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|  HELLENIC CAA | FSD/OPERATIONS SECTION INFORMATION BULLETIN | FSD/OPS/IB/2/2016 |
| | For all Part-SPO Operators and APPLICANTS | Initial 21/12/2016 |

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| Subject | Requirements for SPO Operators |
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1. INTRODUCTION

EASA Air Operations Regulation (EU) No 965/2012 Part-SPO (Specialised Operations) applies to any aircraft operation, other than commercial air transport, where the aircraft is used for specialised activities such as agriculture, construction, photography, surveying, observation, patrol and aerial advertisement.

Part-SPO will apply in Greece from 21 April 2017.

Operators engaged in commercial specialised operations or engaged in non-commercial specialised operations using a complex motor-powered aircraft must submit a declaration to HCAA about their operation. In addition, a commercial operator conducting a high-risk specialised operation must also apply for and obtain an authorisation from us.

The declaration and authorisation will help us to establish and maintain the required oversight programme for Part-SPO aircraft. The programme will be developed based on the nature and complexity of each operation using available data, including that from any past oversight activities.

All affected operators must apply the new implementing rules from 21 April 2017 and should start planning their transition with this date in mind.

Operators will need to be familiar with the EASA Basic Regulation and the Air Operations Regulation. They will also need to comply with the detailed implementing rules in Annex VIII (Part-SPO). In addition, if conducting commercial specialised operations or engaged in non-commercial specialised operations using a complex motor-powered aircraft they will need to comply with Annex III (Part-ORO Organisation Requirements). If an operator needs specific approvals, for example, covering low visibility operations or dangerous goods; they will need to comply with elements of Annex V (Part-SPA).

2. SCOPE

The Scope of this IB is to introduce the Operator in the relative to Specialised Operations Regulation in force, and thus to help the Operator to prepare and submit the Declaration in the most effective way.

3. MAKE A PART-SPO DECLARATION

Part-SPO operators engaged in commercial specialised operations or engaged in non-commercial specialised operations using a complex motor-powered aircraft must submit a declaration to HCAA about their operation. In addition, a commercial operator conducting a high-risk specialised operation must also apply for and obtain a separate authorisation from us.

To determine who the operator is you should consider who is responsible for functions such as:

- Making sure the pilots are licensed, trained and hold the correct ratings
- Making sure the aircraft is insured
- Making sure flight planning is undertaken
- Ensuring the aircraft is airworthy/maintained and properly equipped in accordance with the operating rules
- Writing and updating the Operations Manual
- Applying for approvals (RVSM, LVO etc.) and therefore, in whose name is the approval given
- Maintaining records, submitting MORs
- Who is responsible for delivering those functions where, in the rules, it says 'an operator shall...'

The person (physical or legal) responsible for these things is the Operator. If the operator is established or resident in Greece (regardless of where the aircraft is registered) he should make a declaration to the HCAA and show their address (in Greece) in the 'Operator' section of the declaration.

It is possible that the place from which the operations are normally conducted is different from the place at which the operator is established or residing. If that is the case, there are provisions for that to be shown on the declaration.

The declaration must be completed by the 'accountable manager' for the operation.

The accountable manager is a person, appointed by the operator, who has the authority for ensuring that all activities can be financed and carried out in accordance with the applicable requirements. The accountable manager is responsible for establishing and maintaining an effective management system. The accountable manager may be the same person as the operator.

The declaration includes Specific Approvals held by the operator.

- You must declare whether or not the operator holds a Specific Approval for the carriage of Dangerous Goods.
- Other Specific Approvals held must also be declared.

More detail covering Specific Approvals can be found in Annex V (Part-SPA) to the EASA Air Operations Regulation.

The Air Operations Regulation contains implementing rules which must be complied with.

In addition, there are acceptable means of compliance (AMCs) published by EASA. The AMCs give more detail regarding the implementing rules and they demonstrate an acceptable means of compliance.

When an operator uses the AMC then there is a presumption of compliance with the rule.

However, an operator may develop an alternative means of compliance; they must still fully meet the requirements of the implementing rules, but by way of an alternative means or procedure set out in the operations manual.

As part of the declaration you must state whether or not you use any alternative means of compliance. If you do, you must then state a reference to those published AMCs for which you are using an alternative means of compliance. You do not need to submit the alternative text.

You need to declare whether or not the aircraft is registered in an EASA State.

Declarations for aircraft registered in an EASA State: You will also have to provide details of your Continuing Airworthiness Management Organisation (CAMO), including their approval reference.

Declarations for aircraft registered in a non-EASA State: You must provide us with details of the organisation responsible for its continuing airworthiness management. If that organisation has an approval reference from the relevant State, it must also be included.

Finally, you must enter the regulation under which the aircraft's Certificate of Airworthiness was issued.

