

European licence conversion

Your cut-out-and-keep guide to converting to an EASA licence. By Nick Wilcock

The new regulatory requirements introduced by the European Aviation Safety Agency have been with us for some while now; however, it is pretty clear to us that many private pilots are still unclear about these changes, or how they will need to meet them. Which, given the quite Byzantine complexity of EASA's regulations, is hardly surprising.

So here are some reminders about what you must do in order to comply with the new requirements:

Do I really need to convert my CAA-issued Private Pilots Licence?

The answer to this largely depends upon what you wish to fly. This is because under EASA we now have 'EASA' and 'non-EASA' aircraft. Most light aircraft are now 'EASA aircraft', irrespective of their country of origin or national registration. So a PA28

or Cessna 152 is an EASA aircraft and you will eventually need an EASA pilot licence in order to fly them. However, other aircraft such as ex-military variants, permit-to-fly homebuilts and others will not. If, for example you only ever

intend to fly a Chipmunk, Tiger Moth, Tri-Pacer or Apache and you have an old-style pre-JAA UK PPL, you will be able to continue flying without any need to convert your licence in any way. But you might well find your options rather limited in the future if you do not convert and we recommend that you avoid such a situation. Very sensibly, the CAA has amended the Air Navigation Order to allow you to fly both EASA and non-EASA aircraft using an EASA licence, provided that they fall into a common aircraft class, so you would probably be better advised to convert and keep your future options open.

By when do I have to convert?

As a PPL holder, in order to fly an EASA aircraft and to retain all your existing privileges you will need to convert to a Part-FCL PPL before 8 Apr 2014. However, as all JAR-FCL licences were 'deemed' to be EASA licences on 8 Apr 2012, most privileges included in the licence may continue to be exercised until the 5 year re-issue point. But this does not apply to the old-style pre-JAA UK PPL which may only be used to fly non-EASA aircraft after Apr 2015; such licences will be restricted to LAPL-level privileges after

Apr 2014. Confused? Then do yourself a favour and convert your licence before Apr 2014 as it will make matters much easier for you.

Although most privileges included in a JAR-FCL PPL will be valid until the 5 year re-issue point, there are, however, some important exceptions to this:

IMC ratings: If you held an IMC rating (or IMC rating privileges) before 8 Apr 2014, you will need to convert your IMC rating into an EASA Instrument Rating (Restricted) if you wish to exercise such privileges on EASA aircraft after that date. The reason for this is that a 'non-EASA' rating cannot be included on an EASA licence, but an EASA rating may be restricted to existing national privileges. So the IMCR becomes an IR(R) with precisely the same privileges, limitations, revalidation and renewal requirements.

The conversion process is a simple paperwork exercise which will normally be completed at the time of licence conversion; all new IMC ratings issued to JAR-FCL or Part-FCL PPLs after 17 Sep 2012 have already been issued as IR(R)s. If you don't convert your IMCR before 8 Apr 2014, you won't be able to use the privileges on EASA aircraft until you do. But you will still be able to exercise them on appropriate non-EASA aircraft.

Regrettably, the recent EASA Draft Opinion No. 03/2012 concerning 'Qualifications for flying in Instrument Meteorological Conditions (IMC)' has totally failed to heed the many calls for greater regulatory flexibility from industry and even from the EASA management board. The Draft Opinion includes this quite astonishing comment:

2.4.2.4 Request to maintain national ratings

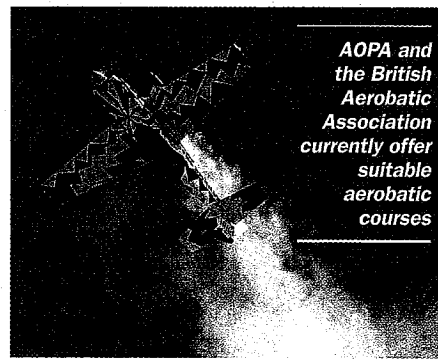
Several stakeholders expressed their concern on the lack of flexibility of FCL.600 when compared to JAR-FCL 1.175. More specifically, stakeholders requested that national instrument ratings be maintained. This issue has been discussed during each phase of the drafting process. The Agency fully appreciates the stakeholder reasoning of allowing MS to maintain some of their national licences, ratings, and certificates. It is true that this may not have an adverse effect on safety, however, it would contradict the general concept of a uniform European harmonisation and the aim of creating a standardised European regulatory system allowing for mutual recognition of licences. In its current form,

the Basic Regulation does not provide the scope for introducing or retaining such national licences, ratings, or certificates. It was, therefore, decided not to amend Subpart G of Part-FCL in this regard.

