

Rescue and Firefighting Services – Extraneous/Ancillary Duties.

1. Introduction.

- 1.1 CAA has been asked by Aerodrome Operators numerous questions relating to the provision of Rescue and Firefighting Service (RFFS) whilst personnel are engaged on extraneous and/or ancillary duties (see Note 1 below), or when aircraft are being boarded in readiness for flight operations.
- 1.2 The following guidance is provided to assist Aerodrome Operators to comply with regulatory requirements, and to enable them to assess the appropriateness and timing of extraneous/ancillary duties, and the impact on RFFS Response Objective.

2. Regulatory Background.

- 2.1 The following extracts are relevant to the questions posed:
- 2.2 UK Licensed aerodromes that hold an Aerodrome Licence issued in accordance with CAP168 (Licensing of Aerodromes)
- 2.2.1 The Air Navigation Order 2016, Part 1, Chapter 1, Article 3 states...

"An aircraft is deemed to be in flight, in the case of a piloted flying machine, from the moment when, after the embarkation of its crew for the purpose of taking off, it first moves under its own power, until the moment when it next comes to rest after landing."

2.2.2 CAP 168, Chapter 1, Appendix 1A, (Public Use Licence) 2 states...

"The Civil Aviation Authority (in this licence referred to as 'the CAA') in exercise of its powers under Article 212 of the Air Navigation Order hereby licenses the above-named aerodrome as an aerodrome to be used as a place of take-off and landing of aircraft engaged in flights for the purpose of the public transport of passengers or for the purpose of instruction in flying, subject to the following conditions:

(Condition 2) No aircraft shall take-off or land at the aerodrome unless such firefighting and rescue services and such medical services and equipment as are required in respect of such an aircraft in the CAA's publication CAP 168 (Licensing of Aerodromes) are provided there. Such services and equipment shall at all times when the aerodrome is available for the take-off or landing of aircraft be kept fit and ready for immediate turnout."

2.2.3 CAP 168, Chapter 1, Appendix 1B, (Ordinary Use Licence) 2 states...

"The Civil Aviation Authority (in this licence referred to as 'the CAA') in exercise of its powers under Article 212 of the Air Navigation Order hereby licenses the above-named aerodrome as an aerodrome to be used as a place of take-off and landing of aircraft engaged in flights for the purpose of the public transport of passengers or for the purpose of instruction in flying, subject to the following conditions:

(Condition 2) No aircraft shall take-off or land at the aerodrome unless such firefighting and rescue services and such medical services and equipment as are required in respect of such an aircraft in the CAA's publication CAP 168 (Licensing of Aerodromes) are provided there. Such services and equipment

shall at all times when the aerodrome is available for the take-off or landing of aircraft be kept fit and ready for immediate turnout."

2.3 UK Certificated Aerodromes that hold an Aerodrome Certificate issued in accordance with UK(EU) No.139/2014

2.3.1 UK(EU) No. 139/2014 (The Aerodrome Regulation) states...

AMC6 ADR.OPS.B.010(a)(2) - Personnel:

The aerodrome operator should ensure that:

- (a) during flight operations and, at least, 15 minutes after the departure of last flight, sufficient trained personnel are detailed and readily available to ride the rescue and firefighting vehicles, and to operate the equipment at maximum capacity;
- (b) personnel are deployed in a way that ensures the minimum response times can be achieved, and continuous agent application at the appropriate rate can be fully maintained considering also the use of hand lines, ladders, and other rescue and firefighting equipment normally associated with aircraft rescue and firefighting operations;
- (c) all responding rescue and firefighting personnel are provided with protective clothing and respiratory equipment to enable them to perform their duties in an effective manner; and
- (d) any other duties carried out by rescue and firefighting personnel do not compromise the response, or their safety.

3. UK CAA Guidance – All certificated and licensed aerodromes:

- 3.1 To comply with the Air Navigation Order 2016, UK(EU) No. 139/2014 (The Aerodrome Regulation): and CAP 168 Licencing of Aerodromes, and acknowledging that there is a duty of care to passengers and flight crews, when considering the nature of extraneous/ancillary duties to be carried out by RFFS personnel, Aerodrome Operators should ensure that the Aerodrome's Safety Management System (SMS), documents the following:
 - a) A list of extraneous/ancillary duties undertaken.
 - b) An assessment of the impact of such activities on the RFFS response objective.
 - c) An assessment of the risk to operations posed by RFFS extraneous/ancillary duties.
 - d) An RFFS response policy documenting safe procedures for making a response when undertaking extraneous/ancillary duties, especially a process for the safe extrication from those duties.

4. Operational Guidance:

- 4.1 When flight operations are taking place (an aircraft is moving under its own power with passengers onboard) a full RFFS response in accordance with aerodrome RFFS category is required.
- 4.2 When flight operations are not taking place, but aircraft are being readied and have passengers/crew on board, the general principle should be that, in the event of an emergency, a full RFFS response in accordance with the aerodrome RFFS category can be made. However, if during this time RFFS personnel are carrying out extraneous/ancillary duties (including snow clearing), the aerodrome operator, in line with its SMS, should conduct a risk assessment to determine what level of RFFS may be required, and put in place appropriate procedures to manage the provision.

5. RFFS engaged in extraneous duties:

- 5.1 Extraneous/ancillary duties may take place during flight operations in a managed way that does not compromise RFFS crew safety or the RFFS response objective.
- 5.2 Extraneous/ancillary duties can be planned to take place outside flight operations in a managed way so that the aerodrome's RFFS can be brought back into a state of response readiness for flight operations to recommence.
- 5.3 A procedure for communicating with other aerodrome departments (e.g. ATC) should be part of the plan to ensure all staff are aware of the status of the RFFS.
- 5.4 Having RFFS vehicles close by when undertaking extraneous/ancillary duties may be acceptable if personnel can safely extract themselves from that extraneous/ancillary duty and the duty being carried out does not compromise RFFS crew safety or their response.
- A documented extraneous/ancillary duties impact assessment should be carried out by a competent manager, subject to periodic review, included in, or referencing the aerodrome manual.

NOTE 1.

Extraneous Duties include the following non-exhaustive examples:

Aircraft loading/unloading
Aircraft moving
Aerodrome maintenance work
Wildlife patrols
Snow clearing
Human Observer RVRs
First aid/medical response
Fire safety work

Ancillary* Duties include the following non-exhaustive examples:

RFFS Training and proficiency checks
RFFS equipment testing and maintenance

*Ancillary duties are those that are an essential requirement to underpin the provision of an effective RFFS.