If the aircraft is operated under an 'industry standard', such as IS-BAO, this information should be included.

For operators having demonstrated compliance with industry standards, we may adapt our oversight programme accordingly.

4. DEFINITIONS

'Specialised Operations' means any operation other than commercial air transport where the aircraft is used for specialised activities such as:

- agriculture
- construction
- photography
- surveying
- observation and patrol
- aerial advertisement

This covers much of what used to be called 'aerial work'.

Some activities may be deemed to be 'High Risk', particularly to third parties, and be subject to prior authorisation .

'Complex motor-powered aircraft'

- An aeroplane:
 - With a maximum certificated take-off mass exceeding 5,700kg, or

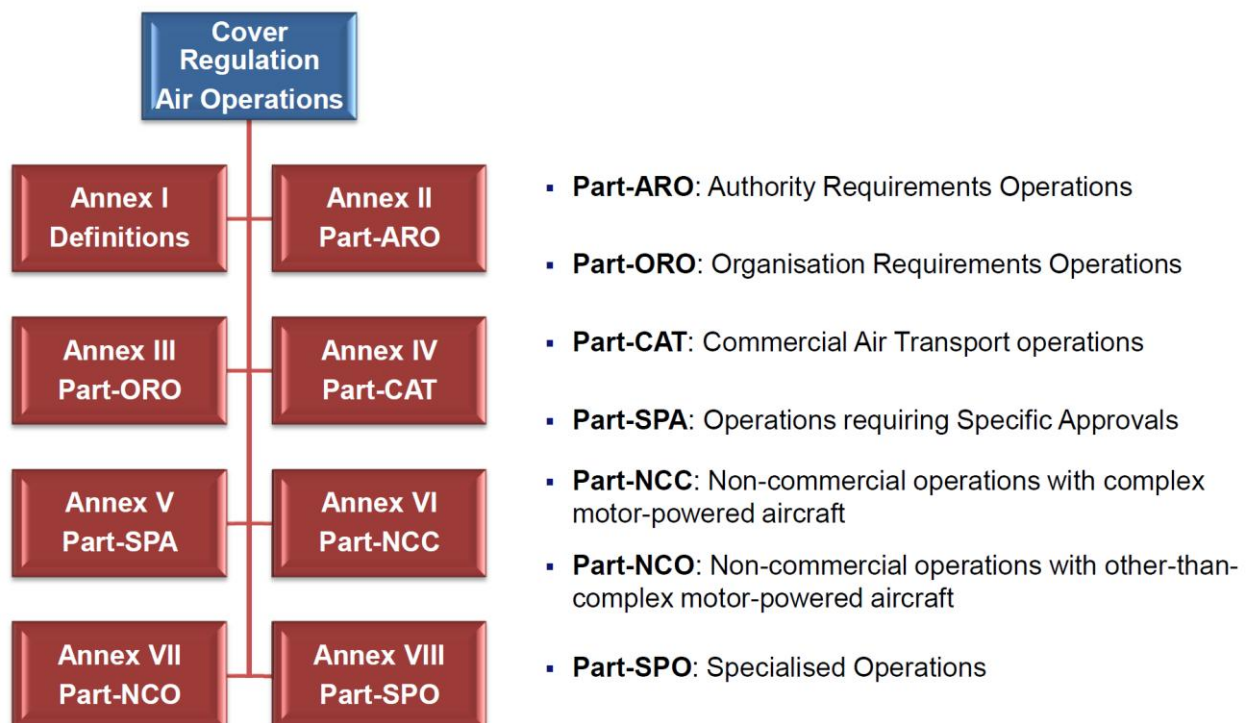
- Certificated for a maximum passenger seating configuration of more than 19, or
- Certificated for operation with a minimum crew of at least two pilots, or
- Equipped with (a) turbojet engine(s) or
- Equipped with more than one turboprop engine and exceeding 5,700kg
- A helicopter certificated:
 - For a maximum take-off mass exceeding 3,175kg, or
 - For a maximum passenger seating configuration of more than nine, or
 - For operation with a minimum crew of at least two pilots, or
- A tilt rotor aircraft

‘Commercial operation’ shall mean any operation of an aircraft, in return for remuneration or other valuable consideration, which is available to the public or, when not made available to the public, which is performed under a contract between an operator and a customer, where the latter has no control over the operator.

