

The IMC is dead – long live the IMC

AOPA is pursuing a multi-faceted strategy for saving the IMC rating, which is under threat from European harmonisation. While the IMC rating we know may disappear in name, there is every reason to hope it will be replaced by something that affords a similar level of protection, while satisfying the sensitivities of the 30 European countries who have concerns about it.

Through IAOPA-Europe, AOPA-UK is working to influence all those national authorities whose representatives have voted against the IMC rating, countering their ignorance of its provisions and promoting its safety benefits. AOPA is also working on the European Commission, where there seems to be a clear recognition that the IMC rating is a vital safety aid to GA, and which can ultimately direct EASA to make it available even in the face of misgivings from European states.

EASA itself recognises that the loss of the IMC rating would have a negative effect on GA and says that as a long-stop measure, it could be retained by Britain as a UK-only rating. But EASA is a highly-politicised organisation whose representatives often tend to agree with whomever is speaking at the time, and it remains to be seen how committed the Agency is to the future of the IMC.

The threat

EASA is taking over responsibility for flight crew licensing from the Joint Aviation Authorities, and as part of that process an EASA working group called FCL001 evaluated ratings offered in each European state to see which should be adopted across Europe. While some, like the Swiss mountain rating, sailed through without demur, the IMC rating was rejected, despite the fact that the UK government and the CAA strongly backed it. Countries like Germany and France, where it is illegal to fly in IMC outside controlled airspace, are adamant that nobody who doesn't have an instrument rating should be allowed to fly in IMC. They are supported by professional pilots bodies like the European Cockpit Association.

The arguments now put forward against the IMC rating in Europe are largely the same as those advanced in the UK in the early 1970s when AOPA first conceived the rating and wrote the syllabus. We have 35 years of experience of the rating and it is clear that it has never led the under-qualified into deadly danger, as the Europeans fear. At a meeting of aviation groups and journalists at the CAA in January, the head of the CAA's Personnel Licensing Department, Ben Alcott, set out the statistics on the IMC. Some 25,000 IMC ratings had been issued, he said, and 23,000 of those pilots still held current medicals (an astounding statistic at a time when 70 percent of all PPLs give up flying within five years – getting an IMC rating seems to be for those who intend to continue, professionally or otherwise, or perhaps helps and encourages pilots to continue). Of the 25,000 IMCs, Mr Alcott said, some 10,000 holders are PPLs.

Experience of the IMC rating has proved its value as a safety aid, he added. "We have no evidence of any particular problems of IMC holders mixing with commercial air

Actually, we're more worried about dead pilots



**Above: EASA's deputy head of rulemaking Eric Sivel says it's out of his hands
Below: the CAA's Ben Alcott says statistics prove the IMC is a lifesaver**



transport. I looked at airprox data going back to the year 2000, and in incidents between GA and commercial air transport in IMC – there were eight – none of them involved the holder of an IMC rating.

"We do believe, on the other hand, the IMC rating has been a safety enhancement. I have been able to trace only one instance of CFIT involving an IMC rating holder, at Keswick in 1992. We were disappointed at being unable to convince our European colleagues that it was a boon to safety."

EASA's deputy head of rulemaking Eric Sivel attended the same meeting and faced some hostile questions from pilots who believe the loss of the IMC rating will cost lives. He got

no credit for indicating that while EASA would effectively be responsible for the abolition of the IMC rating, it wasn't their fault and it was up to us to save it by winning over its opponents at national level.

EASA would, he said, allow the maximum possible transition time under EU law – four years – for the IMC to continue, and UK general aviation would be able to use that time to win around the objectors. It would be impossible, he claimed, for EASA to push through a Europe-wide IMC rating equivalent in the face of near-unanimous opposition from states.

Asked who the main opponents are, Mr Sivel said: "Commercial operators, commercial pilots, who say the only way to fly on instruments is with an IR. They lobby and influence their national safety authorities, with whom we consult. These are the people you must now convince of your case."

It was pointed out that the whole system was back to front. If they wanted to put pilots in the way of danger, it should be them who had to persuade us it was necessary, and not vice versa. That didn't cut much ice. But Mr Sivel said the final recourse was to Article 10(v) of the EC Regulation 1592/2002 (which sets out EASA's remit) which allows nations to put forward an "equivalent safety case" and effectively adopt an amended system from the rest. "Our recommendation is to keep Article 10(v) as a last resort if, in three and a half years, you see that we're not making headway."

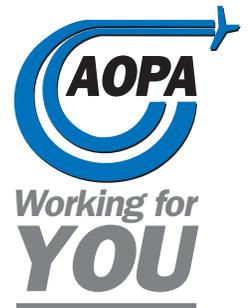
If the UK resorts to article 10(v), its application would have to be approved by the Council of Europe committee that oversees EASA. Countries with the largest populations have the most influence on this committee, and there's no absolute guarantee that it would approve the application – although Mr Sivel said that if the worst came to the worst, EASA would support the UK's application.

At times, it seemed like Mr Sivel didn't fully grasp what was at stake. "We understand that 23,000 people don't want their ratings to go away," he said. Actually, we're more worried about dead pilots. But however this pans out, we're going to have to spend an enormous amount of time, effort and money on this problem, and the best case scenario is that nothing changes. None of this reflects well on EASA. The agency might have been created for the right reasons, but now it often seems to be engaged in an exercise in political integration for its own sake, and the baby goes out with the bathwater.

EASA seems now to be planning another group, possibly to be known as FCL002, to try to undo some of the damage that FCL001 is causing.

Tackling the problem

AOPA is working on the issue on several fronts. A series of meetings with European Commission transport executives will culminate with a dinner with EC Aviation Commissioner Daniel Calleja this month



(April). The Commission has the power to direct EASA to adopt a course of action despite the opposition of individual states. AOPA has already enlisted the support of EC Transport Commissioner Jacques Barrot for the IMC rating.

At the same time, in a Europe-wide lobbying exercise AOPA UK has produced an explanation and defence of the IMC rating which will be presented to the relevant authorities by members of local AOPAs – there are AOPAs in 27 European countries. The paper aims to overcome the prejudices of national authorities who understand the IMC rating imperfectly or not at all, and will be carried directly to the individual from each country who sits on the FCL001 committee, as well to national Transport Ministers and other authorities, by pilots who can explain the issues in their own language.

AOPA has also won the support of BALPA, who have agreed to lobby the European Cockpit Association in favour of the IMC. The ECA has a seat on FCL001 and has influence over national safety authorities, and overcoming its opposition is crucial. Although it is unlikely that all European nations will back the IMC, breaking down the consensus of

opposition against it will help EASA and the EC to force through the right decisions.

