

The rating as it exists today

1. PPL/IR Europe supports the UK IMC rating¹ as an affordable and accessible initial instrument qualification for PPL holders, which enhances flight safety and the utility of a PPL.
2. We recognize that some IMCR holders use the rating frequently, and others occasionally, in different ways, for example to transit cloud on a VFR flight, to facilitate deliberate departure or arrival in IMC conditions, and to safely and legally transit through unexpected IMC conditions.
3. We note that some IMCR holders would like additional privileges (e.g. access to class A airspace and use to the rating in the rest of Europe)
4. We support the UK CAA view that changes to the TK² and practical training for the IMCR should be deferred until the future of the IMCR has been determined.
 - a. We do, however, encourage those who instruct for the IMCR to include the use of RNAV approaches, provided they are qualified and competent to do so.
 - b. At the time of writing (April 2018), we believe that there is nothing in UK or EASA regulations to prevent IMCR holders training for and/or flying RNAV (PBN) approaches.
5. We recognise that suitability of aircraft, cost and maintaining currency are important issues for IMCR holders, and PPL/IR Europe will make its best efforts to lobby for improvements in that regard.
6. The UK CAA recommends higher approach minima for IMCR holders. This is appropriate for IMCR holders with limited experience or currency. For IMCR's with greater experience and currency, we see no objection to flying to personal altitude minima similar to those of a full IR holder (WG paper refers). However, the visibility minimum of 1500m is binding on all IMCR's.
7. PPL/IR Europe welcomes more IMCR holders to its membership, to whom it can offer informal mentorship and knowledge sharing to increase competence and utilisation of the rating.

The future of the IMCR

8. PPL/IR Europe is engaging with EASA on the development of the BIR (Basic Instrument Rating). The BIR is unlikely to be implemented by 2019.
9. We endorse the UK CAA view that an affordable and accessible sub-ICAO instrument rating must continue to exist after the current IMCR arrangement³ ends in April 2019. This rating could be a continuation of the UK IMCR (short / long term) or potentially the EASA BIR (in the longer term).
10. PPL/IR Europe believes that the BIR will only become an effective replacement for the IMCR if it maintains the spirit of accessibility and affordability which presently exists for the IMCR, i.e. if the BIR meets the following conditions:
 - a. It is competence based
 - b. It has an appropriate and proportionate TK syllabus
 - c. It can be delivered through DTO's as well as ATO's
 - d. There is sufficient credit for experience for those who move from an IMCR to a BIR. We consider that differences TK and flight training and a simple assessment of competence would be appropriate.

PPL/IR Europe will use its influence with the UK CAA and EASA to achieve those goals.
11. If the future involves continuation of the IMCR, PPL/IR Europe recommends that the TK syllabus is overhauled, updated and made more specific to the requirements of instrument flight, and that both TK and practical training specifically address the use of RNAV approaches.

¹ The UK IMCR is entered on an EASA licence as an IR(R). The terms IMCR and IR(R) are interchangeable in this document.

² TK – theoretical knowledge

³ i.e. to enter the IMCR as an IR(R) on EASA licenses