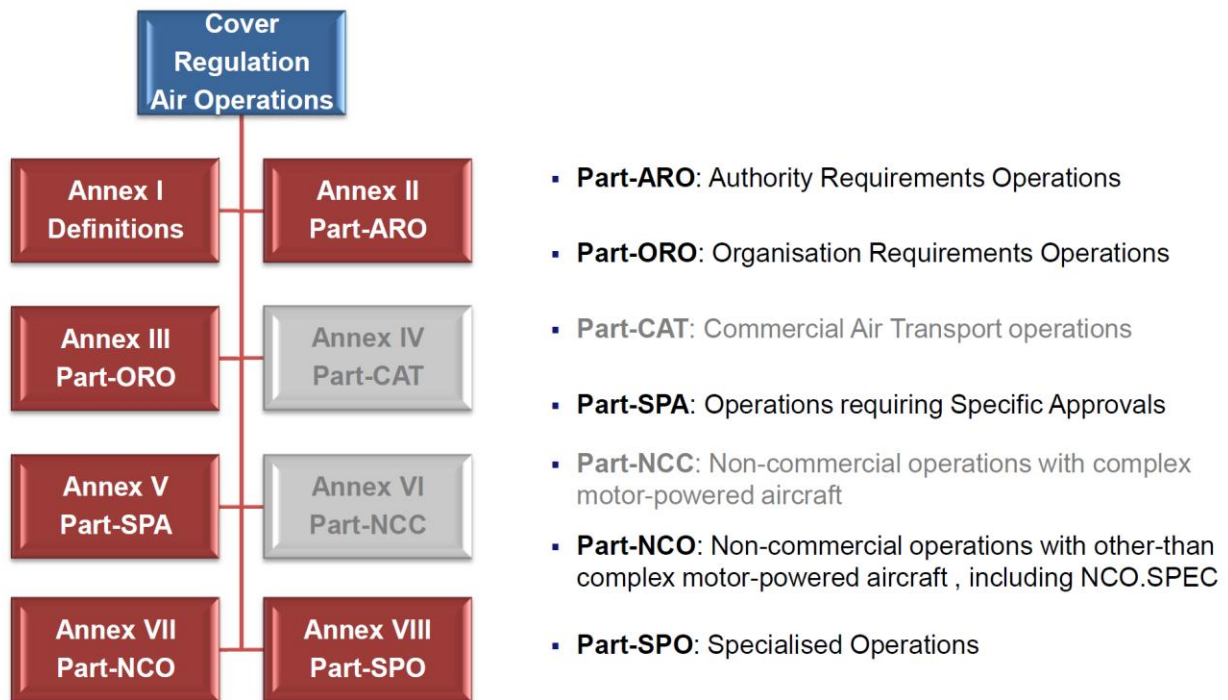
‘High Risk commercial specialised operation’ means: any commercial specialised aircraft operation carried out over an area where the safety of third parties on the ground is likely to be endangered in the event of an emergency, or, as determined by the competent authority of the place where the operation 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

5. REGULATION SYNOPSIS

Regulation 965/2012 Air Operations Rule Structure



Annexes applicable to Specialised Operations



Part-SPO covers:

Specialised Operations by operators conducting:

- Commercial SPO operations with any aircraft,
- Non-commercial SPO operations with complex aircraft.

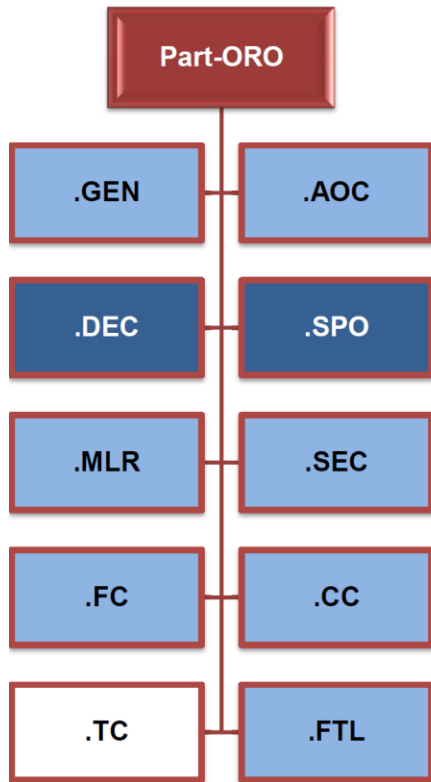
SPO.GEN.105 allows:

Non-commercial SPO operations with other-than complex motor-powered aircraft to be conducted under Part-NCO.

Part-NCO Subpart E (NCO.SPEC) covers:

Specialised Operations by operators conducting non-commercial activities with other-than complex motor-powered aircraft

Part-ORO - Structure & Applicability



| | |
|-------------|---|
| .GEN | general requirements |
| .AOC | air operator certification |
| .DEC | declaration |
| .SPO | commercial specialised operations (requires some compliance with AOC) |
| .MLR | manual, logs, records |
| .SEC | security |
| .FC | flight crew |
| .CC | cabin crew |
| .TC | technical crew |
| .FTL | flight and duty time limitations and rest requirements (yet to be developed) |

Applicability for SPO

| | | |
|------|---------|-----|
| Full | Partial | Nil |
|------|---------|-----|

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.

