

Report On A Survey Of The Estimated Impact Of IMC Options For Glider Flying.



British Gliding Association

October 2009

Report On A Survey Of The Estimated Impact Of IMC Options For Glider Flying

INTRODUCTION

1. Flight in Instrument Meteorological Conditions (IMC) can be a significant part of sailplane flying, particularly in more northern member states with worse weather. There are no reports on record of any collisions or airproxes, anywhere within the EU27+4 where sailplane flight in IMC was a factor, but EASA's NPA 2008-17b proposed a blanket ban on this activity. A large number of responses to the Agency complained of a severe impact on gliding, existing national provisions had always worked well and that there was no safety case for any change. This issue was added to the tasks for working group FCL.008. The group identified a number of possible options: this survey gathered estimates for considering the economic consequences of each option.

QUESTIONS

2. The questionnaire at Annex A was sent to the chairmen and Chief Flying Instructors of all member clubs of the British Gliding Association (BGA), with a similar version, at Annex B, sent to representatives of the other member states where sailplane flying in IMC is permitted (Czech Republic, Finland, Norway, Poland, Sweden & Switzerland).

Note: A cloud flying rating is available to German glider pilots, but very difficult to use in practice. It is very rarely used: Germany was not included in this survey.

3. Knowledge of the definitions of IMC is important for an understanding of this issue. A summary of the relevant ICAO rules were included with the questions, as were the options considered by the working group.

RESPONSES

4. Unsurprisingly for an all volunteer organisation, run by unpaid officials in their spare time, the BGA rarely enjoys a fully 100% response to requests for information. (Military clubs, in particular, are a difficulty: run in their spare time by officers often involved in current overseas operations, only 5 of 13 replied) Weighted for the size of clubs responding, this survey achieved a 63.9% response rate. Outside the UK, 4 of the 6 nations contacted felt able to estimate numbers with the other two offering text only responses.

5. In addition to the numerical answers requested, most respondents added explanatory text. A few, typical samples are included in Annex C; all are published with this report on the BGA web site at www.gliding.co.uk/bgainfo/documents/imc_responses. They add vivid colour to the numerical results.

ANALYSIS

6. The responses offered were weighted according to club size¹ and used with work by T Lober² published in March 2006. This indicates the total value of gliding activity to the UK economy at £20.309,424 per year³.

7. Overall, responses indicated, for Option A, an 82.3% reduction in activity, with 36 of 45 clubs that responded being no longer viable. Option B indicated a 14.1% reduction and Option C, a 31.8% one. Once these reductions are applied to the value of the entire UK gliding movement, the loss of economic activity threatened is:

Option A £16.7M per year

Option B £ 2.9M per year

Option C £ 6.5M per year

Details are in Annex E.

8. A similar survey of national representatives from the other IMC flying member states⁴, Annex B, indicated a remarkably similar 82.7% reduction in their activity for Option A. No figures are available for the economic value of GA within these states but European Gliding Union statistics show that the UK represents 44.0% of all the gliding activity by the IMC flying member states, indicating a total contribution of €50.8M per year. Thus, the cost to the economies of the IMC flying nations is similarly estimated at:

Option A €41.9M per year

Option B € 2.9M per year

Option C €18.5M per year

(Note the change from £ to €)

Details are in Annex F.

¹ BGA totals from Annual Stats to end Sep 2006 (published in S&G Jun-Jul 2008)

²http://www.gaac.co.uk/gasar/GASAR_Conclusions.pdf

³ £18.586M when published in March 2006
£19.143M in 2007, £19.717M in 2008, £20.309M in 2009: assuming 3% growth in economy each year

⁴ Although a cloud flying rating is available in Germany, it is very difficult to use and so taken up by only a handful of pilots. For this document, Germany is treated as a non IMC flying member state.

CONCLUSIONS

9. Thanks are due to the senior officials from all the clubs and member states who responded to this survey. The numbers and words provided shine a stark light on the options being considered by working group FCL.008: each would have a significant effect. Option A would be, in the full meaning of the word, catastrophic. Option B would cause the minimum damage to the community. The effects of Option C are slightly less clearly indicated, but would clearly fall between the two.

