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## IMC, IR, EIR - PAST, PRESENT AND FUTURE?

By *Jim Thorpe* - a personal view

*FCL.008 has now completed its review of existing requirements for the instrument rating and agreed a draft recommendation which may form the basis of an EASA Notice of Proposed Amendment in late 2010*

The issue of the future of the IMC rating has caused a huge amount of controversy, much of it based on misconceptions. This is an attempt to give a balanced account of the development and future of instrument flying for the private pilot. It's rather long but this is a complicated and important story. I have tried to differentiate throughout between facts, likely outcomes and personal opinions. The views are my own and are not in any way official.

**The IMC Rating**

The IMC rating came into being in 1967 following some accidents. Accounts of meetings at the time bristle with complaints about restricting freedom, over complex airspace and an unnecessarily complicated instrument rating. It seems nothing changes. PPL holders were required to have 100 hours total time including 60 hours P1 before starting training for the new rating and this discouraged uptake. Ten years later only 2,000 of the 18,000 PPLs had an IMC even though many had been given it on a grandfather basis at the outset. It had been hoped that other countries would follow the UK lead and obtain exemptions for this sub ICAO rating but none did. Proposals were then tabled for a two stage rating with a basic 10 hours course and an advanced 15 hour course but that never happened. Then, in 1980, changes were implemented which brought us to broadly the current format. The pre-IMC requirement was reduced to 10 hours, the course itself lengthened from 10 to 15 hours plus a new written exam. Interestingly, this set of changes introduced the 'in sight of the surface' limitation to the UK PPL. The IMC was valid in airspace as defined in a schedule of the Air Navigation Order. While there was some relationship to complexity of airspace this seemed idiosyncratic. For example, a large section of little used Scottish airspace was out of bounds. One significant thought to carry forward is that it was normal practice to fly IMC en route and regain VMC well clear of a destination airfield where an instrument approach was not allowed. Later when countries adopted common airspace definitions the schedule was abandoned and the IMC became valid within the UK in Classes D, E and G airspace.

For simplicity the CAA did not define approach minima for the IMC holders. They recommended an added 300ft to individual airfield minima published in the *Air Pilot* with a non-precision absolute minimum of 600ft or the visual manoeuvring height, whichever was greater. These published minima were themselves recommendations. You can see how, when minima later became statutory, the current bizarre position emerged. The privileges of the IMC are to fly in exactly the same weather conditions as the IR except for a visibility restriction of 1,800 metres. On the other hand the CAA advice is not to use the privileges granted but rather to treat it as what became known as a 'get out of trouble' rating. This advice evolved to adding 200ft to published minima with absolute minima of 500ft for precision approaches and 600ft for non-precision approaches.

**The Least Bad Compromise**

I do not wish to disparage the efforts of many well meaning folk over this extended period. In a time of great change they did their best to adapt but the reality was that what emerged was not a finely crafted product carefully aligned to the needs and skills of pilots. In that great British tradition we 'made do' and lived with the least bad compromise.

Thus pilots with 15 hours training, possibly from an instructor whose own experience is quite limited, are accorded effectively the same privileges within the UK as pilots who are deemed to require about 50 hours of training within an approved organisation. IMC holders operate in the lower levels with worse weather, generally flying a less capable aircraft. They have less comprehensive ATC services and use airfields with fewer facilities. Often they have little chance to stay current and are subject to less frequent renewal checks than holders of the IR.

It is not hard to see that this seems rather irrational if you live anywhere else in the world since no other country has seen a requirement for an IMC like rating. On the other hand it must be said that the IMC has in practice continued to generate few problems and is well liked. It is argued that there is a safety benefit but I can find no credible evidence to support this. The data is pretty inadequate with no record of hours flown and often no record of the licence held by pilots involved in accidents or incidents. One might argue polar opposites. It encourages partly trained pilots to enter conditions that they cannot cope with or it enables pilots to avoid situations which would have been dangerous if they had not held the rating. The CAA itself has been somewhat schizophrenic in its reaction to the IMC. In 1995, after a high profile GA fatality blamed on IMC induced overconfidence, the CAA went public with its concerns. A spokesman said that 'We came to the conclusion that the IMC rating is not very satisfactory. We did not like the content, testing or revalidation at only 25 months.' The outcome then was a proposal for the IWR, the **Instrument Weather Rating**. This was intended to be a 20 hour course with similar, but mandatory, privileges to the IMC. The time would have counted towards the full IR. In the event history repeated itself and this proposal did not find favour.