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

Items on the Declaration 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

Includes:

Management system

“The operator shall establish, implement and maintain a management system that includes:
.....”

“The management system shall correspond to the size of the operator and the nature and complexity of its activities, taking into account the hazards and associated risks inherent in these activities.”

AMC and Guidance Material expands for both complex and non-complex operators

ORO.SPO

Includes:

- Common requirements for commercial specialised operations
- Includes the following as for AOC operators:
- Management, supervision and training of personnel
- Continuing airworthiness
- Adequacy of facilities
- Documentation
- Leasing arrangements
- Authorisation of High Risk commercial specialised operations
- Changes to High Risk Authorisations
- Continued validity of High Risk Authorisations

Part-ORO.MLR

Includes:

- Operations manual (OM)
- Structure and content
- Approved minimum equipment list (MEL)
- Record keeping requirements

Part-ORO.SEC

Flight crew compartment security

Part-ORO.FC

Includes:

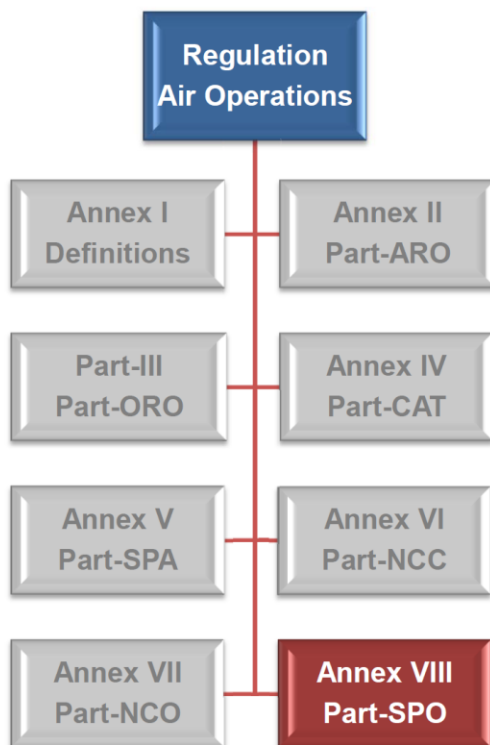
- Composition of flight crew
- Designation as pilot-in-command
- Crew resource management (CRM)
- Operator conversion training
- Recurrent training and familiarisation training
- Operation on more than one type or variant

NOTE: Commercial Air Transport Operators

Operators holding an Air Operator Certificate must make a separate SPO Declaration if also conducting SPO flights.

The alleviation from making a Declaration which is shown in ORO.AOC.125 does **not** apply in the case of SPO.

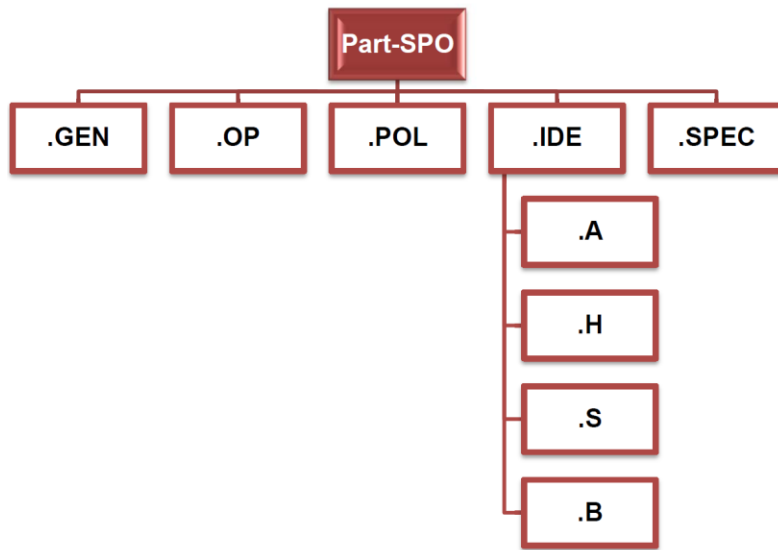
Air Operations – Annex VIII Part-SPO



▪ **Applicability:**

- Technical rules for Specialised Operations of:
 - non-commercial operations of complex motor-powered aircraft
 - commercial operations

Annex VIII Part-SPO - Rule Structure



.GEN – general requirements

.OP – operational procedures

.POL – performance and operating limitations

.IDE – instruments, data, equipment

.A - aeroplanes

.H – helicopters

.S – sailplanes*

.B – balloons*

.SPEC – specific requirements

* The Air Operations Regulations for Sailplanes and Balloons have been deferred until 8th April 2018 for Balloons and 8th April 2019 for Sailplanes.

