

ANGEL FLIGHT CASA REVIEW

Minimum CSF pilot experience.

Comments are confined to Angel Flight CSF operations experience 2013 - 2016. (Thirty flights). Current Angel Flight set pilot experience minimums (less than 250PIC however unspecified) are manifestly inadequate for the following reasons;

1. Angel Flight Ops Demands

Aspects of maturity, psychological factors & work load.

AF Patient retrievals & returns often have high complexity & associated expectations of urgency & certainty.

The writer has conducted a number of Angel Flights where it was made clear the patient really had to make this oncology radiation appointment or other treatment. This was stressed by patients, carers & sometimes AF, if the patient had missed an appointment flight for some reason previously.

This is the elephant in the room here ; the psychological factors for the pilot of you must not let vulnerable people down & of doing good work, helping sick disadvantaged people (distance, financial), & a Noblesse oblige virtue signalling mantle with presumed authority to press on because the gods are with you, on your side of right & charity – nothing can go wrong.

Both AF fatal prangs present this scenario as a mindset pressure not present in private flights.

I observed this stress effect on young commercial pilots who often flew with me on AF's to gain multi hours & experience on long range patient retrievals.

AF have avoided any responsibility for these expectations by putting all this decision making pressure on a single (often fatigued & eager to please) low hour pilot, who is often face to face with desperate patients & concerned carers, in unfamiliar uncertain conditions.

The PIC decision making maturity & flying experience to cope with the psychology for flying strangers, who are ill / frail low mobility patients , & accompanied by concerned emotionally fragile family/carers, to vital medical appointments, is far beyond any 250 hour pilot.

A recently minted PPL (or indeed a CPL) was never designed for this type of flying.

Many experienced pilots consider some more complex long range CSF flights demand a two pilot operation.

The irresistible conclusion is that any CSF flight involving long distance transport of ill patients & patient family members has a complexity beyond any normal private flight & indeed most charters.

2. Angel Flight set no Stop Bars

e.g. AF provide passenger (Patient & carers) weights & baggage but do not require an aircraft W & B to be lodged.

Angel Flight should set stop bars on flights VFR or IFR.

Some of the items that should be addressed for pilot submission review prior to the flight are;

Aircraft

- Time remaining on MR
- Category of Maintenance
 - PVT
 - AWK
 - CHTR
- Permit

- IFR
- NVFR
- VFR

Pilot Currency

- CIR / PIFR / NVFR / VFR
- Flight Hrs last 30days
- IF time last 30 days
- Night Operation last 30days
- Current Approaches 2D / 3D

Weather

- Enroute Weather
 - Visual
 - Cloud at or above LSALT
- Best approach likely
 - Visual
 - RNAV 2D
- Surface winds
 - X-Wind limitation
- Runway Condition
 - Paved
 - Natural
- Day or Night operation
- Patient & carer's weights (seat belt extender).

There are many more items that could be listed. A simple Excel or Spreadsheet with a few formulas would be useful to send out to the allocated pilot. This could have a risk value next to it for numbering and if the number adds up to a high risk then the flight will need to be allocated to another. Compulsory Safety Manager external to the CSF provider (could be positive for Angel Flight even though it doesn't run on an AOC).

As CSF's are far more likely to have medical issue in-flight all pilots should have Current First Aid Cert.(St John's etc.) First aid courses covers you for 3 years, CPR needs to be renewed every 12 months.

3. Angel Flight a Flying Organisation or an Uber charity service?

Given AF schedule flights, roster pilots, set pilot criteria etc. the irresistible conclusion is that AF is a no liability unstructured Flying Organisation? Below a gag order from an employer?

----- Forwarded message -----

From: <mail@angelflight.org.au>

Date: Wed, Jul 26, 2017 at 2:48 PM

“Following the tragic accident in Mount Gambier recently Angel Flight CEO Marjorie Pagani has asked me to pass on to you all that she would be most grateful if no volunteers speak to the media about Angel Flight or the accident, unless they have sought express consent from herself. With respect to the two families involved and the investigation that is currently underway it is inappropriate for Angel Flight to comment or speculate about the cause of the accident until the

investigation is complete. In the weeks following the tragedy Angel Flight have had overwhelming support from the communities affected by this tragedy, the volunteers, the families and the general public for us to keep doing what we do. When the time is morally appropriate we will return to getting the good news stories published and promoting our wonderful organisation but until such time Marjorie would prefer to address all media enquiries”.