On the basis of the only two surveys of IMC holders of which I am aware, it is evident that IMC holders do indeed value the rating and that the vast majority use it in the 'get out of trouble' mode. A minority, for example PPL instructors, use it to recover in mild IMC to known airfields and only a tiny minority use its full privileges for travelling some distance in IMC intending to land using an instrument approach procedure at a possibly unfamiliar destination.

**The Instrument Rating**

The original UK IR system allowed anyone with 700 hours experience to present themselves for the flight test and theory exams. In 1964 new rules allowed those with less experience to do a full time 20 hours course and spend 100 hours in classroom study. At the time the disparity between the 700 hour and approved school routes was considered quite unreasonable. The latter formed the basis of the system we have today and, in the UK, the initial test is still carried out by examiners employed by the CAA.

Much mythology has grown up about this test but what is undoubtedly true is that it is more structured and consistent than most tests worldwide. Not necessarily better or harder, just more consistent. With the advent of the JAA, the IR requirements evolved into the onerous process we have today with extensive theoretical knowledge (TK) exams and 50 hours flying with Approved Training Organisations (ATOs). It is a fact that the JAA system was not based on the needs of an instrument pilot. It represented the training hours remaining after the time for other elements of the full time cadet ATPL course had been allocated. This led to a perception that much of the TK syllabus was useless to a private pilot, that the dual instruction in an ATO was excessive and that the flight test was archaic and unnecessarily demanding.



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The US has always been considered a Mecca for the private pilot leading to more IR myths taking root amongst the facts. Some considered that an FAA IR was like an IMC. Others believed that the FAA IR was entirely comparable to, or even harder than a CAA IR. Almost all believed it was more relevant to the real world of PPL instrument flying. As best I can judge, the truth is that they are comparable but different. The FAA TK is certainly more attainable and relevant, and is offered in convenient ways through distance learning and online exams. While only 15 hours training with an instructor is compulsory for an FAA IR (indeed the ICAO minimum is even less at 10 hours) the reality is that most pilots training in the US take the same 40 or so hours to attain test standards as in the UK. It is true that training and testing standards are far more variable in the US than the UK and while I have come across no evidence of outright corruption, it is almost certainly possible to get an 'easy' IR. That said it is definitely currently possible to get an 'easy' IR in at least one country in Europe. Variability and laxity seem obviously unwise in an activity with such an obvious potential for disastrous outcomes. Surprisingly, as far as I am aware, there is no evidence that the accident rates of pilots trained anywhere in what one might loosely call the developed world differ greatly. Perhaps fear and a desire for self preservation kick in. This cocktail of myth and reality has meant that a large number of aircraft in Europe are operated on the N register by pilots holding the FAA IR. Again there is no evidence of a measurable impact on safety.

#### Recent developments

Europe, through EASA, is taking responsibility for many aspects of aviation including pilot licensing. They want a common system across Europe but this is not in any way peculiar to aviation. The UK has signed up to working towards a federal Europe with much reduced powers remaining to the member states. EASA established that a number of states had national ratings and, unsurprisingly, their view was that they should either become Europe-wide qualifications or disappear. Some, like mountain ratings, were relatively easy to assess. If there were mountains it was needed and in countries that had gentler terrain the existence of such a rating caused no difficulty. The IMC was rather strange in that there seemed no credible reason why the UK was a special case. Arguments based on the nature of UK weather and safety outcomes did not stand up to scrutiny. British people tend to think of Europe in terms of the sunny skies of the south and choose to ignore Germany, Ireland, the Scandinavian countries and Northern France. Also the use of Class A airspace as a means of excluding IMC holders from the busiest airspace simply doesn't work in Europe where much airspace used by commercial traffic is Class C or even E.

In my view the only convincing arguments the UK could deploy for the IMC relate to the general benefits of additional training and the complexity of the IR. This complexity drives the very large discrepancy between the proportion of PPL holders with an IR in the US and Europe. Data is not good but the proportion is perhaps of the order of 30% in the US and 5% in Europe. This was undesirable and decreased the utility value of light aircraft and the freedom of citizens to travel. Utility is a strong argument in the EEC where free movement of goods and people is a fundamental concept. The UK IMC was a reasonable response to this situation and had produced a rating which was popular and which, at the very least, did not have an adverse impact on safety.

