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Title	Helicopter offshore operations
NPA Number	NPA 2013-10

UK CAA (European.Affairs@caa.co.uk) has placed **38** unique comments on this NPA:

Cmt	Segment description	Pag	Comment	Attachm
131	A. Explanatory Note — II. Scope	6	**Page No:** 06 **Paragraph No:** 8 **Comment:** The scope of the NPA is discussed in this section with the mention of Specialised Operations (SPO). SPO can be conducted under commercial (aerial work) or non-commercial auspices and the interpretation throughout the NPA could encompass either. Mention is made later on of non-commercial complex motor powered helicopter SPO so introducing some elements of confusion. Additionally, NCO is excluded from consideration within the NPA but it is not clear if this also excludes SPO by NCO equivalent helicopters. For proportionality and to ensure clarity, it is strongly recommended that the applicability of offshore operations within this NPA be restricted to CAT and commercial SPO; thus excluding NCC and NCO from consideration. As mentioned in the Explanatory Note and the RIA the existence of both SPO and NCC operations offshore (as now defined) is little known but thought to be very limited. This would further support exclusion from 'heavy' regulation. **Justification:** Clarity of intent and appropriate balance of regulation against risk and exposure of operation. The justification for including NCC operations within the scope of the HOFO SPA (Option 2) has not been adequately demonstrated and was not an option identified by the RMT.0409/0410.	
132	A. Explanatory Note — IV. General aspects of offshore operations	7 - 8	**Page No:** 07 **Paragraph No:** 17 **Comment:** The term 'Offshore location' is discussed here but the definition is different from that at page 24. It is assumed that the version at page 24 is the intended definition. **Justification:** Accuracy and clarity.	
133	A. Explanatory	9	**Page No:** 09	

	Note — V. Summary of the proposed changes (Question 1)		**Paragraph No:** 25 **Comment:** Question 1. The UK CAA fully supports the exclusion of Part-NCO operations from the concept of Offshore Operations as proposed in the NPA. **Justification:** The need for a specific approval for NCO operations would be disproportionate and unjustified in terms of any safety benefit and also costly and difficult to manage.	
134	A. Explanatory Note — V. Summary of the proposed changes (Question 2)	9 - 11	**Page No:** 11 **Paragraph No:** 26 **Comment:** Question 2. Not entirely. The UK CAA fully supports inclusion of Part-CAT operations in the concept of the Offshore Operations SPA and in fact was one of the original proposers for this. However, the argument for NCC and commercial SPO is less clear. As highlighted in the Explanatory Note and RIA, the exposure of these sectors to the *newly defined* offshore activities is not considered high and therefore it is not reasonable to mandate increased levels of requirements and expense on such operations for a limited number of events. Such limited operations have been conducted without close oversight and stringent requirements and it is not thought that this has raised an unacceptable safety situation. Additionally, requiring a specific approval for limited events will impose an undue burden on NAAs and the operators. It is considered that in the same way as NCO is excluded, NCC should also be excluded but suitable and proportionate requirements should be placed within those Parts to cover overwater flight. This was the preferred option of the RMT.0409/0410. For commercial SPO, an approval may be acceptable but will require stronger justification within the RIA. This has not yet been demonstrated and was also not a preferred option of the RMT. **Justification:** The need for a SPA for NCC has not been fully justified and its inclusion is considered disproportionate in terms of any safety benefit and the added costs as previously determined by RMT.0409/0410. It will be burdensome for NAAs to manage and possibly liable to abuse due to limited oversight of such operations. The inclusion of SPO with the expected limited amount of commercial activity requires stronger justification.	
135	A. Explanatory Note — V. Summary of the proposed changes (Question 3)	11	**Page No:** 11 **Paragraph No:** 27 **Comment:** Question 3. No, if Commercial SPO remains within the scope of the SPA. The UK CAA	