This pretty well sums up EASA's attitude to flexibility - a standardised European regulatory system is considered of greater importance than any flexibility which affords greater safety. Needless to say neither AOPA nor the CAA are happy with this Draft Opinion and will continue to strive for the same level of affordable, proportionate IMC safety to be available to future generations of UK pilots as are available today. Whether or not we will be successful is, of course, unknown. So at this stage, all we can advise is that, if you don't yet have an IR(R), then we recommend that you do whatever you can to ensure that you've obtained one before 8 Apr 2014. Otherwise you might only be able to obtain one for use on appropriate non-EASA aircraft, which would also mean that you'd need to be issued with a UK non-EASA pilot licence within which to include it as an IMC rating. Watch this space by all means, but please don't count on EASA changing its spots.

Aerobatics

Currently, there is no requirement for an Aerobatic Rating. Pilots who wish to indulge in aerobatics are not even required to take any formal training; however, those without any previous aerobatic experience are well advised not to attempt to teach themselves. AOPA and the British



Aerobatic Association currently offer suitable courses, details of which are on the AOPA website.

However, after Apr 2015, an Aerobatic Rating will be required for any pilot who wishes to perform aerobatics in EASA aircraft. The requirements for the rating are broadly similar to those for the AOPA Basic Aerobatic Certificate, but with one huge difference. Currently EASA propose that a pilot must have achieved not less than 40 hours as PIC since licence issue before applying for an Aerobatic Rating after completing the training course. IAOPA, the BAeA and the FAI's International Aerobatic Commission view this prerequisite as wholly unreasonable, particularly given the



revised interest now being shown in the need for commercial pilots to have better 'stick and rudder' skills in a largely automated era. We are assured that the issue will once again be raised under FCL.002; however, we haven't as yet seen any clear evidence to confirm this.

Nevertheless, 'grandfathering' of existing aerobatic privileges is available under policies agreed by industry and the CAA over recent years; CAP804 Part I Section 4 Part P has full details.

PPL conversion process

JAR-FCL PPL holders will simply need to apply for conversion at or before the 5-year re-issue point. The CAA is aware that the plethora of new forms which were introduced last year have proved to be very confusing and are in the process of simplifying matters, so that you should soon be able to locate the correct forms more easily than at present. The list of flight crew licensing forms can currently be seen on the CAA website at:

<http://www.caa.co.uk/application.aspx?catid=33&pagetype=65&appid=11&mode=list&type=formcat&id=30>

You will need to have your English Language proficiency level either stated in your current licence or declared to the CAA in your conversion application. You can either obtain an assessment during any Skill Test or Proficiency Check, or simply ask an examiner to complete the relevant form, which you can then submit with your conversion. Unfortunately we have heard tales of certain examiners charging £20-£30 for the simple effort of making this informal assessment, so be careful not to be ripped off in this way!

Note that a non-EASA aircraft type (not 'class') cannot be included in an EASA pilot licence. So if you fly something like a Jet Provost, when you convert your JAR-FCL PPL, you will need to obtain a supplementary UK PPL within which your type rating can be included. All helicopters are 'types', so this will also apply to you if you fly a non-EASA helicopter.

Conversion of an old-style pre-JAA UK PPL is slightly more complicated. You will need to have achieved 70 hours or more flight time (75 for helicopter licence conversion), to demonstrate use of radio navigation aids to a CFI or examiner, to demonstrate knowledge of the relevant parts of Part-FCL by self-declaration and to demonstrate English Language proficiency as above. Again, the forms will be found on the CAA website. You may retain your UK PPL if required, for example for the inclusion of non-EASA ratings.

Medicals

Under EASA Part-MED, the level of Medical Certificate required is defined by the licence. Hence for a professional pilot licence you would need a Class 1 Medical Certificate, for a PPL a Class 2 and for the

new EASA Light Aircraft Pilot Licence, a LAPL Medical Certificate. The Class 1 and Class 2 Certificates are broadly similar to those issued under the JAA; however, the LAPL Medical can be obtained either from your GP ('GMP' in EASA-speak) or from an AME.

NPPL and the LAPL?

