

Organised by

Air Operations and Aircrew Departments (FS.2 and FS.3)

List of Participants

Attendees	Members and appointed experts	
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	Czech Republic	Lucie Červenková
	Czech Republic	Vladimír Nekvasil
	Denmark	Mads Eklund – expert
	EC – DG MOVE	Irina Petrova
	Finland	Helena Pietilä
	France	Frantz Chout
		Louis Teodoro – expert
		Stephanie Selim – expert
	Germany	Michael Sieder
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	Ireland	Niall Cummins
	Italy	Marco Silanos
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	Spain	José Luis Lozano Lozano
	Sweden	Jan Thell
	Switzerland	Heinz Marti
	United Kingdom	Geoff Parker
	EASA	
	Claudio Trevisan	(CTR, EASA) – Chair
	Georges Rebender	(GRE, EASA) – Chair
	Daniela Defossar	(DDE, EASA)
	Matthias Borgmeier	(MBO, EASA)
	Krzysztof Kedzierski	(KKE, EASA) - partially
	Herbert Meyer	(HMEY, EASA) - partially
	Vairis Velde	(VVE, EASA) - partially
	Julia Egerer	(JEG, EASA) - partially
	Athanassios Tziolas	(ATZ, EASA) - partially
	Hannu Melaranta	(HMEL, EASA) - partially
	Willy Sigl	(WSI, EASA) - partially
	Bas van der Weide	(BVW, EASA)
	Betty Lecouturier	(BLE, EASA) - partially
	Adina Szonyi	(ASZ, EASA, Interim secretary)

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Related Links/Documents:
Uploaded on CIRCA BC



<p>1. Welcome and introduction <i>Presented by: Claudio Trevisan (CTR)</i></p> <p>The meeting started at 9:30 a.m. and CTR welcomed the attendees.</p>
<p>2. Adoption of the agenda <i>Presented by: Claudio Trevisan</i></p> <p>Additional points have been added to the agenda: Update of OSD information on the EASA website.</p> <p>Conclusion/Action: Agenda was adopted with the recommended items order and the additional points</p>
<p>3. Adoption of the minutes of the previous meeting and review of actions <i>Presented by: Krzysztof Kedzierski (KKE)</i></p> <p><i>WP 01 Minutes of meeting 2-2014</i> <i>AI 03_IP 01 EFOD for FCLOPS TAG (presentation)</i></p> <p>More efficient ways to coordinate the State Letters (SL)</p> <p>For a faster processing, EASA will soon start publishing the draft recommendations on CIRCA BC. Final recommendation to reply to a SL will be still issued by EC. This will gain approximately 1 week for the proposing amendments.</p> <p>Update on the ICAO EFOD Compliance checklist</p> <p>The principle behind the comparison in the EFOD tables applied by EASA: the meaning was taken into consideration rather than the literal wording. Only when the real safety impact was different was it considered to be a difference. The tables do not address the national rules, opt-outs, AltMOC, or any other derogations.</p> <p>There is a SINAPSE group of European National Continuous Monitoring Coordinators (ENCMC) – compliance checklists are posted there. Whoever wants to be part of this group can contact Krzysztof Kedzierski (krzysztof.kedzierski@easa.europa.eu).</p> <p>One MS asked whether there is a technical solution for uploading the data on ICAO CMA on-line framework. EASA is working with ICAO on an automation process. EASA cannot fill the Database for the MS for various reasons (States sovereignty, obligation towards ICAO). The finalisation of the EFOD tables' review depends on the workload of the responsible RM officer – so there can be no exact date specified. The CC for Annex 1 will probably be ready by the end of April, but not surely.</p> <p>One MS said it is not clear whether the AMC&GM should be considered as sufficient proof of compliance with SARPs as proposed by EASA. Is there any progress between EU and ICAO on the agreement of this approach? EASA answered that EASA rejected the ICAO proposal on the revised note on notification of differences (State Letter 2014/66 ref.). The Commission replied also on their own behalf. The discussion in the ICAO Council was postponed until autumn 2015. ICAO will produce a more detailed guidance material. As discussed informally with ICAO: they have nothing against the purposive approach to the interpretation of the SARPs, although they don't seem to favour it either as something to recommend to all ICAO States.</p> <p>There is a technical (IT) problem with the uploading of the EASA compliance checklist. EASA SM3 and ICAO are working on a solution acceptable to the EU MS.</p>
<p>4. Amended Rulemaking Programme and status update on the FCL & OPS ongoing tasks <i>Presented by: Matthias Borgmeier, Daniela Defossar</i></p> <p><i>IP 01 Agency presentation on the subject</i></p> <p>Update on the OPS domain</p>