			fully supports inclusion of Part-CAT operations in the concept of the Offshore Operations SPA and in fact was one of the original proposers for this. This was the only sector that was originally considered appropriate by the UK CAA and therefore justified such an approval and thus attracted an AOC. **Justification:** Part-CAT operators will have an AOC and this is deemed to be a proportionate approach. RMT.0409/0410 did not consider it appropriate to include SPO or NCC in the approval process.	
136	A. Explanatory Note — V. Summary of the proposed changes (Question 4)	11 - 12	**Page No:** 11 **Paragraph No:** 28 **Comment:** This paragraph discusses the mandating of Performance Class 2 on operations other than Part-CAT. This is not appropriate as operation in Performance Classes is only applicable to CAT. Such impositions would be completely unsuitable and unjustified for other operations which should continue to apply their relevant performance requirements from each Part. Indeed, this would impose a restriction on the type of helicopter able to be flown offshore and exclude the use of single-engine helicopters where appropriate. **Justification:** Operations in Performance Classes have only been adopted for CAT and to go beyond this will impose unreasonable limitations and burdens on non-CAT operations for which these performance requirements were not designed. Insufficient justification has been provided to introduce such performance requirements for other than CAT and the consequences of such a requirement have not been sufficiently considered.	
137	A. Explanatory Note — V. Summary of the proposed changes (Question 4)	11 - 12	**Page No:** 12 **Paragraph No:** 29 **Comment:** Question 4. Yes. The current UK requirements call for complex helicopters conducting CAT in a hostile environment to be fitted with VHM. Whilst there would be benefits for wider utilisation of such equipment the availability and justification has not yet been fully established. This measure would seem to go beyond the scope of this NPA as it should cover flight other than offshore. The CAA would recommend that this proposal forms the basis of a new study where the costs, benefits and feasibility can be properly reviewed. **Justification:** The benefits of VHM have been well demonstrated within the current UK offshore sector and wider application would be supported given appropriate impact assessment.	
138	A.	12	**Page No:** 12	

	Explanatory Note — V. Summary of the proposed changes (Question 5)		**Paragraph No:** 30 **Comment:** Question 5. The retrofitting of VHM equipment could be extremely expensive and complicated especially for aircraft types that have not already been schemed for such programmes. To contain those aircraft that have been fitted to date in accordance with national requirements and to address new aircraft in the future it is recommended that the applicability be adjusted as shown below. "VHM must be fitted to helicopters conducting CAT offshore operations over a hostile environment with either: a) a MOPSC of more than 9 and first issued with an individual C of A before 1 January 2016 by 1 January 2018; or b) a maximum certificated take-off mass of more than 3175 kg and first issued with an individual C of A after 31 December 2015" **Justification:** Capturing current UK and Norwegian national requirements and applying reasonable future requirements confined to offshore CAT operations in a hostile environment would not unduly or disproportionately affect operators and safety will not be compromised. Wider fitment should be the topic of a separate study. **Proposed Text:** See UK CAA proposal for SPA.HOFO.160.	
139	A. Explanatory Note — V. Summary of the proposed changes (Question 6)	12 - 16	**Page No:** 12 **Paragraph No:** 31 **Comment:** Question 6. Flight Data Monitoring is not a mandated requirement for CAT helicopter operations although in the North Sea arena most offshore operators have been conducting such programmes as required by their clients. The benefits of such programmes are fully understood and the continued use of FDM is strongly supported. Indeed it could be extended to wider applicability as demonstrated by EHEST analysis. Where an offshore operator with the appropriate equipment fit does not have a FDM programme, a period of 2-3 years would be suitable to allow that operator to become compliant. **Justification:** Complexity of organising the appropriate FDM programme and establishing the resources to manage it.	
140	A. Explanatory Note — V.	12 - 16	**Page No:** 13 **Paragraph No:** 34 (last paragraph)	

