

Alternative Means of Compliance



HEMS operations with Cargo Hook AltMoC No. IT-OPS-2015-01

This document is an Alternative Means of Compliance (AltMoC) issued by ENAC in accordance with Reg. (EU) 965/2012, para. ARO.GEN.120(e).

Regulatory reference:	
Regulation (EU) 965/2012, Annex V	
Rule paragraph(s)	SPA.HEMS.110 SPA.HEMS.130(e)(1)&(f) SPA.HEMS.140(a)

List of Effective Pages:		
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1	Rev.0	24 th september 2015
2	Rev.0	24 th September 2015
3	Rev.0	24 th September 2015

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**1 Full description of the AltMoC, which includes reasoning of the AltMoC**

HEMS is a primary public interest operation and the adoption of the three AltMOC is necessary to regulate and clearly define the means to be adopted for compliance to Reg.965/2012 in case of HEMS by cargo hook.

Current edition of Reg.965/2012 does not forbid the use of cargo hook during HEMS operations. Since no AMC is currently available, operators are free to establish themselves their own policies without any minimum common standard;

The three AltMoC are means of compliance to Rule paragraphs concerning “Equipment requirements for HEMS operations”, “Crew requirements” and “Information and documentation”, with the scope to extend the applicability of current SPO provisions for HEC, as a minimum standard also to HEMS.

2 Assessment demonstrating that the IR(s) are met

The assessment is based on the following considerations:

- a) the three AltMoC are issued for Cargo Hook operations during HEMS only, where recovery and immediate and rapid transportation is essential, in order to give the possibility to carry out a recovery of injured persons in cases for which is not possible a landing of the helicopter close enough to recover the injured person or to operate with Hoist, in view to ensure the safeguard of human life;
- b) HEC with cargo hook is performed during HEMS operations in a remote area with, as a minimum, the same safety standards already recognized as acceptable for HEC during SPO operations;
- c) During HEMS, HEC is performed strictly only during the technical phase of flight related to the recovery of injured persons from sites/locations where the recovery by Hoist is not possible. This phase of flight is normally performed in a short time, so that the exposure time can lead to at an acceptable risk level;
- d) the actual provision for the approved operator to do a specific risk assessment before and manage any critical operation stays in place.

Moreover, due to the particular orography present along all the Italian peninsula, HEMS operations with cargo hook have been authorised and performed for 20 years, achieving a very good level of acknowledgement of this kind of operations from both aspects of regulation and operational issues.

For the above reasons, compliance with the regulation is achieved.



3 **Regulatory wording of the used AltMoC**

The text of the three AltMOC is the following:

- **AltMoC1 SPA.HEMS.110** – In case of hook operations, including Human External Cargo (HEC), the operator should comply also with SPO.SPEC.HEC.105 'Specific HEC Equipment'.
- **AltMoC1 SPA.HEMS.130(e)(1)&(f)** – In case of hook operations, including Human External Cargo (HEC), HEMS technical crew member should comply also with the provision for task specialists in AMC1 SPO.SPEC.HEC.100.
- **AltMoC1 SPA.HEMS.140(a)** – In case of hook operations, including Human External Cargo (HEC), as a minimum the operator should comply also with AMC1 SPO.SPEC.HEC.100.

Notwithstanding the possibility to perform HEMS operations by cargo hook the operator should take in account in its risk assessment and operational procedures that HEC with cargo hook should be limited to the technical phase of flight when other means normally used for recovery of injured persons from the accident site cannot be used (i.e. hoist, typically due to ground orography) and only until when a safe landing and boarding of the injured person is possible.

(digitally signed according to Italian Law D.lgs 82/2005)

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