Part-SPO.GEN

Includes:

- Scope and applicability
- Crew and Task Specialist responsibilities
- Pilot-in-command responsibilities and authority
- Compliance with laws and regulations
- Taxiing of aircraft
- Portable electronic devices
- Documents, manuals and information to be carried
- Preservation and production of documents
- Transport of dangerous goods

“Task Specialist” means: a person assigned by the operator or a third party, or acting as an undertaking, who performs tasks on the ground directly associated with a specialised task or performs specialised tasks on board or from the aircraft

Task Specialist responsibilities include the proper execution of duties in accordance with operating procedures

Note: When a Task Specialist is not operating in that capacity on a flight then he/she reverts to being a passenger

Part-SPO.OP

Includes:

- Standard operating procedures (SOP)
- Aerodrome operating minima
- Departure and approach procedures
- Noise abatement procedures
- Flight preparation (Flight Planning)
- Safety briefing
- In-flight fuel management
- Use of oxygen
- Ground proximity detection
- Airborne collision avoidance system (ACAS II)

Standard Operating Procedures

- Prior to any SPO, the operator must:
- conduct a risk assessment to determine the hazards and associated risks
- establish SOPs based on the risk assessment, the specialised activity and aircraft used
- The SOP shall be part of the Operations Manual or a separate document
- The SOP shall be regularly reviewed and updated
- Any specialised operation must be conducted in accordance with the SOP and in compliance with Part-SPO
- Task specialist procedures must be specified in the SOP

Part-SPO.POL

Includes:

- Operating limitations (AFM, OM)
- Mass and balance, loading
- Performance (general and aeroplane/helicopter specific)

Part-SPO.IDE (Aeroplanes and Helicopters)

Includes:

- Instruments and equipment
- Operations under VFR and IFR
- TAWS
- FDRs/CVRs
- Seats, safety belts and restraint systems
- Supplemental oxygen

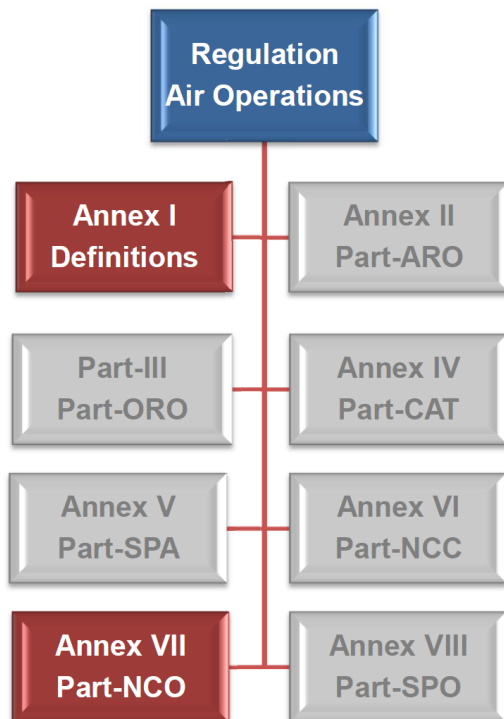
- Survival equipment
- ELTs
- Radio communication & navigation equipment

Part-SPO.SPEC

Includes specific requirements for:

- Helicopter external sling operations (HESLO)
- Human external cargo operations (HEC)
- Parachute operations (PAR)
- Aerobatic flights (ABF)

