

## Proposed safety standard - community service flights (CD 18140S)

### Overview

CASA is proposing to introduce a new minimum safety standard for community service flights (CSF). The new standard relates to:

- licensing and medical requirements for pilots
- minimum CSF pilot experience
- a requirement that flights at night be conducted under the instrument flight rules (IFR)
- maintenance-related enhancements consistent with requirements governing similar operations in Australia.

CASA considers that it is appropriate to establish a regulatory baseline that provides clarity regarding an appropriate minimum safety standard. CASA anticipates that most pilots currently conducting CSF will meet the proposed new standards.

There are currently no legislated minimum qualifications or experience requirements for Australian CSF pilots other than the standard requirements for holders of a Private Pilot Licence (PPL). Furthermore, CSFs are not conducted under the safety umbrella of an Air Operator's Certificate (AOC) or necessarily under what may come to be an Approved Self-administering Aviation Organisation ASAO<sup>1</sup>.

The proposed conditions are necessary in an operation where there is no AOC or other structure to support the supervision and oversee the development of new and existing CSF pilots, or to ensure that maintenance standards appropriate to the nature of the operation have been satisfied.

The safety benefits of the standard significantly outweigh the requirements being imposed. These actions are consistent with CASA's regulatory philosophy where air safety is not compromised, and the proposal reflects a proportionate risk-based approach.

### Background

CSFs are non-emergency flights coordinated by registered charitable organisations and conducted for the purpose of transporting people to receive specialist medical treatment. These charitable organisations are not air service providers. CSFs are conducted by volunteer pilots who are solely responsible for the safe conduct of these flights. CSFs can be conducted by day or night, in varying weather conditions, from and to familiar or unfamiliar aerodromes carrying passengers with a variety of medical conditions and needs. CSFs can pose potentially significant challenges for pilots who may have limited flight experience. Many of these flights are carried out in difficult operational situations including marginal visual meteorological conditions (VMC) and night VFR operations.

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<sup>1</sup> Under [Part 149 of the Civil Aviation Safety Regulations 1998](#).

Operations conducted under an AOC are supported by a comprehensive organisational safety system or a formal safety management system (SMS). Operations in the CSF sector are not required to have any equivalent processes, procedures or risk defences. CASA currently does not have assurance that the CSF sector has consistent processes in place to ensure that pilots who satisfy initial entry requirements into the organisation continue to satisfy the requirements for undertaking CSF operations.

This lack of safety risk mitigators and the reliance on individual pilot assessments regarding mission acceptance, commencement or continuance, results in an increased need for pilots in command to have appropriate and recent flight time experience, and to be well versed in in-flight management, human factors and threat-and-error management skills. People piloting aircraft on CSF are potentially subject to operational risks of the kind to which pilots of charter flights are exposed. These risks are exacerbated in the CSF environment.

CASA is committed to supporting CSFs to maintain public confidence through improved safety. We acknowledge the work being done by CSF organisations to improve pilot and safety education and we are committed to continuing to work collaboratively on these important initiatives.

While some actions have been undertaken by the sector, CASA considers it appropriate to establish a regulatory baseline that provides clarity regarding a minimum safety standard.

## **Previous consultation**

In 2014 CASA sought comment on safety standards for CSF operations via a discussion paper. The responses to the discussion paper indicated a significant lack of support for any regulatory intervention. In response to the feedback on the 2014 paper CASA decided not to take any immediate action, although CASA indicated it would monitor the sector and take action in the future if necessary.

## **Now**

CASA has also engaged with the relevant charitable organisations to encourage the sector to improve safety themselves. While some actions have been undertaken by the sector, particularly in the area of safety education, CASA considers that it is appropriate to establish a regulatory baseline to provide a minimum safety standard.

## **What Happens Next**

At the end of the response period for public comment we will review each comment and submission received through the online response form. We will make all submissions publicly available on the CASA website unless a respondent requests that their submission remain confidential. Information about how we consult and how to make a confidential submission is available on the CASA website.

When the responses to the consultation, for which consent to publish has been granted, are published we will also publish a summary of consultation (SOC).

The SOC will summarise feedback received, describe any intended changes and detail our plans for the proposed standards.

## **Why we are consulting**

You will be asked to comment on the proposed requirements. These requirements are contained in the Summary of Proposed Change (SPC) attached in the 'Related' section at the bottom of this page.

## **Using an iPad**

If you are using an iPad to complete the survey, you will be asked to 'download the relevant PDF'. Depending on the software you have on your iPad you may need to download the free viewer to review the single document PDF files. Where a file is a 'multi-file or portfolio PDF you will need to source the Adobe free view - available from iTunes. More information on the 'how to' is available below in 'related' section below.

## Consultation Contents

This consultation asks for your feedback on the proposal which introduces minimum standards of experience and qualifications for community service flight pilots.

We will ask you for:

**personal information**, such as your name, any organisation you represent, and your email address

**your consent to publish** your submission

**your responses** to the proposed regulations

basic demographic information.

Our **website** <<https://www.casa.gov.au/rules-and-regulations/landing-page/consultation-process>> contains more information on making a submission and what we do with your feedback.

When you have completed the consultation, click the **'Finish'** button at the bottom right of this page.

## Personal information

First name  
(Required)

Last name  
(Required)

Email address

*If you enter your email address then you will automatically receive an acknowledgement email when you submit your response.*

Email

Do your views officially represent those of an organisation?  
(Required)

*Please select only one item*

- Yes
- No

If yes, please specify the name of the organisation.

Where do you operate from?

Please enter your postcode below.

Who are you?

*Required*

*Please select only one item*

- Pilot (has flown community service flights)
- Pilot (has not flown community service flight)
- Licensed aircraft maintenance engineer/aircraft maintenance engineer
- User of community service flights
- Healthcare professional
- Other (please specify).

Other

## Consent to publish your submission

To promote debate and transparency we intend to publish all responses to this consultation. This may include both detailed responses/submissions in full and aggregated data drawn from the responses received.

Where you consent to publication we will include:

- your name, if the submission is made by you as an individual, or the name of the organisation on whose behalf the submission has been made
- your responses and comments

We will not include any other personal or demographic information in a published response.

Information about how we consult and how to make a confidential submission is available on the **CASA website** <https://www.casa.gov.au/rules-and-regulations/landing-page/consultation-process>

Do you give permission for your response to be published?  
(Required)

*Please select only one item*

- Yes - I give permission for my response/submission to be published.
- No - I would like my response/submission to remain confidential but understand that de-identified aggregate data may be published.
- I am a CASA officer.

## **Introduction of proposed safety standard – community service flights**

The proposal introduces minimum CSF pilot experience, licensing and medical requirements, requirement of flights at night to be conducted using instrument procedures instead of visual procedures and requires slightly enhanced aircraft maintenance requirements, in line with other operations within Australia involving similar participants.

We recommend you read the Summary of Proposed Change (SPC) to fully understand the changes. You will find a link to this document on the overview page.

Please provide feedback below. You may enter as little or as much information as you wish.