

Issued: 13 September 2016

The Future of the Instrument Meteorological Conditions Rating (IMC Rating) as the Instrument Rating (Restricted) (IR(R))

This Information Notice contains information that is for guidance and/or awareness.

Recipients are asked to ensure that this Information Notice is copied to all members of their staff who may have an interest in the information (including any 'in-house' or contracted maintenance organisations and relevant outside contractors).

Applicability:	
Aerodromes:	Not primarily affected
Air Traffic:	Not primarily affected
Airspace:	Not primarily affected
Airworthiness:	Not primarily affected
Flight Operations:	All Registered Training Facilities, Flight Training and Approved Training Organisations
Licensed/Unlicensed Personnel:	All Holders of UK-issued National Aeroplane Pilot Licences and UK-issued JAR-FCL/Part-FCL Aeroplane Pilot Licences

1 Introduction

- 1.1 The purpose of this Information Notice (IN) is to update pilots and training organisations on the continuation of the IMC Rating or the Instrument Rating (Restricted) (IR(R)) - as it appears on Part-FCL licences. In order for the CAA to continue to issue these ratings (post 8 April 2014) the requirements of Article 4(8) of the latest version of Commission Regulation No. 1178/2011 must be complied with. This necessitates some minor changes to current administrative practices, including by licence holders and examiners.
- 1.2 Nothing in this IN affects the conversion of IMC ratings obtained prior to 8 April 2014 or those who held instructor or examiner privileges for the IMC rating before that date. IMC ratings and instructor/examiner qualifications for the ratings can continue to be converted and entered on Part-FCL licences and certificates in accordance with the conversion terms set out in [CAP 804](#).
- 1.3 Pilots holding UK licences including IMC ratings that are not endorsed on to either a JAR-FCL or Part-FCL licence are not affected by this IN.
- 1.4 Since 8 April 2014, pilots with UK national licences (pre-JAR-FCL) have been restricted to the privileges of the Part-FCL LAPL(A), including being limited to flight under Visual Flight Rules (VFR), when flying European Aviation Safety Agency (EASA) aeroplanes. UK national licences cease to be valid for flight in any EASA aircraft from 8 April 2018. The privileges of

national licences when being used to fly non-EASA (Annex II) aeroplanes are not affected by EU legislation.

- 1.5 This Information Notice supersedes IN-2015/009 and replaces all previous statements by the CAA concerning the future of the IMC Rating.

2 Background

- 2.1 Commission Regulation No. 1178/2011, as amended – ‘the Aircrew Regulation’ – came into force on 8 April 2012. This regulation included various provisions that the CAA was able to use to convert UK IMC ratings into a restricted form of European Instrument Rating (IR). This restricted IR appears on a UK issued Part-FCL aeroplane licence as the IR(R). It carries the same privileges as the former IMC rating.

- 2.2 During 2013 the UK obtained agreement from the European Commission that the Aircrew Regulation would be amended to allow authorities to continue to issue national authorisations to fly under Instrument Flight Rules (IFR), potentially until 8 April 2019 - but subject to certain specified conditions. The amendment to the regulation was approved and came into force on 2 April 2014. The relevant text was a new article 4(8), which reads as follows:

Until 8 April 2019, a Member State may issue an authorisation to a pilot to exercise specified limited privileges to fly aeroplanes under instrument flight rules before the pilot complies with all of the requirements necessary for the issue of an instrument rating in accordance with this Regulation, subject to the following conditions:

- a) *the Member State shall only issue these authorisations when justified by a specific local need which cannot be met by the ratings established under this Regulation;*
- b) *the scope of the privileges granted by the authorisation shall be based on a safety risk assessment carried out by the Member State, taking into account the extent of training necessary for the intended level of pilot competence to be achieved;*
- c) *the privileges of the authorisation shall be limited to the airspace of the Member State’s national territory or parts of it;*
- d) *the authorisation shall be issued to applicants having completed appropriate training with qualified instructors and demonstrated the required competencies to a qualified examiner, as determined by the Member State;*
- e) *the Member State shall inform the Commission, EASA and the other Member States of the specificities of this authorisation, including its justification and safety risk assessment;*
- f) *the Member State shall monitor the activities associated with the authorisation to ensure an acceptable level of safety and take appropriate action in case of identifying an increased risk or any safety concerns; and*
- g) *the Member State shall carry out a review of the safety aspects of the implementation of the authorisation and submit a report to the Commission by 8 April 2017 at the latest.*

- 2.3 It is important to note that this amendment to the Regulation does not automatically allow the IMC Rating (in the form of the IR(R)) to continue to be issued to Part-FCL licences until 2019. There are conditions which must be complied with and the national aviation authority/Member State must submit a report to the Commission in 2017, which the Commission must approve. If they do not approve the provision to continue issuing the IR(R) may be withdrawn.