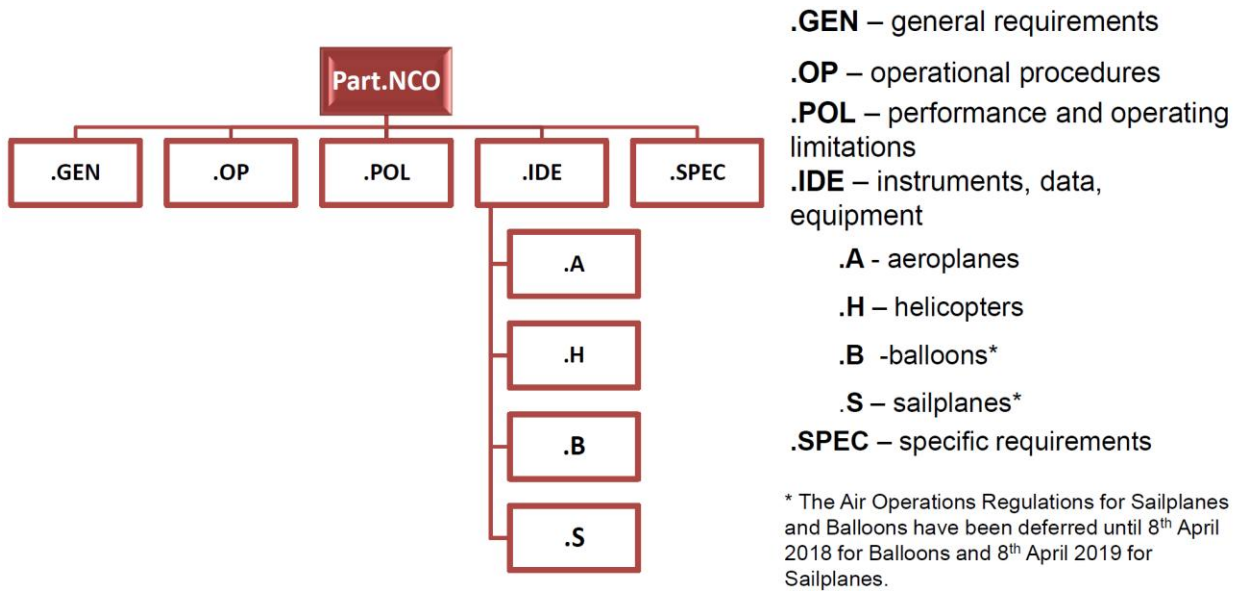
Air Operations – Annex VII Part-NCO



Applicability

- Technical rules for:
 - Non-commercial operations of other-than complex motor-powered aircraft including sailplanes and balloons

Annex VII Part-NCO



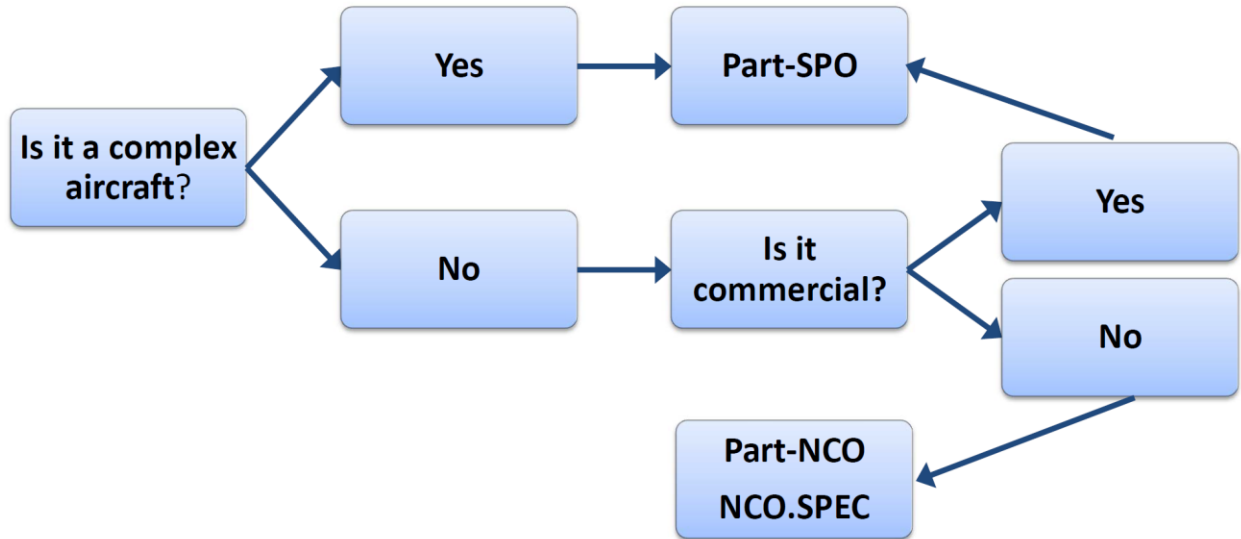
Part-NCO Subpart E NCO.SPEC

Is effectively a subset of Part-SPO with a lighter touch for non-commercial specialized operations

Applies to any non-commercial specialised activity in other-than complex motor-powered EASA aircraft, including but not limited to:

- Helicopter external sling loads
- Human external cargo
- Parachute operations
- Aerobatic flights
- Compliance with all the appropriate elements of Part-NCO are still required

Are my Operating Rules Part.SPO or Part-NCO NCO.SPEC?

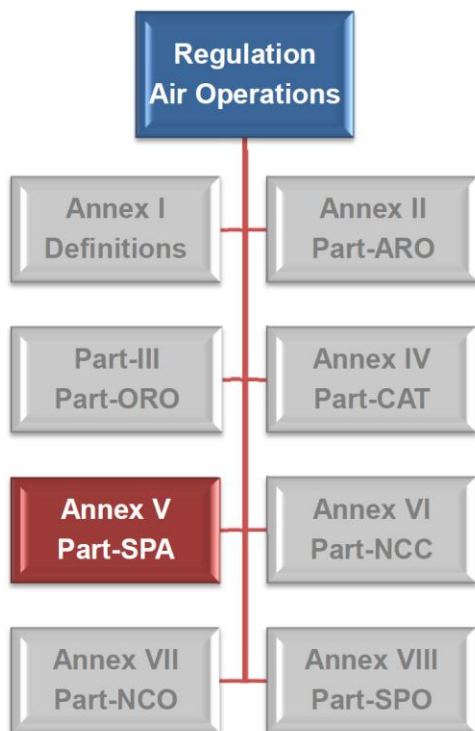


NCO.SPEC

If the activity does fall within the scope of a non-commercial SPO the PIC shall comply with all the assigned requirements. These include *(not exhaustive)*:

- conducting a risk assessment.
- using a checklist based on the risk assessment.
- briefing crew members on the procedures to be carried out including in the event of a forced landing.

