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<b>Title</b>	Easier access for general aviation pilots to instrument flight rules flying
<b>NPA Number</b>	NPA 2016-14

**UK CAA** (European.Affairs@caa.co.uk) has placed **23** unique comments on this NPA:

Cmt#	Segment description	Page	Comment	Attachments
138	(General Comments)	0	<p><b>Page No:</b> N/A</p> <p><b>Paragraph No:</b> General comment</p> <p><b>Comment:</b> It should be ensured that the BIR training and privileges automatically includes PBN. It is suggested that the EASA RMG should determine whether the text needs changing, the key point is to ensure the skills test schedule includes PBN, which the NPA currently does not address.</p> <p><b>Justification:</b> Consistency with forthcoming PBN IR.</p>	
139	2. Explanatory Note — 2.4. Overview of the proposed amendments — 2.4.1. Principles of the proposal	14 - 15	<p><b>Page No:</b> 14</p> <p><b>Paragraph No:</b> 2.4.</p> <p><b>Comment:</b> It is not clear whether helicopters are in scope for the BIR.</p> <p><b>Justification:</b> Clarity required.</p>	
140	2. Explanatory Note — 2.4. Overview of the proposed amendments — 2.4.1. Principles of the proposal — Question on the deletion of the EIR in FCL.825	15	<p><b>Page No:</b> 15</p> <p><b>Paragraph No:</b> 2.4.1 (Question Box)</p> <p><b>Comment:</b> The UK would not object to the removal of the EIR from the regulation. Although existing holders should not be disadvantaged (EASA principle of protecting grandfather rights).</p> <p><b>Justification:</b> If the BIR is successful we would not see much demand for the EIR and indeed the EIRs issued to date by the UK have been in very limited numbers. We believe having unnecessary ratings in Part-FCL adds to the overall length and complexity of the Regulation.</p>	
141	2. Explanatory Note — 2.4. Overview of the proposed amendments — 2.4.2. Training structure	15 - 16	<p><b>Page No:</b> 15/16</p> <p><b>Paragraph No:</b> 2.4.2 (Modules)</p> <p><b>Comment:</b> It is recommended that individual modules must be completed at the same organisation to ensure standardisation</p> <p><b>Justification:</b> Standardisation.</p>	
142	2. Explanatory Note — 2.4.	17	<p><b>Page No:</b> 17</p>	

	Overview of the proposed amendments — 2.4.5. Training organisations		<p><b>Paragraph No:</b> 2.4.5 Training organisations</p> <p><b>Comment:</b> The UK supports allowing the BIR to be conducted at a Declared Training Organisation (DTO).</p> <p><b>Justification:</b> It was the UK understanding that this would be included within the scope of the DTO. However, the NPA does not reflect the position agreed in the Task Force instead it requires training at an ATO. In the UK the IMC rating has been taught by independent qualified Flight Instructors and at Registered Training Facilities with no issues. Furthermore were the BIR to be limited to ATOs it would become impractical and effectively, unavailable to many GA pilots. Most GA pilots have easy access to a DTO but not ATOs.</p> <p><b>Proposed Text:</b> See proposed text provided with CAA comment on paragraph No FCL.835 Basic instrument rating (BIR), (c) &amp; (d)</p>	
143	3. Proposed amendments — 3.1. Draft Regulation (draft EASA opinion) — FCL.035 Crediting of flight time and theoretical knowledge	21	<p><b>Page No:</b> 21</p> <p><b>Paragraph No:</b> FCL.035 Crediting of flight time and theoretical knowledge</p> <p><b>Comment:</b> Provision does not appear to have been made for any expiry dates of theoretical knowledge exams.</p> <p><b>Justification:</b> Clarity is needed as to whether the exams have an expiry date or not.</p>	
144	3. Proposed amendments — 3.1. Draft Regulation (draft EASA opinion) — FCL.835 Basic instrument rating (BIR)	22 - 24	<p><b>Page No:</b> 23</p> <p><b>Paragraph No:</b> FCL.835 Basic instrument rating (BIR), (c) &amp; (d)</p> <p><b>Comment:</b> DTOs should also be included and it is recommended that the text is amended as proposed below.</p> <p><b>Justification:</b> GA pilots' access to BIR training will be facilitated by inclusion of DTOs</p> <p><b>Proposed Text:</b> Amend paragraphs (c) and (d) as follows:</p> <p>'(c) Training course. Applicants for the BIR shall have completed at an ATO or DTO: '</p> <p>'(d) Notwithstanding point (c), the module as referred to in point (c)(2)(iii) may be delivered outside an ATO or DTO.'</p>	
145	3. Proposed amendments — 3.1. Draft Regulation (draft EASA opinion) — FCL.835 Basic instrument rating (BIR)	22 - 24	<p><b>Page No:</b> 23</p> <p><b>Paragraph No:</b> FCL.835 Basic instrument rating (BIR), (c)(2), sub-paragraphs (i) to (iii)</p> <p><b>Comment:</b> It is recommended that sub-paragraphs (i) to (iii) are amended as proposed below.</p> <p><b>Justification:</b> Clarity.</p> <p><b>Proposed Text:</b> Amend to read:</p>	