	Summary of the proposed changes (Question 6)		**Comment:** This section discusses the need for adequate height warning for crews arising from the findings of various accident investigations including that of G-REDU. Whilst elements of the UK CAA Leaflet dealing with the nature of such audio warnings have been included as AMC and GM, it was recognised following the response to the UK AAIB Safety Recommendation 2011-060 that this type of system would not be effective in providing appropriate warnings in all foreseeable scenarios. The CAA believes that the best way to ensure that crews are provided with adequate warning to take corrective action would be through the terrain awareness and warning system (TAWS). The CAA has developed modified offshore helicopter TAWS warning envelopes that will provide significantly greater warning times for a wide range of scenarios without incurring unacceptable nuisance alert rates. Work is now starting on examining the nature and content of the associated flight crew warnings, leading to simulator trials to validate the complete scheme. This project forms part of a research programme managed by the CAA-run joint industry Helicopter Safety Research Management Committee (HSRMC). If this development work proves effective it would be the intention that the HSRMC recommends to EASA the replacement of the AVAD requirement by enhanced HTAWS.	
141	B. Draft Opinion and Decision — I. Draft Opinion for a Commission Regulation (EU) No .../... amending Commission Regulation (EU) No 965/2012 of 25 October 2012 — Amendments to Annex II (Part-ARO Authority Requirements for Air Operations)	24 - 25	**Page No:** 25 **Paragraph No:** (d)(5) **Comment:** This paragraph details the change to CAT.IDE.H.295 in that sub-paragraph (a) of that rule is deleted. This is on the presumption that it will be included in Part-HOFO but this has not happened. The requirement for the crew to wear survival suits in the prescribed conditions needs to be reinstated. This comment links to the UK CAA comment on SPO.HOFO.155. **Justification:** Correcting omission of essential requirement.	
142	B. Draft Opinion and Decision — I. Draft Opinion for a Commission Regulation (EU) No .../... amending Commission Regulation (EU) No 965/2012 of	25 - 30	**Page No:** 25 **Paragraph No:** **SPA.HOFO.100(b) Helicopter Offshore Operations** **Comment:** Sub-paragraph (2). As explained elsewhere, the UK CAA does not support the inclusion of Part-NCC helicopters in this SPA. Delete sub-paragraph (2). Sub-paragraph (3). As explained elsewhere, the UK CAA	

	25 October 2012 — Amendments to Annex V (Part-SPA Specific Approvals)		does not fully support the inclusion of Part-SPO helicopters in this SPA but considers that it would be more appropriate for commercial SPO. Amend sub-paragraph (3) as shown. **Justification:** Proportionality and correct applicability. **Proposed Text:** "(3) shall be a ***commercial*** specialised ***operations*** operator having shown compliance with Part-ORO and Part-SPO, as applicable."	
143	B. Draft Opinion and Decision — I. Draft Opinion for a Commission Regulation (EU) No …/… amending Commission Regulation (EU) No 965/2012 of 25 October 2012 — Amendments to Annex V (Part-SPA Specific Approvals)	25 - 30	**Page No:** 25 **Paragraph No:** **SPA.HOFO.100(c) Helicopter Offshore Operations** **Comment:** The content of this paragraph is effectively covered by ORO.GEN.200 Management System with which HOFO operators would be required to comply. Delete sub-paragraph (c). **Justification:** Reduction of duplication.	
145	B. Draft Opinion and Decision — I. Draft Opinion for a Commission Regulation (EU) No …/… amending Commission Regulation (EU) No 965/2012 of 25 October 2012 — Amendments to Annex V (Part-SPA Specific Approvals)	25 - 30	**Page No:** 26 **Paragraph No:** **SPA.HOFO.105(b)(4) Operating procedures** **Comment:** It is not clear how the commander of the flight can ensure appropriate lateral and vertical separation from other aircraft is maintained if a route structure is not provided. See proposed text. **Justification:** In class G airspace, or where there is no ATS service, this separation cannot be assured. **Proposed Text:** "(4) ***where established***, the offshore route structure provided by appropriate ATS is used. ~~or, if not established, appropriate lateral and vertical separation from other aircraft is maintained "~~	
146	B. Draft Opinion and Decision — I. Draft Opinion for a Commission Regulation (EU) No …/… amending Commission Regulation	25 - 30	**Page No:** 26 **Paragraph No:** **SPA.HOFO.105(b)(5) Operating procedures** **Comment:** On reviewing the original UK AAIB safety recommendation aligned with this requirement (SR 2011-050) it is recommended that the text be changed as shown. This will also provide for a more appropriate solution with wider acceptability.	

