licensing issues generally and had his own confessional box for individual requests. Duxford is a great venue and I know we will be back again in 2013.

'VFR charging' by air traffic control is an issue that won't lie down. We fought it off in 2003 – thanks to AOPA, every pilot pays €10 an hour less than he or she would had we not won that campaign. The issue illustrates two of the problems I grapple with at AOPA – firstly, our hardest-won battles can simply result in 'no change', which is a hard sell to the membership; and secondly, when AOPA members pay for a successful campaign, everybody benefits, including those who make no contribution. All I can say to you is – thanks for your support. We can't do it without you. It looks like we've staved off VFR charging again. On the 27th and 28th September I attended a Charging Study Group in Cyprus – this was during the Cypriot Presidency of the EU. According to the European Air Navigation Service Providers (ANSPs) services provided to VFR flights are not being reimbursed. The Charging Rules are contained in Commission Regulation (EU) No. 1191/2010 16th December 2010, amending EC No. 1794/2006. The Study Group aimed to



consider the existing arrangements for exempted flights and to make recommendations to the Enlarged Committee for Route Charges. Questions under consideration included, among other things, other ways of charging VFR flights. Article 9 of the Regulation states: 'Member States shall exempt from en route charges:

1(a) flights performed by aircraft with an MTOW of less than two metric tonnes.

The Regulation goes on to say that member states shall ensure that air navigation service providers are reimbursed for the services provided to exempted flights.

I made the point that ANSPs should seek a solution to these problems by reminding member states of their obligations under the Regulation. I understand that the Study Group has now agreed and the matter is now closed – this will be confirmed at the Enlarged Committee later in November.

On October 1st I had a meeting with Dave Impey from AirSoc to look at ways in which AOPA can reach a larger audience – more to come on that. On the 6th I attended the AOPA Members Working Group at White Waltham – a meeting reported elsewhere in these pages – and from the 9th to the 13th I was at the AOPA Summit in Palm Springs, which is the major annual gathering of AOPA US. I had a number of meetings with Craig Fuller, who is President of International AOPA, and was able to brief him on European developments and to thank him

order to get it right first time.

Best use should be made of available expertise and resources, and responsibilities should be delegated to an appropriate level. Oversight should be delegated to approved organisations where appropriate, with tasks delegated from national authorities.

The EASA Board of Management has invited member states to identify to EASA specific GA activities such as cost-sharing by private individuals, charity flights or A-A introductory flights at aero clubs which they do not consider as commercial air transport activities. The document suggests: "On the basis of a review of this survey by the Agency, the Commission to clarify before April 2013 the interpretation of 'commercial operations' in relation to certain GA operations. If necessary propose a change to the definitions in the Commission Regulations and/or Basic Regulation, so that the focus on actual professional business activities is explicit.

"The Agency to develop and publish before July 2013 internal guidance material to ensure that the new rule-making process is implemented consistently with the above guidelines when applied to GA activities. This should include explicit checking and a

statement of compliance with the above principles and guidelines at various steps (Regulatory Impact Assessment, Notice of Proposed Amendment, Comment Response Document) of the procedure.

"The Agency and the Management Board to invite the members states to devote specific attention to ensuring the proposed regulations and their implementation are kept as simple as possible. When necessary the Agency should provide explanatory guidance in 'plain language' to assist regulated individuals in understanding the requirements with which they are required to comply.

"The Agency to implement a specific mechanism in the standardisation process that would enable best practices in GA to be identified, subject to the proactive participation of the GA users' representatives, and disseminated to the GA community, in close interaction with the rulemaking process. A specific item on sharing of good practice should be part of the agenda of standardisation meetings.

"The Agency, with the users, to incorporate in this mechanism a way to take into account, when relevant, best practices from non-EU countries with significant GA

activity. The example of the Light Sport Aircraft category should be considered as an interesting starting point."

The document asks industry to provide a shortlist of 'quick fix' items where EASA's non-compliance with the new guidelines has caused difficulties which might easily be resolved, and to highlight problems with existing regulations that need to be addressed. "On this basis the Agency to set up before March 2013 an ordered review process to address this situation, including, as necessary, proposed changes to the Basic Regulation," it says.

For work already in progress or done, the document asks EASA and member states to check regulations against these guidelines as a matter of urgency. It goes on: "The Agency to consider and present to the Management Board in March 2013 a study and possible adaptation of its internal organisation to assure that GA matters are given the necessary resources and attention at the appropriate management level, that they are dealt with consistently throughout all directorates in accordance with above principles and guidelines, and that GA stakeholders can have easy access to the staff of the Agency responsible for GA matters." ■

for the additional financial support which helps us to fund Lutz Dommel, our lobbyist in Brussels. My colleague Michael Erb, Managing Director of AOPA Germany, also presented his proposal for AOPA Germany to host the IAOPA World Assembly in Germany in 2014. Other meetings and discussions that took place were with Jeppesen and AIG. One of the great advantages of belonging to International AOPA is the ability to call upon additional resources and expertise such as these.

On October 16th we had the AOPA Executive Committee meeting. The report I provide to the Committee is largely based on the contents of my diary, so in some cases you get to read it before the Committee hears about it! The Executive Committee considers the issues and provides direction where necessary. At 4pm that day I met with Matthew Bolshaw, an AOPA member and insurance expert, to discuss a policy specifically for aircraft owners who are AOPA members. We may have something ready by the end of the year.

As Senior Vice President of International AOPA I'm often called upon to advise and assist AOPAs elsewhere in Europe. From 17th to 20th September I was in Slovenia for meetings organised by the local AOPA. I met with the heads of the CAA and ANSP – the CAA is only 14 months old and has only 51 staff. It is interesting to see how different states organise their institutions. The main meeting was with the Secretary of State for Transport, who gave two hours of his time to listen and exchange views on the development of GA in Slovenia. He was

particularly concerned about the rising costs and the impact it has on younger people wishing to take part.