3 Changes to the Administration of the IMC Rating/IR(R) to Address the Conditions of Article 4

- 3.1 At present the IMC Rating/IR(R) is administered differently from all other licence ratings in that the CAA has not required that it be notified by examiners or licence holders when the rating is renewed or revalidated. Consequently, whilst the CAA has records of how many IMC Rating or IR(R) ratings have been issued in each year, the CAA has no record of how many remain current/valid.
- 3.2 Paragraphs (f) and (g) of article 4 require the CAA to monitor the use of the rating and to provide a report on the safety or otherwise of its use to the Commission in 2017. To create a meaningful report the CAA will need to have records of how many IMC Rating/IR(R) ratings are valid. This will enable the CAA to include data on how many of the ratings are potentially being used and to set this against the number of accidents, incidents and occurrences reported involving flights under IFR.
- 3.3 After engaging with representatives from UK General Aviation (GA) associations and organisations, we agreed that in order to safeguard the future of the IMC Rating as a rating that can be endorsed on to a Part-FCL licence as an IR(R), the CAA must change the administrative procedure to require that all revalidations and renewals of the IMC/IR(R) are reported to the CAA. This would make the administrative process the same as for all other Class and Type ratings and full Instrument Ratings.
- 3.4 To facilitate this change, the CAA has amended **Form SRG 1176** (the Examiner's Record for the IMC Skill Test). This must be submitted to the CAA as part of Examiners' Reports for issue, revalidation and renewal. Such Examiners' Reports must be submitted directly to CAA Licensing. Related updates to Guidance (Standards) Document 25 and the **Flight Examiner's Handbook** (FEH) are underway.
- 3.5 **Form SRG 1125** (Application for an IMC Rating/IR(R)) has also been updated. This is available on the CAA website for use by applicants seeking issue and renewal of IMC Ratings/IR(R).

Important Note:

Applicants for and holders of the IMC Rating or IR(R) must maintain a PPL(A) or higher aeroplane licence. A LAPL(A) is not sufficient. Part-FCL does not permit any kind of IR (Modular, Competency-Based Modular or En-route) to be added to a LAPL(A). The LAPL(A) is designed to be a VFR-only licence and the training and skill test for the LAPL(A) reflect this.

- 3.6 For clarity, the privileges of the IR(R) as it appears on a Part-FCL licence are stated here.

The privileges of the IR(R) are those of the Instrument Rating Restricted as follows:

- (i) the holder of the IR(R) must not fly as pilot in command or co-pilot of an aeroplane flying in Class A, B or C airspace in circumstances which require compliance with the instrument flight rules;*
- (ii) the holder of the IR(R) must not fly as pilot in command or co-pilot of an aeroplane when the aeroplane is taking off or landing at any place if the flight visibility below cloud is less than 1,800 metres; and*
- (iii) the holder of the IR(R) must not fly as pilot in command or co-pilot of an aeroplane outside the airspace of the United Kingdom in circumstances which require compliance with the instrument flight rules.*

These privileges are the same as those which were formerly provided for the UK Instrument Meteorological Conditions Rating in Schedule 7 of the Air Navigation Order 2009.

4 Instructors Wishing to Teach for the IMC Rating/IR(R)

- 4.1 Commission Regulation No. 1178/2011, Article 4 (d) requires that the CAA specifies credits that are to be permitted in relation to Part-FCL Annex I requirements for those wishing to instruct for the IMC Rating/IR(R).
- 4.2 Part-FCL Annex I states which instructor certificates are required to teach for the Instrument Rating (IR(A)). On that basis, the following will be considered competent to deliver instruction for the IMC Rating/IR(R):
- a) The holder of a valid Part-FCL Flight Instructor Certificate **issued by the UK CAA** who can teach for the Instrument Rating (where FCL.905.FI(g) is endorsed within their licence); or
 - b) The holder of a valid Part-FCL Instrument Rating Instructor Certificate **issued by the UK CAA**.

The instructors must also hold the appropriate aeroplane class or type rating.

- 4.3 In addition, the CAA will authorise instructors to instruct for the IMC Rating/IR(R) if they satisfy the following requirements:
- a) hold a Part-FCL aeroplane licence **issued by the UK CAA**; and
 - b) hold a Flight Instructor (Aeroplane) (FI(A)) without supervisory restriction, qualified to instruct for the single pilot class rating for the class or type of aeroplane which the IR(R) instruction is to be conducted in; and
 - c) hold a valid IR(R) rating or IR(A) (not En-route Instrument Rating (EIR)) on the Part-FCL licence; and
 - d) have passed all TK examinations either for the issue of a CPL(A) or IRI(A), subject to the same time limitations stated in Part-FCL Annex I; and
 - e) have completed at least 10 hours flight time by sole reference to instruments in an aeroplane, Full Flight Simulator (FFS), Flight Training Device (FTD) 2/3 or Flight Navigation Procedure Trainer (FNPT) II; and
 - f) have completed the course as specified in FCL.905.FI(g) as detailed in FCL.930.IRI; and
 - g) have passed an Assessment of Competence to instruct for the IR(R) with a Flight Instructor Examiner (FIE) as specified in FCL.905.FI(g).

