



Australian Government
Civil Aviation Safety Authority

SUMMARY OF CONSULTATION



Community service flights instrument consultation



Date: March 2022

Contents

Overview	3
Introduction	4
Respondent overview	5
Response analysis	7
Response themes	7
Theme - Is CSF like 'any other [recreational] private aircraft flight'?	8
Theme - Should CASA regulate CSF?	8
Topic Area 1 – General requirements	9
Passenger type	9
No restriction on kind of passengers	10
Carriage of another pilot	10
Topic Area 2 – Excluded Aircraft	11
Topic Area 3 – Aeronautical experience	12
Recency (landing in prior 30 days)	12
Effect on CSF experience	12
Effect on safety	13
Drafting	13
Additional experience for PPL holders	13
Topic Area 4 – Operational and notification requirements	15
Topic area 5 – Maintenance requirements	17
The Requirements	17
What is the effect on CSF operations?	18
Topic area 6 – CSF landscape	19
Future direction	20
Appendix A Methodology	21
Appendix B Data summary	25

Overview

The main object of the Civil Aviation Act 1988 is to establish a regulatory framework for maintaining, enhancing and promoting the safety of civil aviation, with particular emphasis on preventing accidents and incidents. Subject to the primacy of safety, CASA must consider the economic and cost impact on individuals, businesses and the community, and take into account the differing risks associated with different industry sectors when developing and promulgating aviation safety standards.

Community Service Flights (CSFs) are non-emergency flights coordinated, arranged or facilitated by an entity for charitable or community service purposes involving the transport of people to receive medical treatment or services. These entities are not air service providers, and CSFs are conducted by volunteer pilots who are individually responsible for the safe conduct of these flights. CSFs can be conducted in varying weather conditions, to and from familiar and unfamiliar aerodromes carrying passengers with a variety of medical conditions and needs.

In 2019 CASA introduced new requirements that apply to pilots conducting CSFs to ensure an appropriate level of safety for the people who use these flights. These requirements are in the *Civil Aviation (Community Service Flights – Conditions on Flight Crew Licences) Instrument 2019 (the 'CSF Instrument')*.

The CSF Instrument expires on 18 March 2022. Prior to determining the ongoing requirements for CSF flights, CASA sought feedback on the instrument from CSF pilots, organisations, and other participants. In particular, we sought data and specific examples of how the CSF Instrument has affected CSF operations (positively or negatively), including any cost-related effects.

Introduction

This consultation was conducted between 17 November and 15 December 2021, with the primary aim to elicit feedback about the effects of the CSF Instrument and any changes to the CSF landscape over the last three years.

CASA used its online Consultation Hub to gather data and specific examples for each of the five topic areas of the CSF Instrument (CSF Instrument sections 7-11), and of changes to the CSF landscape more generally. Respondents had the opportunity to voice their concerns with free-text boxes, to raise related issues and offer their suggestions and opinions regarding their CSF experiences.

Decisions on public policy matters are not decided based solely on raw quantitative results, but instead on a considered evaluation of the feedback in the context of other data and information sources. This consultation focused primarily on the experiences of pilots who had conducted CSF, and respondent demographics reflected this approach. The information obtained in this consultation should be understood on that basis, recognizing that the views of all affected parties were not canvassed.

No restrictions applied to the free-text section. Respondents had the opportunity to voice their views at a general or specific level. Details on the methodology are provided at Appendix A.

Respondent overview

CASA received 67 responses through the Consultation Hub. Respondents were predominantly pilots who have conducted CSF flights. Eight 'other' responses were received, including from a CSF organisation, and from a prior user of CSF services.

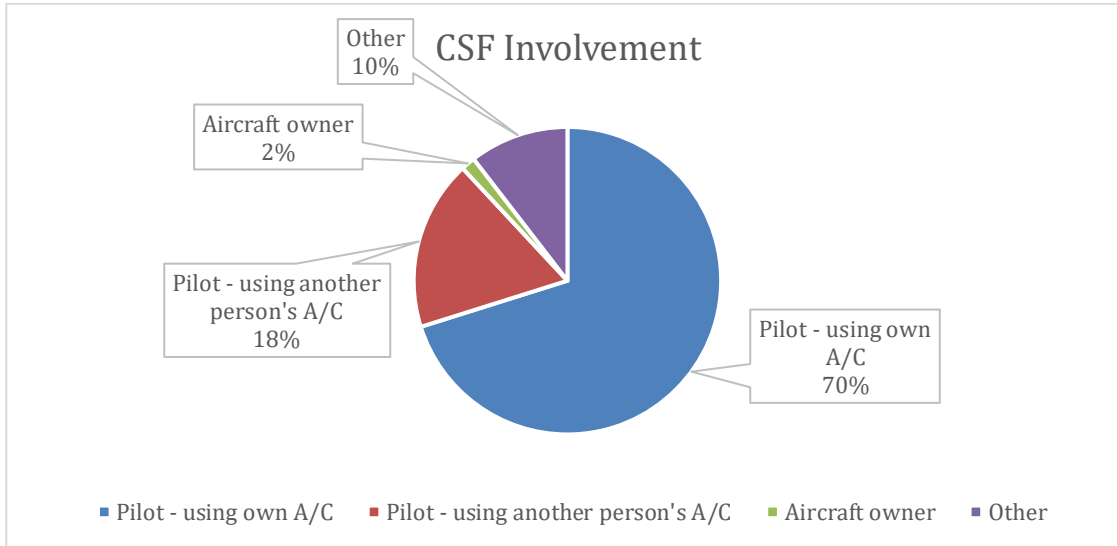


Chart 1 – CSF Involvement

Pilot respondents were asked to provide additional detail relating to the highest flight crew licence held, their CSF experience, and their recent involvement in CSFs. From that information, we found that:

- 57% of pilot respondents held a PPL as their highest licence
- 76% of pilot respondents had conducted a CSF within the last 3 years
- 90% of pilot respondents were based in New South Wales, Queensland, or Victoria. Each of these States was approximately evenly represented

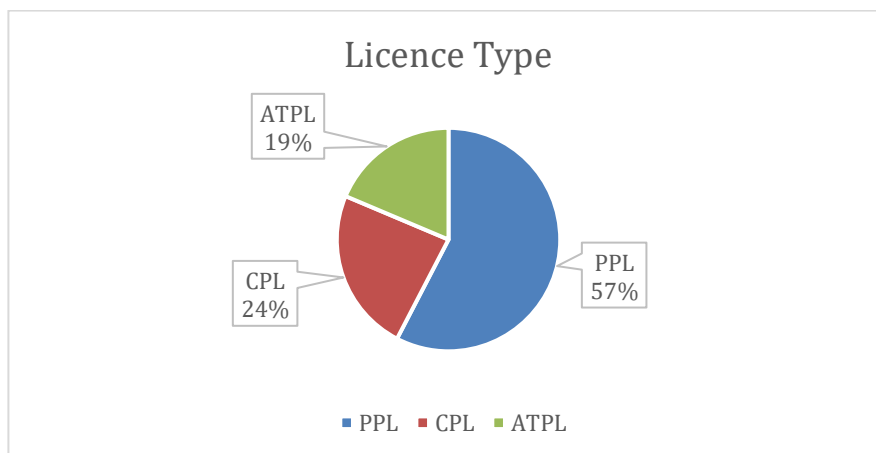


Chart 2 – Highest flight crew licence type held

SUMMARY OF CONSULTATION ON
COMMUNITY SERVICE FLIGHTS INSTRUMENT CONSULTATION

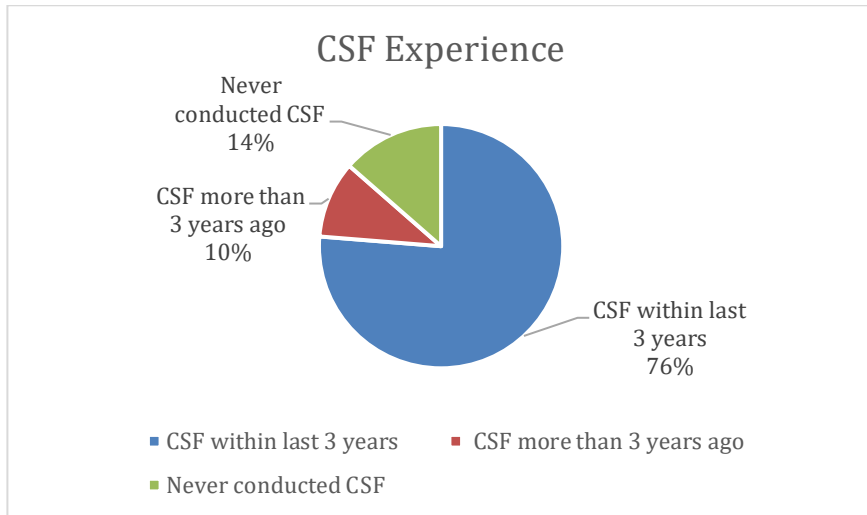


Chart 3 – CSF Experience

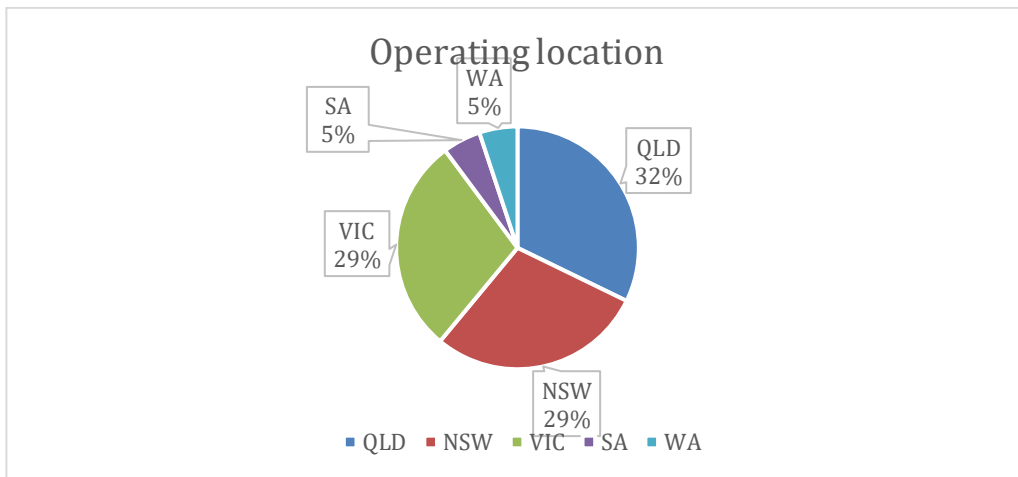


Chart 4 – Operating location

CASA data analysis revealed that most CSF operations had been conducted in New South Wales, South-East Queensland, Victoria and South Australia. It is thought that responses were received from a variety of operating locations in these areas.

Response analysis

Further information on the methodology applied to the questionnaire and analysis is available in Appendix A.

All submissions were reviewed and analysed. Both quantitative and qualitative analyses were conducted. While a quantitative analysis has been performed, it is important to note that most responses provided the opinion of the respondent but did not include any operational data or specific examples to support the position or contention.

Some sections of the CSF Instrument contain multiple requirements. Respondents may agree or disagree with all items within the topic area, have differing views on each requirement, or may comment on only one. In some cases, respondents made comment or suggestion related to the topic area, but which was not directly attributable to an existing provision. To produce a quantitative summary, responses were tagged:

- **Agree** with the provision
- **Oppose** the provision
- Would **modify** the provision
- Made comment that was **not pertinent** to the topic area

Responses that agreed with or opposed all provisions in a topic area were separated from those that addressed a particular provision.

Key to understanding the received information is to remember that, by quantifying the data, some richness of meaning is lost. Because the purpose of this consultation was to understand the effect of the instrument on CSF operations, and changes to the CSF landscape more generally, a qualitative understanding of responses is of particular significance. However, as noted above, responses generally provided little data and few specific examples.

To allow the reader an insight into some of the nuances and depth of meaning behind each category, examples of feedback have been included in the results. Feedback is attributed to the respondents via anonymous ID labels as an additional level of information. The quotes are 'examples only' to show samples of what was considered.

Response themes

In addition to analysing responses in relation to specific topic areas, responses were considered holistically to discover any overarching theme. In some cases, responses indicated that the respondent held a particular overall view that guided the response. This provides further information to assist analysis.

For example, strongly opposing views were found in a range of matters, including of CSFs and pilots themselves.