Refer to presentation.

The Agency furthermore explained that most of the Art. 14 cases were on harnesses (upper torso restraint devices) and helicopters. They are quite a number of exemptions/derogations for HEMS. The Agency proposed to MS to have a separate meeting on HEMS operations.

The presentation continues showing the ongoing rulemaking tasks (RMTs); the postponed RMTs; new RMTs.

There is currently a review of the Rulemaking process. Some tasks have been selected as test cases:

- consultation on CIRCA BC on an AMC on life vests;
- GA roadmap to review the OPS Balloon rules – ToR will be published soon. Review of the entire OPS balloons rules. There will be no NPA, no CRD. This step will be replaced by a workshop. An Opinion will be published after. There will be an expert group – MS have been contacted to nominate experts.

Finally, it was proposed to schedule a meeting in April on the NCC/NCO implementation issues.

COMMENTS AND DISCUSSIONS:

One MS asked whether there would be delays in the implementation of the Balloons rules. EASA replied that all balloon items will be taken out of Regulation (EU) No 965/2012 and a new Regulation on balloons will be created. This Regulation will contain an OPS part. Later on, there will probably be an FCL Part on balloons. The task will take the current rules and simplify them (all balloon related rules, i.e. Parts CAT, ORO, SPO, NCO). The Agency plans to have experts to go through the text of the current rules, review them, re-arrange the text between IRs and AMC/GM or delete it. There is no time to produce a full RIA. The RMT is based on the input of experts and the guidelines given by the GA roadmap.

One MS decided to implement the balloon AOC in April. Will the AOC certification for balloons still be valid? EASA replied that it's not sure whether there might be an AOC or not. MS should not ask for AOC implementation from operators and should postpone the implementation of any balloon rules. Two MS mentioned that they had adapted their national legal system and that it is difficult to stop everything now.

On one MS's request, EASA gave more information about the timeframe: the first expert meeting is on 23-24 March 2015. ToR to be published in Q2 2015. There will probably be 2 additional expert meetings and a workshop in August or September 2015. After the workshop, there may be another expert meeting (depending on the output of the workshop). The structure of the comments has to be done in a clear and transparent way as there will be no NPA or CRD. EASA was requested to share the timelines that had already been shared with the balloon community.

One MS asked if other categories of aircraft or type of operations might also be reviewed. The Agency replied that there are currently no plans but that within the GA Roadmap project everything is possible.

One MS requested more information about the apparent gap existing in the current rules and whether the ongoing RMT.0352 would cover it – commercial SPO activities performed by an AOC holder with the aircraft otherwise used for CAT operations. Should operators be required to have two different manuals and apply two different sets of rules for CAT and SPO if both types of operations are performed under the AOC? How flexible would the rules be in this respect?

EASA explained that the RMT.0352 'Non-commercial operations of aircraft listed on the Operations Specifications (OpSpecs) by an AOC holder' is deliberately limited to non-commercial operations. The reason is that commercial operations other-than-CAT have a different risk assessment. The provisions in ORO.AOC.125 give some credit to an AOC holder if it performs similar operations in a non-commercial environment. This credit cannot be given to operations other-than-CAT, because SPO has a totally different risk assessment. For commercial SPO, an AOC holder has to satisfy CAT and SPO rules. An AOC holder may have a single Ops Manual, but it may not have only one certificate. No certificate (AOC) is required for SPO, just a declaration (or an authorisation for high-risk – which is a different one, an assessment of the risks and SOP), but an NAA cannot issue an AOC and also tick the box for SPO. This was a change agreed during the comitology process.