The final line of defence is for Britain to file an 'equal safety case' under Article 10. This will be invoked if progress is not made in Europe within the next three years, and at that time a letter-writing campaign to MPs may be arranged to help oil the cogs. AOPA chief executive Martin Robinson says: "Until that time, letter-writing campaigns and petitions to UK authorities and MPs are counter-productive because they make work for those who are already on side, and who can do nothing anyway. We urge people not to write to MPs because it will lessen the impact if a campaign becomes necessary in the medium term.

"The EASA mission statement says: 'Our mission is to promote the highest common standards of safety and environmental protection in civil aviation.' Where does the removal of the IMC fit into that mission?"

"We are grateful to all those at the European Commission and at EASA who are supporting us, to BALPA for agreeing to explain the situation to the European Cockpit Association, and to our AOPA colleagues across Europe for carrying the fight to the people who matter." ■

EASA and your licence

Pam Campbell, IAOPA's representative on EASA's FCL001 group, explains what's happening as EASA takes over licensing

In August 2006, the European Aviation Safety Agency – EASA – based in Cologne, set up a Flight Crew Licensing Group to transfer the JAR-FCL requirements for all pilot training and licensing into EASA Implementing Rules (IRs). These rules were to become an EU Regulation.

Members of this FCL group, named EASA FCL001, comprised flight crew licensing experts from the authorities of the EU member states and the accredited industry and airline associations.

It is interesting looking back at the minutes from the first main Core Group meeting we had in August 2006, where it is recorded:

There is wide agreement that the JAR-FCL provisions should be transferred to the Implementing Rules without any changes to the substance. Some changes will be necessary, taking into account the different status and organisation of JAA and EASA rules.

The recently completed IRs do indeed follow

Chief executive's diary:

General aviation exists — official

For the first time the European Commission has formally recognised the industry by publishing its paper on a sustainable GA in Europe. It's almost two years since Phil Boyer, John Sheehan and I went into the EC's aviation commissioner Daniel Calleja's office to ask for this report, and it's been worth the wait. Dare we allow ourselves to believe that European governments will start to take GA seriously? Anyway, it got the year off to a good start.

On January 21st I had an ICB meeting in Brussels – the ICB is the forum in which industry discusses Single European Sky and SESAR issues. Again IAOPA defended the ICAO classifications of airspace and our position on 8.33 kHz radios against continued pressure from airline representatives. These same groups – IATA, AEA and ERA – are constantly seeking to reopen the charging debate, complaining that GA does not pay. IAOPA won that one last year – but they want to restart the argument.

I spent January 22nd at the Commission's conference on airspace. I was given 90 seconds to get over important messages regarding GA's use of European airspace. This was a high-level gathering – there were 430 delegates, mostly senior officials from European Ministries of Transport, and it was opened by Transport Commissioner Jacques Barrot. I was able to thank the Commission publicly and profusely for the GA sustainable future paper.

Next day I paid a visit to Eurocontrol to discuss the general aviation/business aviation day scheduled for April. I was pleased to be able to speak to the new Director General David McMillan, who until last year was the

UK DGCA. Given the changes taking place in Europe, particularly on SES/SESAR, I believe that David McMillan is the right man to steer Eurocontrol through challenging times. We wish him well.

On January 24th I attended the Eurocontrol-organised infringements workshop to present a GA view. The UK is a leading light in this area, with a lot of work going on to reduce the risks associated with infringements, and the rest of Europe is watching with interest.

On February 1st I went to a DfT briefing on charging relating to TMAs/ANSPs as a result of the common charging regulation of Single European Sky. On the 4th there was a meeting at CAA to discuss a project relating to GPS monitoring/reporting, and on February 5th we had a meeting of the Airspace and Safety Initiative's Airspace Communication & Education Plan (ACEP). ATSOCAS was the focus of discussion, in light of the decision to defer the implementation to end of 2008 – see separate story. The LARS system as we know it, with its recent enhancements, is still in operation, so use it when you need to, and please, if you have a transponder, use it too, Mode-C if possible. NATS and the CAA are producing and distributing 50,000 CD ROMS explaining the new air traffic services outside controlled airspace, and they should be dropping on pilots' doormats in the next couple of months.

On the 6th I went to a DfT update on EASA. Our main concerns are the IMCR, the BCPL and the mess of Part M, topics which we raised again for the avoidance of doubt. We had the AOPA Members Working Group at White Waltham on the 9th –



covered elsewhere in these pages – and once again West London Aero Club made a great job of hosting.

I went to the Bath offices of Flyer magazine on the 11th to meet with the publisher, Ian Seager.

We discussed a range of issues, and we're grateful to Ian for his support in hosting the

AOPA discussion forum on the flyer web portal. There's always the risk that we'll open ourselves up to attack by the unscrupulous and the anonymous, but you have to balance that against the opportunity to explain what we're about. There are so many misapprehensions about AOPA that we have to take every opportunity we can get to set the record straight.

From Bath I went to Bristol Airport to discuss the problems facing GA operations at the airport. Following advice from AOPA the user group managed to defer the proposed hike in land and parking fees. See separate story in these pages.

On the 13th NATS hosted a day-long discussion about what changes may need to be made to UK airspace by 2030 and how much it will cost as well as how the environmental challenges will be met.

On the 26th the GA Strategic Forum met and elected a new chairman Roger Hopkinson (LAA) and vice chairman Charles Henry (GAAC). We wish them both well with the main task of getting delivery of the recommendations of the GA Strategic Review.

Next day I attended the BIA meeting on 'GA Excellence' which is debating the eBorders issues that are likely to affect GA. Again, see separate story in this issue. We are seeking simplification of form-filling via a single web-based interface that will enable GA to move relatively freely across borders.

On the 29th I had the pleasure to make

the JARs in content on the whole, although the layout and general presentation tends to be different.

Time scale: The Council of the European Parliament adopted the Regulation for common rules in the field of civil aviation on 30th January 2008.

Work is now progressing on the Notice of Proposed Amendment (NPA) which was planned to go out in March, but I think it is more likely to be published in April, for a consultation period allowed of three to four months.

Anyone who is concerned and wishes to see and possibly comment on the NPA when it is published may register to receive the information on: <http://hub.easa.europa.eu/crt/>

The Implementing Rules

The text in the IRs is kept quite short, and just lays down the main framework, leaving the detail to be included in the Appendices, AMCs and Guidance Material.