Report On Survey Of The Estimated Impact Of IMC Options For Sailplane Flying
Annex A

Questions To BGA Chairmen and Chief Flying Instructors

Survey - EASA and Cloud Flying

You will be aware that EASA has proposed many far reaching changes to the regulation of gliding. The BGA believes that some of these represent disproportionate impositions on UK gliding; in particular, the proposed IMC rules generated many complaints. EASA set up an expert working group – FCL.008 – to make recommendations on this particular issue. The BGA has had a direct input to this group.

Estimates are needed for the likely impact of the available future options currently being reviewed by FCL.008. We would be grateful if you could make your best estimate of the overall impact of each option on the level of activity at your club.

We understand that these impacts will be complex, with many interrelated factors, but ask that you consolidate them into one figure: the overall percentage reduction (or increase). Please assume that, in each case, your pilots will obey the law.

Note: Many of us use the terms “IMC” and “in cloud” as synonyms: understanding the difference between them is crucial to understanding this issue.

Definitions

IMC – Instrument Meteorological Conditions – are defined in ICAO Annex 2 Rules of The Air. In summary, a pilot is within IMC whenever during flight he or she is not:

Below 3,000’ amsl - clear of cloud & in sight of surface

Above 3,000’ amsl - 1,000’ vertical distance & 1,500metres horizontal distance from cloud

There are also visibility requirements that are rarely invoked.

The Big Issue

The current proposal in EASA’s NPA 2008-17b is that glider pilots will not be allowed to fly in IMC unless they hold an appropriate instrument rating. No glider instrument rating is proposed.

This would mean that a glider could not climb higher than 3,000’ amsl unless the cloud base was 4,000’ or higher and would subsequently have to remain 1,000’ below the base.

Wave pilots would be required to maintain at least 1,500m horizontal distance from cloud; wave gaps smaller than 3km width would not be usable.

Options

The FCL.008 group has considered proposing changes to the NPA that would allow glider flight in IMC but clear of cloud where in accordance with existing national regulations.

The group has considered a Sailplane Cloud Flying Rating: this would require some ground training, 5 hrs dual instruction and a flight test. The rating would, where national rules permit, allow flight in cloud.

The group has also considered a Restricted Sailplane Cloud Flying Rating: this would require the same ground training, but no dual flying or test. This RSCFR would, where national rules permit, allow access to airspace that is IMC but clear of cloud.

These are consolidated into 3 options:

Please assume that, in each case, your pilots will obey the law.

<u>Option A</u> Leave in place the proposed ban in NPA 2008-17b: Gliders never allowed to fly in IMC									
What would be the overall <u>long term</u> impact on the level of activity at your Club? If you have indicated a reduction in activity: Would your Club still be able to operate viably?									
No change	20% reduction	30% reduction	40% reduction	Activity would halve	60% reduction	70% reduction	80% reduction	90% reduction	Club would not be able to operate viably

<u>Option B</u> No change to the existing UK rules for gliders flying near cloud. Sailplane Cloud Flying Rating required for flight within cloud									
What would be the overall <u>long term</u> impact on the level of activity at your Club? If you have indicated a reduction in activity: Would your Club still be able to operate viably?									
No change	20% reduction	30% reduction	40% reduction	Activity would halve	60% reduction	70% reduction	80% reduction	90% reduction	Club would not be able to operate viably

<u>Option C</u> Restricted Sailplane Cloud Flying Rating required for flight in IMC (near cloud) Sailplane Cloud Flying Rating for flight within cloud									
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What would be the overall <u>long term</u> impact on the level of activity at your Club? If you have indicated a reduction in activity: Would your Club still be able to operate viably?									
No change	20% reduction	30% reduction	40% reduction	Activity would halve	60% reduction	70% reduction	80% reduction	90% reduction	Club would not be able to operate viably

Finally, Two Questions

1. SCFR. What proportion of your pilots, with Cross Country Endorsement or above, might take up a SCFR?

2. RSCFR. What proportion of your pilots, with Cross Country Endorsement or above, might take up a RSCFR?

Replies are needed by lunch time on Monday 28th and should be sent as an attachment or as text within the email to both office@gliding.co.uk and andy@asmiller.freeserve.co.uk.

If necessary, telephone replies can be to Andy on 01249 821 031; he can answer questions you may have.

Final Note

There will be further levels of scrutiny, both public and within the European Commission, before any of these options can become law.

Thank you for your assistance.

BGA 22 September 2009

Questions to National Representatives of IMC Flying Member States

As (FCL.008) completes its work, we need to understand the likely impact of the options considered. You know the British consider that the impact of the current proposals would be disproportionate, but it is vital to understand the position of the other “IMC flying” member states.