#### The EASA response

It is greatly to EASA's credit that in spite of their enormous workload they accommodated UK minority concerns even though they were often expressed in unhelpful ways. In a public meeting I attended, a well known GA figure suggested that we needed an IMC because England stood alone against the Nazi hordes in the Second World War. This seemed a rather bizarre way of influencing an organization based in Cologne, a city almost wiped out in that same war. While not descending to this level, individuals and organisations took a quite aggressive and strident public stance, doing harm to the cause they espoused. In spite of all this EASA set up an expert group to consider the issue and the FCL.008 committee was born.

Here it is necessary to outline briefly the make-up of such "expert groups", as they are known. Keep in mind there are almost 30 countries and numerous sectional interests to balance. Recommendations for membership originate from two EASA standing committees. GA representatives are put forward via **Europe Air Sports** (EAS) who have a place on one of the standing committees. **PPL/IR Europe** is the only member of EAS representing powered flight. We lobbied hard since we believed we were one of the few organisations with specialist knowledge. Private instrument flying has always been an activity which has fallen uncomfortably between the wider GA interest and the interests of commercial aviation. Indeed this inability to have our interests represented elsewhere was one of the key reasons why **PPL/IR Europe** came into being. Being something of an aviation nut, I have acquired a fair portfolio of evidence of pain and expense with a JAA CPL IR, FI, IRI, CRI and a couple of type ratings plus an FAA CPL IR. I operate from a grass strip and have worked in maintenance and engine rebuild companies and held an AOC. This enabled me to fill a few boxes on the CV and I was offered a place. One rather awkward EASA rule is that group membership is personal and substitution is not allowed. This does facilitate the work of groups dealing with complex and detailed topics and it means commitment to spending ten or twelve days in Cologne on unknown dates, up to a year ahead. This made it impossible for anyone in full time employment and, having recently retired, I was able to take on the task.

#### The FCL.008 Committee

The make-up of the committee is of some interest:

National airworthiness authorities	3
Europe Air Sports	2
IAOPA	1
Airline pilots	1
Training organisations	1
Gliding	1
EASA	1

Of these ten people, eight hold instrument ratings and only one is not a PPL holder. Two are IR examiners and one is an air traffic controller as well as a voluntary instructor and examiner. Several others are instructors. The group is also dealing with another UK anomaly, glider flying in and near cloud, not considered here. It is therefore pretty unarguable that there is a considerable concentration of expertise. Three members are from the UK, two French, three German, one Dutch and one Dane. Overall the representation might be considered quite favourable from a UK and GA perspective. In fact when the group actually met I was delighted to find that every member was open to ideas. There was general agreement that it was unacceptable that so few European private pilots held instrument ratings. There was absolutely no need to argue from first principles as I had expected. Rumour had it that the European professional pilots were very aggressive in defending what they regard as 'their airspace'; however in reality their French representative on the group, while having real concerns and a different perspective, was very fair and open minded in working towards solutions for each specific issue.

The meetings opened with an invitation to present papers outlining various aspects of the existing situation and any proposals the members chose to bring. The convention is that, once appointed, group members do not represent a sectional interest but act as individual experts. I, perhaps naively, had taken this seriously. When appointed I had arranged to visit the CAA, the LAA, AOPA and the BGA and also held an open meeting in London. My aim had been to be as inclusive as possible and garner suggestions as to how the IMC might fit into the European airspace structure. While there were many expressions of support for the IMC there were absolutely no suggestions forthcoming as to how this might work.

The only people offering to work towards some credible proposals were **PPL/IR Europe** members. We did a study on the distribution of airspace classes throughout Europe and tried to develop a range of solutions. We wrote several draft proposals and in the event all but one of the IR related papers presented to the first meeting emerged from this work. The CAA argued for something based on the existing proposal for a ten hour basic instrument flight module. This has always struck me as a concept of limited appeal as it carries no privileges and, in effect, is just the first few hours of the current IR syllabus. Consideration was also given to the UK IMC and unsurprisingly it was soon apparent that it was unworkable and unacceptable outside the UK. In the context of designing a new system for PPL access to instrument flying it was obvious that a truly accessible IR on FAA lines was the key issue and the place to start detail consideration.