I wish to express my support for Angel Flight. Having personally conducted numerous Angel Flights, I have seen first hand the positive impact this charity has on families in rural communities. (ANON-JTM4-WD4G-N)

Good tax right off and inexpensive currency for the wealthy private pilots or wealthy companies gaining subsidised operations whilst exhibiting under par procedures, telephony and knowledge of the rules! (ANON-JTM4-WD5P-Y)

Theme - Is CSF like ‘any other [recreational] private aircraft flight’?

A key overarching theme was whether CSF operations are like ‘any other [recreational] private aircraft flight’, with diverging views expressed.

Still hard to understand why CASA treats these flights differently from any other private aircraft flight undertaken in Australia every day of the year. (ANON-JTM4-WD5Q-Z)

CSF is a good thing but it is more than just a “private” flight. Its correct for CASA to set some compliance standards in this sector (ANON-JTM4-WD57-6)

Respondents who submitted that a CSF is like ‘any other private flight’ generally objected to provisions of the Instrument.

A follow-on to this theme were some respondents who submitted that operations should be conducted under the IFR, or by instrument rated pilots.

Based on my experience I therefore strongly suggest that such pilots be instrument rated. I would never carry out an Angel flight under the VFR : too risky. ... Private VFR pilots can be easily influenced by the situation to complete as mission as the operating environment worsens, and have too few tools to resist this. These pressures are greater than on most private VFR flights. It may be self-serving, but I think these tools are available to commercial pilots (who mostly operate under commercial pressures within stricter rules) and IFR-trained pilots (by the nature of the complexities of IFR flight planning). (ANON-JTM4-WD45-3).

Theme - Should CASA regulate CSF?

Another overarching theme was whether CASA should regulate CSF, or whether it should be left to CSF organisations to set their own standards.

Some respondents objected to CASA establishing higher minimum standards for CSF generally, while others objected to CASA stipulating requirements even where these were equivalent to ‘existing’ practices of CSF organisations. In some cases responses equated CSF with a specific organisation, despite the instrument applying to all CSF organisations (present and future).

This regulation has no purpose as CSF’s don’t use these excluded aircraft. (ANON-JTM4-WD5B-H)

The NVFR restriction is irrelevant because night flights have been prohibited by Angel Flight since well before March, 2019. (ANON-JTM4-WD52-1)

Other responses expressly or impliedly accepted CASA’s regulation of CSF, but not necessarily individual provisions.

They represent to myself personally a good set of general requirements (ANON-JTM4-WD4V-4)

CSF is a good thing but it is more than just a “private” flight. Its correct for CASA to set some compliance standards in this sector (ANON-JTM4-WD57-6)

Topic Area 1 – General requirements

Section 7 of the CSF Instrument places four general requirements on flight crew licence holders.