One MS expressed its concern in relation to RMT.0348 (Flights specific to design and production activities) being put on hold. National regulations currently apply to those flights as the NAA allows (by authorisation) to have a single-pilot in a dual-pilot position. What will happen when Part-SPO becomes applicable?

EASA explained that RMT.0348 does not address normal operators performing demonstration flights, but manufacturers if the flights are linked to their design or production activity. National rules continue to apply until EU rules are available. Part-NCO/SPO already includes demonstration and display flights for “normal” operators or activities not linked to design/production. The discussion concluded that possibly the exemption in the Cover regulation for the introduction or modification of aircraft would need be reviewed for clarity.

One MS questioned whether the EASA type-rating list published on its website was current and also commented on the availability of OSD Flight Crew data on the EASA website. The lack of Operational Suitability Data on the EASA website would create confusion and MS are not aware of the means of distribution of the information. Could there be a better dissemination of information or publication on the website?

EASA explained that existing OEB reports are in the process of transfer into Operational Suitability Data. In a first step, the mandatory and non-mandatory elements of OEB reports are being identified. Subsequently, these reports will become Operational Suitability Data and become proprietary documents of the relevant TC holder. In the interim phase, OEB reports may remain on the OEB website and may be supplemented with the identification of mandatory/non-mandatory elements. Current OEB and OSD Document references can be found in the EASA type-rating list which is revised on a regular basis. Furthermore, OSD references will be added in the applicable TCDS(s) when the transition process is completed. Paragraph 21.A.62 of Part-21 establishes requirements for the owner of the data (i.e. the TC holder) on making these OSD data available which can no longer be published by the Agency. On request, Competent Authorities responsible for verifying conformity with one or more elements of Operational Suitability Data must be provided with this information by the TC holder. Explanatory Notes are due to be published on the EASA website to explain this process.

Update on FCL and Aircrew

The presentation showed an overview of the FCL rulemaking tasks (RMTs).

MS have to send additional opt-outs to EASA for the derogations which are allowed to use until April 2018 as the extension is not done automatically.

ToR for RMT.0595 – there is an urgent need to review the learning objectives and syllabi, also requested with the ECQB refresh of the database. The first group meeting will be at the beginning of May.

Balloons are included in an activity to review the aircrew elements for balloons. EASA will organise a workshop with the industry (GA community) and with the MS, who are asked to nominate a balloon expert to take part in this task. The workshop will take place one day in the following 2 months – date to be determined.

EASA specified that these discussions had to be fit in the new rulemaking programme which would be discussed in the RAG.

For the date when the update of Part-MED would start, it was decided to split the NPA to publish first only the changes for MED, and the second one to deal with the changes on MED included in Parts ARA and ORA. The Opinion should be published by the end of this year. The NPA has to be prepared for the Parts ARA and ORA related to MED as well, later this year. The group already developed some elements.

One MS asked how EASA would address the concerns resulting from some of the comments received to the NPA on non-complex ATOs. EASA replied that it is a very diverse range of reactions which would be very carefully assessed in the following two weeks. The main concern will be addressed in an additional task on training outside ATOs. The AMCs are foreseen for the already approved and certified ATOs and should bring some further guidance and support.

One MS asked about the AMC for recovery training in Subpart ORO.FC. The ICAO proposed amendment will be published in April. Should the MS start implementing it?



Participants asked if there is already a date established when the RMT on Subparts J and K would be initiated. EASA answered that the aim is to start in Q3, but it depends on the availability of the Regulations officer.