Please could I ask you to answer a few questions?

I am asking you to distil complex issues into a single figure for each question – a percentage (%)

Many, many thanks,
Andy Miller

Definition

From hard experience, I have found it necessary to clarify my own understanding:

IMC – Instrument Meteorological Conditions – are defined in ICAO Annex 2 Rules of The Air. In summary, a pilot is within IMC whenever during flight s/he is not:

Below 3,000' amsl; clear of cloud & in sight of surface
(also applies at any altitude when less than 1,000' above the terrain)

Above 3,000' amsl: 1,000' vertical distance & 1,500metres horizontal distance from cloud

There are also visibility requirements that are rarely invoked.

Issue

The current proposal in EASA's NPA 2008-17b is that glider pilots will not be allowed to fly in IMC unless they hold an appropriate instrument rating. No glider instrument rating is proposed.

This would mean that a glider could not climb higher than 3,000' (900m) amsl unless the cloud base was 4,000' (1,200m) amsl or higher and would subsequently have to remain 1,000' (300m) below the base.

Wave pilots would be required to maintain at least 1,500m horizontal distance from cloud; wave gaps smaller than 3km width would not be usable.

Options

The FCL.008 group has considered proposing changes to the NPA that would allow glider flight in IMC but clear of cloud where in accordance with existing national regulations

It has considered a Sailplane Cloud Flying Rating: this would require some ground training, 5 hrs dual instruction and a flight test. The rating would, where national rules permit, allow flight in cloud.

The group has also considered a Restricted Sailplane Cloud Flying Rating: this would require the same ground training, but no dual flying or test. This RSCFR would, where national rules permit, allow access to airspace that is IMC but clear of cloud.

These are consolidated into 3 options:

<p><u>Option A</u> Leave in place the proposed ban in NPA 2008-17b Sailplanes prohibited from flying in IMC</p>

<p><u>Option B</u> No change to your existing <u>national</u> rules for gliders flying near cloud. Sailplane Cloud Flying Rating required for flight within cloud</p>

<p><u>Option C</u> Restricted Sailplane Cloud Flying Rating for flight in IMC (near cloud) where existing <u>national</u> rules permit. Sailplane Cloud Flying Rating for flight within cloud</p>

Question A1 What would be the overall impact of Option A on the level of sailplane activity in your country? _____%

Question A2 If you have indicated a reduction in activity, would gliding clubs still be able to operate viably?

Question B1 What would be the overall impact of Option B on the level of sailplane activity in your country? _____%

Question B2 If you have indicated a reduction in activity, would gliding clubs still be able to operate viably?

Question C1 What would be the overall impact of Option C on the level of sailplane activity in your country? _____%

Question C2 If you have indicated a reduction in activity, would gliding clubs still be able to operate viably?

Question D1 What proportion of your licenced sailplane pilots might take up a SCFR? _____%

Question D2 What would be a typical cost for one of your pilots to gain a SCFR? €_____

Question E1 What proportion of your licenced sailplane pilots might take up a RSCFR? _____%

Question E2 What would be the typical cost for one of your pilots to gain a RSCFR? €_____

Extracts From Written Responses

Midland GC

"The impact [of Option A] on the level of activity at the Midland Gliding Club would be a serious reduction, probably more than 70% and the club would no longer be able to operate viably."

Wrekin GC

"This [Option A] would have a catastrophic impact on our club. It would not be viable"

Highland & Fulmar GCs

"This [Option A] would have a devastating effect on our clubs. We are a ridge, wave and thermal site. Members would effectively be stopped from soaring flight and would leave gliding."

London GC

"[Option A]the probability is that sufficient members would leave the sport, particularly cross country pilots who are also the core of the instructors, that the viability of the club will be threatened because a) costs will rise very significantly for remaining members, b) cross country flying will be much more difficult for the inexperienced who therefore will not take it up"

Angus GC

"Option A: Club would not be able to operate viably. I would like to point out that this option would make any cross country flying from our site (and probably all of Scotland) impossible."

Yorkshire GC

"Option A If this was allowed to happen, bearing in mind the Yorkshire Gliding Club is 75 years old this year, the long term overall impact on the level of club activities would be disastrous. With wave, thermal and ridge flying available at Sutton Bank the club would suffer at least an 80% reduction and would cease to be viable in its present form. (Seven day a week operation with professional staff)"

Czech Republic

"Option A is absolutely unacceptable for our country, Option B is the best solution for us - it fully answers our standards/tradition. We prefer use NATIONAL rules ONLY, because in CZ is gliding fully organized by NAC."