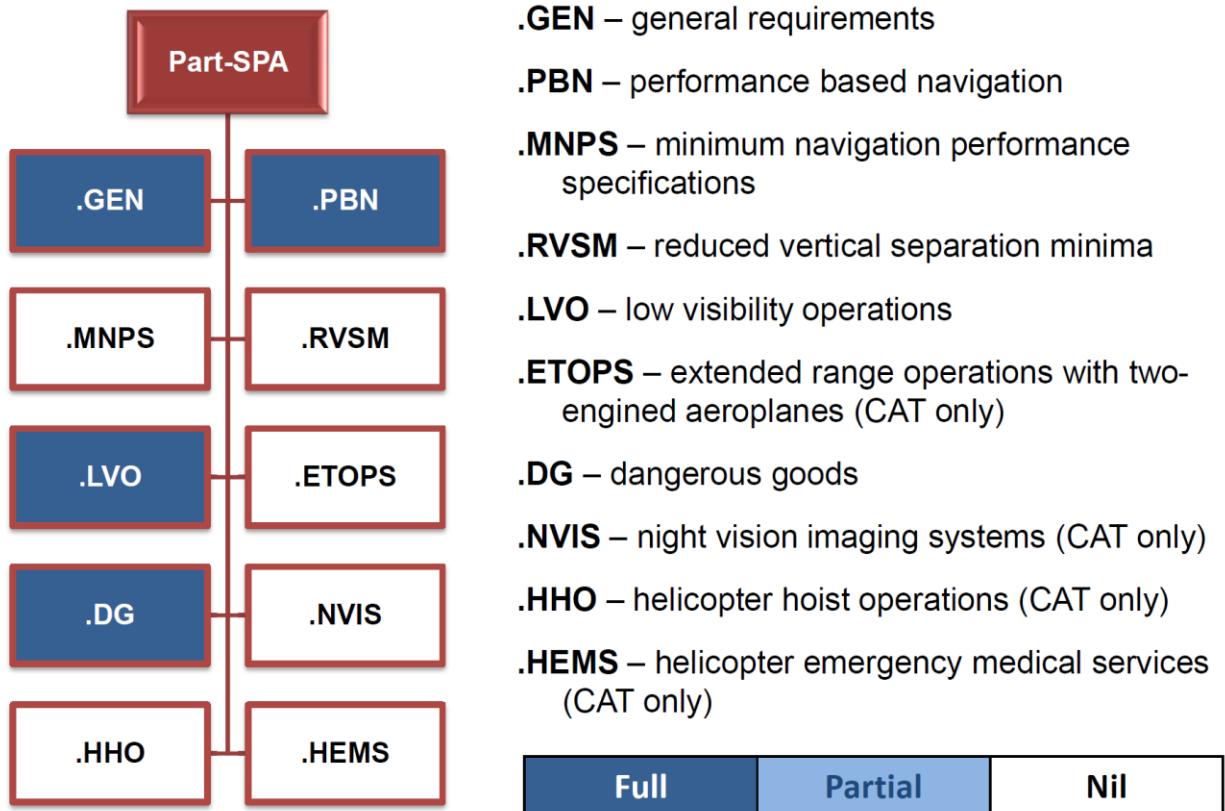
Annex V Part-SPA



▪ Applicability:

- Operators which wish to conduct an operation requiring a Specific Approval
- To be documented in:
 - OPSPECS for certified operators
 - List of specific approvals for non-certified operators

Part-SPA – Rule Structure & SPO Applicability



Part-SPA.GEN

Competent Authority (SPA.GEN.100)

965/2012 uses the State of the operator principle

The competent authority for issuing a specific approval for non-commercial operators shall be the State in which the operator is established or residing

For non-commercial operators using an aircraft registered in a non-EU country, the rules for the approval of PBN, MNPS and RVSM do not apply, if the State of the registry issued approvals for such operations

List of Specific Approvals (SPA.GEN.110)

Approvals have to be documented in the list of specific approvals, issued by the competent authority

The operator has to carry the document on board the aircraft

Changes (SPA.GEN.115)

Any change to the conditions of a specific approval requires a prior approval of the competent authority .