One MS expressed the concern about the implementation of risk based oversight: AMC will be published in 2 years, as previously stated by EASA. Can it be done faster? EASA replied that it cannot be promised, it's relatively advanced, identification of good practices is the first step before having guidance material. By June there should be the first deliverable published, then the Guidance Material. It represents a high priority for the Agency.

A general discussion started on the distinction between TAGs and Standardisation meetings. EASA gave more details about the internal proposal to make a clear distinction between the members attending the two groups: policy options, implementation issues, technical discussions with the authorities should remain at the TAG level. The Standardisation (S) meetings should focus on discussions on the findings raised with the S focal points and inspectors. This proposal is to avoid EASA talking on the same issue to different people and discussions taking to different outcomes. MS are asked to provide their feedback on this proposal. In principle, MSs declared in favour of the proposal to clearly separate the two groups.

Another MS suggested that this should be a common approach of all the other TAGs. How can this be done in the next steps? EASA said this was an OPS proposal for the moment and would have to be coordinated with the other TAG groups if this approach was accepted.

Conclusions/Actions:

1. Distribute the presentation on the OPS balloon task timing
2. Schedule a special TAG meeting on NCC/NCO/SPO implementation in April.
3. EASA to review in consultation with MS the exemption on the introduction or modification of aircraft in Art 6(3) of the OPS cover regulation.
4. Schedule a workshop with the industry (GA community) and the MS on balloons.

Action owners: 1 to 3- EASA Air Ops Section; 4 - EASA Aircrew Section

Dates: asap

5. Feedback on implementation OPS

Presented by: Claudio Trevisan

Presented material: IP 02 on the subject

EASA proposed several options to help implementing the OPS rules. GRE confirmed that this principle would be valid for all areas, not just OPS. Refer to presentation.

One MS raised the issue of different interpretations given by EASA on certain issues. The standardisation of the EASA opinions should be made stronger and clearer. A consistent manner in different domains has to be applied before starting anything and each MS should do the same on their side. The content cannot be different, the quality level cannot vary too much. The existing requirements on what can be merged within one set of rules should be reviewed.

EASA agrees with the view that an alignment of different requirements in different domains is required. A consistent approach in all domains has to be kept. If it is decided to expand the discussion with a consistent approach in all domains, it will take some time until this is achieved. Shall EASA do something in-between?

On the pool of experts, one MS said that it was not clear what the administrative rules and procedures are: do experts sign the recommendation, are they just advisors? What is the responsibility level? It is good to have this pool of experts, but it's not clear how it works in real life.

Conclusion/Action: MS to come back to EASA in case they wish assistance from EASA

Action owner: TAG members

Due date: at MS convenience

6. Update on AltMOC process

Presented by: Vairis Velde



Rule ref: ARO.GEN.120 and ARA.GEN.120

EASA has a page on its website dedicated to AltMoC. The Notification of an AltMOC is published on the EASA website only after the Agency receives the permission of the CA. Those are considered to be in compliance with the implementing rules. The Notification Form has to be sent to the special mailbox. CA have to include the name of their focal point, as well as the subject, regulatory reference, the AltMoC proposal (if it was proposed by an organisation or by the CA itself). Statistics are provided as well.

The EASA internal process for AltMoC management is under review. The Notification Form will include a few additional items (including the date when one AltMOC was disseminated to operators).

One MS asked the Agency to facilitate a more searchable function per topic and regulation. EASA confirmed this to be part of the review process. Publication on SINAPSE was also considered, but SINAPSE is not accessible by the industry. For now, it will be just an updated list on the website.

Another MS requested to include more details in the list of AltMoCs. However, since the owner of the AltMoC is either an organisation or a competent authority (CA), EASA would publish only general information of an AltMoC if agreed with the CA which has notified the AltMoC. Queries related to detailed AltMoC information should be addressed to the responsible CAs.

Some MSs have published their AltMoCs on their websites and they are available to the public. Other MSs publish a synthesis of AltMoCs proposed by operator, so it's not the full document that is published.