40 pertinent text responses to this section were received:

- 11 responses agreed with all general requirements
- 4 responses opposed all general requirements

In addition, 25 responses addressed one or more (but not all) individual provisions. When considering overall numerical support for a provision, it is necessary to combine both the general and individual positions. For example, in ‘Passenger type’ below, 14 respondents supported the provision, and 23 opposed.

All general requirements			
11 agree all		4 oppose all	
Individual provisions			
	Agree	Modify	Oppose
Licence type	0	0	0
Aircraft type	0	0	0
Passenger type	3	2	19
Medical	0	1	0

Passenger type

The CSF Instrument requires that only the patient, a person accompanying a patient to provide support and assistance, and the operating crew can be carried.

24 specific responses addressed this provision. The descriptive responses fell into three general areas:

- a. There should be no restriction on the kind of passengers carried
 The pilot should be allowed to carry other pax to assist them in their duties and performance. To specifically disallow this degrades safety. (ANON-JTM4-WD1U-Z)
- b. Another pilot should be permitted
 It would be good to broaden definition of operating crew to allow other licenced pilots to join in on CSF operations. I know a number of licenced pilots who would like to assist on flights but don't have sufficient hours to carry out flights independently. This would enable them to participate in CSF operations, whilst not adding any risk to the operation. (ANON-JTM4-WD4G-N)
- c. No other persons should be carried
 Aircraft safety is the responsibility of the pilot and their co-pilot. I believe only personnel that are medically qualified should accompany the passenger. (ANON-JTM4-WD5P-Y)

No restriction on kind of passengers

Responses in the first category were argued on two bases; first that as a private flight no additional restrictions should apply, and second that carrying another person would improve safety by providing general 'company and assistance', or by reducing PIC distraction and workload by assisting with the boarding, in-flight comfort and deplaning of the passenger.

One respondent observed

Often older and or less agile patients are picked up dropped off at regional and remote airstrips, assistance in boarding the patient is required and usually not available. This can make the process challenging for the pilot and uncomfortable both physically and emotionally for the patient.

With respect to inflight management, if a patient is uncomfortable during the flight, this has the potential to distract the pilot from the aircraft management tasks, the ability to carry an additional passenger to assist in the inflight patient care and comfort [would lower workload] (ANON-JTM4-WD5Z-9)

No responses addressed other operational considerations of having additional passengers on board, including on weight and balance and aircraft performance.

Carriage of another pilot

Responses in the second category generally contend that having another pilot on board will increase safety. Current [guidance](#) explains that for a person to be considered operating crew, as permitted by the CSF Instrument, they 'must have duties assigned by the pilot-in-command in relation to the safety or flying of the aircraft,' and that 'the decision on whether the carriage of operating crew ... is considered necessary to provide the required support is up to the PIC.'

CASA has previously indicated that another pilot carried on a CSF as part of a 'mentoring' program could be regarded as a member of the operating crew, as that term was previously defined in the Civil Aviation Regulations. Some respondents requested that this be clarified, and some responses showed that this provision was misunderstood.

Following commencement of the Flight Operations Regulations, the CAR definition of 'operating crew' has been repealed. In the absence of that definition, and with a view to clarifying the matter, the role and functions of persons carried on a CSF for purposes demonstrably and directly related to the safe conduct of the flight or future CSFs will be specified in the instrument.

Topic Area 2 – Excluded Aircraft

Section 8 of the CSF Instrument excludes certain aircraft from use in CSF operations.

23 pertinent text responses to this section were received:

- 17 responses agreed with the excluded aircraft requirements
- 3 respondents would modify the requirements
- 3 responses opposed the requirements

	Agree	Modify	Oppose
Excluded Aircraft Requirements	17	3	3

Two of the three respondents who opposed the provision believed that the section is unnecessary and does not improve safety [as certain experimental aircraft are safe]. One respondent also believed the provision is a restriction on the 'intent and ability' of CSF operators.

A CSF organisation submits that this provision is not required as they (and the other current CSF organisation) do not use these aircraft types (with the implication that the substance of the restriction is appropriate).

Topic Area 3 – Aeronautical experience

Section 9 of the CSF Instrument places five aeronautical experience requirements on flight crew licence holders.

43 pertinent text responses to this section were received:

- 8 responses agreed with all general requirements
- 14 responses opposed all general requirements

In addition, 21 responses were received which addressed one or more (but not all) individual provisions. Respondents who would ‘modify’ the PPL additional hours requirement generally discussed removing the 400hrs total experience while retaining the 250hrs as pilot in command.

All general requirements			
8 agree all		14 oppose all	
Individual provisions			
	Agree	Modify	Oppose
Landing in prior 30 days	2	2	9
VFR/IFR Time on type	2	0	1
25hrs M/E	1	1	2
PPL Additional Hours	2	7	5

Recency (landing in prior 30 days)

Effect on CSF experience

Two respondents directly addressed the effect of this provision on the CSF experience for pilots. A CSF organisation submitted:

The landing [recency] requirement is both expensive and unnecessary. Pilots must travel to often distant (large city or remote country) airfields to ‘practice’ a takeoff and landing 40 (sic) days PRIOR to [a] CSF.