	(EU) No 965/2012 of 25 October 2012 — Amendments to Annex V (Part-SPA Specific Approvals)		**Justification:** Simplification and wider applicability. **Proposed Text:** "(5) the ~~highest possible mode~~ ***optimum use*** of the automatic flight control systems (AFCS) is used throughout the flight."	
147	B. Draft Opinion and Decision — I. Draft Opinion for a Commission Regulation (EU) No …/… amending Commission Regulation (EU) No 965/2012 of 25 October 2012 — Amendments to Annex V (Part-SPA Specific Approvals)	25 - 30	**Page No:** 26 **Paragraph No:** **SPA.HOFO.105(b)(7) Operating procedures** **Comment:** Although this is not a HOFO specific requirement (all IFR operations need this) it is recognised that it stems from an AAIB recommendation. However, in the case of single pilot operations it would not be so appropriate. As originally drafted, the sentence started with "where appropriate" and it is recommended that this is reinstated as shown with additional suggestions. **Justification:** Clarity. **Proposed Text:** "(7) ***where appropriate, procedures are in place for*** a member of the flight crew ***to*** monitor~~s~~ the flight instruments during ~~the~~ ***a helideck*** approach ***or departure*** to ensure that a safe flight path is maintained; and"	
148	B. Draft Opinion and Decision — I. Draft Opinion for a Commission Regulation (EU) No …/… amending Commission Regulation (EU) No 965/2012 of 25 October 2012 — Amendments to Annex V (Part-SPA Specific Approvals)	25 - 30	**Page No:** 26 **Paragraph No:** **SPA.HOFO.110 Use of offshore locations** **Comment:** Not all offshore locations will provide all of these facilities; wind turbines for example. It is suggested that the text be amended as shown. **Justification:** Clarity. **Proposed Text:** "The operator shall only use offshore locations that are adequate for the ***type of*** helicopter ***and operations concerned.*** ~~operated in relation to size, facilities, lighting, fire fighting, and manning"~~	
149	B. Draft Opinion and Decision — I. Draft Opinion for a Commission Regulation (EU) No …/… amending Commission Regulation (EU) No	25 - 30	**Page No:** 27 Paragraph No: **SPA.HOFO.120(a) FDM** **Comment:** For clarity, it is suggested that the text be amended as proposed. **Justification:** Clarity. **Proposed Text:** "(a) ~~Whenever operating a~~	

	965/2012 of 25 October 2012 — Amendments to Annex V (Part-SPA Specific Approvals)		~~helicopter equipped with a flight data recorder in commercial air transport operations,~~ ***When conducting CAT offshore operations with a helicopter fitted with a flight data recording system***, the operator shall establish and maintain a flight data monitoring system which shall be integrated in its management system."	
150	B. Draft Opinion and Decision — I. Draft Opinion for a Commission Regulation (EU) No .../... amending Commission Regulation (EU) No 965/2012 of 25 October 2012 — Amendments to Annex V (Part-SPA Specific Approvals)	25 - 30	**Page No:** 27 **Paragraph No:** **SPA.HOFO.125 Flight Following System** **Comment:** For clarity, it is suggested that the text be amended as proposed. **Justification:** Clarity and appropriate applicability. **Proposed Text:** "~~A commercial air transport operator or specialised operator~~ ***CAT and commercial SPO operators*** shall have ~~available~~ a monitored flight following system for offshore operations in a hostile environment from the time the helicopter departs until it arrives at its final destination."	
151	B. Draft Opinion and Decision — I. Draft Opinion for a Commission Regulation (EU) No .../... amending Commission Regulation (EU) No 965/2012 of 25 October 2012 — Amendments to Annex V (Part-SPA Specific Approvals)	25 - 30	**Page No:** 27 **Paragraph No:** **SPA.HOFO.130 ARAs** **Comment:** The subject of ARAs has been under review by the UK CAA for a number of years as it has been acknowledged that the current procedure using only the aircraft weather radar as an obstacle detection and navigation device has several limitations and risks. The UK CAA instigated a study into the procedure with a view to identifying ways to mitigate the risks involved in the shorter term, and also to go beyond this to find a more appropriate long term solution to IFR approaches to offshore helidecks. The first element was reported on in CAA Paper 2009/06 "Hazard Analysis of the Use of GPS in Offshore Helicopter Operations". Continued research is in progress to take this one step further and produce a full procedure as reported in CAA Paper 2010/01 "The SBAS Offshore Approach Procedure (SOAP)". In the interim, and as a result of the first stage of the development, a revised ARA procedure has been developed and implemented by UK offshore operators utilising GPS to underpin the weather radar procedure, thereby reducing the level of error and risk in some elements of the procedure. It is recommended that the associated information be incorporated into the AMC and GM for ARAs to enhance safety and allow the benefits to be used by any operator. The details are too extensive to include here, but the CAA would be pleased to cooperate with EASA to incorporate the relevant parts of the paper into the AMC and GM. In the longer term, it is envisaged that the highly improved	