7. Draft ToR and NPA related to an industry-led task 'ETOPS for business Jets'

Presented by: Daniela Defossar

Support material: IP 03a Introductory paper

IP 03b ToR 'ETOPS for business Jets'

IP 03c Draft NPA 'ETOPS for business Jets'

IP 03d RAG-SSCC - EDTO For Business Jets

IP 03e Presentation GAMA 2014-12 Non-ETOPS-EDTO Rulemaking Concept

EASA presented a summary of the case: Manufacturers made a proposal to raise the threshold for the non-ETOPS operations of CAT.OP.MPA.140 above the current threshold of 45 360 kg MTOM. Manufacturers are designing new aircraft above the current threshold. Their proposal is to cover not only the aircraft under new design but to draft a rule which would be sustainable for some time in the future. Last December, they gave a presentation at the SSCC and received the go ahead for this proposal. Manufacturers have drafted a NPA and they are now turning to EASA to start a RMT and publish the NPA. EASA took the commitment to present this proposal to TAG to receive feedback from MS on its priority.

This could be part of the EDTO rulemaking task (RMT), which could not start sooner than 2016 (with published ToR, NPA, Opinion with proposed changes in the IRs). The industry asked that it should be done faster, but if the Agency expedites this, it means de-prioritisation of other RMTs..

EASA is asking for the agreement of the MS on accepting the proposal of the industry (to raise the threshold for ETOPS) as a non-controversial task and on prioritising this RMT by postponing another RMT.

The MS supported the proposal and also made some comments:

- The issue is clear and the proposal sound. There are no real consequences. It's a more commercial constraint for manufacturers, which is acceptable.
- Other limits in the regulation might need to be considered: security issues with the cockpit door, which has the same limit for take-off mass.
- We should identify other task that can be postponed.
- The question is why is there an ETOPS limit. There is no safety issue.



- What other item do we postpone?

EASA replied that the SSCC proposal was to postpone the RMT on TAWS for smaller aircraft, but this is a priority from EASp. This RMT is on-going. Another RMT that could be postponed is EFB.

Conclusion/Action: General agreement to go ahead with the ETOPS rulemaking task.
EASA to identify one RMT that can be postponed and prepare the ToR for the ETOPS fur business jet task soon.

Action owner: EASA

Due date: asap

8. Qualification and training of inspectors – transposing Flight Operations Inspector (FOI) competency matrix into AMC/GM

Presented by: Julia Egerer

IP 04a ToR RMT.0516/0517

IP 04b Draft AMC/GM on qualification and training of inspectors

IP 04c Op Inspector competences viewpoint review Feb. 2015

EASA presented a summary of the issue and asked whether the MS support the matrix with the type-rating (TR) qualification requirements for the Flight Operations inspectors (FOI). The Agency is to make sure the MS' suggestions are included in the AMC/GM proposal and whether the current draft received (IP04b) should be included in the NPA to RMT.0516 ('Update of Regulation 965/2012') to be published by Q3 2015.

Comments made by several MS strongly opposed this proposal as being too demanding and impossible to achieve. MS would not be able to comply with such requirements. One MS prepared a material with the help of their Standardisation focal points, to express the viewpoint of 3 MSs, stating that the matrix for the qualification requirements of the FOI is too ambitious. The task force which drafted the matrix included representatives of UK, CH, EASA and FAA as observer.

In short, the following comments and suggestions were expressed:

- NAAs will not be able to apply these requirements, especially the smaller ones.
- Although the FOI of one MS agree to this proposal, the organisation does not accept the AMC/GM proposed. As one MS remembers, nobody agreed in such a way to this proposal. The only one agreement was on the principal need to give more specific guidance in this regard.
- This is overregulation considering the high number of additional pages, complexity, details and the content itself. This approach is different from the one described in ARO.RAMP 150 (115/120?) for SAFA inspections; inconsistencies in the same regulation should be avoided.
- Importance of proper RIA.
- Some findings can never be closed; inspectors cannot be recruited at the level required by this task. Pilots are either retired or have an expired licence.
- This task can be achieved without inspectors being type-rated for this.
- The financial and organisational impacts are too strong and the proposal doesn't solve the issues.
- Examples of issues given by one MS where there will be problems with the implementation of such a proposal: 1. FOI must have a type-rating. 2: the requirements of AMC4. 3. the inspectors' background. Point 1: this MS has 18 different TR and 25 FOI. It is impossible to have TR for each category and it will be very challenging in the future too. From a technical point of view, this is not so relevant. Point 2: FOI will not be the only ones qualified to oversee some tasks. AMC4 is useful, but this view is not shared. AMC 4 is not clear about the fact that the task can be done with the help of the FOI. Point 3: in relation to the OPS manual, the requirement says that there should be a FOI to check the OM-B. An FOI may not be needed as this manual is a copy/paste of the Flight Manual.



- Some MS have a more performance based approach. EASA should consider taking an holistic approach and start with identifying the competences necessary.
- ICAO guidelines seem a bit old-fashioned for today rules and regulations.
- The table (matrix) can be used as a guideline. It's a good proposal but it should be more proportionate and involve more MS in the discussion.
- This NPA should not publish this proposal, however, the work should be continued. The requirements for FOI should be proportionate and should include enough flexibility. There should be more MS involved in this task force.
- New roles of operators and NAA should also be discussed – what competence is needed, not only type specific requirements but others too.
- There is no real benefit in safety compared to the costs of implementation.
- It could be a good goal, but we should be realistic and consider organisational issues, recruitment.
- The AMC text is partly not linked to the rule itself, and GM is referred to in AMC raising the question of the status of this GM
- Proposal of one MS to postpone this RMT to give room for item no. 7 (non-ETOPS).

EASA: The difficulty was with the interpretation of ICAO standards. One solution is to use a senior TRE (type rating examiner) from the industry for tasks requiring specific aircraft competences, but to keep the responsibility with an inspector. It doesn't have to be a pilot (could be an engineer). The task force concluded that the FOI should not be 'type-rated' (no endorsement on the licence, just the training). The scope of this matrix was only meant for initial qualification. Continuous oversight was not captured by that and a FOI can do this work very well.

EASA thanked for the input and that it was helpful to decide whether to include this proposal in the NPA to RMT.0516. The outcome is clear in this respect. EASA will continue to inform the MS on this.

Conclusion/Action:

1. The AMC/GM on TR qualification of FOI shall not be included in the NPA to RMT.0516.
2. The discussions will continue to reach a more systemic way forward. Consistency across domains to be considered too.

Action owner: EASA

Due date: n/a

9. Update on General Aviation (GA) road map

Presented by: Athanassios Tziolas

IP 05 Presentation on the subject

GA safety strategy was implemented under the auspices of the EASA MB, with the recommendations to revive the GA sector in Europe. Requirements identified in 2012 are reflected now in the GA safety strategy. The high-level plan (the GA roadmap) is a response to the concerns raised. No specific definition of GA was given in the safety strategy. It was only mentioned as non-complex aircraft and non-commercial operation, so a very large scope. Actually the focus of the GA work was ranging from sport and recreational activities to some commercial operations, e.g. aerial work. It was done on purpose. The ICAO definition of GA was taken to define the scope range. A stricter framework would prevent some operators from going higher up in the structure of operations if they wish to do so at one point in time.

Issues to be addressed in OPS: to review the oxygen requirements for NCO and to provide a definition of 'passengers'.

One MS asked if there is a means to receive more information about the status of this task force as countries are not included in the groups. Is there anything on a webpage? EASA replied that more information will be made available to external parties via Sharepoint.



10. Technical issues

Presented by: Hannu Melaranta, Willy Sigl, Italy TAG member, France TAG member, Betty Lecouturier

Interface between SERA and NCO related to VFR flights at night

IP 06 Interface between SERA and NCO

EASA said that SERA is work in progress.