Derby & Lancs GC

"[Option B] 20% reduction in activity. Club viability would be impacted significantly"

Report On Survey Of The Estimated Impact Of IMC Options For Sailplane Flying
Annex D

Responses

			Reduction in activity if A	Viable if A?	Reduction in activity if B	Viable if B?	Reduction in activity if C	Viable if C?	Take- up of SCFR	Take- up of RSCFR
Lasham	Lasham	Richard Moyse	80%	no	20%		50%	no	10%	10%
London	Dunstable	Paul Rackham; Chairman	100%	no	0%		0%		15%	100%
Soaring Centre	Hus Bos	Chas Cowley; CFI	50%	no	0%		20%		20%	70%
Booker	Booker	Geoff Tabbner; Chairman	100%	no	50%		30%		50%	70%
Scottish GU	Portmoak	John Williams; Chairman	100%	no	0%		20%		5%	70%
Cambridge	Gransdown	Phil Jeffery	60%	no	0%		20%		5%	95%
Bristol & G	Nympsfield	Colin McEwen	100%	no	0%		20%		20%	100%
Bicester	Bicester	Cris Emson; Chairman	80%	no	0%		20%		30%	50%
Midland	Long Mynd	Jon Hall; Chairman	75%		50%		15%		35%	60%
Southdown	Parham	Craig Lowrie; Chairman	100%	no	20%		40%		20%	70%
Yorkshire	Sutton Bank	Graham Evison; Chairman	80%	no	20%		55%		50%	80%
Devon & S	North Hill	jb	70%	no	10%		30%		40%	100%
Derby & Lancs	Camphill	Bill Bollam; DCFI	80%		20%		50%		5%	50%
Burn	Burn	Dave Peters; CFI	50%	no	0%		30%	no	5%	100%
Bath, W & ND	The Park	Mark Hawkins; Chairman	100%	no	0%		20%		5%	75%
Buckminster	Saltby	Roger Keay; Chairman	80%	no	20%		20%		20%	90%
Bowland Forest	Chipping	Phil Punt; CFI	20%		0%		20%		5%	50%
Norfolk	Tibbenham	Mark Wright	100%	no	0%		100%	no	10%	70%
Borders	Milfield	K I Latty; CFI	100%	no	100%		20%		0%	100%
Bidford	Bidford	Gordon Burkert; CFI	100%	no	0%		100%	no	5%	10%
Deeside	Aboyne	Fiona Bick; Chairman	80%	no	30%		30%		5%	60%
Oxford	WOG	Paul Smith; Secretary	100%	no	40%	no	20%		20%	90%
Black Mountains	Talgarth	Martin Langford	100%	no	20%		20%		20%	100%
Wyvern	Upavon	Paul Jessop; Chairman	40%		0%		20%		5%	80%
South Wales	Usk	Dave Jeffries; CFI	50%	no	20%		30%		10%	70%
Shalbourne	Rivar Hill	Colin Barnes; Chairman	100%	no	0%		0%		5%	55%
Dartmoor	Brentor	Steve Lewis; Chairman	100%	no	0%		100%	no	30%	100%
Welland	Lyveden	Mark Prickett; CFI	90%		40%		0%		1%	100%

Nene Valley	Upwood	Roger Morrisroe; CFI	100%	no	0%	100%	no	1%	60%
Dorset	Eyres Field	Douglas Every; Chairman	100%	no	20%	70%		"-	"-
Needwood Forest		Val Roberts;	80%		0%	20%		0%	90%
Northumbria GA	Currock Hill	Steve Fairley;	80%	no	0%	0%		10%	90%
Peterborough & S	Crowland	Paul Goulding	100%	no	0%	20%		20%	80%
Seahawk	Culdrose	George Kosak; CFI	30%		20%	40%		10%	30%
Highland	Easterton	Robert Tait	100%	no	0%	0%		85%	100%
Cairngorm	Feschie	Ray Hill	60%	no	20%	20%		70%	80%
Lakes	Walney	Rose Saunders; Chairman	100%	no	0%	100%	no	25%	75%
Kestrel	Odiham	Brian Garston; CFI	90%	no	0%	90%	no	5%	2%
Upward Bound	Thame	Michael Clark; CFI	50%	no	0%	20%	no	10%	40%
Wrekin	Cosford	Dennis Maddocks; CFI	90%		0%	70%		15%	75%
Vectis	Bembridge	JC Leonard; Chairman	70%	no	0%	20%		10%	90%
Fulmar	Easterton	Robert Tait	100%	no	0%	0%		85%	100%
Dumfries	Falgunzeon	John McIver	35%		5%	35%		0%	5%
Angus	Drumshade	Wolf Rossmann; Chairman	100%	no	0%	0%		0	65%
Shropshire	Sleap	John Vella-Grech; Chairman	100%	no	30%	50%		15%	50%