			procedure delivered by SOAP will be available and should then replace the ARA as known today. **Justification:** Improved safety through enhanced procedures and awareness. **Proposed Text:** To be developed.	
152	B. Draft Opinion and Decision — I. Draft Opinion for a Commission Regulation (EU) No .../... amending Commission Regulation (EU) No 965/2012 of 25 October 2012 — Amendments to Annex V (Part-SPA Specific Approvals)	25 - 30	**Page No:** 27 **Paragraph No:** **SPA.HOFO.130(a) ARAs** **Comment:** Paragraph (a) states that "a CAT Operator shall only undertake an ARA if." This is incorrect in that an operator cannot conduct an ARA. It is recommended that the text be amended as shown and also include some introductory words, in a similar way to many CAT.OP.MPA sections, to ensure that operators include the required information in their operations manuals. **Justification:** Clarity. **Proposed Text:** "(a) ~~A CAT operator shall only undertake an ARA if~~ ***A CAT operator shall establish operational procedures and ensure that ARAs are only undertaken if:"***	
153	B. Draft Opinion and Decision — I. Draft Opinion for a Commission Regulation (EU) No .../... amending Commission Regulation (EU) No 965/2012 of 25 October 2012 — Amendments to Annex V (Part-SPA Specific Approvals)	25 - 30	**Page No:** 27 **Paragraph No:** **SPA.HOFO.130 (a)(1) ARAs** **Comment:** The requirement states that: "(1) the radar provides course guidance to ensure obstacle clearance; and" Helicopter weather radars cannot provide course guidance as they are not certified to do so. It is recommended that the text is amended as shown. **Justification:** Accuracy and appropriateness. **Proposed Text:** "(1) equipped with a radar capable of providing information regarding the obstacle environment."	
154	B. Draft Opinion and Decision — I. Draft Opinion for a Commission Regulation (EU) No .../... amending Commission Regulation (EU) No	25 - 30	**Page No:** 28 **Paragraph No:** **SPA.HOFO.130(d) ARAs** **Comment:** Correction to spelling of minimum descent altitude/height. **Justification:** Accuracy. **Proposed Text:** Line 2, amend "descend" to ***'descent'.***	

	965/2012 of 25 October 2012 — Amendments to Annex V (Part-SPA Specific Approvals)			
155	B. Draft Opinion and Decision — I. Draft Opinion for a Commission Regulation (EU) No .../... amending Commission Regulation (EU) No 965/2012 of 25 October 2012 — Amendments to Annex V (Part-SPA Specific Approvals)	25 - 30	**Page No:** 28 **Paragraph No:** **SPA.HOFO.145 Performance** **Comment:** The performance requirements should reflect the type of operation and be reflected back to the appropriate Part. Imposing CAT performance on SPO or other operations just for offshore operations is not appropriate and disproportionate. Indeed, many SPO activities might not be feasible under such performance restrictions. The requirement as stated would exclude single-engine or lower powered helicopters to operate in other than CAT operations. Amend text as shown. **Justification:** Performance requirements should be proportionate to the risk/exposure and reflect the type of operations being conducted. CAT performance requirements should not be imposed on non-CAT which will prevent some operations from being conducted without justification. **Proposed Text:** "Helicopters taking off and landing at offshore locations shall be operated in accordance with the performance requirements of ***the appropriate Annex according to their type of operation.*** ~~Annex IV (Part-CAT), Subpart C, Section 2, and comply with the requirements for operations without an assured safe forced landing capability."~~	
156	B. Draft Opinion and Decision — I. Draft Opinion for a Commission Regulation (EU) No .../... amending Commission Regulation (EU) No 965/2012 of 25 October 2012 — Amendments to Annex V (Part-SPA Specific Approvals)	25 - 30	**Page No:** 29 **Paragraph No:** **SPA.HOFO.150(a)(1) Equipment requirements** **Comment:** The Public Address requirements do not accord with CAT.IDE.180 and the requirement for other than CAT is not substantiated. It is recommended that this section is deleted and reliance placed upon the standing requirements in the relevant Parts. Delete SPO.HOFO.150 (a) (1). **Justification:** Discrepancy with main requirements and disproportionate.	
157	B. Draft Opinion and Decision — I. Draft Opinion for a	25 - 30	**Page No:** 29 **Paragraph No:** **SPA.HOFO.150(a)(3) Equipment requirements**	