On September 22nd I again had the honour of presenting the 'Best GA Airfield' award at the Aerodrome Operators Association gala dinner. The award went to Sywell and Michael Bletsoe-Brown, picking it up for the third time. The dinner presents an opportunity to talk to a number of regional airport directors – several of whom asked what they can do to attract GA back to their airports. More to follow on that – a big thanks to Tom Needham and the AOA for a very enjoyable evening.

Earlier in the day I met with Giles Porter and Chris Finnigan from the CAA to discuss what AOPA considers could be a quick win under the new direction to EASA to change its rulemaking culture. Our first suggestion is for the retention of Registered Facilities, which EASA proposes to require to transform themselves into infinitely more complicated and expensive organisations under the name 'Approved Training Organisations'. We're proposing that if they want to change the name, they needn't change the organisational requirements – just let them carry on as they are under the new name. There's no safety issue at stake. We shall see what happens – but again, 'no change' will be a significant victory.

From the 24th to the 26th October I spent some more time in Lebanon with the local AOPA and with Craig Spence, the IAOPA Secretary General, when we met with the head of the Lebanese Safety Regulator. They are involved with EASA on

the air transport front but they are very aware of the importance of GA, and happily they are not planning to make any major changes to their GA regulations at this time.

The main success has been the opening of VFR flights between Beirut and Larnaca – the Cypriot CAA and Larnaca Airport has played a pivotal role in getting these flights back. It is only 112 nm between the two airports, and for Lebanese GA it's much more attractive than flying to the next possible destination, Rhodes, which is about three hours flying time away in a C172.

On the 27th and 28th October I was in Larnaca for the 127th IAOPA Europe Regional Meeting, which was attended by 14 European AOPAs and is well-covered in these pages. On the Sunday morning, Michael Erb of AOPA Germany chaired the technical affairs meeting.

Back in London on 30th October I met with Charles Henry and Steve Slater from the General Aviation Awareness Council, which is doing sterling work on the aerodromes which AOPA continues to support.

All eyes now are on EASA to gauge its response to the suggestions for change which have the backing of the industry, the EASA Board of Management and the European Commission. During November I have meetings in Brussels with Members of the European Parliament and the Commission, plus other European organisations. We'll keep you posted.

**Martin Robinson**

# EASA making amends on Part M?

By George Done

EASA has recently issued a Notice of Proposed Amendment (NPA) 2012-17 which addresses selected aspects of the continuing airworthiness requirements contained in Part M. This mighty tome first appeared in 2002 and buried the activity of maintaining light aircraft subject to



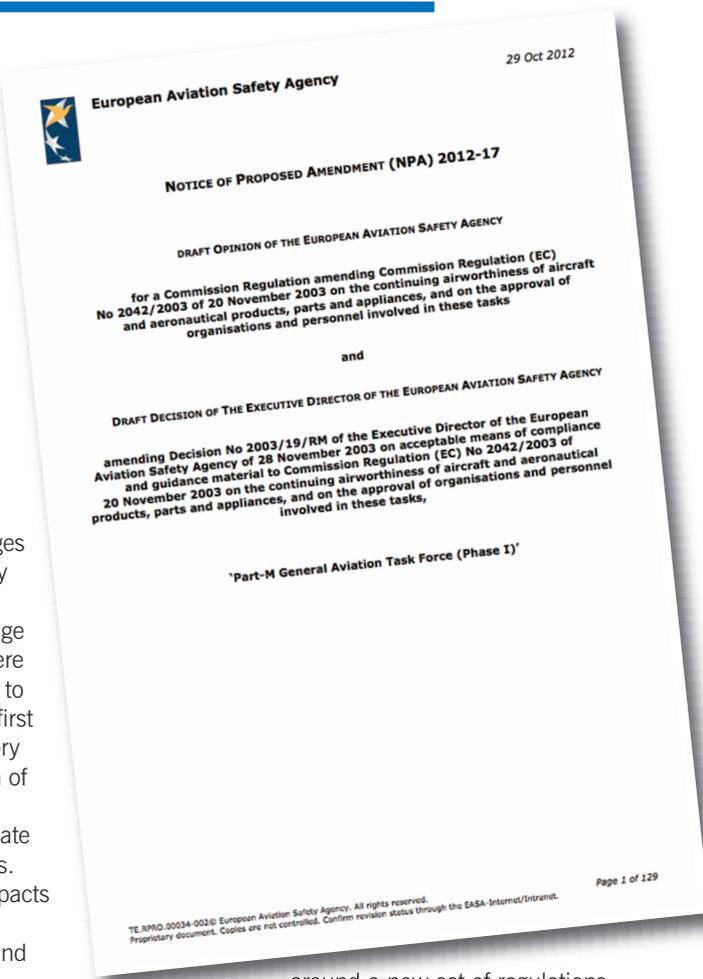
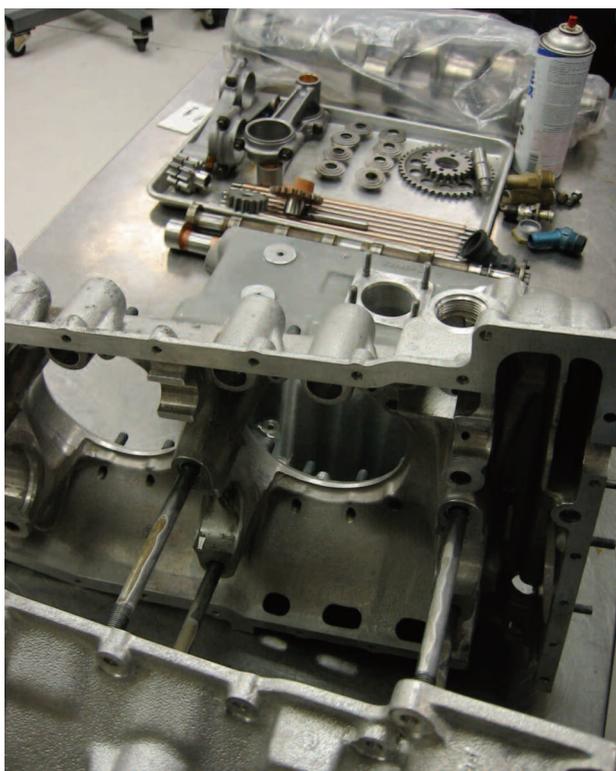
regulation by EASA (i.e. Annex 1) under a mountain of extra bureaucracy in what has now been seen as disproportionate as far as GA is concerned and devoid of consideration of risk.