Conversely, another respondent submitted:

The landing recency requirement is so easy to comply with that I fail to see the supposed problem that it addresses (ANON-JTM4-WD3C-G)

In both cases, it was asserted that the landing requirement was unnecessary for safety.

The CSF organisation’s concern with the expense and cost appears to be primarily (but not solely) based on a further assertion about the drafting of the provision, which is discussed further below.

Effect on safety

There were a variety of views expressed regarding the effect on safety achieved by the recency requirement. Some respondents asserted there was no safety benefit achieved, while others saw the requirements as appropriate.

There is no evidence to support the increased landing or flight recency a would improve safety outcomes. (ANON-JTM4-WD5Z-9)

Recency requirement is reasonable and important for safety. (ANON-JTM4-WD4M-U)

Other respondents highlighted the difference in recency for passenger carriage between CSF (1 landing in 30 days) and commercial operations (3 take-offs and landings in 90 days), in some cases implying the latter would be a more appropriate requirement.

However, other respondents sought increases in recency expectations. For example, one respondent suggested recency be set to 15 days, while another recommended increasing to 3 take-offs and landings in the last 30 days.

An alternative submission was to increase recency requirement in place of minimum pilot experience.

It would be more appropriate ... to reduce [pilot minimum experience] limits by 50%, but increase the recency requirement (to say 10 hours flown on the aircraft type in the last 60 days), and thereby allow more private pilots to conduct CSF. (ANON-JTM4-WD3M-T).

Drafting

A CSF organisation and one other respondent indicated concern about the drafting of this provision, and in CASA's interpretation.

I am aware of the CASA advice that a circuit or a positioning flight on the day of a CSF would be sufficient but I am conscious of the wording in the instrument that the requirement is for "the previous 30 days" and I am unwilling to accept the risk that my insurer and/or a court of law would interpret that to include the day of the flight. (ANON-JTM4-WD52-1)

As noted by these respondents, CASA has [published guidance](#) that a landing on the same day as the CSF, but prior to the CSF operation, meets this requirement. This interpretation is consistent with other similarly drafted recency requirements within the Civil Aviation Safety Regulations.

Nevertheless, CASA will revise the drafting of this provision to ensure the policy intent (as per published guidance) is clearly expressed in the instrument.

Additional experience for PPL holders

The CSF Instrument places additional experience requirements on pilots who hold a PPL as their highest licence. A PPL holder must have a minimum of 400hrs of flight time as a pilot, and 250hrs as pilot in command, to conduct as CSF flight. 14 respondents addressed this point directly. Respondents who disagreed with the CSF Instrument requirement generally contended that:

SUMMARY OF CONSULTATION ON
COMMUNITY SERVICE FLIGHTS INSTRUMENT CONSULTATION

- no additional requirements above the PPL minimum should apply, or
- the 250hrs PIC should apply to PPL holders, but not the 400 hours flight time, or
- the 250hrs PIC should apply to all pilots conducting CSF regardless of licence type

Some responses in the second and third categories referred to Angel Flight's policy of requiring 250hrs PIC for all pilots.

Angel Flight requires a minimum of 250 hours PIC which is a more relevant requirement than the 400 hours total time stipulated in the instrument. (ANON-JTM4-WD1V-1)

A response in the third category was a strong submission by a CSF organisation that 250hrs PIC should apply to all pilots conducting CSF, not just PPL holders.

Further, the minimisation of the command time in the Instrument for CPLs is a safety concern. The CPL can achieve the licence with only 70 hours command time: that is grossly insufficient. [The organisation's] experience with min command time CPLs has been unsatisfactory, leading to a resumption of [the organisation's] former requirement of 250 hours as PIC for all pilots.

It is not clear upon which precise premise this submission is based, and no data or specific examples (such as incident reports, passenger feedback) are provided.

One respondent highlights the difficulty with hours-based requirements

Most CSF's are conducted by older pilots. Frankly, older more wealthy pilots are the only ones that can [afford] the time and cost of flying a CSF. So, once again these restrictions are pretty much meaningless and completely misguided as a safety measure. I challenge the assumption that a 21 year old freshly minted CPL with maybe 150 hours is less safe than a (say) 20 year experienced pilot with maybe 1,000 hours. (ANON-JTM4-WD4T-2)

CASA intends to review the CSF Instrument considering the submission that newly qualified CPL holders do not have sufficient experience to conduct CSF. We also note that the CSF Instrument imposes minimum requirements, and CSF organisations are encouraged to apply additional requirements for flights coordinated by them where they see an opportunity for safety benefit.

Topic Area 4 – Operational and notification requirements

Section 10 of the CSF Instrument places four general requirements on flight crew licence holders.

38 pertinent text responses to this section were received:

- 11 responses agreed with all general requirements
- 3 responses opposed all general requirements

In addition, 24 responses were received which addressed one or more (but not all) individual provisions.