The big difference in the document is the inclusion of all the categories of aircraft in the one volume: Aeroplane, Helicopter, Sailplane, Balloon and Airship. Powered Lift is also included, but not for the PPL or Light Aircraft

my presentation on the work of AOPA to the Rochester Airport Users Association. Let me again thank them for their support in return.

At the start of March I attended the BBGA conference and listened to a varied and interesting set of presentations. AOPA has, for many years, had a close working relationship with BBGA, which I'm sure will continue under the new DGCA Peter Griffiths, a former PPL-FI and easyJet captain.

On the 5th I chaired the GPS Working Group (a sub set of ACEP) which is busy developing material on how best to use GPS as an aid to visual navigation. I spent the 6th in consultation with Sir Joseph Pilling, who has been tasked with doing a 'root and branch' review of the CAA. It was highly professional and we had a good exchange of information and views.

The SRFAC – the CAA's finance advisory committee – met on the 7th. It is still a struggle to get the CAA to understand that the high level of charges are damaging to parts of the UK industry, with CAA charges being a significant proportion of the bottom line of any SME in the GA sector. It would be a good time for CAA to consider the Ramsey pricing theory, in which marginal costs are adjusted to reflect willingness to pay. The airlines continue to bang on about cross subsidies – however we agree with the airlines on the need for the CAA's mandated profit to be reduced from 6% to 3.5% in line with other government agencies.

On the 11th we had the GACC, the GA consultation committee. A lot of items are discussed at GACC, many of which I feel we can do little about. Influencing new rules such as Part M is really beyond the influence of the CAA. Which brings us back to European attitudes to GA. Will we fare better under European control? It's difficult to see us faring any worse.

Martin Robinson

Pilot Licence (LAPL).

Apart from Subpart A - General Regulations, each Subpart starts off with the Common Requirements which apply to all the aircraft categories that are included in the document, i.e. (A), (H), (S), (B), and (As). This is followed by Specific Requirements for each of the above categories of aircraft.

Implementation of EASA FCL.

Once EASA FCL is implemented – anticipated in some two years time – holders of UK pilot licences will be required to convert their licences/ratings by initially undertaking the conversion to the JAR equivalent before being eligible for an EASA FCL licence.

There will no longer be any national licences or ratings.

This presents some major problems for the UK, and much has already been written about the demise of the BCPL and IMC Rating in particular – two brilliant additions to licensing within the general aviation sector in the UK, and both, incidentally, AOPA initiatives.

The IMC Rating will not be accepted in its present form, but there will be a transition period of up to four years, allowing the UK IMC Rating to continue in the short term. During that time, studies will start to check if the IFR rating is adapted to the PPL and to address the issue of a possible European IMC Rating. The hard part will be to convince the opponents throughout Europe!

A new working group is planned to look at an alternative for the IMC Rating, acceptable to EASA, in conjunction with the work put forward by the PPL IR Group. We have yet to receive further details of this.

There is a section in the EASA FCL document for additional qualifications, which includes: Aerobatics, Towing (both sailplanes and banners), Mountain and Night Flying. The AOPA Basic Aerobic Course and Syllabus has been offered for the AMC material for the Aerobic Qualification.

So what effect does the introduction of such qualifications have on the existing AOPA qualifications and certificates?

I am assured by the CAA, in their view, that while European law may prevent the CAA from issuing national ratings, they do not consider it will extend to qualifications issued by non-regulatory bodies.

The UK NPPL will no longer be recognised following implementation of EASA FCL. However, the Light Aircraft Pilot Licence (LAPL) will replace it for both aeroplanes and for helicopters, plus the other categories listed for the full PPL above. The conversion from the UK NPPL to the LAPL should be a relatively simple exercise as the requirements for the licences are very similar. There will also be a Light Aircraft Flight Instructor (LAFI), enabling either a full PPL or LAPL holder to undertake the LAFI course to instruct for the LAPL. It has been stated that a PPL holder with an FI Rating instructing for the LAPL may be remunerated, but the LAPL holder with a LAFI rating may not.

Unlike the UK NPPL which is restricted to UK airspace, the immediate advantage of the LAPL will of course be the ability of the holder to fly to any other country within the EU, as it will be a European licence.

All training for licences and ratings under EASA shall be conducted from an approved training organisation (TO). A separate, simplified approval has been agreed for PPL and LAPL training, although the requirements for these are more extensive than those for the existing Registered Facility arrangements.

A happy note to finish on...

Latest news regarding prerequisites for applicants for Flight Instructor courses: it is known that the level of theoretical knowledge held by an instructor must be equivalent to the licence for which training is to be provided. Thus the instructors giving training for the PPL need only have the theoretical knowledge as required in the syllabus for the PPL. This was acknowledged at the last meeting of the EASA FCL Core Group, and therefore, the prerequisite for a PPL holder applying to take the Flight Instructor course to have passed the CPL theoretical knowledge examinations has been removed. ■

ATSOCAS delay

The introduction of proposed changes to UK Air Traffic Control Services Outside Controlled Airspace (ATSOCAS) has been delayed following a request from AOPA for more time to inform the general aviation public about the provisions of ATSOAS, and to train the people who will implement it. AOPA has been informally supported in this by Ministry of Defence officials who say they are not yet ready for the change. The ATSOAS review arose from the Airspace and Safety Initiative, a joint military-civil programme involving commercial airlines and general aviation which aims to reduce the number of infringements of controlled airspace, partly by providing a seamless military and civil LARS service. AOPA has a seat on the ASI's High Level Group, and is involved with its sub-group ACEP – Airspace Communication and Education Plan – while Martin Robinson chairs a further sub-group looking at the opportunities presented by GPS to reduce infringements.

Martin Robinson says: "We felt the original April deadline for implementation was too aggressive, given the requirement to retrain military and civil controllers and educate pilots. It may seem relatively simple to bring military and civil systems together, but there is quite a gulf of understanding. As I said in my last Diary, I have met military controllers who didn't understand that GA can still be non-radio.

"The military in particular must be ready. If GA pilots call expecting the new service and it is not available, confidence will be lost and the system will suffer."

According to Richard Taylor, head of the CAA's Air Traffic Standards Department, the authority received some 400 comments on the proposals during the consultation period which ended in mid-December.

"To allow a fair review of those comments, consider any changes that may be required and allow sufficient time for air traffic control units to train staff in the new procedures, we will unfortunately have to aim for a later date than the planned April 2008 introduction," he said.

Martin Robinson has suggested a 12-week period from the time educational material becomes available to going live.

Fuel tax – if the left doesn't get you...

Just as we seemed to have seen off one of the greatest recent threats to general aviation – the addition of another 30p a litre in tax on avgas – the government is planning to impose a new avtur tax that would devastate many AOC operators, particularly in the helicopter sector.