Last year, however, in response to pressure from continued expressions of pain and disapproval from the GA industry, EASA set about obtaining feedback on Part M, leading to the organisation of a key workshop held in Cologne in October 2012. Representatives from all areas of GA attended with presentations from aviation associations such as IAOPA and Europe Air Sports, maintenance organisations, manufacturers, national authorities and EASA officials. It is fair to say that those attending from the authorities were taken aback by the strength of feeling exhibited by the others on the receiving end of the regulations, that Part M for GA was currently a disaster area.

EASA acted commendably quickly and set up a small GA Task Force initially of 12 members, later increased to 13, representing fixed and rotary wing aircraft, gliders and manufacturers, two from the NAAs (Austria and France) and two EASA officials. Our man representing IAOPA Europe was Dan Åkerman from AOPA Sweden, a past CAMO operator. The GATF had an objective to discuss appropriate actions that would reduce the burden on the GA community. There were to be two phases, Phase I (covered by this NPA) in which a set of alleviations in areas identified where high costs were incurred but with no real safety benefit, and for which an extensive Regulatory Impact Assessment is not required, covering in particular maintenance programmes and airworthiness reviews, and Phase II, for which deeper technical discussion and also a more extensive RIA was required. It has taken three two-day meetings of the GATF to reach the present stage. A pragmatic decision was made early on to limit consideration to ELA1 aircraft (MTOM of 1200 kg for non-complex motor-powered aircraft, sailplanes and powered-sailplanes, certain balloons and airships) not

used for commercial purposes, with extension to ELA2 (MTOM 2000 kg for non-complex aeroplanes, etc) planned for Phase II.

The NPA is 129 pages long and very detailed. However, the structure and presentation is commendable, something that could not be said for the original Part M. Quite a bit of extra flexibility in many of the processes has been introduced and this and other modifications represent substantial changes for the better. Probably, only maintainers actually in the business will be able to judge the impact properly, but there do seem to be real benefits to aircraft owners who ought first have a look at the Regulatory Impact Assessment of each of the seven specific change proposals to get an immediate flavour of the improvements. These cover anticipated impacts under headings of safety, economic, proportionality and social and make good and relatively easy reading. If owners wish to comment on the NPA, this would probably be the most productive area to start from. Maintainers, however, may well groan at the thought of having to get their minds



around a new set of regulations, even though subsequent life may be made easier for both themselves and their customers. This aspect appears several times in the RIA by mentioning possible economic loss faced by some CAMOs through reduction of approval activity and hence earned income. Many CAMOs have taken on extra staff to deal with the administrative needs of Part M. However, it is in the maintainers' ultimate interests to do whatever they can to use any opportunity to reduce costs to aircraft owners and help keep the GA fleet, their customer base, viable.

Dan Åkerman comments that he feels that EASA are now honestly trying their best to sort things out, but he has a niggling worry that "...some NAAs will, as they have done in the past, read the new rules and regulations in the same way as the devil reads the Bible..." his own Swedish NAA having been one of the worst culprits.

NPA 2012-17 is downloadable from the EASA website and comments must be received by 31st January 2013 using the Comment Response Tool (CRT) available at <http://hub.easa.europa.eu/crt/> ■

# Who deserves recognition?

AOPA invites and urges members to submit for consideration the names of worthy candidates for its prestigious achievement and endeavour awards, which recognise the special contributions of individuals and organisations to private aviation.

The AOPA Awards are made every two years and cover almost every facet of GA, seeking to reward the contributions of pilots, instructors, air traffic controllers, engineers, flying schools and aerodromes – in fact anyone or any organisation who has improved the lot of aviators anywhere.

If you would like to make a nomination for an award, please send a letter or an email to AOPA with enough supporting evidence to help a panel of judges form a decision. About 200 words should be enough, but more is welcome. The postal address is 50a Cambridge St, London SW1V 4QQ, and the email address is [info@aopa.co.uk](mailto:info@aopa.co.uk). If you have a possible nomination in mind, please do not delay – get an email or letter off to us straight away. The awards will be presented at the 2013 AOPA Bonus Day at Duxford.

*The Achievement and Endeavour Awards are as follows:*

**Lennox-Boyd Trophy.** Awarded to a person, club, group or organisation who has contributed significantly to the furtherance of flight training, club flying or

piloting standards. The trophy is a cup in a special presentation box that was originally given to the Association of British Aero Clubs by the late Rt Hon Alan Lennox-Boyd PC CH MP (subsequently Viscount Boyd of Merton) in 1953. In 2011 the trophy was awarded to Alan Cassidy, MBE, for services to aerobatics.

**AOPA Special Award.** Awarded to a pilot, controller or engineer, or other person who has made a special contribution to safety, or other areas of general aviation. The trophy is a cup originally presented by the British Precision Pilots Association in 1987. The trophy was awarded in 2011 to the British Women Pilots' Association for promotion and support of women in aviation.

**Best Aerodrome.** Awarded to the aerodrome that has been an outstanding place to visit, offering value for money and helpful service. The trophy is a sword donated to AOPA by Airtour International Ltd (now Pooley's Flight Equipment Ltd) in 1982. The sword was presented to Andrewsfield in 2011 for its warm welcome to visiting pilots.