All operational and notification requirements			
11 agree all		3 oppose all	
Individual provisions			
	Agree	Modify	Oppose
Passenger numbers	1	0	9
No night VFR	5	0	3
Flight notification / RMK	3	0	12
Logbook	0	0	13

Many responses suggested that ‘RMK/CSF’ did not add to flight safety.

It is not clear why adding “RMK/CSF” to a flight notification will enhance safety. This seems to be a requirement for the sake of a requirement – does it provide an added layer of safety? (ANON-JTM4-WD4N-V)

The requirement to annotate a flight as a ‘CSF’ is not to address safety on that specific flight. Rather, this allows CASA to obtain detailed CSF activity data beyond that otherwise available to monitor and appropriately respond to changes within the sector, with a view to better ensuring the safety of these operations.

Some respondents indicated a preference for all positioning flights to also be considered as ‘CSF’. One response highlighted difficulty using certain flight notification software that limits the ability to differentiate between CSF and positioning legs.

A CSF should include the return flight even if no patient on board (ANON-JTM4-WD5U-4)

SUMMARY OF CONSULTATION ON
COMMUNITY SERVICE FLIGHTS INSTRUMENT CONSULTATION

Other responses indicated a misunderstanding about the intent and applicability of the instrument.

This shows how ridiculous this instrument is, if the only official leg in a mission of a CSF flight is when you have a patient on board, how do you get to pick the patient up and how do you get home again without it being the same mission??? (ANON-JTM4-WD5B-H)

Finally, some respondents contended that all CSF should be conducted under the IFR.

Topic area 5 – Maintenance requirements

The CSF Instrument details modified maintenance requirements for certain aircraft conducting CSF flights. Despite the complex drafting of this provision, it only applies to aircraft that are:

- a. maintained to the CASA maintenance schedule (known as Schedule 5)

and only affects operators where:

- b. the aircraft is used for more than 100 hours per year, and
- c. the aircraft is not used for other operations requiring 100-hour inspections.

In total 26 pertinent text responses were received:

- 11 agreed with the current requirement
- 14 opposed the requirement
- 1 indicated to amend the requirement (primarily related to drafting)

Individual provisions			
	Agree	Modify	Oppose
100 Hour requirement	11	1	14

Responses that agreed with the current requirement were generally brief.

I have no problems with this as I see my maintenance for safety just as important for myself and my family as for all CSF passengers. (ANON-JTM4-WD39-6)

An additional comment was provided in a different topic area (and is not included in the numbers above)

Aircraft that engage in regular CSF operations, should have a higher standard of periodic maintenance (ANON-JTM4-WD4F-M)

Responses that opposed the requirement included both simple and detailed comment. Detailed responses are considered below.

The Requirements

Some responses indicated a misunderstanding of the maintenance requirements for CSF flights, and for private flights more broadly. To avoid confusion relating to this analysis, the requirements are discussed here.

Schedule 5 requires that prior to flight:

- a. all aircraft must have undergone a periodic inspection within the last year, and
- b. aircraft other than 'private aircraft' (i.e., aircraft conducting aerial work, air transport etc.) must have also undergone a periodic inspection within the last 100 hours.

As the first (yearly) requirement applies to all aircraft maintained to schedule 5, in practice the

CSF Instrument requires CSF flights to also comply with the '100-hour' requirement. The CSF guidance explains:

- a. If the CSF aircraft is maintained according to Schedule 5, it must have undergone a periodic inspection within the previous 100 hours flight time or 12 months since the last inspection (whichever occurs first)
- b. If the aircraft was issued its current certificate of airworthiness less than 12 months before the flight a CSF may be conducted in the aircraft if it has been in service for less than 100 hours since the certificate was issued
- c. If the aircraft is maintained in accordance with another approved schedule of maintenance or an approved system of maintenance in accordance with the Civil Aviation Regulations, the aircraft can be used for a CSF provided the requirements of that schedule are met

The effect of the CSF Instrument (i.e., between private non-CSF operations and CSF operations) is in the '100-hour' requirement, and responses address this point.

What is the effect on CSF operations?

Respondents indicated that the 100-hour requirement had varying effects on their CSF experience. A small number of respondents attempted to quantify the effect on their operations, noting reduction (or limitation) of their participation, increased cost to participate, or a combination of both.

Examples include:

I use my aircraft around 300 hrs per year with approximately two thirds of that on CSF flights. To impose an obligatory full annual inspection every few months after each 100hrs is cost prohibitive and I cannot perform CSF flights after around 4 Months of use flying following each annual inspection. A commercial maintenance regime will [cause] many pilots to abandon CSF flights due to the increased costs. (ANON-JTM4-WD5U-4)

In 2.5 years ... I have incurred an estimated \$3,500 in additional maintenance costs to meet the CSF requirement. I am certain that, if the demand for CSF services had not been dramatically reduced by various COVID restrictions, the additional cost would have been in the vicinity of \$7,000. (ANON-JTM4-WD52-1)

A CSF organisation submitted:

'The cost is prohibitive to most pilots and owners – and averages \$6000 pa in our experience'.

