

## **CORONAVIRUS - RFFS EASEMENTS AND FREQUENTLY ASKED QUESTIONS**

During the extremely challenging times the UK Aviation Sector continues to face we have been asked a number of questions regarding the provision of Rescue and Firefighting Services (RFFS) at Licensed or Certificated Aerodromes. The below FAQ are intended to help by providing clear regulatory advice. However, as government restrictions are being removed, things are changing on a daily basis, so the advice and easements outlined in paragraph 2 will be subject to continuous review and update.

### **1. Frequently Asked Questions**

**Q1** We are preparing contingency arrangements to enable aircraft operations to continue if we should lose the availability of RFFS personnel through infection or self-isolation. What dispensation would CAA allow?

**A** See regulatory easement below which can be applied for Covid-19 related resource limitations.

**Q2** My aerodrome is experiencing business challenges arising from the COVID pandemic. Can we utilise the RFFS easements to help the business survive the recovery period?

**A** Yes, the easements are available to mitigate any business or RFF service provision issues arising from the COVID pandemic.

**Q3** How do we achieve social distancing guidelines with operational RFFS crew when they are required to participate in training, carry out routine RFFS equipment testing and maintenance and attend operational calls?

**A** CAA regards training and other non-operational functions as a lower priority than keeping RFFS personnel safe and free from picking up or spreading the Covid-19 virus. Therefore, it is reasonable to suspend these activities. If you take this course of action you must consider the duration of the suspension, its impact on competence, serviceability and safety, and you must put in place plans to return to normal when government advise supports it. Operational calls must take priority therefore it is recommended that you review your procedures and liaise with other emergency services to put in place measures to provide crews with protection.

**Q4** Can CAA provide dispensation if, due to the pressure faced by NHS, we are unable to meet the medical assessment requirements of our RFFS personnel?

**A** The regulatory requirement is that RFFS personnel demonstrate their medical fitness to undertake their role, and the aerodrome operator should determine an appropriate medical standard. Ongoing assessments should be undertaken by competent personnel. As the regulation does not mandate a frequency for ongoing assessments and taking into consideration the difficult challenges currently being faced by all organisations, we consider that it would be reasonable for the period between medicals to be extended. If you take this course of action you must consider the length of the extension and its impact on safety, personnel and you must put in place plans to return to normal when government advise supports it.

**Q5** Can CAA provide any dispensation if we are unable to carry out scheduled maintenance tests such as foam testing?

**A** The principal objective should be to continue to maintain and test vehicles and equipment as planned. However, where there are difficulties in arranging for such testing to be carried out, and where a suitable ongoing maintenance and testing schedule has provided evidence that RFFS vehicles and equipment are safe and operating at their optimum performance, we consider it reasonable to delay any testing that falls due during the challenging times currently being faced. If you take this course of action you must consider the length of the extension and its impact on safety, and you must put in place plans to return to normal when government advise supports it.

Q6 Can CAA provide any dispensation if we are due to hold a full-scale or partial test of our aerodrome emergency plan, but due to the additional pressure placed on local authority emergency services they are unable to attend?

A CAA recognises the increased pressure being placed on emergency services, and that they may also be facing significant resource challenges due to self-isolation and infection. Therefore, we accept that full-scale and partial exercises may be postponed. We encourage aerodrome operators to consider alternative methods of testing their emergency arrangements, such as table-top exercises and the use of virtual reality scenarios\*. Aerodrome operators should also maintain emergency planning dialog with external emergency services to ensure mutual understanding of what services can and cannot be delivered during these challenging times. Where full-scale exercises are postponed plans must be put in place to test the emergency plan at the earliest opportunity.

\*Please note, where such an alternative method is used it should be considered an interim measure and not a replacement for a full-scale exercise which should be planned and carried out as soon as circumstances allow.