**Contribution to the Community.** Awarded to a person or organisation who has made an outstanding contribution to the aviation community. The trophy is a cup donated in 1997 by Flyer magazine. In 2011 it was awarded to Hayward Aviation Ltd for their

contribution to flight safety awareness.

## **Individual Merit.**

Awarded to a pilot who has made an outstanding aviation achievement. The trophy is a cup on a granite plinth. It was awarded in 2011 to private pilot Douglas Cairns for

demonstrating the viability of pilots with diabetes with a record breaking flight to the North Pole and back.

**Instructor of the Year.** Awarded to an instructor who has made a special contribution to the training of student pilots for the PPL or NPPL, or to private pilots for added qualifications. The trophy is an art deco cup donated in 2004 by Virgin Experience Days. It was awarded in 2011 to Luke Hall, Chief Flying Instructor of the Cambridge Aero Club.

**Friend of AOPA.** Awarded to a person or persons who has or have made a special contribution towards the work of AOPA. The award is normally a tankard for the recipient to keep. In 2011 it was presented to Alan Evans for his promotion of the Duxford Bonus and Safety Days, including the AOPA Bonus Day. ■



**Douglas Cairns won the Individual Merit Award in 2011**

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# LAPL: Good news for helicopter pilots



Helicopter pilots should be aware that the European Light Aircraft Pilots Licence (LAPL), now in force, applies not only to fixed-wing but to helicopters up to 2000kg. The LAPL was based on the UK's

fixed-wing-only NPPL and allows day VFR throughout Europe, with a simpler medical and licensing regime. It was originally due to be available at the beginning of July but was put back until September 17th. The first LAPL(H) in Britain was issued on September 19th to a pilot who had

previously been unable to obtain a Class 2 medical. The LAPL medical requirement is broadly similar to the DVLA standard for professional drivers. In theory, the medical can be carried out by your own GP, but in practice the majority of GPs don't understand it, know nothing about it and are wary of signing a certificate saying that they consider someone fit to fly an aircraft. So at the moment at least you have to still go to an AME to get it done.

There are many medical conditions which would debar a pilot from getting a Class 2 medical but which are no bar to passing a LAPL medical. If you need advice, contact Dr Ian Perry via AOPA. Another good thing about the LAPL medical is that it lasts for two years for pilots aged over 50, rather than the one year of the Class 2. The currency requirements for the LAPL(H) are also different. The annual LPC with an examiner is now gone, and all you have to do is have six hours P1 in the last rolling year, to include an annual one hour 'instructional flight' with an instructor. You just need to keep track of the rolling year.

The privileges of the holder of a LAPL for helicopters are to act as PIC on single engine helicopters with a maximum certificated take-off mass of 2000 kg or less, carrying a maximum of three passengers, such that there are never more than four persons on board. ■

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## Liverpool Airport General Aviation Users Association

An inaugural meeting was held on 10th September 2012 to establish an Association to represent the interests of general aviation users at Liverpool Airport. The Chairman, Andrew Ambrose, welcomed some 35 pilots, mostly AOPA members, and Martin Robinson, Chief Executive of AOPA attended to offer advice and guidance, and to give updates on the work of AOPA and current initiatives.

Membership of the Users Association is open to pilots and trainee pilots who operate out of Liverpool John Lennon Airport. Those present agreed unanimously to the establishment of the association and appointed a Working Group to be chaired by Jim Addison to produce a Constitution and drive forward the current issues of concern to GA users.

A meeting had been arranged between Martin Robinson and Paul Staples, Operations Director at LJLA, for the following morning and Martin agreed to report back following the meeting. There has been a subsequent meeting between Jim Addison and Paul Staples following that first meeting. Jim has raised a number of issues of concern to the GA community and has established a positive dialogue with the airport management and the FBOs.

The association has created its own web site at [www.liverpoolgausers.org.uk](http://www.liverpoolgausers.org.uk) and the report of the inaugural meeting and application forms for membership can be downloaded from that site.

A considerable amount of support has been received from all quarters and progress is being made. It bodes well for the future representation of all GA users at Liverpool. ■

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# Members Working Group

The AOPA Members Working Group met at White Waltham early in October for progress reports on all those things they have either started off, or in which they have an interest. The meeting was chaired by Pauline Vahey and brought together Martin Robinson and Mandy Nelson from AOPA with Nick Wilcock, James Chan, Chris Royle, Peter Barron, Richard Warriner, Pat Malone, Timothy Nathan and John Murray. As luck would have it we chose to meet on one of the few blue-sky Saturdays of the summer, but the West London Aero Club has big picture windows and we didn't miss much.

As always there were new suggestions, variations on old suggestions and explanations of where projects are skipping along or are mired in the mud. Chris Royle and Mick Elborn have started work with the AOPA regional and airfield representatives in an attempt to revitalise the network, which was set up with such great expectations but withered for lack of follow-through. Chris and Mick have met with a handful of reps to discuss the world as they see it, how the role is defined and what sort of support AOPA can give. The local reps are seen as being crucial to the success of many Members Working Group initiatives, from the promotion of the Wings Scheme to the Mentoring Scheme and much more. There was a discussion of the changing nature of flying at clubs and

small airfields; where once pilots engaged with a club in order to get necessary information, now it's more common just to turn up, fly, and leave – the weather, the Notams and other information will have been obtained on a laptop and the role of the club has thus changed. It was thought also that having regional reps and corporate members working together would produce better results. Chris Royle told members that Mick Elborn had done a serious amount of work on this, and further meetings are planned.

John Murray gave an update on progress



towards more efficient GAR filing; because of recent changes in government, priorities have shifted and issues relating to general aviation are not deemed to be of the first importance. It was suggested that the success of the Olympic Games, when general aviation played by the rules, had taken the wind out of the sails of those who would apply ever more onerous restrictions; this may be a tad optimistic. Martin mentioned that AOPA was keeping in contact with the Royal Yacht Association, which had similar concerns and had 100,000 members and great influence.