Report On Survey Of The Estimated Impact Of IMC Options For Sailplane Flying
Annex E

Weighting The UK Responses

	Reduction in activity if A	Viable?	Reduction in activity if B	Viable?	Reduction in activity if C	Viable?	Weighting as % of BGA total	Contribution to economy using T. Lober	Loss of economic activity from A	Loss of economic activity from B	Loss of economic activity from C
Lasham	80%	no	20%		50%	no	7.25	£1,472,433	£1,177,947	£294,487	£736,217
London	100%	no	0%		0%		4.40	£893,615	£893,615	£0	£0
Soaring Centre	50%	no	0%		20%		3.53	£716,923	£358,461	£0	£143,385
Booker	100%	no	50%		30%		3.34	£678,335	£678,335	£339,167	£203,500
Scottish GU	100%	no	0%		20%		3.31	£672,242	£672,242	£0	£134,448
Cambridge	60%	no	0%		20%		2.75	£558,509	£335,105	£0	£111,702
Bristol & G	100%	no	0%		20%		2.66	£540,231	£540,231	£0	£108,046
Bicester	80%	no	0%		20%		2.42	£491,488	£393,190	£0	£98,298
Midland	75%		50%		15%		2.20	£446,807	£335,105	£223,404	£67,021
Southdown	100%	no	20%		40%		2.10	£426,498	£426,498	£85,300	£170,599
Yorkshire	80%	no	20%		55%		1.90	£385,879	£308,703	£77,176	£212,233
Devon & S	70%	no	10%		30%		1.71	£347,291	£243,104	£34,729	£104,187
Derby & Lancs	80%		20%		50%		1.52	£308,703	£246,963	£61,741	£154,352
Burn	50%	no	0%		30%	no	1.41	£286,363	£143,181	£0	£85,909
Bath, W & ND	100%	no	0%		20%		1.40	£284,332	£284,332	£0	£56,866
Buckminster	80%	no	20%		20%		1.34	£272,146	£217,717	£54,429	£54,429
Bowland Forest	20%		0%		20%		1.32	£268,084	£53,617	£0	£53,617
Norfolk	100%	no	0%		100%	no	1.30	£264,023	£264,023	£0	£264,023
Borders	100%	no	100%		20%		1.25	£253,868	£253,868	£253,868	£50,774
Bidford	100%	no	0%		100%	no	1.24	£251,837	£251,837	£0	£251,837
Deeside	80%	no	30%		30%		1.21	£245,744	£196,595	£73,723	£73,723
Oxford	100%	no	40%	no	20%		1.21	£245,744	£245,744	£98,298	£49,149
Black Mountains	100%	no	20%		20%		1.20	£243,713	£243,713	£48,743	£48,743
Wyvern	40%		0%		20%		1.14	£231,527	£92,611	£0	£46,305
South Wales	50%	no	20%		30%		1.06	£215,280	£107,640	£43,056	£64,584
Shalbourne	100%	no	0%		0%		0.92	£186,847	£186,847	£0	£0
Dartmoor	100%	no	0%		100%	no	0.80	£162,475	£162,475	£0	£162,475
Welland	90%		40%		0%		0.79	£160,444	£144,400	£64,178	£0
Nene Valley	100%	no	0%		100%	no	0.78	£158,414	£158,414	£0	£158,414
Dorset	100%	no	20%		70%		0.69	£140,135	£140,135	£28,027	£98,095