## **2. Regulatory Easements**

The regulatory easements outlined below are intended to provide aerodrome operators with a degree of flexibility that may be applied within the defined periods. It should be noted that the easements apply only to the provision of RFFS, the aerodrome may have to provide other essential services in line with applicable regulations.

- a) Remission may be applied during the period 23 July 2021– 31 January 2022 (regardless of the number of aircraft movements in the period up to 23 July 2021, or the projected number of aircraft movements after the period 23 July 2021 – 31 January 2022) subject to 2b and 2c below.
- b) The rescue and firefighting level of protection is appropriate to the longest aeroplane normally operating at the aerodrome except that where the number of movements (landing or take-off) of aeroplanes performing passenger transportation in the highest category, normally using the aerodrome, averages less than 20 per day in the easement period (23 July 2021 – 31 January 2022), the level of protection provided may be reduced by one category.
- c) Where the number of movements of the longest aeroplane normally using the aerodrome averages less than 8 per day in the easement period (23 July 2021 – January 31 2022), a two category reduction may be applied (see 3d below).
- d) Aerodrome operators may wish to consider supplementing the core RFFS crew with specifically trained personnel who have a specific and limited role. These supplementary personnel should make up no more than 20% of the operational crew.
- e) For all-cargo, mail, ferry, training, test, positioning and end-of-life aeroplane operations, with only the flight crew on-board, including those carrying dangerous goods, irrespective of the number of movements, a risk assessment and task/resource analysis may be carried out that focusses on the protection of the flight deck and escape routes of occupants to determine an appropriate level of RFFS protection.

## **3 Implementation and promulgation of the easements\*:**

- a) The default position should be to deliver the promulgated level of protection based on the aerodrome's RFFS task and resource analysis and promulgated category.
- b) Implementation of easements in 2a, 2b and 2c above **will require the prior approval of CAA.**
- c) Approval will only be given for cases where the aerodrome operator cannot provide the normal level of RFFS protection due to Covid-19 related limitations, examples include:
  - i. significant reduction in the number of movements by aeroplanes performing commercial air transport of passengers when compared to pre-pandemic levels
  - ii. Significant reduction in the number of passengers onboard aeroplanes operating at the aerodrome (aeroplane load factor)
  - iii. RFFS personnel unavailable due to positive Covid-19 test result
  - iv. significant numbers of RFFS personnel self-isolating in line with government guidelines,

- d) Where remission is applied as per 2b and 2c above the aerodrome operator should endeavour to provide the minimum number of RFFS vehicles required for the aeroplane RFF category.
- e) Aerodrome operators should review their RFFS Task and Resource Analysis in order to determine the impact of the reduced level of RFFS protection arising from the implementation of the easements.
- f) Details should be shared with the aerodrome's local authority emergency response partners through the aerodrome's emergency planning forum.
- g) A NOTAM should be issued to alert operators to the revised use of remission and the level of RFFS protection that will be provided.
- h) Implementation of the easements should be continuously assessed through the aerodrome's SMS with sign off by the Accountable Manager.

**\*Implementation of the easement may introduce an increased business risk to aerodrome operators**

#### **4. Application for prior approval of CAA**

Aerodromes who wish to implement the easements detailed in 2a, 2b and 2c above should use the usual process which can be initiated by completing and submitting form SRG2011 which is available on the CAA website [www.caa.co.uk](http://www.caa.co.uk)

#### **5. Ongoing monitoring and review**

Aerodrome operators should monitor the number of aeroplane movements to ensure that, if the limits of the above easements are reached, the level of RFF protection reverts to pre-pandemic levels.

CAA will review the above easements against continuing government advice, and may terminate or extend the easement accordingly.

Aerodrome operators should continuously review any temporary arrangements that are put in place during the current health crisis to ensure that collective measures do not impact on the effectiveness of RFFS response and intervention.

#### **6. Contact**

If you have any questions regarding the above, please contact your allocated aerodrome inspectors in the first instance.



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