

THE AEROMEDICAL SOCIETY OF AUSTRALASIA  
& FLIGHT NURSES AUSTRALIA CONFERENCE  
Darwin 19<sup>th</sup> to 21<sup>st</sup> August 2015



MEDICAL TRANSPORT  
OPERATIONS FUTURE  
POLICY INFORMATION  
SESSION AND BRIEFING

*safe skies for all*

# Background

WHY ARE WE HERE?



C I V I L   A V I A T I O N   S A F E T Y   A U T H O R I T Y

# Background

To know that answer we need to understand what is an:

AIR TRANSPORT OPERATION  
&  
AERIAL WORK OPERATION

# Background

Under the CASRs Air Transport Operations will comprise passenger and cargo-carrying operations that:

Are provided on a commercial basis (for hire or reward) or are otherwise publicly available; and

Are conducted in manned free balloons, and in aircraft that are certificated in the transport, commuter or normal category -

In this class of operation, passengers, cargo consignors and aircraft hirers may generally be expected to have limited, or no, knowledge of the risks involved in their transport and little or no control over those risks.

# Background

## Air Transport Operations cont.....

The Air Transport Operations class will include operations that are provided on a scheduled basis and on a non-scheduled basis.

Operations classified as Air Transport Operations will require an Air Operator's Certificate (AOC).

Air Transport Operations will be operated to the highest regulated safety standards

# Background

Under the CASRs classification of operations - Aerial Work will comprise operations in which:

The aircraft is being used for specialised in-flight purposes; and

The operation presents elevated operational and/or organisational risks and/or the potential for significant injury or damage to persons or property if there is an accident (taking into account the number of persons involved and/or the area of operation).

# Background

## Aerial Work under the CASRs:

Aerial work may involve specially trained and/or qualified 'task specialists', who perform duties on board the aircraft related to the specialised use of the aircraft.

In some cases, the aircraft flight crew may also act as task specialists.

In certain circumstances, aerial work operations may involve the carriage of limited numbers of passengers, who are informed of and accept the risks associated with the flight.

The CASRs (CASR Part 138) will define in what circumstances passengers may be carried in specific aerial work operations

# Background

## ICAO Definitions..

- ***Aerial work.*** An aircraft operation in which an aircraft is used for specialised services such as agriculture, construction, photography, surveying, observation and patrol, search and rescue, aerial advertisement, etc.
- ***Commercial Air transport Operation*** (is) an aircraft operation involving the transport of passengers, cargo or mail for remuneration or hire.
- ***Air Operators Certificate (AOC).*** A certificate authorizing an operator to carry out specified commercial air transport operations

# Background

## CASR Classification of operations:

The new framework under the CASRs contemplates three broad classes of operations:

- Air Transport Operations;
- Aerial Work Operations; and
- General Aviation Operations.

# Background

There is also a “NOTE” in the Classifications of Aircraft Operations policy which outlines....

“for an unconscious passenger carried on an air ambulance flight it is not reasonable to expect that passengers can or will be meaningfully informed of, and thus accept, the risks involved.”

# Background

SO....

Into this classification of operations policy  
CASA's task was to find a home for  
“ambulance function” passenger carrying  
type flights as we know them today.

# Background

To do this we reviewed....

1. The history of the Ambulance Function aerial work purpose
2. The definition of what is an Ambulance Function flight today
3. The organisational and operational characteristics of operators who do this task on a regular basis
4. What is aerial work and what should it be
5. Current International standards for similar operations
6. Policy under development for medical transport type operations around the world

and came up with two options

# Options

1. **Ambulance Functions can be retained as an aerial work purpose,**
  - but we would only partially meet our obligations under ICAO particularly for international operations
  - would need to be the same standards as is required for Air Transport operations in any case.
  - Could only be applicable to domestic ambulance function flights, resulting in two standards for the same operation

Or..

2. **We could move the operations into the Air Transport classification,**
  - with a coincident increase in baseline safety target and provision for appropriate relief from these requirements (where necessary) to allow operations to continue
  - application of robust risk assessment and management processes where necessary
  - Full international operational compatibility

# IT REALLY IS A PACKAGING ISSUE

PACKAGING

ISSUE



⇔ OPERATIONAL

CONSIDERATIONS

# Considerations

## THE CASE FOR CHANGE

1. Industry trend towards adoption of AT standards
2. Contractor trend towards a requirement for AT standards
3. Ensuring integrity of international AOC coverage
4. Clarity of authority for the carriage of persons in medical transport ops
5. Standardisation of requirements for MT operations
6. Flexibility of operations

# Options Considered

1

- The AUS model = Ambulance functions remain AW and be regulated under Part 138

2

- The US model = Mixed classification model, based on current FAR requirements

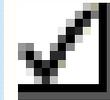
3

- The international model = re-classification of ambulance functions to medical transport

# Preferred Option

Option 1  
& 2

Option 3



Status quo =  
addition aerial  
work complexity

The US model +  
added risk  
mitigators.

Safety enhanced  
operational  
model

Authorised by an  
AOC

AT standards  
supplemented

# Air Transport Standard =



What are Air  
Transport  
Operations  
Standards?



# Result

The Result of alignment with AT requirements is

A robust AOC holder organisational maturity model, via

- Establishment of required Key Personnel positions
- Establishment and construction of an Exposition
- Establishment and operation of an SMS
- Aircraft maintenance provided by a Part145 organisation to the requirements of Part 42
- Establishing a method of ensuring competency of personnel
  - ✓ Training and checking system – flight crew + cabin crew
  - ✓ Ground staff competency training and assessment system
  - ✓ Non-tech skills training and competency assessment
- Establishment of a method of managing personnel fatigue
- Establishment of an operational control policy and procedure set
- Internal monitoring and review via SMS processes to protect the above

# Safety Benefits

## Benefits of preferred option:

- mandated training and checking
- more robust aircraft equipment requirements
- introduction of fatigue risk management criteria to specifically address aeromedical operations
- a more appropriate organisational model for medical transport operators using the certification criteria of Part 119 of CASR
- a more robust operational rule set based on AT-type operations, with appropriate relief and additional criteria to allow the continued functionality

# Benefits

## Benefits of preferred option:

- greater operational and tasking flexibility for medical transport operators who conduct other associated operations such as clinic flights
- greater potential for recognition of AOC authorisations during international operations
- high levels of ICAO compliance & international standardisation and harmonisation
- enhanced potential for greater flexibility in ASEA operations
- mandated operational control policy with a focus on assisting the PIC (without diminishing the PIC's responsibility) in managing the risks of the operation.

# Impacts

## Potential impacts of preferred option:

- Some operators may need to upgrade their organisational systems to meet the criteria of Part 119 of CASR.
- Some industry providers who conduct 'ambulance functions' as a secondary function may decide to move out of this sector.
- Some operators who do not presently have carrier's liability insurance cover will be financially disadvantaged by the requirement to gain this for their future operations.
- Some potential for increased operational costs for operators who are operating at a lower standard today.

# OVERVIEW

## Potential benefits and impacts of preferred option:

CASA believes that these impacts are negated considerably by the fact that many current operators have already upgraded to these higher standards to meet current contractual requirements, or will be to meet future requirements.

# Where are we up too?

- 2014 - NPRM 1304OS released, consulted and Summary of Responses posted.
- MTO drafting instructions compiled from the results.
- MTO drafting Instructions issued to OPC.
- MTO provisions to be inserted into Parts 119, 133 and 135 as consequential amendments
- Provisional making date Mid 2016.
- Effective mid to late 2017.
- At least 3 year transitional process.

# QUESTIONS