4. Angel Flight Safety & experience criteria sacrificed to ensure increased pilot supply?

From: mail @ angelflight.org.au

Date: Wed, Mar 21, 2018 at 10:52 AM

Subject: Angel Flight Volunteers

Dear Pilots,

As you know we have requests from potential volunteer pilots who haven't quite made the 250 PIC but who have completed their CPL and CIR. We are a little short of pilots in a couple of States with the exception of Victoria, and I have recently put a proposal to our Board, which has been accepted, as follows:

“That there be an exemption from the requirement to have 250 hours PIC, where the pilot has both a CPL and CIR, or completed ATPL; and that whilst a mentoring flight is desirable, it is not mandatory for these exempt pilots.”

So we can now accept registrations to undertake Angel Flights from these pilots. We would also encourage our experienced AF pilots to offer a mentoring ride (or accompany new pilots in their own aircraft with the AF pilot as PIC on the AF passenger leg) to those private pilots who have registered their interest on our volunteer FB page but have not yet reached their 250 hours. We think this would be invaluable experience for them, particularly in fostering the culture that it is ok to cancel a flight due wx or any other concerns, and no matter how close to the proposed flight: we always have back-up plans.

Thanks again for your commitment to Angel Flight, and please spread the word through your social clubs and training organisations.

Regards,

Marjorie Pagani

CSF Pilots need to be carefully prepared, & screened, not procurement by lowest possible criteria due shortage of qualified candidates.

5. CSF Mentor flights mandatory & compulsory.

AF have avoided extending their authority over pilots by insisting on mandating check rides/flights & have stipulated mentoring is a voluntary suggestion only.

This despite this most readily arranged through AF data base?

“We would also encourage our experienced AF pilots to offer a mentoring ride (or accompany new pilots in their own aircraft with the AF pilot as PIC on the AF passenger leg) to those private pilots who have registered their interest on our volunteer FB page but have not yet reached their 250 hours”.

In addition a pilot forum for discussion of specific issues should have been put in place at the commencement of operations. Both these omissions are major failures of duty of care.

AF has no accrued safety culture beyond the gratuitous advice of if the weather looks bad don't fly.

Arguably all CSF organisations should have prospective pilots checked by an outsourced certified Flying Training School for currency & competency with attention to specific CSF flight demands criteria. It is possible such arrangements could be honorary & as such would impose no additional cost burden on CFS operations.

6. Currency.

There exists anecdotal evidence that many older low hour private pilots rely on subsidised CSF AF's for currency. If two flights a month then good, if four flights a year then an additional hidden risk? No monitoring.

It also ignores an additional statistic for an identifiable risk factor group that is appearing in Australian aviation with alarming regularity: Pilots past 60, mainly Private, some with reasonable experience and hours, but others who have low hours & limited experience in relation to years holding a PPL, who prang for no good reason, and are becoming the fastest growth subset in the industry.

The homily of young and bold being dangerous is now being replaced by old, complacent, self-assured and perilous.

The older we get the better we were – mind set?

Middle aged dormant license motor bike riders, with new recently purchased powerful bikes, are another high risk category which comes to mind for this syndrome.

So ubiquitous there is an A& E term for it.

7. Remote Area Operations.

Unfamiliar exercise for many city pilots, long range op's e.g. Bris - Quilpie, long time intervals, weather changes, heat/stress/fatigue, ground communication & culture issues.

Angel Flight are in complete denial of conducting remote area Ops & published this 040119.

"The operational environment for a CSF pilot is benign in comparison to that of a working CPL holder. No employment threats, serviceable & familiar aircraft, the ability to cancel a flight without consequence, flights planned well in advance & no remote areas. To suggest that the experience requirements to operate a CSF flight should be higher than those required for a commercial operation is thus nonsensical."

AF have deleted replies which challenged the truth of this & other statements & then bared AF pilots from commenting & from viewing AF social media on the current CASA Review. The danger here is that any idea of a AF Pilots forum where various issues that confront pilots conducting CSF's can be discussed is now impossible.

Photo removed for privacy reasons

10:57am Jan 4

not entirely sure how my posts can be seen or read in a manner that causes stress though.

To me, this RPT pilot's opinion, suggesting passengers are not un-informed, thereby shifting some blames onto the passengers, is causing some distress but I don't ask it to be removed though....

Anyway, I hope some good will come out of all this and I hope that everyone who was involved in these tragic accidents will find closure soon...