			<p>“(2) instrument flight instruction modules:  (i) <b>Module 1</b> - the core flying training module of flight handling skills by sole reference to instruments;  (ii) <b>module 2</b> - the applied flying training module of IFR departure, holding, 2D and 3D approach procedures;  (iii) <b>module 3</b> - the applied flying training module of en-route IFR flight procedures.”</p>	
146	3. Proposed amendments — 3.1. Draft Regulation (draft EASA opinion) — FCL.835 Basic instrument rating (BIR)	22 - 24	<p><b>Page No:</b> 23</p> <p><b>Paragraph No:</b> FCL.835 Basic instrument rating (BIR), (e)</p> <p><b>Comment:</b> It is recommended that paragraph (e) is amended as proposed below.</p> <p><b>Justification:</b> Clarity</p> <p><b>Proposed Text:</b> Amend to read:</p> <p>“(e) If BIR privileges are sought for multi-engine aeroplanes, instrument flight training under instruction in multi-engine aeroplanes, <b>shall include</b> asymmetric instrument approach and go-around procedures.”</p>	
147	3. Proposed amendments — 3.1. Draft Regulation (draft EASA opinion) — FCL.835 Basic instrument rating (BIR)	22 - 24	<p><b>Page No:</b> 23</p> <p><b>Paragraph No:</b> FCL.835 Basic instrument rating (BIR), (i)(2)(ii)</p> <p><b>Comment:</b> It is recommended that sub-paragraph (ii) ‘complete at least 1 hour of instrument flight time with an instructor holding privileges to provide training for the BIR’ should include some guidance on the content of the flight.</p> <p><b>Justification:</b> To ensure that the skills required for flight in IMC are sufficient for continued safe use.</p>	
148	3. Proposed amendments — 3.2. Draft AMC & GM (draft EASA decision) — GM1 FCL.835 Basic instrument rating (BIR)	25 - 27	<p><b>Page No:</b> 25-26</p> <p><b>Paragraph No:</b> GM1 FCL.835 Basic instrument rating (BIR)</p> <p><b>Comment:</b> It is recommended that the Modules and tolerances are AMC rather than GM.</p> <p><b>Justification:</b> To enable standardisation. If it is only guidance material it will be difficult for an FE to fail a candidate as this is only guidance rather than a standard to be met.</p> <p><b>Proposed Text:</b> Move to AMC.</p>	
149	3. Proposed amendments — 3.2. Draft AMC & GM (draft EASA decision) — GM1 FCL.835 Basic instrument rating (BIR) — Module 2: Departure, precision (3D) approach	38 - 55	<p><b>Page No:</b> 44</p> <p><b>Paragraph No:</b> Table, SKILL (B)</p> <p><b>Comment:</b> It is recommended that the text is amended as proposed below.</p> <p><b>Justification:</b> Recognised terminology.</p> <p><b>Proposed Text:</b> Amend to read:</p>	

	procedures and non-precision (2D) approach procedures		“Complete a <b>short self</b> briefing with regard to arrival, holding, approach, minima, weather conditions, associated performances, taxiing and missed approach procedure. ”	
150	3. Proposed amendments — 3.2. Draft AMC & GM (draft EASA decision) — GM1 FCL.835 Basic instrument rating (BIR) — Module 2: Departure, precision (3D) approach procedures and non-precision (2D) approach procedures	38 - 55	<p><b>Page No:</b> 45</p> <p><b>Paragraph No:</b> Table, ATTITUDE (A) (2) to (5)</p> <p><b>Comment:</b> We believe the attitudes numbered (2) to (5) are in the wrong area and should be relocated as they seem to be skills rather than attitudes.</p> <p><b>Justification:</b> Appropriateness and clarity.</p>	
151	3. Proposed amendments — 3.2. Draft AMC & GM (draft EASA decision) — GM1 FCL.835 Basic instrument rating (BIR) — Module 2: Departure, precision (3D) approach procedures and non-precision (2D) approach procedures	38 - 55	<p><b>Page No:</b> 46</p> <p><b>Paragraph No:</b> Table, SKILL (C)</p> <p><b>Comment:</b> It is recommended that item (C) is amended as proposed below.</p> <p><b>Justification:</b> Clarity.</p> <p><b>Proposed Text:</b> Amend to read: ‘Arrive at the minima <b>on a stabilised approach</b> in order to ...’</p>	
152	3. Proposed amendments — 3.2. Draft AMC & GM (draft EASA decision) — GM1 FCL.835 Basic instrument rating (BIR) — Module 2: Departure, precision (3D) approach procedures and non-precision (2D) approach procedures	38 - 55	<p><b>Page No:</b> 49</p> <p><b>Paragraph No:</b> Table, SKILL (B)</p> <p><b>Comment:</b> It is recommended that the text is amended as proposed below.</p> <p><b>Justification:</b> Recognised terminology.</p> <p><b>Proposed Text:</b> Amend to read: “Complete a <b>short self</b> briefing with regard to arrival, holding, approach, minima, weather conditions, associated performances, taxiing and missed approach procedure. ”</p>	
153	3. Proposed amendments — 3.2. Draft AMC & GM (draft EASA decision) — GM1 FCL.835 Basic instrument rating (BIR) — Module 2: Departure, precision (3D) approach procedures and	38 - 55	<p><b>Page No:</b> 50</p> <p><b>Paragraph No:</b> Table, KNOWLEDGE (D)</p> <p><b>Comment:</b> In item (D) ‘Autopilot and flight director limitations’ there is no reference to understanding the modes on GPS systems that are more likely to be used in GA aircraft.</p> <p><b>Justification:</b> Safety and proportionality. Incorrect use of GPS modes has resulted in at least one fatal accident in the UK.</p>	

