

GA1360

Posted on 15.05.2024 by Steve Forward

Category: [General Aviation](#)

Report TitleLack of flexibility (and capacity)

Initial Report

My flight was approximately two and a quarter hours to [Airfield], Isle of Man. This requires a General Aviation Report (GAR) be filed at least 12hrs in advance of the flight. During the flight, somewhere in the Sheffield area, I realised that I was going to sooner or later need to answer a call of nature. This became increasingly urgent as time went on, until it became extremely hard to ignore while crossing the Irish Sea. My aircraft is a small tailwheel type which requires close attention on landing to avoid a bounced landing (which on the 3rd bounce will almost certainly become destructive) or a loss of directional control.

Under normal circumstances, I could have diverted to [Airfield], which was a waypoint on my trip north. However, with the 12hr GAR requirement, to remain legal this would have required a night's stay in the UK to give another 12hrs notice, or the significant additional expense and time of having to add two more stops at "designated airfields" (e.g. Blackpool and Ronaldsway) with the expense in additional landing fees this would have incurred, so I decided to press on, not realising quite how serious the need to relieve myself would become!

This resulted in a rushed approach and downwind landing at [Airfield], possibly the worst landing I have ever made in this aircraft due to the distracting nature of my problem. Fortunately no harm was done, but distraction during the approach and landing phase in this type of aircraft can have very serious consequences. I strongly suspect the inflexible GAR system means I'm not the only one to experience issues such as this; if the GAR was a mere notification – which in these days of Mode-S transponders and ADS-B would seem a lot more reasonable than the draconian 12hrs notice requirement – human factors such as these would be a lot more straightforward to deal with.

Comment

There are 2 separate elements to this report: firstly, the reporter's difficulties regarding their need to relieve themselves; and, secondly, the issues behind there being a GAR 12hr PPR requirement for some IoM airfields. The first issue may be familiar to those of us of a certain age and can be mitigated by suitable preparations such as restricting flight duration to your personal limits, diverting (and accepting the burden of additional admin/expense in favour of putting yourself in a risky situation brought on by distraction), or carrying an appropriate travel pee-bottle in the aircraft

for just such situations – there are many available on well-known internet shopping sites and at least that would give an opportunity for some instantaneous relief (depending on who might be with you in the cockpit perhaps!).

The GAR issue is worthy of highlighting. GAR is not an IoM-specific issue but relates to any flight that crosses associated international borders. GAR was introduced as a requirement under Paragraph 12 of Schedule 7 to the Terrorism Act 2000 wherein the captain of an aircraft operating between Great Britain and Northern Ireland, Ireland, the Channel Islands or the Isle of Man (or between Northern Ireland and Great Britain, Ireland, the Channel Islands or the Isle of Man) using an aerodrome not designated under that Act, must notify the police where the aerodrome is located 12hrs before departure from or arrival in the UK. For aerodromes that are designated under the Act (see Annex A of [General Aviation Guidance](#)) the requirement is to notify a minimum of 2hrs before departure. This is so that appropriate Border Force/police personnel can be notified and mobilised if thought necessary. In fact, there is an ongoing consultation that was initiated by the Home Office in November 2023 with a view to strengthening border protection requirements rather than relaxing them; it is expected that the outcome of this consultation will be enacted in the summer of this year.

Being a Home Office policy matter, GAR requirements are binding Government legal requirements and are not a CAA issue. More information on GAR requirements can be found at [General Aviation Operators and Pilots Notification of Flights](#). Failure to comply with GAR requirements may result in a civil penalty of up to £10,000.

Key Issues

The following 'Dirty Dozen' Human Factors elements were a key part of the CHIRP discussions about this report and are intended to provide food for thought when considering aspects that might be pertinent in similar circumstances.

- **Stress** – Continuing the flight when in urgent need of relief.
- **Pressure** – Desire to get to destination rather than divert and conduct further GAR admin/expense.
- **Resources** – Availability of in-flight relief.

stressStress

pressurePressure

lack_of_resourcesResources