Chris Royle gave an appraisal of the AOPA Bonus Day at Sywell which was said to have been a great success (report elsewhere in this issue). This was the third such Bonus Day and they'd been able to iron out the glitches they'd encountered in the past. There has been a lot of positive feedback from the members who attended, and numbers have grown each year.

## Handling issues

We discussed the changing situation on mandatory handling, with particular reference to the shortfall in passenger numbers afflicting most British airfields and its affect on the mindsets of regional airport operators. Stansted traffic is down by five million, Bournemouth from 1.1 million to 650,000, Liverpool has lost 700,000 pax this year and cargo is moving to Manchester. Doncaster (Robin Hood) and Teesside were having a bad time, and many airports are realising that general aviation represents revenue rather than nuisance. Liverpool has had something of a change of heart on based GA operators, but they're

**Above: Pauline Vahey in the hot seat for the first time after taking over as Chairman from Chris Royle**  
**Below: AOPA Members Working Group at White Waltham – Martin Robinson, Nick Wilcock, Pauline Vahey, Richard Warriner, Peter Barron, Timothy Nathan, Mandy Nelson, John Murray, Chris Royle, James Chan**



still hammering visitors. There was also an issue at Liverpool with monopoly fuel provision that AOPA is trying to address. The government is currently working on a framework document on airport capacity and AOPA is formulating a response.

The difficulty of practising instrument approaches was discussed; pilots often have to fly as far as Calais or Le Touquet on a Tuesday to maintain proficiency. This is leading to dangerous situations where pilots and instructors are overlaying procedures on local airfields in order to practice; AOPA dealt with a case where a pilot had overlaid Southampton onto Rochester and infringed the TMA when he forgot to change his altimeter. Horror stories abound; timed NDB approaches backtracking BBC local radio are not unknown, ad hoc GPS approaches are commonplace, and an approach had been demonstrated using SkyDemon on an iPad with a vertical navigation component. Martin Robinson said AOPA had worked for years to get the CAA to provide GPS approaches but the Authority had decided to allow them only where there was already an instrument approach in place,



**Above: Nick Wilcock describes EASA paper-folding requirements to the amusement of James Chan**

at airfields like Shoreham or Staverton, and predictably the experiment has been a failure. As a result the UK was lagging far behind other countries and exposing its pilots to danger.

AOPA's presence on social media sites including Facebook and YouTube was discussed; it was generally agreed that we're under-strength in these fields and more needs to be done. Other topics covered included the AOPA website, which is being updated with Joomla 2.5 to assist with the build-up of the member database, among other things – again, Mick Elborn is devoting time and effort to the job. The changes should be evident within three to six months.

The next meeting of the AOPA Members Working Group is at White Waltham in January; any member is welcome, although please inform Mandy at the AOPA office if you want to come – if you don't give notice, you might find there's no chair for you, and you'll definitely get no biscuits. ■

## Biggin holds back tax avalanche

Biggin Hill Airport has successfully fought off a new business rates demand which would have cost companies at the airport another £300,000 a year. With the assistance of the airport, the tenants have managed to reduce a new tax demand from the Bromley Valuation Office by about two thirds. Nonetheless, the companies face swingeing increases in rates at a time when most recession-hit businesses have nothing to spare.

Local government employee levels have ballooned in recent decades, and every authority is desperate for cash. Kent County Council, for instance, is bigger than the RAF, with some 44,000 employees. Famously, two of its executives were being paid more than twice as much as the Prime Minister, while seven were paid more than the PM and 27 employees pulled down more than £100,000 in 2010.

The Bromley Valuation Office demand left some airport tenants facing an increase of up to 100% in business rates. Airport management stepped in to assist with the difficult task of renegotiating rateable values on administrative offices and hangars. As a result of a firm and united response by the tenants, assisted by specialist advisors funded by Biggin Hill Airport Ltd, the Council's Valuation Office have now agreed a two thirds reduction from the proposed initial increase of airport Rateable Values.

Despite the alleviation, the companies must find another £50,000 a year.

Amarjit Singh Bamrah, who runs Falcon Flying Services – which has been in the aviation business at the airport since 1977 and today employ 22 staff – is angry with the Valuation Office for their lack of understanding of the business rates issue. "The Valuation Office's initial approach was insensitive to business needs and abilities which – if left unchallenged – could easily have crippled my businesses," Singh says. "What is needed are valuation officers at a local level who can listen, understand and communicate, thus becoming sensitive to local business needs, thereafter being capable of making the right well informed decisions, that will ultimately be in the public interest for all."

## CAA tiptoes into FTO credit minefield

The CAA has taken the difficult step of publishing guidance for prospective commercial pilots, including information on how to protect yourself from the sort of financial disaster that is all too common in the flight training industry, especially in times of recession.

It's a difficult step because while the CAA has responsibility for ensuring that commercial schools are up to scratch, their financial arrangements with their students are their own affair – it's a transaction between a private business and a private individual and as such does not fall under the CAA's remit. Some FTOs might argue this is none of the CAA's business, and it's creditable that the Authority has seen fit to address the issue.

Some students have lost tens of thousands of pounds this year as commercial Flight Training Organisations in Europe and the United States have gone broke. The CAA's guide, called 'Commercial training: protecting your investment', gives advice on finding a flight school, types of courses available, and the limitations of a CAA or EASA approval. The leaflet explains the advantages of payment by credit card, by credit agreement, or

through an escrow account. There's also a note on what to do if your FTO goes bust, focusing on how to secure training records that prove what you've done.



Ray Elgy, Head of Licensing and Training Standards at the CAA, says: "This guide is intended as a first stop for anyone contemplating a career as a commercial pilot. It is a basic introduction to the options available, highlighting some of the potential financial risks involved. A career as an airline pilot is unquestionably an appealing prospect to many people. However, it is important that anyone embarking down that path understands the commitments, particularly financial commitments involved." ■

# New faces on the Board

Nick Wilcock and Mick Elborn have joined the Board of AOPA, bringing new administrative skills, aviation expertise and energy to the governing body. Both have been active in AOPA as volunteers in recent years.