10:44am Jan 4

may I asked why replies are being deleted? I know it's a "closed" group but I didn't realise that it was THAT closed? Personally, I don't see any harm in having a bit of discussion - specially in an invitation-only closed group? If [Angel Flight](#) isn't looking for discussion, then may I suggest not to use Facebook as a means of distribution? Especially if Angel Flight is only looking for compliments as it is in this case, leaving only positive comments behind.

C'mon, we care as much about this organisation as you and our comments are as sincere and genuine as whoever that RPT pilot is.

And there is a lot at stake here, [REDACTED]. The last thing [Angel Flight](#) can afford to do is to shut the door to opinions from its own volunteer pilot...

Palmer

8:29am Jan 4

Thanks Marjorie. Why publish an anonymous opinion? A number of the statements made in this submission are very wide of the mark & bear very little scrutiny. Given that these two fatal crashes claimed the lives of four completely innocent young mothers & their daughters these comments appear dismissive very callous indeed? "If a CSF passenger is still 'uninformed', it is by choice". Other statements such as "no remote areas" are ludicrous & plain wrong. To claim that "The operational environment for a CSF pilot is benign in comparison to that of a working CPL holder" show a complete ignorance & contempt for the some of the more obvious ominous similarities between these two tragic fatal crashes in 2011 & 2017. To suggest that CASA should "examine what the 22,998 flights have been doing successfully rather than impose a grab bag of untried limitations" & not analyse very closely the fatal unnecessary crashes is gratuitous, self congratulatory & dangerous nonsense. What is the writers position when the next mirror image fatalities occur if nothing changes & there is no attempt at a review?

This is not an 'anonymous opinion'. It is a formal submission to CASA, with authority for them to publish. I deidentified as a matter of courtesy to the pilot. Those of us who are or have been engaged in commercial ops well know of the enormous pressure in that environment, to cut corners to get the job done. There is no pressure in Angel Flight volunteers - quite the opposite. There is no objection to a review. I have met with and worked with CASA regularly over the past year. We are doing what we can to enhance safety. We have worked cooperatively with CASA, however, at no stage did they involve us in this administrative restriction of licensing privileges: it was presented orally to me by a senior CASA officer and I was told it would be published 'in a few days'. The senior CASA manager conceded the proposed restrictions bore no relationship whatsoever to the causes of the accidents. The safety reforms we have worked on at AF, by contrast, are directly aimed at the accidents.

Marjorie Pagani
Chief Executive Officer
Angel Flight Australia

My AF ops were mostly long range remote area patient & carers retrievals or returns. E.g.

Hello Arthur it is [REDACTED] from Tara here i have had an Email from Kelsey as i have an appointment at the PA on August 28 at 11.15am and she tells me that she has had no one volunteered yet an was wondering if you are still doing these flights as you told me the last time that you would be happy to transport me again that was back in June when we had bad weather .

Please see below details for a QLD flight requiring pilot assistance tomorrow.

Tues (25/09) REDFORD STATION/ MITCHELL- ARCHERFIELD (0830hrs) 2pax
->Mission Number 13630

A gentleman is requiring travel assistance to attend chemotherapy that is not available in his hometown. Due to his medical condition, it is becoming exhausting to travel to and from his appointments via road travel and there are no commercial flights in close proximity. The passenger has a well-maintained airstrip in Redford Station that would be the preferred airport for pick up and drop off for flights. Redford Station Airstrip's runway is 1500m- Gravel and the coordinates are as follows: 25° 49' 40.27" S 147° 24' 43.00" E, please note in the comments section if you would like to conduct the flight from Redford Station or Mitchell Airport.

This mission will involve 2 adults (114kg+ 63kg) and overnight bags (15kg)= 192kg

Please note that passenger is immunocompromised

Have spoken to [REDACTED] (owner of Narrandool) strip is as follows

Hard Gravel, use East West strip, 1100mts long.
2 or 3 head cattle in paddock, will check nothing on strip if he knows you will use it.

Lat 29 15 17 3S
Long 147 52 26E

This will bring you across the top of the wind sock.

See you soon

hours return. That equates to 14 fatal accidents per million hours. Happy to be corrected, but pretty sure, using your stats and even DOUBLING the average flight time of the sortie, Angelflights have 3 times the amount of fatal flying accidents per million flying hours. What stats are you using?

█:20pm Dec 20

█ pay your own fuel and landing fees?

I did one flight for them - on a run they could have done by rpt with a change in Sydney or driven in 3hrs, thought they might need the direct flight - nope just don't like airports... complained that the duchess I took was slower than the baron they normally got. Complained that it was bumpy (ifr flight in imc most of the way) didn't even day thanks. That summed up my experience.