AOPA and other organisations have spent the last year and a half battling a European tax directive on avgas that might have taken the price of a litre of avgas beyond £1.60 a litre. In a series of meetings with UK Treasury officials, it was arranged to have avgas reclassified as a specialist fuel, which allows the UK to levy tax at a rate that varies from an EU-mandated minimum. As a result, avgas prices will probably increase by about 2p a litre – difficult, but not impossible.

The European Commission has also decreed that a tax be introduced on JetA1 used for private pleasure purposes and has set it at about 60p a litre, which effectively doubles the pump price of avtur. However, only a tiny proportion of avtur is used for private pleasure purposes, and the tax will not be applied at the pump – instead, private pleasure users will be expected to declare their use and pay tax on an honesty-box system.

The UK government, however, wants to abolish departure tax on commercial flights and to move to a system where instead of taxing passengers, the tax falls on aircraft, with heavier aircraft paying more tax. This new tax, called aviation duty, is designed to encourage airlines to increase load factors, but international flights will be exempt, so the number of commercial movements affected will be relatively small.

At the bottom end, there is a cut-off point of 5,700 kg – but while aircraft below that weight will be exempt from aviation duty, they will have to pay fuel duty instead. Helicopters are specifically mandated to pay fuel duty, even if they are over 5,700 kg.

A doubling of the cost of helicopter fuel will devastate the UK AOC industry. In the case of an S76, for example, it will increase running costs by £300 an hour. Because it is a UK-only tax, British operators will be uniquely damaged. At the AGM of the Helicopter Club of Great Britain – an AOPA corporate member – secretary Jeremy James painted a scenario in which JetA1 in Lydd was twice the price it was in Calais, and where operators like Bristows were forced to fill up in Norway.

Illegal taxes?

However, a court case in which AOPA-Germany emerged victorious has established that such national taxes may be illegal under European law. The case, which AOPA has been fighting for two years, may entitle German pilots to a tax rebate for business-related flying, and could have ramifications for taxation in the UK.

AOPA-Germany based its claim on a European Court judgement dating back to June 1999 when the airline Braathens challenged the Swedish imposition of an



National fuel taxes may be challenged

environmental tax on aviation over and above EC-harmonised levels. The court ruled that Sweden's action was incompatible with EC tax harmonisation.

The court's judgement says: "The obligation imposed by Article 8(1)(b) of Directive 92/81 to exempt from the harmonised excise duty mineral oils supplied for use as fuel for the purpose of air navigation other than private pleasure flying may be relied on by individuals in proceedings before national courts in order to contest national rules that are incompatible with that obligation."

Using this ruling, AOPA-Germany's lawyer and tax expert Prof. Gustav Real went to court to defend a pilot who flies a rented Mooney for both private and business purposes, and who had had his claim for a fuel tax rebate refused by German customs. AOPA-Germany won the case, and the pilot had his entire rebate claim paid in full.

On the basis of this ruling, AOPA-Germany is promoting claims for rebates for all business-related flights, and is also lobbying politicians to extend the concession to private flying. The Court directive defines private pleasure flying as 'the use of aircraft by its owner or the natural or legal person who enjoys its use either through hire or through any other means, for other than commercial purposes and in particular other than for the carriage of passengers or goods or for the supply of services for consideration or for the purposes of public authorities.'

Under European law, what's sauce for the German goose should be sauce for the British gander – although in Germany, the tax authorities say they are bound by German national law, rather than European law, and will continue to contest every case. Given the precedent, this seems unnecessarily perverse as they are certain to get their ears boxed every time. But several European AOPAs including the UK are consulting with tax experts in their own countries to see if similar tax rebates can be won. On the face of it, the European Court ruling should protect pilots against industry-destroying taxes such as the fuel duty. ■

Local heroes wanted

At the instigation of the AOPA Members Working Group a network of regional AOPA representatives is being set up across the country. We're looking for volunteers to take this role in many areas. Could you be AOPA's representative at your airfield?

Member Andy Rehorn is co-ordinating this initiative and has already signed up about a dozen reps, as well as establishing with AOPA what materials they will need and arranging to have them provided. Here, Andy explains the system

AOPA regional reps

The idea behind this is to establish an AOPA point of contact for those schools, clubs and groups who may require it. A regional rep will be someone who can encourage new and old PPL holders to improve their flying experiences in different ways. Whether to gain additional skills through an approved AOPA course, experience with a mentor or advice on gaining their AOPA Wings, the regional rep would be the first point of contact.

So what role would you be asked to fulfill as an AOPA Regional Rep?

Commitment to an airfield or a group of local airfields

There are parts of the country where a rep could only reasonably be expected to cover one local airfield, there are others where covering several small airfields is possible. The initial brief is to broaden and increase the membership and encourage sharing of experience by making yourself the point of contact for local PPL holders.

Schools and Clubs

To establish a contact with each school or club, preferably the CFI or club owner. From smaller airfields where no training is carried out, permission from the airfield owner to display a poster and contact details in an attempt to reach those who have not remained in the school environment post PPL.

A display should show a contact name and number and a poster of both AOPA and the Wings Scheme. Providing space is available, one would hope a regularly updated new

Channel Islands ANO

The Channel Islands is setting up its own Civil Aviation Authority, although the changes are largely procedural and general aviation pilots will be little affected. The change was recommended after ICAO audited the UK's compliance with its requirements, and found that there was insufficient separation between regulator and service provider in the islands. The director of Jersey and Guernsey airports had effectively been an employee of the Department for Transport regulating aviation. As a result, a three-person regulatory body has been introduced. The Channel Islands needs its own ANO, to which AOPA has recommended alterations. It provides for airports to be closed down if they do not attain certain standards, but on islands where there is only a single airport, that is not a feasible option.

section, or 'What's Hot' section could be incorporated.

Wings Awards

Promotion of the scheme and general awareness. The availability of Bronze Wings to new PPL holders and free AOPA membership to students. The advantages to pilot development of the Wings Scheme, to old and new PPL holders alike, in retaining pilots in currency and as licence holders in the long term.

Mentoring Schemes

Subject to future developments on this type of scheme, a regional rep would be a good first point of contact for those wishing to develop their flying in this manner.

AOPA Evenings

An evening with a speaker is always popular with the pilot community. One organised with a short AOPA talk incorporated would be a good way to raise awareness. Martin Robinson or other prominent AOPA figures would possibly make themselves available for this, or a local rep could indeed do this him or herself if they were happy to do so. This is a good opportunity to increase awareness.