Pilots holding a NPPL may continue to fly both EASA and non-EASA aeroplanes within the relevant restrictions until Apr 2015. Thereafter, a NPPL may only be used for flying non-EASA aircraft. The CAA has introduced a conversion process for NPPL holders wishing to convert to the LAPL; this may be found in CAP804 Part I Section 4 Part P. Currently there is no method published by which a NPPL may be converted directly to a Part-FCL PPL; however, agreement has been reached with the CAA in principle and further details will be published in the next amendment to CAP804. Note also that a NPPL issued after 8 Apr 2015 may not be converted to a Part-FCL pilot licence.

LAPL privileges are greater than those of the NPPL; significantly, the LAPL may be used throughout the EU within ICAO VMC limits rather than the more restrictive limits applicable to the NPPL. Subject to the relevant training and medical requirements, it may also be used at night. Broadly speaking, it allows pilot to fly under VFR in aircraft of up to 2000 kg MAUW with not more than 4 PoB, including the pilot and is available both for aeroplanes and helicopters; however, it cannot include instrument or instructional privileges. The LAPL medical is slightly more formal than the NPPL medical declaration, but as one senior AME put it: "If you can drive to your medical appointment, you'll probably be able to hold a LAPL medical!" So even though it might involve a bit of slap and tickle and a ceremony involving a small plastic bottle, it really isn't anything about which you should be greatly concerned.

Any UK-issued pilot licence may also be regraded to a LAPL. So if you are happy to restrict yourself to day/night VFR private flying throughout the EU in aircraft of up to 2000kg MAUW and with no more than 4 PoB, you might well find it easier and cheaper to regrade to LAPL.

Those of you who are still awake might have spotted that you can't fly a non-EASA helicopter type using a LAPL(H). So for this reason, the CAA has introduced the NPPL(H) for flying non-EASA helicopters which basically extends existing LAPL(H) requirements to non-EASA helicopters such as the RotorWay Executive and Bell 47. Unlike the NPPL(A), you can only hold a NPPL(H) if you already hold a LAPL(H); furthermore, a NPPL Medical Declaration is not acceptable for the NPPL(H).

ORS4 No. 912 / 913

Under ORS4 No. 912 and 913, a non-NPPL licence holder who could no longer hold a Part-MED Class 1 or Class 2 Medical Certificate could continue to fly SEP Class aeroplanes within NPPL restrictions, using the non-NPPL with a medical declaration, until such time as the licence was due for re-issue, or the SEP Class Rating reached its expiry date, whichever came first. The SEP Class Rating could not be revalidated or renewed under this exemption; however, a pilot could instead apply for an SSEA Class Rating. However, this system will end on 30 Sep 2013, although it is likely that a pilot who already holds an SSEA Class Rating in an old-style pre-JAA UK pilot licence may continue to do so. But the SSEA Class Rating will not be valid for use on EASA aeroplanes after 8 Apr 2015.

Our firm recommendation is that any non-NPPL holder who can no longer meet Part-MED criteria for a Class 2 Medical Certificate should apply to have the licence converted to a LAPL rather than using the exemptions of ORS4 No.912 and 913, which now have very little life left to run. Further details of the withdrawal of ORS4 No. 912 / 913 may be found in AIC White 113/2012 which was issued in July 2012.

Annex II aircraft

Although flight time in non-EASA aircraft within the same class as EASA aircraft may be used towards rating revalidation requirements, flight time in Microlight aircraft is not currently accepted for this purpose even though a Microlight may be flown by a pilot whose Part-FCL pilot licence includes SEP privileges, subject to differences training. However, this is something which IAOPA seeks to redress and our proposal to include flight time conducted in 3-axis Microlights was favourably received at a recent Part-FCL Implementation Forum meeting and is now under review by FCL.002.

Costs

The costs for all these various licence conversion requirements are included in ORS5 No.281 'Scheme of Charges', which can currently be seen on the CAA website at <http://www.caa.co.uk/docs/33/281PLS.pdf>

Conclusion

EASA pilot licensing requirements are vastly more complicated than anything we've seen hitherto. To keep it simple, our recommendations are:

- Convert your licence to a Part-FCL licence sooner rather than later.
- If you can possibly do so, obtain an IR(R) before 8 Apr 2014.
- If you can't hold a Part-MED Class 2 Medical Certificate, regrade to LAPL rather than using ORS4 No. 912/913 exemptions.
- Make sure that you've included your English Language proficiency assessment when you apply for licence conversion. ■