As the flight was classed as a private journey, the only claim Mr Twigg could pursue was through the pilot's insurer.

"The insurance policy was worded that if you survived the accident you had a claim, if you were struck by a piece of the aeroplane at the accident site you had a claim, but as a third party there was nothing," he said.

"In the end I got \$40,000. That's all my wife and daughter were worth."

He offered this advice to the family left devastated by the latest Angel Flight crash.

"First thing to do, get in touch with a lawyer and caveat everything of the pilots, everything he owns, so it can't be sold," he said.

"If someone had said that to me I would have said, 'don't be stupid, why would I want to do that?'

"Do it. You can't not think of yourself, you have to think of you, your family, your kids and the future."

10. Angel Flight & CSF Transparency.

There is a considerable body of evidence that Angel Flight stamps it's authority on pilots with sole concern for the organisations public image & small regard to pilot welfare & safety & that of passenger patients/carers? AF statements indicate a closed shop, bubble echo chamber under siege mentality?

10:46am Jan 4

Unfortunately the post of Arthur Palmer contained a crash picture and other comments which have caused distress to some people – hence it was necessary to remove that and all subsequent posts, including those of our CEO, to ensure fair dealing with the thread.

Angel Flight welcomes comments and constructive criticisms, and particularly suggestions on how things might be improved. However, when we receive complaints from members and others to whom the posts have been sent, and those complaints indicate a level of stress has been caused, then we are obliged to act. This is and always has been a very transparent, open and accessible organisation. It will remain so. The post from our pilot at the beginning was (with consent) taken from a CASA submission. We did not write it nor have any input. It is regrettable that former volunteers use this members' forum to attack the organisation. Our pilots and drivers remain our most valued asset. Our policies and procedures are open to all.
Marjorie Pagani Angel Flight CEO

10:53am Jan 4

the crash photo is in every major newspaper in Australia & public domain. You seem to construe asking valid questions as an attack on AF? AF moral high ground should not require false premises.

10:57am Jan 4

Understood, █, not entirely sure how my posts can be seen or read in a manner that causes stress though.

To me, this RPT pilot's opinion, suggesting passengers are not un-informed, thereby shifting some blames onto the passengers, is causing some distress but I don't ask it to be removed though....

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Photo removed for privacy reasons

Photo: Using two step ladder & child stool to load low mobility aged carer assisted by patient (husband). P68.

Photo removed for privacy reasons

████████ all AF long range patient retrieval/ return flights I've done was specifically "picked" due ease of loading low mobility frail sick patients into P68. Always looked at the upcoming AF "schedule" & picked what far west flights were available to do. That is my experience last few years

My view has come around to AF needs to have a complete culture overhaul. To publish self serving anonymous opinions which claim AF are not remote Op's & that there is no pressure on low hour/experienced pilots is the heart of the problem & very possibly the two fatal prangs? Just needs to be openly addressed instead of hiding behind some unknown RPT guru & a toxic culture of bullying & shutting down any debate.

Good afternoon all,

I have had enquiries from pilots asking about the pilot liability and associated issues arising out of incidents or accidents when carrying passengers whose flights have been facilitated by Angel Flight. For those pilots who may not be fully aware of the documents which are executed by passengers prior to Angel Flight coordinating the proposed flight, we have enclosed for your reference all of the current Flight Request Documents (the documents sent both to the health professional referrer (including the medical clearance), and the passenger (including the Passenger Guidelines and Waivers & Release of Liability, both of which must be executed by the passengers or in the case of children, to be signed by the guardian). You may wish to have your legal and/or insurance advisers

peruse these documents. I would be happy to answer any questions you have arising out of these documents. However, they are sent to you for your own information and to seek professional advice if thought necessary, and are not for publication to any other person. It is important that they are kept confidential, so as to give us confidence that all documents we receive are those we have provided to the health professional referrer, and that there is no risk of them coming back directly from a passenger.

Regards,
Marjorie Pagani

11. Night VMC.

Dead leg return flight OK if conducted with daylight take off.
All other night flight, including black windscreen take off into daylight (dawn), to be conducted IFR due susceptibility of private class 4 to somatogrovic illusion.



Author:

Palmer AB. ARN 180143. Owner operator of a number aircraft 1984 – 2016 (P68's IYI,IXC, PFP,IYN, C210 MGE, DHC2 WOG, Pitts S1S-IOO). 2,000hrs NT remote Op's 1978-1999. Year of Outback Senior Consultant 2001-2. Based Qld 1999 - present. Angel Flights P68 & C172.