Ongoing Marketing

To ensure regular contact with airfield owners, CFIs and club owners. To ensure that application forms and news items are kept up to date and that any information displayed is current and tidy. If a noticeboard incorporates a 'What's Hot' section, to keep this updated with current news.

Furthering the awareness of AOPA certificates (e.g. Aeros) which further skills and also increase the business opportunities for corporate members.



Martin Robinson shows the AOPA noticeboard to the Members Working Group

Obviously making oneself available via the displayed contact number is vital. Anything that a rep cannot understand would be resolved by ringing AOPA Head Office.

A package of display material and application forms will be made available to all reps with any back up required. It will include:
Letter of Introduction from Martin Robinson, CEO
Pilot Application Forms (12)
Student Application Forms (12)

Poster
Wings flyers (12)
Wings Folder/Guide/Application
Stickers (six of each)
Magazines (six)
Notice boards can be supplied if they are required.

If you can act as an AOPA rep at your airfield or club, let Andy Reohorn know – andy.reohorn@gmail.com, 07809 737232 ■

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New strife at Bristol

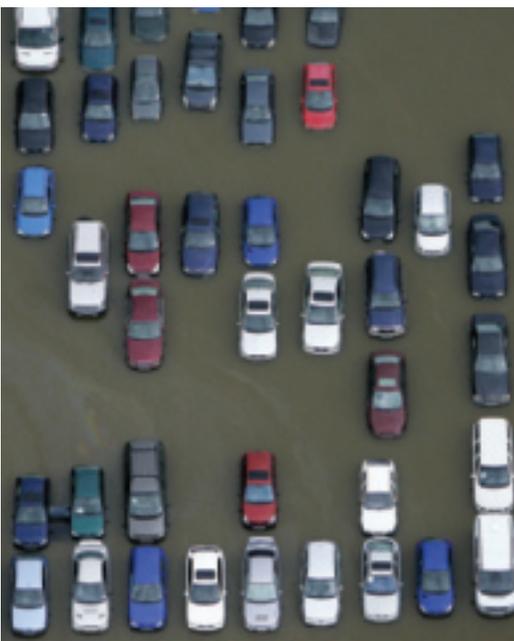
AOPA has been called in to try to help general aviation operators at Bristol Airport, where the management are trying to convert the GA apron into a car parking area.

Bristol has agreed to defer increases in landing fees and parking charges – which were to have been doubled overnight – but pressure on GA will continue in an area of the country where there are few alternative aerodromes. Says Martin Robinson: “If Bristol shuts out GA, where will the young people of Bristol go to pursue aviation careers?”



The problems at Bristol, and at many other provincial aerodromes, have their roots in a government diktat dating back to the 1980s which demanded that local authorities divest themselves of any capital assets over a certain value. Since then, airports that have been sold into the private

sector include Newcastle, Teesside, Sheffield, Bristol, Exeter, and Shoreham. In every case, the sale has led to problems for



GA, with aerodromes no longer being looked upon as necessary cogs in the transport industry, but more often being treated as cash cows. Rarely has the taxpayer had value for money; two years after being sold by the local authority, Bristol Airport was resold at a profit said to be in the

region of £40 million. Some were sold with few guarantees that they would remain as airports, or with weak safeguards. Sheffield City Airport, which is to close this month, has a clause in its contract allowing owners Peel Holdings to close it down if it was not commercially viable. A cynic might say that a little neglect was all that was required to ensure that the airport could be turned into a property development, which is what will now happen.

When maximising profit outweighs everything, deaf ears are turned to the argument that aerodromes have an amenity value to a local community. When a small provincial airport can have 1,000 cars in the car park, each paying £8 a day and costing virtually nothing in overhead, it's clear that there's no incentive to provide a service to GA in return for a £15 landing fee, and plenty of incentive to turn the GA apron into a car park. ■

Left: at £8 each a day there's ample incentive to turn a GA apron into a car park

Lee on Solent update

The work to keep Lee on Solent progresses apace. Lee has the only hard runway on the south coast that is available to GA between Brighton and Bournemouth and is of strategic importance to UK aviation. Those who want it retained for aviation use include Fareham and Gosport borough councils, Hampshire County Council and South East England Development Agency (SEEDA). SEEDA, local MP's and local people would like to see aviation related businesses located on the site which can benefit from and utilise the airfield infrastructure. Unfortunately, despite many planning, policy and public statements to this effect there remains no agreement from the airfield operators to allow access by air to the SEEDA land.

Ownership of the airfield (formerly HMS Daedalus) transferred from Defence Estates in March 2006. The central portion, including the runway, went to First Secretary of State, who holds it on behalf of DfT for use by the Maritime and Coastguard Agency. The rest of the site went to SEEDA, including a large part of the manoeuvring area and practically all of the accommodation and hangarage.

Hampshire Police Authority lease the DfT land, manage the airfield and Portsmouth Naval Gliding Club have a license to operate from it. The current situation has developed as a result of continuing efforts by Hampshire Constabulary to clear the site of everyone except themselves and the MCA SAR flight, now operated under contract by CHC Helicopter Corporation. As far back as 2004 the Chief Constable of Hampshire wrote to the local MP, Peter Viggers to tell him that “the risk to safety would be unacceptable if gliding activity remains on any part of the airfield.” Hampshire Police and the DfT originally sought 71 Hectares of the site but were persuaded to take an additional 35 acres to allow sufficient space for continued gliding operations.

Nonetheless gliding ceased at the site in March 2006 and was re-instated only after support from the MoD (Navy) resulted in a license being granted to the Secretary of State for Defence by the First Secretary of State.

Community groups including aero-modellers clubs and two local Children's Motor Cycle Display Teams were also told by Hampshire Constabulary they had to leave, for various reasons, despite decades of safe operation supported by Health and Safety procedures and Risk Assessment documentation.

In October 2007 it was the turn of light aviation to be removed when a shock announcement was made that “The airfield operator, Hampshire Constabulary (HC) has made the decision to close the Daedalus airfield to general aviation in consultation with the Maritime and Coastguard Agency (MCA) and the South East England Development Agency (SEEDA). This decision has been made primarily on the grounds of health & safety concerns about the mix of general aviation, gliding and emergency services operations, relative to the level of existing infrastructure.”



The airfield users did not take this lying down, particularly as, through the Lee Flying Association, they were part-way through a consultation and proposal process with these stakeholders, offering to provide safety improvements such as an air-ground radio service and airfield services. Following legal advice LFA obtained two extensions of the closure deadline until mid-May this year, with a commitment from the Chief Constable that he will adopt any reasonable solution that protects the operational requirements of the Police and Coastguard while enabling GA to operate without additional costs falling on the Hampshire Police budget.