#### **An Accessible IR Consensus Emerges**

To skirt around a quite involved process, the accessible IR was broadly welcomed, tempered mainly with concerns about maintaining standards. There was general agreement that the TK syllabus involved far too much material which was either commercial in nature or irrelevant. The group considered all the thousand plus learning objectives individually. It became quite amusing to admit that I did not understand some obscure topic and ask someone round the table to explain its meaning or relevance. After the first few times with the whole group furtively avoiding eye contact to avoid exposing their own mystification, it was relatively easy to eliminate about half the existing syllabus. This would make the candidate's task quite comparable with that involved in the FAA TK.

There was more difficulty with the flying training as the basic EASA concept is to vest authority in approved organisations, unlike the FAA system where individual instructors have authority. A compromise was reached in which the course is a mix of experience, training with a qualified instructor and training within an ATO prior to the initial skills test. The mix is entirely ICAO compliant with the ATO element being the ICAO minimum of 10 hours. Please understand this does not mean that the average person can or should get an IR with 10 hours training as it will still take the vast majority of candidates much longer. However, it will not be arbitrary but related to what is needed to reach the test standard. We felt that the current standards are entirely appropriate to the skills instrument pilots need but they could be delivered in a flexible manner. It is vital to emphasise that this is not some lesser IR. The skill test remains identical for all applicants whether they are commercial or private pilots. There are just various ways in which candidates can acquire the necessary competence.

#### **The En-route Instrument Rating**

Frankly, I was astounded at the degree of support for the proposals we put forward. While it will still be more expensive and time consuming to get an IR in Europe than the US, this reflects the relative cost and aviation infrastructure rather than the outcome of an inappropriate syllabus. Given this 'win,' and considering that nowhere other than the UK has found some sub ICAO instrument qualification necessary, I expected to meet considerable resistance to our suggestion of an en-route instrument rating (EIR). In the event this was not the case. Though there were many detailed concerns, the key motivator was a feeling that the step between the PPL and the IR was still too great. Given that a key objective was to encourage pilots to become IFR qualified, an intermediate step was very valuable.

EASA has few non-negotiable requirements but, as the European legal system builds, later rules and privileges have to be consistent with earlier decisions. This meant that licence privileges could not be defined in terms of airspace classes, and any rating would be valid in any class of airspace, including Class A. The group also considered it desirable that experience and training for the EIR (five hours with an instructor, ten in an ATO) would count should the candidate later decide to carry on and gain a full EASA IR. Partly because of this, the group decided that an EIR would require the same TK as a full IR. The pilots will share the same airspace and need knowledge so nearly identical to the full IR that creating separate exams was not warranted. The benefit is that a pass in TK acquired as part of EIR will, assuming an EIR is issued and kept current, be valid for seven years. This gives pilots plenty of time to decide if they wish to upgrade from an EIR to the full IR so the processes are fully 'joined up'.

#### **Outcomes**

FCL.008 has now agreed the draft they will recommend as the basis for the EASA Notice of Proposed Amendment (NPA). Although very important, this is only the first step in the process. Next, the EASA legal department will ensure that the draft matches standards and precedents. They will not aim to change the intent of FCL.008 but this could happen. Then the NPA will go out to public consultation and, having taken account of comments, will then proceed to the higher levels of the European decision making process. It is perfectly possible for this political process to overturn the recommendations of FCL.008; however, these will be part of the overall licensing process which has been given the highest priority by EASA, as confirmed as part of the outcome of the much publicised disagreement between the Commission and EASA. I emphasise that I have no crystal ball, these are my opinions based on my experience and on EASA public statements. But the proposals do have solid support and are integral with changes which are based on years of work and which have a lot of political and organisational momentum behind them. I would be very disappointed indeed if they did not find their way into law largely intact.

#### **UK IMC holders**

The question of grandfather rights for the IMC is primarily a matter for the CAA rather than EASA but the member state freedom of action is constrained. I am not qualified to explain the European legal process but will try to give a flavour of the options. It is not possible at the EASA level for there to be a UK only qualification. It is amazing to me that from the outset people have not understood that a European system was bound to resist anything other than Europe wide rules. Hey guys, just read the national press! It is possible at the member state level for opt-outs of various kinds to be negotiated (remember Mrs Thatcher). However it seems to me highly unlikely that the UK government and indeed the CAA would spend scarce political capital in this minority cause. Such an opt-out would have little to do with the facts of the case. It's a horse trading process across a wide spectrum of political objectives.