One MS emphasized the need to have a total system approach as there are many regulations and the information may fall in-between them.

EASA gave information on the OPS side on VFR during night on top of clouds. EASA concurred with the safety assessment described in IP06. The reason why VFR operating minima are not specified in NCC/NCO is to avoid duplications of rules with Part-SERA. Most non-commercial flights of European operators would be performed within the EU airspace. Nevertheless, if MS wish that VFR minima are specified in the Air OPS Regulation, the Agency will take this into consideration. It is advisable though to keep rules proportionate and concise.

One MS suggested to add at least some reference in the GM to NCC/NCO that the VFR minima are published in SERA.

Another MS agreed with the EASA explanations. GM could clarify the cross-reference with SERA.

EASA added that the SERA provisions 5005 have to be kept in mind.

Another MS said that their rules were stricter before, based on cloud condition. Is it possible to impose higher minima if a MS considers to be necessary?

Search and Rescue operations

IP 07a Discussion Paper HEMS vs SAR

IP 07b JAA Administrative & GM on the subject

This issue was raised by Italy. There are difficulties in the Alps to implement the HEMS requirements as Reg. (EU) 965/2012 on air operations does not address the HEMS issue clearly. HEMS is a commercial operation. The operator has to rescue the injured person or a person at risk, then transport the person to the hospital. In JAA the issue was addressed, in Leaflet 43. There is no trace of that guidance in the EU 965/2012 except for some items in CAT.POL.H class 2 and class 3 helicopter ops.

A specific part of the flight is performed outside HEMS. An operator cannot land on site to take the person to another place in order to be taken on board; the person cannot be hoisted. This cannot be accepted under a common EASA framework.

Search and Rescue (SAR) cannot be separated from HEMS. As HEMS is a service on the market, the air rescue is part of the mission. If the injured person is on board, HEMS can apply as part of the aerial work (SPO). The MS proposed to clarify this issue.

One MS said that HEMS operations share more attributes in common with SAR (which is a State-governed operation) than with commercial operations. For this reason, could HEMS be taken outside the Air OPS regulation? Indeed, a flight can start as a SAR operation, outside is taken airborne outside the Air OPS regulation and in the end it becomes a HEMS flight and is covered by Air OPS regulation. However, it would make more sense to take HEMS outside the Basic Regulation (BR).

National authorities (NAA) have different approaches to HEMS and these operations are governed by different services in different states. There is an on-going RMT on HEMS which reviewed JAA TGL 43 for inclusion into GM of the Air OPS rules.

One MS stated that rescue operations in the mountains is a business for all the countries which have mountainous areas (e.g. the Alps): CH, FR, IT. Agreed that there should be clear rules – what HEMS is and what it is not. Another MS confirmed it was the same for them – HEMS is a business.

EASA proposed to have a different meeting on this, with joined TAG and the industry – a proposal for a date



would be sent in the following week. The issue has to be considered at a global level.

Flying displays and Air OPS ('manifestation aérienne')

IP 08 on the subject

France briefly described the situation: this operation is a specialised operation and applies Part-SPO and Part-ORO of Air Ops Regulation (EU 965/2012). Several clarifications were required on the following:

- Who is the operator? Answer (confirmed by EASA): The one who owns the aircraft (the operator or the pilot) and performs the flying display. EASA does not regulate the event organisers.
- Who is responsible for the commercial aspect of the flight itself – the operator of the aircraft or the organiser of the event? Answer (confirmed by EASA): the operator, not the organiser.

Regarding coordination between all aircraft in a flying display event: if there are more aircraft involved, it should be considered a high-risk operation, so the operator should have an authorisation; for that, the NAA has to perform an assessment. For several operators – several risk assessments have to be performed. Should there be several risk assessments although it is clear that the operation cannot be performed by only one operator? What will happen with the authorisation for flying displays once SPO is applicable considering there is no qualification on flying displays? What is the future of the flying displays authorisation? Will they be considered high risk operations? Do flying displays constitute a high risk? Do all NAAs have some regulation to organise the flying displays as a whole? Answer (by EASA): This is not addressed at EASA rules, so it needs to be addressed at national rules.