Lee Flying Association is working hard on the content of this proposal, necessarily involving dialogue with many other groups and organisations. LFA should have finalised and presented to the Chief Constable and Hampshire Police Authority leaders in the next few weeks. John Walker and Mike Cross from AOPA UK have been assisting LFA and working hard on contacts within CAA and DfT to ensure that the LFA proposition meets all of the safety requirements.

LFA believes the airfield can continue to be used for non-aviation activities by Hampshire Constabulary and community groups, and encourages these provided they do not interfere with normal aviation use of the airfield.

The complex situation at Lee has developed over a number of years and requires a significant amount of untangling of aviation and non-aviation issues. If the Chief Constable is true to his word and agreement can be reached to allow users of the SEEDA land to arrive and depart by air it will be a significant step towards realising the aspirations of SEEDA and the local community. By the time the next issue comes out we should know the answer. ■

A glider from Portsmouth's Naval Gliding Club soars over Gosport, with Portsmouth's Spinnaker Tower in the background

Big Brother is watching you

The government's plans for 'E-borders' – the computerised system of ticking people in and out of the country – shouldn't affect you greatly as a private pilot, but as a citizen they might well horrify you.

E-borders is already in place at major airports, where your data is sent to a computer as your passport is swiped when you enter or leave the country. The government knows instantly where you're going and when you got back, and can track your travels in real time.

What is disturbing is that the authorities make no bones about the fact that they will be cross-referencing this data with other electronic records to build up a detailed picture of every aspect of your life. Credit card records will tell them who paid for your ticket, social security records will show whether you're in Benidorm when you're claiming the dole, tax records will paint them a picture of what you were up to when you went to the Cayman Islands, Andorra or Liechtenstein. Have you paid your parking tickets?

The state's excuse for this is that terrorism must be countered.

For private pilots leaving the country, the operation of informing the authorities under E-borders should be relatively painless. You'll fill in your details online at the same time as you file your flight plan. And of course, as they said in Germany in the 1930s, if you're a law-abiding citizen you'll have nothing to worry about, will you.

*Lars Hjelmberg of AOPA-Sweden represented IAOPA at the recent European Civil Aviation Conference Facilitation-Immigration Subgroup meeting in Paris in January. One purpose of the meeting had to do with the universal acceptance of an ICAO authorised crew member certificate (CMC).

The CMC is designed to provide faster and easier access to international airports. IAOPA feels that it should provide a means of properly identifying the crew member to government authorities for administrative tasks in conjunction with his or her flight related tasks. Unfortunately, some states do not believe that this additional purpose is warranted or justified.

Hjelmberg told the meeting: "IAOPA believes that the CMC should serve as both a crew identity document for the purpose of obtaining exemption from visa requirements and as an

identity document for security and access purposes. With access we include authorisation data to be communicated by computer card readers for internet access to computer systems of authorities when performing required air crew duties. If not, the crew will have to obtain various identification documents based on specific needs, adding to cost and complexity."

IAOPA statements regarding CMCs include:

- They should be optional for non-commercial aircraft operations.
- The cost for the aircraft operator shall not exceed the cost of obtaining a similar governmental identity card.



- If a CMC is issued by an EU state it may be used as a substitute for the national identity card of that state, if one is already produced.
 - Any required background checks should be funded by the state of issuance.
 - Contracting states should include features on CMCs to grant internet access to computer systems required in the performance of pilot duties.
- A meeting of the full facilitation panel is being held at ICAO in Montreal in April. ■

Mode C saves the day



A GA pilot who infringed the Heathrow zone, causing delays to outbound flights, is unlikely to be prosecuted, in part because when he realised he was in trouble he turned on his Mode-C transponder to help ATC bail him out.

The pilot, who had only recently qualified for his PPL, instinctively turned off his transponder when he realised he was probably in the London TMA, then commendably thought the better of it and turned it on again. That fact, AOPA believes, renders him much less liable to prosecution.

Martin Robinson says: "We have to get past this entrenched idea that a transponder is an instrument of CAA retribution. The opposite is now the case. Use LARS where available, plan your flight well, and turn on your transponder, mode-C if you have it, every time you fly."

Intriguingly, the pilot was for the first time interviewed not by the CAA's investigations department, but by NATS. Is NATS taking over some of the CAA's enforcement duties?

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Members Working Group



Left: AOPA members at the February AMWG meeting at White Waltham

February's meeting of the AOPA Members Working Group covered a wide range of topics, most of which are covered in articles elsewhere in this magazine with the members' observations included.

Fifteen members attended the meeting, at White Waltham, with apologies for absence from four more. The meeting was chaired by Chris Royle, and members attending were Auriol Stephenson, Timothy Nathan, Richard Warriner, Pat Malone, Greg Prendergrass, Michael Ryan, Chris Gunn, Steve Copeland, Andy Reohorn, Mike Cross and Pauline Vahey. The AOPA executive contingent comprised chief executive Martin Robinson, chairman George Done and office manager Mandy Nelson.



The threat to the IMC rating was the first item up for discussion. Pat Malone gave a brief outline of the meeting called by the CAA and EASA to explain the issue – see separate story – and warned that relying on the British

authorities to effectively “file a difference” to maintain the rating was an uncertain strategy.

Martin Robinson warned that the campaign of letter-writing to UK MPs and others could be counter-productive at this stage because, as AOPA had made clear last year, the CAA and the DfT supported the IMC rating and pledged to try to maintain it. Under ‘Better Regulation’ stipulations, civil servants now had three days to answer MPs queries, and making work for them when they were already on side, while giving them the opportunity to pigeon-hole an issue as ‘dealt with’, could work against us. The time for letter-writing, he said, would come in three years if the UK authorities were backsliding on the promise to seek exemption under the safety provisions of the EASA regulations.

Mike Cross gave a run-down of the situation at Lee on Solent – see separate story – while Andy Reohorn updated the group on the plan for a network of regional representatives for AOPA, outlining the responsibilities of airfield reps. This is also dealt with fully elsewhere.

New initiatives proposed and taken up at the meeting include a training syllabus for the Class Rating Instructor, reinforcing AOPA's proactive stance on environmental issues, and the resurrection of the IAOPA (Europe) e-newsletter on a bimonthly basis.

Michael Ryan outlined proposals for improving GA safety by laying new emphasis on human factors. He presented a reasoned paper suggesting a new approach, given that something like 80% of GA accidents are largely due to pilot error. In essence, he said we over-train for aircraft failure and under-train for human shortcomings.