	Commission Regulation (EU) No …/… amending Commission Regulation (EU) No 965/2012 of 25 October 2012 — Amendments to Annex V (Part-SPA Specific Approvals)		**Comment:** The requirement for airborne weather detecting equipment for non-complex helicopters used for SPO is disproportionate and not even required by CAT helicopters. This requirement should be deleted. Delete SPO.HOFO.150 (a) (3). **Justification:** Disproportionate and unjustified requirement.	
158	B. Draft Opinion and Decision — I. Draft Opinion for a Commission Regulation (EU) No …/… amending Commission Regulation (EU) No 965/2012 of 25 October 2012 — Amendments to Annex V (Part-SPA Specific Approvals)	25 - 30	**Page No:** 29 **Paragraph No:** **SPA.HOFO.155 Additional equipment** **Comment:** This section reflects that of CAT.IDE.H.310 but does not include the important initial paragraph and the requirement for the wearing of survival suits (paragraph (a)). It is recommended that the preceding factors are included in this section. Additionally, the appropriate AMC/GM material from CAT.IDE.H.310 has not been included and this should be added. **Justification:** Completeness.	
159	B. Draft Opinion and Decision — I. Draft Opinion for a Commission Regulation (EU) No …/… amending Commission Regulation (EU) No 965/2012 of 25 October 2012 — Amendments to Annex V (Part-SPA Specific Approvals)	25 - 30	**Page No:** 30 **Paragraph No:** **SPA.HOFO.160 VHM** **Comment:** This new requirement comes from a proposal by the JAA HSST. However, in the context of this SPA it is recommended that the text be amended as shown. This reflects the original proposal better but also recognises the current national requirements and alleviates the need for retro fitment which would be extremely costly and difficult to justify. In the wider context of recognising the benefits of VHM, it is recommended that EASA assign a specific task to review the requirements for all helicopters operating CAT. **Justification:** Alignment with current requirements and a more appropriate and proportionate compliance requirement. However, the implementation dates will require careful scrutiny to ensure these measures are met. **Proposed Text:** "**SPA.HOFO.160 Vibration health monitoring system** (a) The following helicopters ~~operating~~ ***when conducting offshore CAT operations*** in a hostile	

			environment ~~in commercial air transport operations~~ shall be fitted with a vibration health monitoring (VHM) system capable of monitoring the status of critical rotor and rotor drive systems: (1) helicopters ***with a MCTOM of more than 3175 kg and*** first issued with an individual ~~Certificate of Airworthiness (CoA)~~ ***CofA*** after 31 December 2015; and (2) helicopters ***with a MOPSC of more than 9 and*** first issued with an individual ***CofA*** before 1 January 2016 by 1 January 2018. "	
160	B. Draft Opinion and Decision — I. Draft Opinion for a Commission Regulation (EU) No .../... amending Commission Regulation (EU) No 965/2012 of 25 October 2012 — Amendments to Annex V (Part-SPA Specific Approvals)	25 - 30	**Page No:** 30 **Paragraph No:** **SPA.HOFO.165(a)(4) and (5) Crew requirements** **Comment:** The text of paragraphs (4) and (5) does not fit with the leading text at (a). It is recommended that (4) becomes (b) and (5) becomes (c). Additionally (5) requires a commander/pilot-in-command to re-establish recency by undergoing a training programme established by the operator. It is considered that a training programme would be too onerous and will have to be defined. It is proposed that the recency could be achieved under the supervision of an instructor or Line Training Captain as used in Part-FCL. The associated AMC allows this recency to be carried out in the Helicopter or an FFS and an instructor or LTC has the authority to determine whether the commander is competent within the operators system. It is recommended that the text be amended as shown. **Justification:** Clarity and proportionality. **Proposed Text:** "(~~4~~***b***) A commander/pilot-in-command conducting offshore operations shall fly at least once in this role in an offshore environment each 28 days. (~~5~~***c***) A commander/pilot-in-command not meeting ~~this~~ ***the*** recency requirement ***at (b),*** shall ~~undergo a training programme established by the operator to~~ re-establish recency ***on a flight under the supervision of an instructor or Line Training Captain***."	
161	B. Draft Opinion and Decision — II. Draft Decision amending Decisions 2012/016/R, 2012/018/R and 2012/019/R of the Executive Director of the European Aviation Safety Agency of 24	32	**Page No:** 32 **Paragraph No:** **AMC3 ARO.OPS.200(a)(4)** **Comment:** Textual amendment. **Justification:** Accuracy. **Proposed Text:** "(4) flight crew involved in these operations ~~is~~ ***are*** trained ..."	