Needwood Forest	80%		0%	20%		0.66	£134,042	£107,234	£0	£26,808	
Northumbria GA	80%	no	0%	0%		0.65	£132,011	£105,609	£0	£0	
Peterborough & S	100%	no	0%	20%		0.61	£123,887	£123,887	£0	£24,777	
Seahawk	30%		20%	40%		0.49	£99,516	£29,855	£19,903	£39,806	
Highland	100%	no	0%	0%		0.44	£89,361	£89,361	£0	£0	
Cairngorm	60%	no	20%	20%		0.41	£83,269	£49,961	£16,654	£16,654	
Lakes	100%	no	0%	100%	no	0.41	£83,269	£83,269	£0	£83,269	
Kestrel	90%	no	0%	90%	no	0.38	£77,176	£69,458	£0	£69,458	
Upward Bound	50%	no	0%	20%	no	0.38	£77,176	£38,588	£0	£15,435	
Wrekin	90%		0%	70%		0.36	£73,114	£65,803	£0	£51,180	
Vectis	70%	no	0%	20%		0.31	£62,959	£44,071	£0	£12,592	
Fulmar	100%	no	0%	0%		0.25	£50,774	£50,774	£0	£0	
Dumfries	35%		5%	35%		0.16	£32,495	£11,373	£1,625	£11,373	
Angus	100%	no	0%	0%		0.15	£30,464	£30,464	£0	£0	
Shropshire	100%	no	30%	50%		0.12	£24,371	£24,371	£7,311	£12,186	
						63.93	£12,983,815	£10,680,726	£1,825,817	£4,126,469	
						Loss as a % of the economic activity represented by those who answered the survey			82.3%	14.1%	31.8%
							Option A	Option B	Option C		
							£16,706,908	£2,855,963	£6,454,667		
							In Euros if €	In Euros if €	In Euros if €		
							€1.10=£1	18,377,598	3,141,559	7,100,134	
							Total gliding contribution to UK economy pa, using T. Lober study as basis	£20,309,424			
							In Euros if €1.10=£1	€ 22,340,366			

Weighting Other IMC Flying Member States' Responses

PROPORTIONS FOR WEIGHTING

	Gliders		Members		Launches		Working % used
	No	% of total	No	% of total	No	% of total	
Czech	687	11.1%	3209	14.3%	820190	12.8%	12.0%
Finland	385	6.2%	1965	8.8%	340720	5.3%	7.0%
Norway	115	1.9%	1411	6.3%	93000	1.4%	4.0%
Poland	855	13.8%	3000	13.4%	297025	4.6%	10.0%
Sweden	420	6.8%	2100	9.4%	549361	8.5%	8.0%
Swiss	1189	19.2%	2760	12.3%	942741	14.7%	15.0%
UK	2550	41.1%	7950	35.5%	3386728	52.7%	44.0%
Totals							
	6201		22395		6429765		100%

UK gliding's contribution to the EU economy

€ 22,340,366

UK gliding as a proportion of all gliding in the IMC flying member states

44.0%

Gliding contribution to economy of all IMC flying member states (including UK)

€ 50,773,559

= €22,340,366 / 44%

	Reduction in activity if A	Reduction in activity if B	Reduction in activity if C	Take-up of SCFR	Take-up of RSCFR	Weighting as % of IMC Flying States activity	Contribution to economy.	Loss of economic activity from A	Loss of economic activity from B	Loss of economic activity from C
Czech	100%	0%	50%	5%	0%	12.0%	€ 6,092,827	€ 6,092,827	€ 0	€ 3,046,414
Finland						7.0%				
Norway						4.0%				
Poland	20%	0%	0%	25%	90%	10.0%	€ 5,077,356	€ 1,218,565	€ 0	€ 0
Sweden	90%	0%	90%	10%	50%	8.0%	€ 4,061,885	€ 5,483,544	€ 0	€ 5,483,544
Swiss	100%	0%	10%	15%	80%	15.0%	€ 7,616,034	€ 6,092,827	€ 0	€ 609,283
Sailplane contribution to economy of member states responding to survey							€ 22,848,102	€ 18,887,764 82.7%	€ 0 0.0%	€ 9,139,241 40.0%
Weighting of member states offering responses						45%				
Weighting of all IMC flying member states excluding UK						56%				
								Option A	Option B	Option C
Loss for IMC flying member states excluding UK								€ 23,504,773	€ 0	€ 11,373,277
Loss for all IMC flying member states (including UK)								€ 41,972,809	€ 0	

Note: Estimated reductions for Option C differed between UK respondents (31.8%) and the other nations responding (40%)
Total reported is the sum of: UK reduction €7,100,134 + 'others' reduction €11,373,277 = €18,473,411