Note: The course specified in FCL.905.FI(g) may be completed for the purpose of qualifying to instruct for the IR(R) without having the prerequisite IFR experience for the issue of the FCL.905.FI(g) privileges.

- 4.4 To ensure that the UK is compliant with Article 4(d) of the Aircrew Regulation, it will be necessary for instructors who are teaching the IR(R) through compliance with the requirements of paragraph 4.3 above to have the authorisation to instruct included in their licence by the CAA, which they will need to apply for using **Form SRG 1133** and pay the appropriate fee. Their Instructor Certificate will be endorsed with '(g)(IR(R))' in the Remarks and Restrictions column against the entry for the FI(A) in Section XII of the licence.
- 4.5 Instructors qualified in accordance with paragraph 4.3 above and who subsequently wish to instruct for the Integrated IR, Modular IR, En-route IR or the Competence Based Modular IR courses, may apply to have the instructor restriction lifted once they meet in full the prerequisite requirements of FCL.905.FI(g). A further application showing evidence of

compliance with those requirements may be made using [Form SRG 1133](#) and payment of the appropriate fee will be required.

5 Examiners Wishing to Conduct Skill Tests and/or Proficiency Checks for the IMC Rating/IR(R)

5.1 Paragraph (d) of Article 4 requires that the CAA determine Art 14(4) exemption granted concerning the JAR flight experience who may conduct Skill Tests and/or Proficiency Checks for the IMC Rating/IR(R). This section of this IN provides clarification for Examiners who wish to examine for the IMC Rating/IR(R) and explains the Examiner privileges that must be held.

5.2 Only examiners who hold licences, ratings and certificates issued by the UK CAA may examine for the IMC Rating/IR(R).

5.3 The holder of an Instrument Rating Examiner (IRE) Certificate issued by the UK CAA has the privileges under Part-FCL to conduct IR Skill Tests and Proficiency Checks. These examiners are also authorised to conduct the IMC Rating/IR(R) Skill Test and/or Proficiency Check. They must also hold a valid rating for the class or type of aeroplane in which the test is to be conducted.

5.4 The holder of a Class Rating Examiner (CRE) Certificate issued by the UK CAA has the privileges under Part-FCL to conduct IR Proficiency Checks if the examiner complies with FCL.1010.IRE(a). These examiners are also authorised to conduct the IMC Rating/IR(R) Skill Test and/or Proficiency Check, provided they have completed the appropriate Examiner Standardisation training. They must also hold a valid rating for the class or type of aeroplane in which the test is to be conducted. The CRE Certificate may be re-issued to show the IMC Rating/IR(R) test and check privileges as:

“Conduct Flight Tests for the issue and maintenance of the IMC rating and IR(R)”.

5.5 The holder of a Flight Examiner (FE) Certificate issued by the UK CAA does not have the privilege under Part-FCL to conduct IR Skill Tests or Proficiency Checks. However, historically the CAA has authorised FEs to conduct IMC Rating/IR(R) Skill Tests and/or Proficiency Checks. FEs can be authorised to conduct the IMC Rating/IR(R) Skill Test and/or Proficiency Check if they have the privilege to Instruct for either the Instrument Rating or the IMC/IR(R) Rating and have completed the appropriate Examiner Standardisation training. They must also hold a valid rating for the class or type of aeroplane in which the test is to be conducted. The FE Certificate may be re-issued to show the IMC Rating/IR(R) test and proficiency check privileges as:

“FE PPL(A) - Flight Tests Permitted; IMC and/or IR(R)”

6 Training Organisations Conducting Training for the IMC Rating/IR(R)

6.1 Further to the agreement reached with representatives of the UK GA associations, the CAA has decided to maintain the existing policy that there is no requirement for the IMC Rating/IR(R) training course to be conducted within a Registered Training Facility (RTF) or Approved Training Organisation (ATO) within the airspace and territory of the UK.

6.2 Some RTFs applying to become ATOs and some existing ATOs have asked if they can add the IMC Rating/IR(R) to their Training Manuals. The CAA has no objection to ATOs adding the IMC Rating/IR(R) to their Training Manuals, but it will not be an approved course, as there is no requirement for approval. It should not therefore be presented as a course approved by the CAA in any material produced by the ATO.

7 Queries

- 7.1 It is emphasised that the intent of all of the measures and clarification given in this Information Notice is to preserve the mechanism that will allow the CAA to continue to issue the IR(R) in Part-FCL licences until 2019.
- 7.2 At the next opportunity Standards Document 25 and the **Flight Examiners Handbook** will be updated with this information.
- 7.3 Any queries or further guidance required as a result of this communication including RTFs and ATOs should be addressed to the following:
- GA Unit
Telephone: 01293 573988
E-mail: ga@caa.co.uk
- 7.4 Any queries or further guidance required by applicants for the IMC Rating, extending Instructor and Examiner privileges to teach and examine for the IMC Rating should be directed to:
- Licensing, Shared Services Centre
Telephone: 01293 573700
E-mail: fclweb@caa.co.uk

8 Cancellation

- 8.1 This Information Notice will remain in force until further notice.