Michael, a former Navy pilot who is also on the AOPA board, outlined some of the problems he and his colleagues had experienced landing early jets on carriers, and briefly analysed how the Navy had addressed the issues that had arisen. He suggested the CAA might rely less on legislation and more on motivation to improve human performance. The group was wary of involving the CAA too closely in any such discussion as their primary contribution was likely to be more regulation and cost, which would not address the core issue.

Michael said pilots are too often left to their own devices after basic training and suggested that a motivational system might be established around a ‘contract’ entered into by pilots, under which they agreed to involve experienced examiner-instructors in incident analysis. Pilots would be able to analyse their actions and identify the points in the chain of events leading to an incident where wrong decisions were made or actions taken. Further training in specific areas would be agreed. Fees would be payable to the examiner by the pilot. The aviation insurance industry might be inclined to support such a scheme.

Members thought Michael's suggestions had real merit and ought to be developed, and agreed to bring their own ideas to the next meeting. ■

NPPL revalidation

As from your next revalidation (which must be completed before 30 June 2009), all Class Ratings on NPPLs will have a 24 month validity period. In this period, a total of at least 12 hours flight time, including eight hours as PIC, must be completed in order to revalidate by experience.

1. Holder of a licence with one class rating (SSEA* or SLMG or Microlight) complete on the class of aeroplanes held:

(a) within the period of validity of the rating have flown as pilot:

- at least 12 hours flight time including eight hours PIC.
- at least 12 take-offs and landings.
- at least one hour training flight with an instructor. If this flight has not been completed, the rating will be endorsed ‘Single seat only’.

(b) Within the 12 months preceding the expiry date of the rating, have flown as pilot:

- at least six hours flight time.

2. Holder of a licence with two or three ratings (SSEA/SLMG/Microlight):

(a) Within the period of validity of the rating on any of the classes of aeroplanes held, have flown as pilot:

- at least a total of 12 hours including eight hours PIC
- at least 12 take-offs and landings
- at least one hour training flight with an instructor. If this flight has not been completed all ratings will be endorsed ‘Single seat only’.

(b) Within the 12 months preceding the expiry date of the ratings held have flown, as pilot on any of the class ratings held:

- at least 6 hours flight time.

(c) Within the period of validity of each class rating held, have flown as pilot:

- at least one hour PIC on each class held; or
- undertaken at least one hour of flying training on each class held with an instructor entitled to give instruction on aeroplanes of those classes.

If (c) has not been fully completed, you will be required to renew the relevant Class Rating(s) by GST.

*Note: After 31 January 2008, Microlight/SLMG privileges may not be exercised on an SSEA Rating. However, a general exemption applies to anyone currently exercising such privileges and the relevant Class Rating(s) will be added to the licence upon revalidation.

Holders of the NPPL SSEA

In order for you to move to this new system, there is a transition period from 1st February 2008 until 30th April 2009, during which you need to take your licence and your log book, which must show the following evidence of rating validity, to a Flight Examiner:

- a minimum of six hours (including four hours PIC) in the 12 months before logbook presentation; and
- a one hour training flight with an instructor in the 24 months before the log book presentation.

The Examiner will sign and date the rating page in the licence, and the new revalidation procedure, i.e. 24 month rating, will start from that date. – Pam Campbell ■



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The world comes to Athens

Representatives of the 66 AOPAs worldwide will be gathering in Greece in June for the 24th IAOPA World Assembly to discuss international issues affecting general aviation.

The World Assembly coincides with the Icarus Aero Expo in Athens, an unprecedented general aviation event for which the Greeks have relaxed their normally onerous restrictions on GA. The Greeks are waking up to the potential of general aviation tourism, particularly for the islands of the Aegean, and in order to test the waters are making major concessions to fly-in visitors. GA aircraft will be exempt from handling charges at all Greek airports in June, while Tatoi Airfield (LGTT) outside Athens, where the Expo is being held, will have no landing fees, no PPR requirement, no airport taxes and cheap fuel.

Key speakers at the World Assembly will be David McMillan, Director General of Eurocontrol, Daniel Calleja Crespo, EC aviation commissioner, Karsten Theil, Regional Director of ICAO, Phil Boyer, President of IAOPA, and Bruce Landsberg, Executive Director of the Air Safety Foundation. Delegates have registered from all over the world. AOPA Pakistan will be attending their first World Assembly, Japan and Lebanon are sending three delegates, and non-AOPA countries like Nigeria are sending observers.

The Expo and the Athens World Assembly have come about almost wholly because of the drive and commitment of AOPA-Greece executive Yiouli Kalafati, who has worked tirelessly to convince the Greek authorities that their country could benefit hugely by welcoming GA. Good and reliable weather and the attractions of the Aegean Islands make Greece a perfect destination for European general aviation, and Yiouli has convinced the Greek Ministry of Tourism Development, the Hellenic Air Force and other important bodies that restrictions on GA should be relaxed. She has also attracted major sponsors for the Athens Expo, including Aegean Airlines, Air BP, Olympic Airways and the Greek National Tourism Organisation. As well as providing fuel at a five percent discount, Air BP is sponsoring GA initiation flights for members of the public.

Yiouli says: 'The European South is one of the fastest-growing aviation markets because



Above: Eurocontrol director general David McMillan (left) with Yiouli Kalafati of AOPA Greece

of excellent weather, EU enlargement and dynamically growing economies. The world of aviation now has an opportunity to introduce itself and explore the untapped potential of the region while paying a visit to Athens, at the crossroads between East and West, a bridge to the Middle East and the most important economic hub in the south eastern Mediterranean.'

The World Assembly runs from June 9th to 15th, while the Icarus Aero Expo runs from June 13th to 15th. It will be an unprecedented showcase for general aviation in a country which has not up to now embraced the industry. There are around 100 GA aircraft in all of Greece – compared to 10,000 in the UK – and their pilots operate only with great difficulty. But the shackles are off for the month of June, and for the foreseeable future it looks to be the best opportunity European GA will have for some time to visit Greece.

Tatoi airfield, just 15 km from downtown

Below: the attractions of the Aegean Islands make Greece a perfect destination for European general aviation

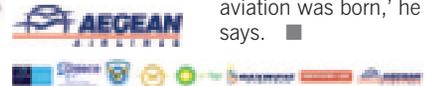
Athens and having excellent road and rail connections with the city, has a 5,800 ft tarmac runway. From 6 to 16 June Tatoi will be open from sunrise to sunset for all general aviation flights with no prior permission, no landing fees and no airport taxes. Air BP will be offering a 5% discount at Tatoi on published June fuel prices. The Expo incorporates an air show at which Greek military and civil aircraft will display. Demo flights will be held for the public, sponsored by Air BP, Greek aero clubs and flight training schools.

