

EASA Cloud Flying Proposals.

BGA Clubs have been requested to comment on these proposals contained in Document NPA 2011-16 in respect of flying close to or in cloud and the introduction of the Sailplane Cloud Flying Rating.

The BGA Newsletter of December 2011 also invites comment by pilots who fly “within 1000ft of cloud”. The BGA Newsletter does not specify a horizontal or vertical distance from cloud and thus does not appear to question the Law in respect of VFR or IFR flight . It would be pertinent to look at the VFR minima before considering this matter further.

Part of the VFR minima is that flight below 3000ft at 140 kts or less need only be clear of cloud and in sight of the surface with an in flight visibility of 1500mtrs. Most aerotow operations in this country will fall into this part of the VFR rule and particularly in the case of wave sites. As a tug pilot of some experience at a wave site I frequently fly closer to cloud than the specified distance in the Newsletter whilst maintaining the VFR rules . It is only when required to climb above 3000ft where more care must be taken to remain within the Law in terms of distances from cloud both horizontally and vertically.

Any Gliding club in the country will have operations where either on a winch launch or on aerotow operations the glider or combination will often be within the distance given in the BGA Newsletter (1000ft) from cloud.

The BGA Laws and Rules and the ANO are clear as stated in page 12 in Rule 6 .1 that “ a glider will not be flown in such proximity to another as to create a danger of collision” ..I would suggest at the outset that flying in cloud does in fact heighten that risk irrespective of any rating held . A fundamental failing in the human eye is that it has difficulty in seeing both in the dark and in cloud .

The UK gliding has long enjoyed a freedom to fly in this country within the parameters of Aviation Law as defined at the time. Cloud flying is deemed to be a necessary part of competition flying but is not regulated in any way..pilots can and frequently do enter cloud to continue their flight in the quest to win.

It must therefore , whilst supporting its implementation and introduction , be a reasonable question as to how the SCFR can best be introduced without too tenuous a route to its achievement as detailed in the NPA .

I have no disagreement with the proposals in the NPA for the SCFR and it is a good thing to bring this into line at a time of other proposed changes . Reading the document , however , the parameters for the test required for sailplane pilots to achieve the rating do seem somewhat onerous. Whilst the oral examinations can be studied for and passed with some work the subsequent flying test required is heavily biased in favour of those who already have ratings or some practical experience and proficiency in instrument flying .

In respect of the actual implementation of the Rating , therefore , I see a practical problem .I do not believe that the normal club glider pilot will have either the opportunity , the money or the time to achieve even the minimum suggested hours under training as specified on page 190 and 191 to achieve the

object . It will be known that , unlike riding a bicycle , instrument flying needs constant practice to remain both current , confident and safe . A further question must be how is this going to be achieved in a normal weekend only club. The examining of this Rating will not only require the services of properly rated Instructors and examiners whose time will be limited and may not tie in with the prospective pupils' availability , but is also subject to an aircraft fitted with the requisite instrumentation for teaching the exercises being available at the site.

None of these comments are to be seen as a criticism of the implementation of the Rating more as the perceived difficulties as seen from a ground roots Gliding Club which only operates at weekends with very limited facilities for teaching the syllabus and subsequently examining it in order to keep the Rating current.

I believe however , that the flight safety aspect of the proposed SCFR must be closely scrutinised . In the UK where competition flying and racing are perceived as *the* most important facet of our movement , it follows that competitions do generate large numbers of participants. Where numbers of “qualified” pilots are taking part , those pilots have the requisite experience, and the gliders are fully equipped for flight in IMC , what additional safeguards to those in place now will be there to protect them . The immediate danger will be from en route IFR aircraft flying in UK Class F or G Airspace above 3000ft at a quadrantal flight level in cloud . Whilst we already have a nominated RTF frequency for “cloud flying” it will require an agreed , more disciplined , regime to complement the introduction of the SCFR.

We have an excellent safety record in the UK in all types of gliding from Open competition to the most modest club flying but this is an opportunity to regularise the practices which are extant in the UK even now.

The final point which must be made is the cost of implementation of this Rating both to the individual and the National governing body.. At a time of financial crisis within the EU a further obstacle for glider pilots in the UK to continue exercising their privileges in the manner they have enjoyed for many years may not be particularly palatable . Nevertheless the SCFR must be seen as a step in the right direction and ,with some modification , be seen to be attainable in the UK.