

## Part-SPO

Illustration of transition from an AOC system to a declaration/authorisation system and oversight of SPO operators

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# Personal Experience

- CPL/H. TRI. FI.  
EC135, AS355, AS350, EC120, B206,  
R44, R22.  
25 years experience in UK helicopter industry
- Aerial filming, photography, ENG.
- Powerline & pipeline patrol
- Railway network survey/patrol & emergency response
- LIDAR survey
- Ad hoc CAT/Air taxi operations
- CAA Flight Operations Inspector since 2011
- Assigned Inspector for 12 UK-based AOC holders including powerline, pipeline & utility Operators.
- FO(H) gateway for ANO/SERA Permissions issued to helicopter Operators (CAT, NCC & SPO)



# Background

- Prior to the Part-SPO concept of 'Task Specialist', a UK Operator would have to hold an AOC under the Air Navigation Order (ANO) to carry passengers on an aerial work flight.
- Because the UK CAA is not Government-funded we are required to charge those that we regulate to cover our expenses. Therefore an AOC costs the Operator several thousand pounds per year.
- Commercial operators who do not hold an AOC are charged a fee for the issue of a Permission or Exemption from the ANO or SERA. ( e.g. Low Flying or Dropping of Articles)

# Background (cont)

- Some UK AOC holders who do not conduct CAT operations have confirmed that they intend to surrender their AOCs and work solely under Part-SPO.
- The 2 principle power-line inspection companies intend to keep their AOCs and submit SPO declarations even though they perform minimal CAT ops.
- Other operators who conduct significant CAT ops & commercial SPO will, of course, need to retain their AOCs and make SPO declarations.



# Part SPO Declarations and High Risk Authorisation Applications



- Prior to the introduction of Part-NCC in August 2016, the UK CAA created a web-based declaration form for the use of NCC operators.
- This form has been further developed to enable UK Part-SPO declarations to be made on-line. The form went live on 9 January 2017.
- There is a charge of £112 (~ €130) per declaration.
- We are in the final stages of producing a form to permit an SPO operator to apply for an Authorisation to conduct High Risk Commercial SPO flights.
- These applications will require more input from CAA administrators and technical experts and will therefore attract an additional charge.



# Oversight (ARO.GEN.300 & 305)

- The competent authority shall verify continued compliance with:
  - the applicable requirements of organisations it has certified, specialised operations it has authorised and organisations from whom it received a declaration
  - continued compliance with the applicable requirements of non-commercial operators of other-than complex motor-powered aircraft
- The competent authority shall establish and maintain an oversight programme for declared organisations or those holding a SPO HR authorisation, it shall:
  - take into account the specific nature of the organisation, the complexity of its activities and the results of past oversight activities
  - be based on the assessment of associated risks
  - include audits and inspections, including ramp and unannounced inspections, as appropriate





## **ORO.DEC.100 Declaration**

The operator of any aircraft engaged in commercial SPO or the operator of a complex motor-powered aircraft engaged in non-commercial SPO shall:

- (a) provide the competent authority with all relevant information prior to commencing operations, using the form contained in Appendix I to this Annex;
- (b) notify to the competent authority a list of the alternative means of compliance used;
- (c) maintain compliance with the applicable requirements and with the information given in the declaration;
- (d) notify the competent authority without delay of any changes to its declaration or the means of compliance it uses; through submission of an amended declaration using the form contained in Appendix I to this Annex; and
- (e) notify the competent authority when it ceases operation.

# Part-ORO.DEC

- **Intent of the Declaration is to:**
  - ensure that the operator has acknowledged its responsibilities under the applicable safety regulations and that it holds all necessary specific approvals
  - inform the competent authority of the existence of any operator required to comply with Part-SPO
  - enable the competent authority to fulfil its oversight responsibilities

## Declaration Form

### Items on the form:

- Operator data
- Continued airworthiness data
- Aircraft operation data
- Details of specific approvals
- List of alternative means of compliance
- Statements on the compliance with applicable rules
- Information on industry standards, if applicable

# High Risk SPO

- Affects commercial SPO only
- The operator requires an Authorisation to conduct High Risk SPO (Ref. ORO.SPO.110)
- ANO 2016 and SERA requirements for 3<sup>rd</sup> party protection are also relevant
- List of High Risk activities being developed alongside an authorisation process
- More information will be posted on the CAA website in due course

# What is High Risk SPO?

- 'High Risk commercial specialised operation' means:
  - any commercial specialised aircraft operation carried out over an area where the safety of third parties on the ground is likely to be endangered in the event of an emergency, or, as determined by the competent authority of the place where the operation is conducted, any commercial specialised aircraft operation that, due to its specific nature and the local environment in which it is conducted, poses a high risk, in particular to third parties on the ground

# UK CAA High Risk SPO activities

- **Possible** examples of HR activities
  - Helicopter under-slung loads
  - Dropping of articles
  - Aerial Spraying
  - Research flights
  - Some display activity
- Authorisation process
  - Being developed but in accordance with ORO.SPO.110 and ARO.OPS.150
  - Operator must provide a risk assessment and SOP for the event
  - May be issued for one or more events
  - Authorisation issued by the Competent Authority as in Appendix IV to Part-ARO
  - If being conducted in another State, prior agreement with the Competent Authority of that State required



# CAA website information for Part-SPO



- <http://www.caa.co.uk/spo>
- Includes advice and web link to making a Declaration and applying for a High Risk Authorisation.