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Title	Qualifications for flying in Instrument Meteorological Conditions
NPA Number	NPA 2011-16

European Gliding Union (EGU) (d4468@t-online.de) has placed **1** unique comments on this NPA:

Cmt	Segment description	Page	Comment	Attachments
888	B. Draft Opinion and Decision - I. Draft Opinion	16 - 22	<p>Response from European Gliding Union</p> <p>FCL.830 Sailplane Cloud Flying Rating</p> <p>The EGU is the association of European Gliding Federations or Gliding Sections of National Aero Clubs. Its aim is to represent the interests of all glider pilots in Europe with respect to regulatory affairs; it currently counts 22 full members and represents more than 80,000 glider pilots.</p> <p>The EGU welcomes these proposals.</p> <p>In a number of Member States, exclusion from flight in IMC would add significant hazards to glider flying, generally by forcing pilots to fly lower, thus increasing the risks of off airfield landings, and in more congested airspace. These are generally the States with colder, wetter weather.</p> <p>Associations and National Authorities in these Member States have gathered considerable experience in this aspect of glider flying. Not one of them has found it to present any particular risks. Further, there is no evidence, at all, that those states with the more onerous requirements enjoy any extra safety advantages.</p> <p>In particular, the Nordic nations have proved that safe revalidation can be achieved by a training flight with an instructor. This proposal's requirement for a proficiency check instead of the well-established training flight would introduce significant difficulties with examiner availability and incur extra costs when</p>	

examiners can be available. These extra difficulties and costs would offer no safety benefits, but would reduce the take up for the SCFR, introducing the very dangers that the rating is intended to avoid.

Similarly, the Member State with the most experience of glider IMC flying (UK) has never found it necessary to mandate any minimum for instrument training.

The EGU does not understand why the privileges of the SCFR should be extended to TMGs. It is essential that training for the rating is possible in TMGs, but we know of no demand for its use in these aircraft. Indeed, it would be more appropriate to mandate an EIR or IR for IMC flight in these aircraft. We know of no TMGs with a Flight Manual that permits flight in IMC.

Recommendations:

1. FCL.830 (c) should read: "..... For revalidation, the applicant shall undergo 1 dual instructional flight, if launched by aerotow or self launch, or 3 dual instructional flights from other launch methods. For renewal, the applicant shall pass a proficiency check"

2. FCL.830 (b)(2)(ii) should read: "dual instruction, controlling the sailplane solely by reference to instruments, as assessed to be necessary by the ATO"