

THE GUILD OF AIR PILOTS AND AIR NAVIGATORS

Position paper on Pilot Licensing Issues

Introduction

The United Kingdom's legal responsibility for rule making in the field of Flight Crew Licensing and Flight Operations has passed to the European Commission which in turn has delegated it to the European Aviation Safety Agency (EASA) to introduce all Rules and Regulations in these areas.

The UK's Civil Aviation Authority (CAA) will have no power to make new Regulations, vary new EASA Regulations or add to or subtract from EASA Rules and Regulations.

1. IMC Rating and Instrument Ratings

EASA has made no provision for the IMC (Instrument Meteorological Conditions) Rating for holders of the Private Pilot License (Aeroplanes) to continue under its Rules and currently it will cease to be available once these are adopted. In spite of its strong representations the UK found itself almost alone in wanting to have this Rating available and was therefore outvoted.

Flight into conditions for which the pilot had received insufficient training continues to be a matter of concern. In the UK the IMC Rating is seen by the industry and the CAA as a major safety initiative for flight in poor weather conditions and every effort must be made to ensure it continues to exist in the European scene. EASA has formed a new Working Group, known as FCL008, to consider the IMC issue. Its deliberations will not affect the existing Notice of Proposed Amendment (NPA), but may lead to a further NPA.

Recently the French DGAC proposed an Instrument Rating which may satisfy those who wish to maintain the UK IMC Rating.

2. LPL/PPL Qualifying Requirements

EASA has made proposals to change the requirements for the basic Private Pilot's license (PPL) and to introduce a new license to be known as the Leisure Pilot License (LPL). There has been much debate regarding this new qualification.

The intention of EASA is to make learning to fly easier and less costly, thereby attracting more people to take up this recreational activity.

3. Multi-Pilot License (MPL) Developments

This license was first introduced less than 3 years ago under the Joint Aviation Authorities (JAA). The first courses for a UK airline were sponsored by FLYBE and were run by Flight Training Europe and Oxford Aviation Academy. It offers another path for professional pilots wishing to fly for an airline, and may become the accepted route to such a career. No other

airline has sponsored students on a MPL course and even the recently announced BA FPP programme will utilise the 'old' syllabus.

4. Licensing Structure

Whilst the new licenses and ratings closely follow the current Joint Aviation Requirements Flight Crew Licensing (JAR-FCL) there are some changes which will need to be monitored by the Guild.

5. Training and Operations outside the European Community (EC)

It would appear that grandfather rights will be given to existing EU FTOs for training outside the EU. No further variations to the requirements will be granted to other FTOs, and no further variations to the requirements will be granted that anyone instructing for, or a qualification or license issued by EASA through a Member State must themselves hold an EASA (or fully JAA compliant) license together with the appropriate ratings. Grandfather rights have also been granted to those non EU based FTOs undertaking recurrent training for corporate type turbine aircraft.

There is very little simulator provision within Europe for these aircraft types and the current training requirements are mainly met by facilities in the USA or Canada.

6. Guild Position

6.1. The Guild has campaigned to pressure EASA to look again at the retention of the IMC rating and at modification of the Instrument Rating academic requirements for Private Pilots. The Guild does not seek any relaxation in the flying requirements and validity of the Instrument Rating, but changes in the requirements for relevant theoretical knowledge are needed.

6.2. While the Guild supports the LPL initiative in theory, it believes that careful consideration needs to be given to the actual training requirements, since good training is a prerequisite of safety. A LPL could lead to a significant increase in private recreational flying and this will be to the greater value of the aviation community as a whole.

6.3. The Guild will monitor closely the development of the MPL qualification and look for constructive improvements.

6.4. The Guild will encourage Training providers and Operators of companies outside the UK to develop training systems and equipment intended to maintain the highest levels of flight safety.