For those who elect to fly scheduled, Aegean Airlines is commencing a twice-daily service from Stansted to Athens on May 15th and is offering discounts to AOPA members. Aegean Airlines, headline sponsor of the Athens Expo, is owned by Mr Anton Simigdalas, a member – and strong supporter – of AOPA who started his company with one single-engined aircraft and built it into one of the great success stories of Mediterranean aviation. Last year it carried 5.2 million passengers. Its London service will be flown with new Airbus A320s, with departure times from Stansted set at 10:20 and 20:00. Flights will connect with Aegean's network covering the Greek island, Cyprus and other domestic destinations. The Greek national carrier Olympic Airways is also offering discounts for AOPA members in June.

Yiouli Kalafati says: 'Greek hospitality is rightly famous throughout the world. We have planned a variety of visits, and cultural and entertaining events. The highlight will be a day-trip on Aegean Airlines' new A320 to Santorini. Such generous offers should be exploited to the maximum.'

Phil Boyer, president of IAOPA, issues a personal invitation to all AOPA members.

'Come and visit the land of Icarus, where aviation was born,' he says. ■



Gathering dust on a shelf

The purpose of the GA Strategic Forum was to ensure that the positive messages of the Strategic Review were acted upon. But two years on nothing has changed. By Martin Robinson

Remember aviation minister Gillian Merron's positive and uplifting noises about general aviation? Remember CAA chairman Sir Roy McNulty's Strategic Review, and his attempts to claw back some of the authority he lost with his abysmal Joint Review Team by offering GA a new deal? The minister has gone, the chairman will be going soon, and with the threat of new taxes, charges, costs and regulations, GA is in an even bigger mess that it was two years ago.

The GA Strategic Review was completed in April 2006. At the same time there was a review of the regulatory framework – the Regulatory Review – the object being, as I recall, to examine where improvements could be made. Largely because of the Joint Review Team and the then-pending increases across the CAA's charging schemes, I always understood that an output of the review would be an attempt to streamline the regulations so that GA was only paying for direct regulation where it is needed by law. In that way, the increased charges resulting from the JRT would be offset by having fewer chargeable items. I do not believe that we succeeded in that goal.

The CAA finance people have worked hard to try to balance the books while at the same time trying to remove cross-subsidies in CAA charging schemes, but the bill for many GA companies is still disproportionately high as a percentage of turnover. So I fear we will need to look again at the volume of regulation and

“need to retain a viable network of GA airfields”. Nor can we get any movement out of the CAA on certification issues surrounding silencers and three bladed propellers, which have been certified elsewhere in Europe but require a separate CAA certification for UK use.

When John Arscott of the DAP complains that his department deals constantly with noise complaints about GA, I have to point out that the CAA's Safety Regulation Group seems to have put this certification issues into the “too hard” box. While industry has been innovative in introducing ‘fly neighbourly’ schemes, more work needs to be done. Many GA pilots and owners want to reduce the environmental impact of their operations but it seems most

The CAA must take some responsibility for ensuring GA aircraft are not as quiet as they could be

hangarage) all seem to point to a reduction in the overall economic value of £1.4bn.

The European Commission's paper on a sustainable European GA may be the only light on the horizon, as a key component of that document is the need for proportionality when dealing with GA, but we must not let this document wallow in shallow waters. Through IAOPA Europe we will continue to work with the Commission to achieve a stronger GA. It is clear that the UK government has little or no interest beyond what it can extract from aviation – and I include the airlines in that, because while the government constantly strives to increase its revenues from aviation, it's in the Jekyll & Hyde position of wanting the aircraft to sit on the ground in order to find an environmental scapegoat. If the British public wanted a green government they would have elected the Green Party, which if I recall correctly received the

same number of votes at the last election as the BNP. We must all take responsibility for our environmental impact, recycling more and cutting carbon emissions, but I'm wholly cynical about new ‘environmental’ taxes that just end up in the black hole in the Treasury.

This Government, as well as previous ones, does not care about our industry, perhaps because it is still considered to be elitist or privileged. It is difficult to remain upbeat about the future of GA when I look at the big picture. From airspace changes to new equipment, the pressure will only increase. Looming issues include fuel price and availability, maintenance costs and skilled labour requirements, E-borders rules, the relentless pressure from airlines for regulators to take more from GA... throw in the credit crunch, and I feel that if we are not careful we could end up with a GA fleet that has no value.



**Left: quiet prop on a Swedish Cherokee - the cost of UK regulation prevents it
Above: Liese silencer on the same aircraft gives a 7db noise reduction
Right: where will tomorrow's maintenance engineers come from?**



what the CAA charges for it.

It will be remembered that the economic value of GA was estimated to be about £1.4 billion annually, and it must be assumed that the Strategic Review recommendations were developed so as to enhance GA and ensure its long term sustainability. To ensure that the review recommendations did not gather dust on a shelf the GA Strategic Forum was established, involving AOPA, BBGA, BGA, BHCGB, CAA, DfT, MoD, NATS, and LAA, and meeting four times a year.

But over the last 20 months there has been very little progress. Even though we have reported in the pages of GA interviews with at least three aviation ministers, we still cannot get a statement from the minister regarding the

are deterred by the high level of charges. The CAA must take some responsibility for ensuring GA aircraft are not as quiet as they could be.

Also highlighted in the review was the subject of the supply of skilled labour, including pilots, engineers and controllers, but there is very little evidence coming out of the GA Strategic Forum that suggests anyone (other than industry) really cares. The government considers it to be industry's problem. Again, I really fear that with the coming imposition of new maintenance rules the situation with engineers will become even worse.

So much is changing, all at the same time. Take fuel duty – we still do not know what rate of duty will be applied to avgas (not until the November Budget) whereas the duty rate for Jet-A1 is proposed at 58 pence per litre, doubling the price of avtur. This will slow down the number of conversions from petrol to diesel engines as the economic reasons no longer stack up. However, if the avgas usage volume tails off you may have to convert to diesel engines if you want to keep flying. What about those aircraft that cannot convert? Soaring fuel prices, higher CAA charges, higher operating costs, (maintenance, insurance



Yet I know GA will survive because of the passion that so many of us have to be airborne. Is the GA Strategic Forum stopping that review ‘gathering dust on a shelf’? If it is to be successful it will need more commitment from DfT and the CAA. Words are cheap! Action is required now, while we still have an industry worth the name. ■