	and 25 October 2012 on air operations — Amendment of AMC/GM to Annex II, Part-ARO			
162	B. Draft Opinion and Decision — II. Draft Decision amending Decisions 2012/016/R, 2012/018/R and 2012/019/R of the Executive Director of the European Aviation Safety Agency of 24 and 25 October 2012 on air operations — Amendment of AMC/GM to Annex II, Part-ARO	32	**Page No:** 32 **Paragraph No:** **GM1 ARO.OPS.200** **Comment:** The approval for flight without an assured safe forced landing capability is only relevant to CAT operations. CAT operators may already have such an approval and anyway the approval is based on types of helicopters and operations and not given as a blanket approval to the operator. This section should be deleted as it is addressed in Part-CAT. Delete GM1 ARO.OPS.200. **Justification:** Appropriateness and clarity.	
163	B. Draft Opinion and Decision — II. Draft Decision amending Decisions 2012/016/R, 2012/018/R and 2012/019/R of the Executive Director of the European Aviation Safety Agency of 24 and 25 October 2012 on air operations — Amendment of AMC and GM to Annex IV Part-CAT 25	32 - 34	**Page No:** 33 **Paragraph No:** **(10) AMC3 CAT.IDE.H.145** **Comment:** There is slight confusion at this section as a GM1 is mentioned but AMC3 is detailed. In fact there is also an omission here. From the original drafted text by the RMT, it was intended to include an AMC and GM for Radio Altimeters required under CAT.IDE.H.145. The AMC was to reflect the “audio warning” requirement of the regulation and state that this should be a ‘voice warning’. The GM, as described in this NPA, was to provide suitable guidance on voice warnings as learned from previous experience. It is recommended that a new AMC3 be included as shown and the drafted AMC3 be changed to GM. **Justification:** Achievement of intent and correction of inaccuracies. **Proposed Text:** (10) *A new AMC3 CAT.IDE.H.145 is added as follows*: ***“AMC3 CAT.IDE.H.145 Radio Altimeters*** *AUDIO WARNING* *The audio warning required in CAT.IDE.H.145 should be a*	

			voice warning. *(11) A new GM1 CAT.IDE.H.145 is added as follows:* ***GM1 CAT.IDE.H.145 Radio Altimeters*** *AUDIO VOICE ALERTING DEVICE* *(a)…" (insert text shown on pages 33 and 34)*	
164	B. Draft Opinion and Decision — II. Draft Decision amending Decisions 2012/016/R, 2012/018/R and 2012/019/R of the Executive Director of the European Aviation Safety Agency of 24 and 25 October 2012 on air operations — New AMC and GM to Annex V Part-SPA, Subpart K, is added	35 - 53	**Page No:** 35 **Paragraph No:** **AMC1 SPA.HOFO.100(c) Helicopter offshore operations** **Comment:** Paragraph (a)(1), amend text as shown for clarity and accuracy. **Justification:** Clarity and accuracy. **Proposed Text:** "RISK ASSESSMENT (a) The operator's risk assessment should include, but not be limited to, the following hazards: (1) collision with ~~windmills~~ ***wind turbines***;"	
165	B. Draft Opinion and Decision — II. Draft Decision amending Decisions 2012/016/R, 2012/018/R and 2012/019/R of the Executive Director of the European Aviation Safety Agency of 24 and 25 October 2012 on air operations — New AMC and GM to Annex V Part-SPA, Subpart K, is added	35 - 53	**Page No:** 36 **Paragraph No:** **AMC1 SPA.HOFO.110 Use of offshore locations** **Comment:** It is considered that there would be merit in including some guidance material to accompany this transposed AMC as provided for within the UK CAA publication CAP 437 Standards for Offshore Helicopter Landing Areas. This publication has become an accepted world-wide source of reference for helideck operations and provides advice on 'best practice' obtained from many aviation sources. It is recommended that a GM be added as shown. **Justification:** Additional information of operators. **Proposed Text:** Add after AMC1 SPA.HOFO.110 **"GM1 SPA.HOFO.110 Use of offshore locations** General Operators should utilise available international guidance material provided for operations to offshore locations such	

