



European Union Aviation Safety Agency
Comment Response Document (CRD) to Special condition ref. SC-O 23-div-01
issue 3 on
Usage of aeroplanes for parachuting activities

IV. CRD table of comments, responses and resulting text

In responding to the comments, the following terminology is applied to attest EASA's position:

- (a) **Accepted** — it means that EASA agrees with the comment and any proposed change is incorporated into the text
- (b) **Partially accepted** — it means that EASA either partially agrees with the comment or agrees with it but the proposed change is partially incorporated into the text
- (c) **Noted** — EASA acknowledges the comment, but no change to the text is considered necessary
- (d) **Not accepted** — EASA does not agree with the comment or proposed change and the text will not be changed

(General Comments)

comment	1	comment by: <i>LBA</i>
	LBA: The LBA has no comments	
response	Noted.	
comment	4	comment by: <i>FOCA (Switzerland)</i>
	Thank you for the opportunity to comment. I can hereby inform you that we have no comments on this matter and so support the proposal. Thank you very much for taking note.	
response	Noted.	
comment	10	comment by: <i>DGAC France</i>
	DGAC France would like to thank EASA for this opportunity to comment this Special Condition.	

response Noted.

IDENTIFICATION OF ISSUE:

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comment

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comment by: *KNVvL Netherlands Aeroclub*

The identification of issue states the Special Condition has been in use since 2005. It appears that it will be published - after the consultation period - in 2023. With the publication it should be stated explicitly this will not affect the aircraft currently used for parachuting operations, whether operated by a parachuting club or owned by a flight club or individual, and regardless of the number of parachuting flights.

I should also be made clear that any currently used aircraft - or future aircraft - for parachuting operations can do so in all EASA member states, regardless of the EASA member state which allowed the use of the aircraft for this operation.

response

Not Accepted

Thank you for your comment. Any new Special Condition publication has no effect on approvals already granted under EASA framework (including grandfathered approvals).

SPECIAL CONDITION

p. 3

comment

2

comment by: *HK aviation*

II. Design and Structure

(a) The seating/accommodation and restraints "approved" requirement refers to STC or manufacturer construction approval by authority, which is a rather long and costly process. The need for restraint is limited to only a maximum of 5 (five) minutes of flight after brake release during t/o.

When/After safe emergency altitude above ground is reached, the current procedure for parachutists, is to evacuate the aircraft before emergency landing or other emergency procedures are initiated

Considering the amount of time in relation to the total time, the "approval" of such restraints would be an excessive requirement.

The authority has not proven that this requirement would mitigate any risks considering the safe operation of acft in skydiving operations.

Currently, the authority states according to NCO.SPEC.PAR.110, that the floor of the aircraft may be used as a seat, provided means are available for the task specialist to hold or strap on.

Skydive operators do not normally utilize task specialists in skydiving operations and the parachutists manage their seating according to safe practises which have performed satisfactorily in accidents (Teuge/NL)

My suggestion to amend this section is as follows:

(a) The seating/accommodation and restraints (when installed¹) or “means to hold on” that are approved for use during take-off and landing. This should include an assessment that the pilot seat can accommodate a pilot wearing a personnel emergency parachute;

The suggestion is to strike the underlined text; restraints **that are approved** and replace the underlined text with; ... *suitable restraints supplied by the responsible skydive operator..*

response

Not accepted.

Thank you for your comment. EASA do not agree with the comment.

The seating/accommodation, the restraints (when installed) or “means to hold on” shall be approved, meaning that they shall meet the certification basis defined by EASA, which will include this special condition.

comment

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comment by: *DGAC France*

Scope of the special condition:

It should be specified that this special condition is applicable only for parachuting activities with civil parachutes, as military hemispherical parachutes generate other constraints.

response

Not Accepted.

Thank you for your comment. EASA acknowledge the comment, anyway the Special Condition does not cover the approval of the specific parachute, rather the modification of the aeroplane for parachute operations. The type of the parachute will be anyway part of the information to be provided by the applicant and need to be considered to meet some requirements of the special condition.

comment	3	comment by: <i>Skydive Caravan Pilot</i>
	<p>(a) The seating/accommodation and restraints (when installed¹) or “means to hold on” <u>that are approved</u> for use during take-off and landing. This should include an assessment that the pilot seat can accommodate a pilot wearing a personnel emergency parachute;</p> <p>The suggestion is to strike; that are approved and replaced with; ... <i>suitable restraints supplied by the responsible skydive operator..</i></p>	
response	<p>Not Accepted. Thank you for your comment. See response to comment 2.</p>	
comment	7	comment by: <i>KNVvL Netherlands Aeroclub</i>
	<p>Art II (iv) sets requirements regarding the actions needed in case of a hang up. This we believe should be part of the parachuting operations manual, not here in the Special Condition. There exist several different procedures for this occurrence, depending on the member state or parachute operator.</p>	
response	<p>Not accepted. The Special Condition is intended to request investigation of any precaution that can be taken at design level. Then the Operator may use these information, eventually provided in the Flight Manual, to complement its specific operational manual.</p>	
comment	12	comment by: <i>DGAC France</i>
	<p>II.Design and structure:</p> <p>It should be added that in case of flights with an open or removed door, a safety strap should be installed across the opening.</p>	
response	<p>Not accepted. Thank you for your comment, EASA believes that a Safety Strap may be installed but it is not required. If a Safety Strap is installed it needs to be substantiated as per Special Conditional requirements, e.g. II(b), in addition to the requirements of the certification basis of the aircraft.</p>	

comment

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comment by: *DGAC France*

II. Design and structure:

It should be added that if the copilot seat is used by a parachutist, the flight controls and other aircraft controls should be removed or protected.

response

Partially Accepted.

Thank you for your comment. Point II (f), requires to assess the adequacy of protection of the control system. EASA has revised the text to clarify the specific scenario of parachutists seating in correspondence of co-pilot seat.

I. General

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comment

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comment by: *KNVvL Netherlands Aeroclub*

The applicant must, under article I.(a) provide the "applicable serial numbers". It is not clear if this must be provided for every single aircraft or if the numbers are applicable for all aircraft of the same type and model. There are a lot of parachuting aircraft around (e.g. Cessna C-208 Caravan) which are identical. The same question arises for new aircraft, of changes to existing aircraft.

In article I.(c) it is written "maximum number of parachutists to be dropped". Please note that on parachute student training jumps (static line) the jumpmaster sometimes descends with the aircraft for the next load. Better text would be: "maximum number of parachutists on board".

response

Partially Accepted.

Thank you for your comment.

Comment on Par. I(a) is not accepted: The approval of the Change to TC may be granted to specific Serial Numbers but even to all S/N of a Type/Model, if the design evaluations allow to cover all possible configuration without exclusion (except the interference with any other change case by case).

Comment on Par. I(c) is partially accepted. Text will be corrected and reference will be made to parachutists on board (including jumpmaster if present)

comment 8

comment by: *KNVvL Netherlands Aeroclub*

Art III (2) (f) states that a single trial jump and then a group jump should be made. There is no reference to the size of the group. Apart from that, static-line jumpers do not jump as a group but always jump by themselves, either one jumper per jump run, or two or more separately in one jump run. It is understood that when a used static line trails behind the aircraft it could cause a hazard to (other following static line) parachutists. But this is applicable to two static line parachutists already.

Furthermore, there is no exact number of jumps written in (f), whilst in (c) a minimum of 20 is defined. Does the number of 20 apply to (f) too?

response

Accepted.

The (f) simply requires the repetition of the letter (b) and (c), the group jump is intended as sequence jump. EASA will change the text for clarity.