Returning to the 'EASA level' it is possible for a national airworthiness authority to make what is known as an equivalent safety case for national variations. The CAA representative on the FCL.008 group commented that such variations would only be possible for those holding an EASA rating such as the EIR and even then only as a transitional arrangement. This is a very important point to understand for those

who have mistakenly regarded the EIR as an IMC replacement. Firstly, the EIR is not intended as an IMC replacement and, secondly, the EIR is the only basis on which a safety case might be made for some IMC-like privileges in the UK for existing IMC holders.

There is not the slightest chance of basing any equivalent safety case on the relationship between the IMC and a full IR. Thus only the holder of an EIR could possibly be the beneficiary of any grandfather rights. Whatever its privileges in the UK, the EIR would remain a European rating with Europe wide privileges.

#### **A least bad compromise again?**

The required skills for an EIR are not the same as the IMC. It is more limited in that there are no approaches but in other ways it is more extensive covering flight in the busiest airspace at higher levels and across Europe.

Because of this my personal view is that it would be appropriate for an IMC holder to take the TK exam. The IMC has a limited theory element and what there is has a practical UK focus and is administered at the PPL level within the flying schools. If this is what is decided I don't expect IMC holders to be pleased but the knowledge is important and the effort required proportionate to the privileges on offer.

As regards flying skills my opinion would be that IMC holders should do an assessment flight in an ATO and subsequent training as determined by the ATO in order to meet the skill test standard. In some cases this might be very little or even zero. In others, the full 15 hours training might be needed. This seems to me unarguable and anyway anything less is unlikely to be acceptable in Europe. For that minority of IMC holders who are highly experienced and have been using their rating for hard IFR flight then my advice is to go for the full IR. The minimum training is modest and the TK requirement identical. Those who are less experienced or who have used their rating more in the 'get out of trouble' fashion do not lose out greatly. All the training they take will be valid if, at a later stage having built experience, they go on to the full IR.

The CAA has understandably been unwilling to give any formal statement as to its intentions before EASA publishes the NPA. However it has been very helpful informally in responding to a request for clarification of the legal position. The indication is that the only mechanism available to it is Article 14 of the basic EASA regulation. EASA has given some hints that it would give any equivalent safety case presented under the provisions of this article favourable consideration. To my non-expert eye, using Article 14 to bolt on time-limited IMC privileges to an EIR goes beyond its apparent intent. However I guess anything is possible if the CAA and EASA are in accord. I certainly feel that some method of allowing existing IMC holders to retain their current privileges within the UK while holding a current EIR would take a lot of the heat out of the situation and be a good way of ensuring an orderly transition.

#### **FAA IR holders**

The position of FAA IR holders is more complicated. This issue was not the responsibility of the FCL.008 group. Nevertheless we tried to build (into the EASA IR) minimum requirements which would not be unduly onerous for the experienced holders of an ICAO licence to fulfil. They would be in the same position as the experienced IMC holder described above needing TK, an assessment flight, minimum 10 hours in the ATO and a skill test. I don't expect them to be overjoyed but this is not ridiculous overkill. This route gives the holder an EASA IR (assuming they have at least an EASA PPL to attach it to.)

An alternative route involves a process by which EASA accepts a third country - in this case FAA - qualification allowing them to continue to fly N registered aircraft within Europe. The current proposals for the acceptance of third country licences are set out in Annex 3 to the EASA Implementing Regulations which have been in place for some time. This only applies if you are a European resident. If you are a US citizen flying in Europe then you do not have a problem. For all those who think it possible to work round residence rules then I suggest that decades of taxation law has meant that for most people it won't work. If you swim in the pond and quack, it's hard to argue you are not a duck. I am sure there will be lots of clever schemes suggested and maybe, if you operate a very expensive aircraft, the cost and effort is worthwhile but I doubt it.

Since I was on the spot, I was asked by the legal department at EASA to give my personal opinion as both the owner of an N registered aircraft and an FAA licence holder. Firstly, I suggested that any acceptance of e.g. an FAA qualification should be permanent and not annual as in the current proposals. Secondly, I suggested that the TK differences could be dealt with by an oral examination as part of a skill test rather than doing some of the exams as presently proposed. There is also a requirement for 100 hours of instrument time which seemed reasonable. One does not want to open up anything which might be seen as bypassing an EASA IR and generating vigorous protectionist opposition from professional pilots. You are more likely to get draft legislation amended if you keep the alterations to a minimum. The above has no status whatsoever. It's entirely up to EASA how they proceed. All I can say is that I was given a good hearing and the ideas seemed to meet with serious consideration.