Another MS mentioned other situations that should be addressed: when 2 pilots operate in a formation of flying display, the one in front has more risks than the following pilot. So the risk is by individual performer, not by event. There can be a mix of rules: to perform a flying display with an aircraft which is under Annex II and one which is to compliant with the Air OPS rules, etc.

Due to lack of time to discuss these operations, it was proposed and agreed to address them at the NCC/NCO meeting. EASA will collect the input from the MS connected to SPO questions, then circulate it to the entire group.

One MS announced that EGAST drafted a leaflet on flying displays (on 4 March).

Feedback on the fast track consultation regarding Infant Life Jackets (amendment of AMC1 CAT.IDE.A.285(a)) - Outcome of the consultation of the Advisory Bodies

AMC on this topic required life vests to be reachable when the person is seated **and** fastened.

The outcome of the comments received on CIRCA BC: the 4 comments received from main operators associations show a consensus. The comments from MS show concerns about this change: 1. Procedures described by associations were not considered to be compliant with the rules (not before take-off and landing, only in case of emergency). 2. The change to the AMC creates a disconnection from the corresponding certification standards. 3. The issue might not be as simple as it seemed at the beginning and there might be some consequences.

EASA made further investigations in coordination with the colleagues from Certification and there are the same requirements – life vests should be reachable from seated and fastened position. The FAA TSO (resulted from the Hudson river accident investigation) showed that certification standards are being stricter rather than more relaxed.

One MS said that some of their operators believe that deleting the AMC will allow them to distribute the infant life jacket in case of emergency. It needs to be made clear if this is the case.

EASA said there are currently 2 operational procedures that operators apply: one – to distribute the infant life jackets only in case of emergency. However, in those cases, cabin crew have to concentrate on the evacuation procedures, not on retrieving and distributing the life vests, so this procedure would be against regulations. A second procedure: to distribute them before take-off.



The rule should be clarified as regards infants. There is the possibility to clarify CS-25 and for future aircraft, the manufacturer will provide additional stowage for infant package (life vests and masks). For existing aircraft, the new AMC has to clarify and explain the different options: the operational procedure just mentioned before (distribution before take-off / after landing, not in case of emergency) or to add a stowage area close to the seats where infants may be carried. It involves additional costs, but they would be lower than the current costs run by operators.

The 3rd option from the Certification point of view: to find a design by a DOA (design organisation approval) that would fit the life vest on the loop belt. It needs to be investigated more to find the best way forward.

Acceptance of national pilot licences during the extended 'opt-out'

This item was not discussed due to lack of time.

Conclusions/Actions:

1. Schedule a special TAG & SSCC meeting on HEMS in April.
2. INF life jackets to share ideas and proposed ways forward
3. Flying displays will be discussed in the Special TAG meeting on NCC/ NCO/SPO.
4. EASA will distribute the EGAST material.
5. Disseminate the EASA position on the issue of licences.

Action owners: EASA

Dates: asap

11. Review of current action items and planning of future meetings

Presented by: Claudio Trevisan

CTR reviewed the actions on EASA and mentioned that a decision should be taken on how future meetings will be organised for this TAG group as it no longer reflects the current organisational structure. It might be more efficient to have dedicated TAG meetings for OPS separate from Aircrew.

Not everybody agrees to this proposal; further discussions in the Agency are required. Conclusions to be presented at the next meeting.

11. Closing

Presented by: Claudio Trevisan

CTR thanked the FCL & OPS TAG members for attending the meeting and contributing to the discussion. The meeting closed at 16:30 on 12 March 2015.

Next meeting:

9 September 2015, EASA premises, Cologne, MR 04/049

MoM Distribution:

TAG FCL & OPS members

MoM prepared by	Adina SZONYI	30.03.2015
MoM reviewed by	Claudio Trevisan	31.03.2015