Nick gained his PPL under the tutelage of the late Ron Campbell in 1968, before joining the RAF as a pilot for the following 35 years. Although most of his flying was on the Vulcan, Phantom and VC10K, after returning from Gulf War 1 he later became an A2 Qualified Flying Instructor on the Bulldog at the University of London Air Squadron. This encouraged him to become a civil FI in 1992 and a PPL examiner a few years later. After gaining A2 QFI and 'A' Cat status on the VC10, for some years he was CFI of both the VC10 Training Flight and the Brize Norton Flying Club simultaneously.

In addition to being the Vice Chairman of the AOPA Instructor Committee, Nick is a Master Air Pilot and Liveryman of the Guild of Air Pilots and Air Navigators and has for many years been a member of the Guild's Education and Training Committee. He is also Chairman of the NPPL Policy and Steering Committee and represents IAOPA at the EASA FCL Partnership Group.

After leaving the RAF in 2003, Nick became a part-time self-employed aviation consultant, working primarily as an air-to-air refuelling subject matter expert on the Airbus A310MRTT mission computer system and associated ground training systems.

After 40 years and almost 10,000 hours of flying, in 2008 he decided to take a rest from flight instruction and instead to devote his efforts towards guiding AOPA members through the stultifying and often bewildering legislation emanating from EASA. Having held instrument flying qualifications continuously since 1971, he is a staunch advocate of the UK IMC rating



**Above: revisiting old haunts, Nick Wilcock in the left seat of a VC-10 at Brize**  
**Left: happy in his work – Mick Elborn airborne in a light twin**

and works with other aviation organisations, as well as the CAA, in attempting to ensure that current levels of safety enjoyed by UK pilots will continue to be available into the future.

Mick Elborn gained his PPL in 1997, having been trained by BAFC at Wycombe Air Park. Later he added Night, IMC and MEP ratings and has over 600 hours. He writes: "I have enjoyed flying many of these hours touring, both around the UK and widely in Europe, and in various aircraft types. I took early retirement, as an offer I couldn't refuse, some seven years ago after a lengthy career in engineering and project management.

"To keep me from getting bored I responded to a request for help to get the AOPA Mentoring Scheme going. Did I think

that that was all there was to it? I got much more involved with AOPA, over and above being a passive member, to put many hours into constructing and maintaining the AOPA website, together with Mike Cross and James Chan,

and I am also getting increasingly involved in other matters. Those of you reading this who have been AOPA members for some years may well recall that the AOPA website at that time was pretty static, not a very interesting place to visit and didn't carry AOPA's message very well.

"It is worth stressing that AOPA can only work as well as it does by members coming forward to offer their skills and time voluntarily. My volunteering put me firmly in a seat on the Members Working Group and subsequently I was asked if I would also join the AOPA Executive Committee, to which I agreed. This year I was asked if I would be happy to be proposed as a new Board Member, to which I also agreed, and was subsequently voted in at the AGM." ■

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## Security in America

Sir,

Having had hugely enjoyable flying holidays in America in virtually every winter since 2001, I am writing lest any reader should be put off unnecessarily by the letter ('The price of security' *General Aviation*, October 2012). I have rented planes from bases on the Gulf and Atlantic coasts of Florida, three on the Californian coast, Seattle and Texas. In no case did I need more than a couple of hours preliminary ground school and an hour's checkride. At two-yearly intervals the checkride also satisfied the Biennial Flight Review requirement to keep my FAA PPL (easily obtained 15 years ago on the back of my UK PPL) current. Presumably, the visa and other problems arise only if you are going for flight training.

I always take my flight bag, containing my headset, Private Pilot manual, Airport Facilities Directory and charts as hand luggage. It has never caused any problems on international or internal flights.

Colin D. Lever

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# One World Alliance

The countries which make up IAOPA are increasingly becoming inter-dependent as regulation is homogenised across the world, and examples of cross-border assistance on a bilateral and a global basis peppered the day-long discussions of the 127th Regional Meeting of IAOPA Europe in Cyprus in October. Craig Spence, newly confirmed as General Secretary of IAOPA, came from the USA, and Frank Hoffman, IAOPA's man at ICAO in Montreal, flew in from Canada for the meeting, which brought together delegates from the UK, Lebanon, Luxembourg, Malta, the Netherlands, Norway, Sweden, Cyprus, Denmark, Germany, Finland, Greece, Iceland and Italy; Austria, Switzerland and Poland sent their apologies.

During the day, Greece thanked the UK, Italy and others for support, Lebanon thanked Cyprus, Cyprus thanked the UK and the USA, and everybody thanked Frank Hoffman for help on specific national issues. The realisation that general aviation is one global industry needs to take root, because everywhere there is pressure to split us up into recreational fliers, business aviation, flight training and so on. But we hang together, or we are hanged separately, and we need to make maximum use of our international strength.

Chairing the meeting, IAOPA Senior Vice President Martin Robinson said: "No other GA organisation in the world meets like we meet, or has met 127 times to discuss the issues that are affecting GA. We should be proud as an organisation of what has been done through the years, and we continue to make progress, often against a very strong headwind."

Craig Spence's confirmation as Secretary General of IAOPA was characterised by Martin Robinsons as a positive move for the organisation, not only because of Craig's qualities but because he had constant and direct access to the President of IAOPA, Craig Fuller. "When I started working with IAOPA the Secretary General was Steve Brown, who was the head of the Technical and Government Affairs division in AOPA US. He was my mentor. When Peter Boyer took over AOPA US the arrangement was to have an external General Secretary, and John Sheehan came in. John did a great job for 17 years, but the philosophy of having a Secretary General back inside AOPA US is a good one."