It is not clear if this average represents the total annual maintenance cost for CSF pilots/aircraft owners, or an average increase due to the 100-hour requirement. Without further information about the specific group considered it is difficult to address this observation further.

Two respondents believed that the 100-hour requirement would decrease overall CSF safety by discouraging pilots who fly more than 100 hours per year from participating. A CSF operator commented:

The other negative impact is the loss of very experienced and current pilots (doing greater than 100 hours pa) in favour of pilots with less current experience.

Topic area 6 – CSF landscape

The final question on the CSF Consultation asked respondents to comment on the CSF landscape generally, including changes in demand, frequency of flights, departure and destination aerodromes, aircraft type used, flight rules used, type of patient/passenger, and the effect of COVID-19 on CSF operations. Respondents were asked to provide data or specific examples where possible. It should be noted that the respondent demographic limited responses to the CSF landscape as experienced by pilots and CSF organisations, and not the experience from the CSF patient/user perspective.

A wide variety of responses were received in this section, with many submissions making statements and providing examples about the value of CSF.

It is my experience that the community Angel Flight serves is very small. However, the benefits from the Angel Flight service to that community have an impact which Australian aviation should cherish, preserve and build upon. The significance of providing safe, comfortable, swift and reliable transport on a regular basis for chronically ill people – the majority are aged and from isolated communities – should not be underestimated by CASA. Undoubtedly, the benefits are similar to the “multiplier effect” in economics i.e. the decrease in burden due to isolation also spreads to the families/friends of the passenger. I am not aware of this service being provided in any other way or by any other organisation. (ANON-JTM4-WD3E-J)

Some respondents submitted comment about CASA, and about other topics generally.

I have flown almost 300 CSF flights for Angelflight and the only issue I have ever had due to unfamiliar airfields is trying to get out to the passengers thanks to the pointless security gates impose on all airports that add nothing to security except inconvenience (ANON-JTM4-WD5U-4)

Greatest threat to the safety of operation is the high degree of inaccuracy with en-route and destination weather forecasts. (ANON-JTM4-WD5Y-8)

Of the smaller number of respondents who addressed the volume and type of CSF, most noted a reduction in demand during the COVID-19 period. No data were supplied.

The only significant change in the CSF landscape since March 2019 has been the COVID pandemic which has prevented many people from seeking much needed medical attention, so the demand for flights has been lower. However, among the many CSF pilots I know, the departure and destination aerodromes, aircraft types used, flight rules used, weather conditions encountered, and types of passengers have not changed. (ANON-JTM4-WD52-1)

Other respondents provided detailed commentary about CSFs relating to IFR flight, CASA engagement with the community, opportunities for improvement, and about the pilots who conduct CSF. These responses were all considered as part of the CSF Instrument review.

Future direction

CASA will amend the existing CSF Instrument based on community feedback and other data and information sources. CASA anticipates that the registration of the amending instrument will occur in early March 2022.

Appendix A

Methodology

Respondents were asked to complete an online questionnaire and provide free-text feedback on the CSF Instrument. Individual free-text fields were provided for the five topic areas of the CSF instrument, and a further free-text field for a general question regarding the CSF landscape.

No restrictions were applied to the free-text section. Respondents had the opportunity to voice their views at a general or specific level.

All submissions were reviewed and analysed. Both quantitative and qualitative analyses were applied to the data to measure engagement and levels of support.

A.1 Content analysis

Each submission was systematically evaluated and coded to determine the key issues and themes expressed in the responses.

It is important to remember that the purpose of this consultation was to understand the effect of the instrument on CSF operations, and changes to the CSF landscape more generally, prior to determining the ongoing requirements for CSF flights. To this end, a qualitative understanding of responses is of particular significance.

While a quantitative analysis has also been performed, the key to understanding the received information is to remember that, by quantifying the data, some richness of meaning is lost. To allow the reader an insight into some of the nuances and depth of meaning behind each category, examples of feedback have been included in the results. Feedback is attributed to the respondents via anonymous ID labels as an additional level of information. The quotes are 'examples only' to show samples of what was considered.

A.2 Explaining the codes and categories

Categorisation measured the level of support for the existing provisions within the CSF Instrument. The responses were grouped according to both overt statements of support or opposition, and by analysing the tone or related comments in the response. Responses were considered in four primary categories – agreement, modification, opposition, and those that either expressed no discoverable opinion, or provided a comment not pertinent to the question. In addition, responses which demonstrated a misunderstanding of the CSF Instrument or other regulatory requirement were identified.

Occasionally, responses were made covering multiple topics, or in a text box other than that allocated for the topic area. These responses were not included in the numerical data for the relevant question but were considered during qualitative analysis.

A.3 Those who agree with the requirement

Responses included in this category were identified by the following characteristics:

- A direct statement of support
- Suggestions that fully aligned with the existing requirements
- No repudiation of the requirement

Examples of feedback:

I agree with this condition (ANON-JTM4-WD38-5)

No, these requirements seem relevant and sensible (ANON-JTM4-WD57-6)

A.4 Those who would modify the requirement

Responses included in this category were identified by the following characteristics:

- A statement that an alternative requirement should be in place
- A proposal of an alternative requirement

Responses may suggest increasing, reducing, or changing to an equivalent regulatory requirement.