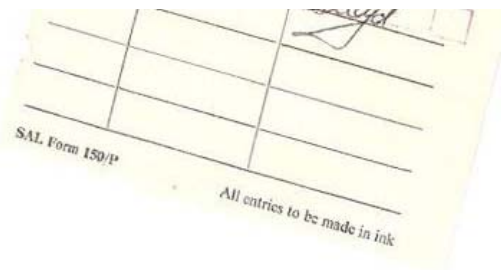
#### **A PPL /IR Europe perspective**

Of course there are some who will resist any change; however, I think what has emerged is potentially a 'dream ticket'. For years we have worked away quietly accepting criticism and sometimes abuse and I think it is time we were little more forthright. What is on the table has been achieved entirely through the efforts of **PPL/IR Europe**. Far from helping, some aggressive voices have hindered the process and adversely affected the UK's influence in Europe.

Date of Test	Aircraft Type	Initial Test	Signature and Licence Number
1st January, 1968	Exempted	Exempted	



A copy of Roger Dunn's IMC, possibly the first and certainly one of the earliest IMC ratings ever issued is shown. Roger has spent the best part of thirty years representing pilot's interests in far from favourable



circumstances. More recently Paul Draper has spent four or five years building on the foundations laid down by Roger, spreading the influence of **PPL/IR Europe** through steady work, year after year, on representative bodies in the UK and Europe while these bodies have only gradually become receptive to change. In particular, he represented us with *Europe Air Sports* and it was this connection that enabled me to gain a place on FCL.008. All the committee and indeed some members have helped in less visible ways but I will mention Vasa Babic with his particular skill in analysis and an ability to get to the heart of lengthy and less than crystal clear documents.

What we need now is for every member to do their bit over the next 12 to 18 months. Take a few minutes to explain the reality to other pilots who believe all the negative rubbish to be found on *PPRuNe* and elsewhere. These changes have the potential to drive an enormous upsurge in interest in instrument flying. It helps in our negotiations with the CAA, NATS and others. To be fair these bodies are far more open than ever before but if we expect them to do things to help us, we have to show that the volume of users makes their efforts worthwhile. We have to show airfields that there is enough GA usage to make it in their interests to provide decent access and handling services at a fair price. We need you to participate in our future efforts to make mainland Europe more aware of the potential that is opening up.

As a group we have more experience of what is possible than anyone else. **PPL/IR Europe** will be producing material in several languages and doing lots of practical work to show how a new rating structure could be used to best advantage. Most important of all, when the NPA is published towards the end of 2010, we need to do our best to encourage lots of positive response to balance the inevitable negativity. It is human nature for the dissatisfied to be noisy and the satisfied to remain silent. GA has many opponents in the wider aviation world and we have failed lamentably to speak with one voice or at least to coordinate and minimise our differences. Let's see if on this occasion we can help EASA steer these excellent proposals through to implementation and make going places IFR a really practical proposition for many more people.

**Comparison of knowledge and training requirements for existing and proposed instrument ratings**

	FAA IR	ICAO IR	JAA IR	UK IMC	Proposed IR	Proposed EIR
Theoretical Knowledge	Yes	Yes	Yes	Limited	Yes	Yes
Prior experience	50 Hours	50 Hours	50 Hours	10 Hours	50 Hours	50 Hours
Assessment flight	Pre test sign-off	No	Pre test sign-off	No	Pre ATO Training	No
Instrument time	40 Hours	40 Hours	Not Specified	Not Specified, 4 hours in PPL	40 Hours	None other than in PPL
Dual training	15 Hours	10 Hours	N/A	None	15 Hours	5 Hours
Training in an ATO	None	None	50 Hours	15 Hours	10 Hours	10 Hours
Skill test	Yes	Yes	Yes	Yes	Yes	Yes
Revalidation	Logged hrs or annual flight	Unspecified	Annual flight test	25 month flight test	Annual flight test	Annual flight test

[< Prev](#)      [Next >](#)

[\[ Back \]](#)

**Joining PPL/IR Europe**