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## *Delegates listen carefully to Treasurer Peggy van Ootmarsum's financial presentation*

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Martin reported that he had come to Cyprus from Slovenia, where he had been asked by the embryonic AOPA Slovenia for some guidance. "They are growing their membership and we will have more active participation from Slovenia in future," he said. "We are also in the process of establishing an AOPA in Belgium, and our new Brussels lobbyist Lutz Dommel has been instrumental in this."

Craig Spence spoke of IAOPA Europe as the most active and organised of the IAOPA regions, and gave an update on what AOPA US was doing with the FAA, the standards authorities and with the pilot community in the USA, particularly on reducing the cost of certification and improving the flying club structure. "We are starting to see a realisation that GA is over-regulated, and even ICAO and EASA are accepting this; we have a declining pilot population while costs increase, but attitudes are changing and I'm really optimistic for the future."

Frank Hoffman spoke of the differences in attitude between ICAO and EASA. "ICAO has said publicly that regulations should be performance-based rather than prescriptive. However, EASA does not seem to have said that." He outlined some of the new issues at ICAO's Air Navigation Commission that are receiving his attention, one being rules on fuel reserves. "They want GA to pay attention to what constitutes a fuel emergency and how it is declared," he said. "I've told them that this isn't going to work – fuel gauges in GA aircraft just don't tell you you've got 20 minutes left. You can't make a rule for airlines that will also fit GA."

IAOPA's own initiative at ICAO is to create a workable airworthiness structure for aircraft under 750kg so they can cross borders as easily as other aircraft and can be bought and sold internationally, and so that flying and engineering experience on them counts towards professional licences. "The only way to do that now is with a type certificate, which costs millions of dollars," Frank said. "This issue is very definitely on the agenda, and is supported by ICAO's own study of the pending shortage of manpower. We must have pilots and mechanics that filter up into the airline system."



# Getting EASA back in its box

Martin Robinson gave delegates an update on progress with the EASA Board of Management's request for a new approach following the submission of a set of guidelines and recommended practices by a working group on the regulation of GA headed by the French DGAC. The Agency has been given until July next year to publish internal guidance material against which it will have to check its rulemaking proposals. The basic philosophy should be that one size does not fit all, and GA should be handled separately from commercial air transport (CAT) and merits a different, proportional approach based on a risk hierarchy. "We can challenge things like the accelerate-stop problem against these guidelines," Martin said. "The European Commission has effectively agreed to this because it is part of the Board of Management."

"The idea is to adopt the minimum number of rules, and to adopt a risk-based approach based on good quality accident

data, from which statistically significant trends can be identified and on which a realistic risk assessment can be based. Grandfather rights should be protected, bureaucracy must be minimised, best use



**Above: by a derogation a local gliding association can administer the sport**

must be made of existing expertise, and tasks should be delegated where possible to the level at which they can be performed most efficiently, including by GA organisations. Gliders, for example, may be looked after by a derogation to allow a

local gliding association to administer the sport.

"It is recognised by the Board of Management that GA does not aim to achieve an equivalent level of safety to CAT. ICAO states this categorically – the person responsible in ICAO annex 6 is the owner-operator, to whom ICAO says the national aviation authorities do not owe the same duty of care. The idea is that they should no longer start with rules from CAT, then water them down to fit GA, but to make a fresh start in all fields – licensing, operations, air traffic management... and they must also consider the 'do-nothing' option."

One of the first things IAOPA was looking to have changed, Martin said, was EASA's Approved Training Organisation requirement, which will force flying schools to follow a completely new bureaucratic path which will be expensive and time-consuming, and has zero safety benefit. EASA intends that ATOs should require new and continuing authorisations for everything they do and every course they offer. AOPA's suggestion is that the current Registered Facilities simply be named Approved Training Organisations without any further requirement.

## 'Specific rules' leave nations to decide

Jacob Pedersen of AOPA Denmark has been IAOPA's representative on the working group dealing with EASA Ops, specifically non-commercial operation of complex aircraft. "Most of the relevant regulation has now moved away from EASA and into the 'comitology' stage in Parliament," he said. "We are waiting for Acceptable Means of Compliance material from EASA, which will detail how we are allowed to meet their demands, and these will not be published until after the rule is adopted."

Jacob said EASA had published its Opinion on SPO – which we formerly called 'aerial work' – and an Opinion on 'A to A' commercial operations, which are effectively sightseeing flights that return to the point of departure. Under Part SPO, no approval is needed – you must merely send in a declaration that you're conducting special operations. These include helicopter rescue operations, external load work, avalanche flights, glider towing, display flying, competition flying, and skydiving.

"In the rule structure, we have 'Specific Rules' which are effectively the get-out clauses we have been asking for," he said. "For instance, we have been complaining that aerobatic flights should not be forced to carry a fire extinguisher because it would be dangerous. Now, if you file your SPO declaration, you can have an alleviation. We objected to forcing parachutists to be strapped into the aircraft at all times, and they too can now have an alleviation. And if you carry smoke canisters, you can get an alleviation that exempts you from the regulations on carrying dangerous goods."

Under EASA, 'Approved Training Organisations' (ATOs) will be able to offer promotional sightseeing flights, but only on four days a year. While some delegates thought ATOs would simply designate these as trial lessons on the other days, it was pointed out that in some countries a medical and a background security check is required by anyone wanting to touch the controls of an aircraft, even for a trial lesson. Craig Spence said that in the USA, special security regulations

came into play when you start calling something flight training, and the process became much more difficult. In Italy, Massimo Levy pointed out, to do a trial lesson you needed the permission of the Interior Ministry, which took four to five months.

One of the most intractable problems of EASA Ops concerns the imposition of accelerate-stop distance requirements on private flights in twin turboprops like the King Air and the Piaggio Avanti. "As a result, aircraft that have been operating safely for decades from certain airfields will be unable to do so, and some pilots will be forced to downgrade to single-engined aircraft, which will make them less safe for 99 percent of a flight in order to make them more safe for five seconds during the take-off roll," Jacob said.