Examples of feedback:

I believe it is important to have as much flight training as possible for these situations. Perhaps a landing within 15 days could be implemented. (ANON-JTM4-WD5P-Y)

A.5 Those who oppose requirement

Responses included in this category clearly stated opposition to the requirement.

Responses included in this category were identified by the following characteristics:

- A statement rejecting the requirement
- A statement that the requirement should not be above that for private operations.
- A general statement that CSF is equivalent to private operations.

Some respondents made a general statement that CSF is equivalent to private operations in one text box and left some (or all) other boxes blank. For quantitative analysis, the comment was included as opposition for the question in which it appeared.

Examples of feedback:

[N]ot sure why additional requirement for the CSF, why is this any different from any other passenger? (ANON-JTM4-WD3G-M)

Any maintenance requirements should be the same as applied to GA. (ANON-JTM4-WD3S-Z)

During *qualitative* analysis, consideration was given whether a response which equated CSF and other private operations was intended to oppose all requirements within the instrument.

These experience requirements should be the same as they are for all general aviation. Doing a CSF is no different to any other GA flight. You fly in conditions that you are licenced/experienced to fly in with passengers. (ANON-JTM4-WD3S-Z)

A.6 Nil pertinent comment

Responses included in this category were identified by the following characteristics:

- A statement indicating no comment
- A statement that could not be identified as agreeing to, suggesting modification to, or opposing the requirement

A text box with no input was not counted as a response to that question.

Examples of feedback:

NO (ANON-JTM4-WD49-7)

Schedule 5 (ANON-JTM4-WD4J-R)

A.7 Misunderstanding of the CSF Instrument or other requirement

Some responses demonstrated a misunderstanding of the instrument, or another aviation requirement. This misunderstanding may include where the respondent makes a statement that may be correct for their operation but is incorrect for other CSF participants. Where such misunderstanding was identified, the topic was noted to inform potential future educational material. Responses demonstrating misunderstanding were nevertheless included in the analysis.

Examples of feedback:

The pilot cannot provide medical assistance whilst piloting the aircraft so why do you require medical certificates???????????? (ANON-JTM4-WD49-7)

This is no different from any other flight 12m/100hr is required anyway. A CSF instrument is not needed to establish this. (ANON-JTM4-WD4H-P)

Why? How can a IFR flight at night not include a VFR NGT component. It seems you don't understand the existing regulations. (ANON-JTM4-WD1U-Z)

A.8 Strong opinions about regulation and CASA

Some responses gave strong opinion about regulation, and CASA generally. Where appropriate, these responses were considered as opposition to a requirement.

Examples of feedback:

These are private flights i.e. non commercial, so all that should be required is a valid private pilot's licence or better. Your over regulation of everything is what is killing the light aircraft community. (ANON-JTM4-WD51-Z)

You are killing this community service. Yes I'm sure the flights numbers of a/c have been decreasing due to the increased regulations. (ANON-JTM4-WD3A-E)

Appendix B

Data summary

SUMMARY OF CONSULTATION ON
COMMUNITY SERVICE FLIGHTS INSTRUMENT CONSULTATION

	Section	Description	Agree / No Change	Modify requirement	Oppose requirement	Nil pertinent comment
General requirements	7	Whole Section	11	-	4	-
	7(1)(a)	Licence PPL/CPL/ATPL	0	0	0	48
	7(1)(b)	Aeroplane or Helicopter only	0	0	0	48
	7(1)(c)	Patient, support pax and crew only	3	2	19	24
	7(1)(d)	Medical Class 1/2	0	1	0	47
Excluded aircraft	8(2)	Excluded aircraft	17	3	3	11
Aeronautical experience	9	Whole Section	8	-	14	-
	9(1)(a)	Landing in previous 30 days	2	2	9	8
	9(1)(b)	VFR - 10hrs in type	2	0	1	18
	9(1)(c)	IFR - 20hrs in type	2	0	1	18
	9(1)(d)	25hrs ME	1	1	2	17
	9(2)(3)	Additional req't for PPL	2	7	5	7
Operational and notification	10	Whole Section	11	-	3	-
	10(a)	No more than 5 pax	1	0	9	14
	10(b)	No VFR at night	5	0	3	16
	10(c)	Identified as CSF, flight notification	3	0	12	9
	10(d)	Record CSF in personal logbook	0	0	13	11

SUMMARY OF CONSULTATION ON
COMMUNITY SERVICE FLIGHTS INSTRUMENT CONSULTATION

	Section	Description	Agree / No Change	Modify requirement	Oppose requirement	Nil pertinent comment
Maintenance¹	11(2)(a)(i)	Within last 100hrs of service	11	1	14	11
	11(2)(a)(ii)	Within last 12 months				
	11(2)(b)	Cert airworthiness <12 months, less than 100 hours in service				

¹ While there are three provisions, these give practical effect to only one additional requirement. See Topic 5 section for further.