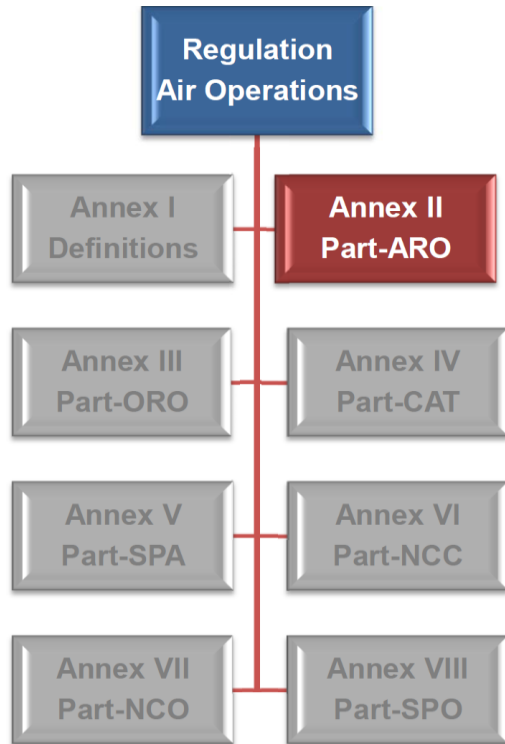
This also includes alternative means of compliances developed by the operator .

Validity (SPA.GEN.120)

Specific approvals are issued for an unlimited duration.

This also implies that the competent authority provides continuous oversight over such operations.

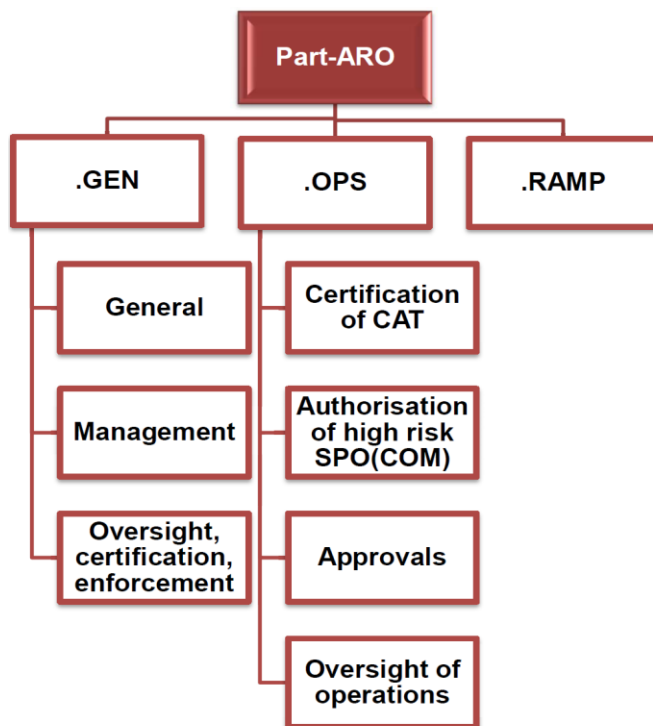
Annex II Part-ARO



▪ **Applicability:**

- Authority Requirements for Air Operations for:
 - Competent Authorities (National Aviation Authorities)
 - EASA

Part-ARO – Rule Structure



- ARO** Authority Requirements
- .GEN** general requirements
- .OPS** air operations
- .RAMP** ramp inspections

Part-ARO – Specific Rules for SPO Operations

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

FINDINGS (ARO.GEN.350)

A level 1 finding shall be issued when any significant non-compliance is detected which lowers safety or seriously hazards flight safety.

The level 1 findings shall include:

- (1) failure to give the competent authority access to the organisation's facilities during normal operating hours and after two written requests;
- (2) obtaining or maintaining the validity of the organisation certificate or specialised operation authorisation by falsification of submitted documentary evidence;
- (3) evidence of malpractice or fraudulent use of the organisation certificate or specialised operation authorisation; and
- (4) the lack of an accountable manager.

A level 2 finding shall be issued when any non-compliance is detected with the organisation's procedures and manuals or with the terms of an approval, certificate, specialised operation authorisation or with the content of a declaration which could lower safety or hazard flight safety.

Ο Προϊστάμενος

Διεύθυνσης Πτητικών Προτύπων

Χ. Παπαγεωργίου

ΥΠΗΡΕΣΙΑ ΠΟΛΙΤΙΚΗΣ ΑΕΡΟΠΟΡΙΑΣ ΤΗΛ. : 210 9973061

ΔΙΕΥΘΥΝΣΗ ΠΤΗΤΙΚΩΝ ΠΡΟΤΥΠΩΝ ΦΑΞ : 210 9973060

Τ.Θ. 70360 166-10 ΓΛΥΦΑΔΑ