			as that contained in UK CAP 437 'Standards for Offshore Helicopter Landing Areas'."	
166	B. Draft Opinion and Decision — II. Draft Decision amending Decisions 2012/016/R, 2012/018/R and 2012/019/R of the Executive Director of the European Aviation Safety Agency of 24 and 25 October 2012 on air operations — New AMC and GM to Annex V Part-SPA, Subpart K, is added	35 - 53	**Page No:** 41 **Paragraph No:** **AMC1 SPA.HOFO.115(b)(3) Selection of aerodromes and operating sites** **Comment:** The UK CAA has been concerned about the clarity of intent with regards what constitutes a "coastal aerodrome"; in other words when is a coastal aerodrome on the coast? This NPA provides an opportunity to clarify the position by amending this AMC with suitable criteria to bound the applicability of this alleviation which allows flight from offshore without an alternate. The text at (b)(3)(i) is quite loose and can be interpreted widely. Suggested text is shown to provide a limit to this interpretation. **Justification:** Clarity and firmer interpretation. **Proposed Text:** "(3) where the destination coastal aerodrome is not directly on the coast it should be: (i) within a distance that, with the fuel specified in (b)(2), the helicopter can, at any time after crossing the coastline, return to the coast, descend safely and carry out a visual approach and landing with VFR fuel reserves intact***, but in any case no more than 5 NM from the coastline***; and"	
167	B. Draft Opinion and Decision — II. Draft Decision amending Decisions 2012/016/R, 2012/018/R and 2012/019/R of the Executive Director of the European Aviation Safety Agency of 24 and 25 October 2012 on air operations — New AMC and GM to Annex V Part-SPA, Subpart K, is added	35 - 53	**Page No:** 44 **Paragraph No:** **GM1 SPA.HOFO.120 FDM** **Comment:** The link to Flight Data Monitoring in AMC/GM for ORO.AOC.130 is noted but it might be a good opportunity for helicopter specific FDM procedures to be developed for the expected increased and wider use of these principles in the future. In addition, (and as demonstrated in GM1 SPA.HOFO.160 VHM), examples of where other guidance material can be found such as, in this case, CAP 739 FDM, could be added to the text. **Justification:** Relevance and applicability.	
168	B. Draft Opinion and Decision — II. Draft Decision	35 - 53	**Page No:** 45 **Paragraph No:** **AMC1 SPA.HOFO.130(c) & (d)**	

	amending Decisions 2012/016/R, 2012/018/R and 2012/019/R of the Executive Director of the European Aviation Safety Agency of 24 and 25 October 2012 on air operations — New AMC and GM to Annex V Part-SPA, Subpart K, is added		**ARAs** **Comment:** Correction to spelling of minimum descent altitude/height **.** **Justification:** Accuracy. **Proposed Text:** Amend "descend" to ***'descent'*** in sub-paragraphs (c) and (d)***.***	
169	B. Draft Opinion and Decision — II. Draft Decision amending Decisions 2012/016/R, 2012/018/R and 2012/019/R of the Executive Director of the European Aviation Safety Agency of 24 and 25 October 2012 on air operations — New AMC and GM to Annex V Part-SPA, Subpart K, is added	35 - 53	**Page No:** 52 **Paragraph No:** **AMC1 SPA.HOFO.165 (a)(6) Crew requirements** **Comment:** The text of this requirement does not capture the important aim of what was originally intended here. The purpose was for "Pilot Monitoring" (PM) skills to be checked and tested not 'monitoring the pilot's skills'. Amend text as shown. **Justification:** Correction of intent of requirement. **Proposed Text:** "(6) ~~emphasise on monitoring the pilot's skills~~ ***for a multi-crew operation, emphasis on the importance of multi-crew procedures and the role of the Pilot Monitoring during all phases of the flight***; and"	

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