	non-precision (2D) approach procedures		
154	3. Proposed amendments — 3.2. Draft AMC & GM (draft EASA decision) — GM1 FCL.835 Basic instrument rating (BIR) — Module 2: Departure, precision (3D) approach procedures and non-precision (2D) approach procedures	38 - 55	<p><b>Page No:</b> 50</p> <p><b>Paragraph No:</b> Table, ATTITUDE (A) (2) to (4)</p> <p><b>Comment:</b> We believe the attitudes numbered (2) to (4) are in the wrong area and should be relocated as they seem to be skills rather than attitudes.</p> <p><b>Justification:</b> Appropriateness and clarity.</p>
155	3. Proposed amendments — 3.2. Draft AMC & GM (draft EASA decision) — GM1 FCL.835 Basic instrument rating (BIR) — Module 2: Departure, precision (3D) approach procedures and non-precision (2D) approach procedures	38 - 55	<p><b>Page No:</b> 51</p> <p><b>Paragraph No:</b> Table, SKILL (C)</p> <p><b>Comment:</b> Suggest re-wording 'Arrive at the minima stable in order to make a correct decision to perform a landing, go-around or circling approach safely. '</p> <p><b>Justification:</b> Clarity</p> <p><b>Proposed Text:</b> Amend to read:</p> <p>'Arrive at the minima <b>on a stabilised approach</b> in order to ...'</p>
156	3. Proposed amendments — 3.2. Draft AMC & GM (draft EASA decision) — GM1 FCL.835 Basic instrument rating (BIR) — Module 2: Departure, precision (3D) approach procedures and non-precision (2D) approach procedures	38 - 55	<p><b>Page No:</b> 51</p> <p><b>Paragraph No:</b> Table, ATTITUDE (A)</p> <p><b>Comment:</b> It is recommended that item (A) 'identify whether the approach is not stabilised' is amended as proposed below.</p> <p><b>Justification:</b> Clarity.</p> <p><b>Proposed Text:</b> Amend to read:</p> <p>'confirm the approach is stable'</p>
157	3. Proposed amendments — 3.2. Draft AMC & GM (draft EASA decision) — GM1 FCL.835 Basic instrument rating (BIR) — Module 2: Departure, precision (3D) approach procedures and non-precision (2D) approach procedures	38 - 55	<p><b>Page No:</b> 53</p> <p><b>Paragraph No:</b> Table, OBJECTIVE</p> <p><b>Comment:</b> It is recommended that the text is amended as proposed below.</p> <p><b>Justification:</b> Improved grammar.</p> <p><b>Proposed Text:</b> Amend to read:</p> <p>'At the minima, <del>or</del> as directed by ATC, <b>in the event of an unstable approach</b> or <b>if due to a</b> loss of integrity, make a smooth transition to a climb at the correct speed and complete the checks. '</p>

158	3. Proposed amendments — 3.2. Draft AMC & GM (draft EASA decision) — GM1 FCL.835 Basic instrument rating (BIR) — Module 3: En-route IFR procedures	56 - 65	<p><b>Page No:</b> 60</p> <p><b>Paragraph No:</b> Table, SKILL (C)</p> <p><b>Comment:</b> Suggest re-wording item (C) '[...] or navigation aircraft system'</p> <p><b>Justification:</b> Better phrasing</p> <p><b>Proposed Text:</b> Amend to read:  '[...] or aircraft navigation system'</p>	
159	3. Proposed amendments — 3.2. Draft AMC & GM (draft EASA decision) — GM1 FCL.835 Basic instrument rating (BIR) — Module 3: En-route IFR procedures	56 - 65	<p><b>Page No:</b> 60</p> <p><b>Paragraph No:</b> Table, SKILL (D)</p> <p><b>Comment:</b> It is recommended that item (D) should include GPS systems.</p> <p><b>Justification:</b> There is a greater likelihood of a lighter GA aircraft having a GPS system on the aircraft.</p>	
160	3. Proposed amendments — 3.2. Draft AMC & GM (draft EASA decision) — GM1 FCL.835 Basic instrument rating (BIR) — Module 3: En-route IFR procedures	56 - 65	<p><b>Page No:</b> 63</p> <p><b>Paragraph No:</b> Table, SKILL (B)</p> <p><b>Comment:</b> It is recommended that item (B) should be reworded as proposed below.</p> <p><b>Justification:</b> Clarification.</p> <p><b>Proposed Text:</b> Amend to read:  'Navigate by means of an appropriate navigation system for the cleared route.'</p>	