Dr Michael Erb said AOPA Germany had calculated that some 900 airfields in Europe would lose their premium traffic as a result of this rule, for which no safety imperative had been claimed. A King Air which required an 800m take-off roll would be prevented from flying off a runway of less than 1,341 metres. Many small airfields have said that the loss of their top-end traffic would tip them out of business. When this was pointed out to EASA, the Agency said: "Financial issues of airports are not relevant for our decisions."

"We had a meeting last week with representatives of the German regional airports, with whom we're working closely," Dr Erb said. "It's either physically or financially impossible for them to lengthen the runway. EASA's torpedo is running, and if we don't stop it many airports which can only justify their existence because of use of light jets and turboprops will disappear for ever."

Jacob concluded by saying EASA's Notice of Proposed Amendment was now out for Master Equipment Lists for GA aircraft. IAOPA's focus was on allowing the use of generic master equipment lists for GA, so that each aircraft did not have to have its own specific MEL, as was originally proposed.



**Above: special operations include external load work**

# €10 an hour in your pocket

The subject of VFR fees is never very far away, but IAOPA has been successful in fending it off on several occasions in recent years. "IAOPA has saved every GA pilot €10 a flying hour," Martin Robinson said. "That was the proposed fee in the original EC framework regulation on charges. IAOPA put up a strong case against it, and I was in Ben Van Houtte's office in Brussels in 2003 when he crossed it out, to his eternal credit. He accepted that we had no way of passing the charges on to passengers, that it would cost more to collect than it brought in, and that if we were charged for services, they would have to be provided – every VFR flight would be entitled to a deconfliction service, putting great strain on the system.

"But it's a subject that doesn't go away. Air Navigation Service Providers are unhappy that GA doesn't pay, especially as all their traffic forecasts have proven to be wildly out and they're desperate for money. But Eurocontrol rakes in €7 billion a year from route charges to commercial aircraft and it beggars belief that they can't organise efficient airspace use without charging GA."

EC regulation 1191 of December 2010 says the level of charges on light aircraft should not discourage the use of facilities for safety or new techniques, and that charges should be established in a fair and transparent manner after consultation with users. So VFR fees could not be introduced

**Right: Jacob Pedersen of AOPA Denmark, Martin Robinson of AOPA UK and Dr Michael Erb of AOPA Germany**



without consultation with industry.

Given that handling VFR traffic is of safety benefit to commercial IFR traffic, Air Navigation Service Providers are allowed to pass the cost of handling VFR traffic to member states. Some states pay what they think is reasonable – in Germany, the ANSPs got €6.5 million last year. Other states decline to pay, despite their obligations.

GA also faced calls for new and increased charges from EASA, but through the EASA Advisory Body, on which IAOPA sits, it had managed to influence the situation enough to hold charges steady. "They accept that they get engineers and pilots through having a good relationship with GA," Martin said. "EASA's budget is being reduced by one percent per annum for the next five years. Patrick Goudou says he needs more money, but I suggested that their budget should be cut by 30 percent to make them focus on the things they need to focus on, rather than bragging they have more tasks than the FAA."

## SES and instrument flying

In his report on progress (or lack of it) towards the Single European Sky, Dr Michael Erb, Managing Director of AOPA Germany, said the authorities wanted to reduce the priority of what working group FCL-008 had been proposing, including the En Route Instrument Rating (EIR) which would supposedly improve access to the IFR system for GA.

Some national aviation authorities considered the EIR to be dangerous, but he had countered by saying that very few people would get one, so it wasn't a problem. "We finally had a meeting with some national CAAs who raised concerns about this project," Dr Erb said. "The strongest language came from Ireland, who said the EIR should be renamed the 'Suicide Rating' and believed it would endanger their IFR system.

"I asked how many private pilots they had – they said about 1,500. How many would want this rating? Perhaps ten percent. And maybe they'd each fly ten hours a year. So in a year, only a tiny number of hours would be flown with an EIR.

"The Swedish also said they didn't see

the need to change anything, while the French were more worried about the English language proficiency requirement. The French are speaking French in French airspace anyway, so is it really so difficult?"

One of the main bones of contention is EASA's attitude to GPS approaches with vertical guidance – LPV approaches. "Our argument is that these are just a replacement for ILS," Dr Erb said. "They outnumber ILS now in the USA. It's flying down the same needles, yet EASA believes a whole new training system needs to be imposed. It is foolish to force pilots to fly VOR/DME or NDB approaches instead. We'd have more CFIT accidents. They have promised to introduce a new working group to consider it, but so far nothing has happened.

"As part of the same issue, they want every aircraft to be specially certified for LPV approaches, which would make it hugely expensive. It will be a requirement to have an individual operational approval – if you have a 172 with a Garmin 430, you have a 20-page paper that details how you want to operate, how you train your people, how you report incidents, and

details of each and every pilot who wants to fly this, and you send it to EASA and they stamp it. But people will just fly these approaches, because there is nobody from EASA sitting next to them.

"In Germany we hope to have four or five LPV approaches available this year, but they will be at airports with existing ILS approaches. We say it will improve safety at smaller airports where there are no approaches, but the licence specialists say this is too difficult.

"We have as our allies the European Space Agency, who say that hundreds of millions of euros have been spent putting up the EGNOS satellite system into space, and they want it to be a success – they don't think it needs to be made more complicated and expensive for people to use it. It's good to have them on our side.

"We have the arguments, we have the common sense, we have European Space Agency, and our airline colleagues also say it's stupid, so I think we have a chance of success. But it's time-consuming, going to meetings, spending money. We hope sense will prevail before the requirement kicks in."

Progress on the Single European Sky has stalled, with budgets under pressure and the recession affecting traffic to the point where yesterday's forecasts of ever-