



FOCA AltMoC

Alternative Means of Compliance



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according to
Regulation (EU) No 965/2012 (Air Operations), ARO.GEN.120



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0 Introduction

Current edition of Regulation (EU) 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 intend of this AltMoC is to regulate and clearly define the means to be adopted for compliance to Regulation (EU) 965/2012 in case of HEMS operations with cargo hook.

0.1 Terms and Conditions

The use of the male **gender** should be understood to include male and female persons.

The most frequent **abbreviations** used by the **EASA** are listed here: easa.europa.eu/abbreviations.

AltMoC	Alternative Means of Compliance
AMC	Acceptable Means of Complicance
EASA	European Aviation Safety Agency
FOCA	Federal Office of Civil Aviation
HEC	Human External Cargo
HEMS	Helicopter Emergency Medical Service
SPO	Specialised Operations

When used throughout the AltMoC the terms such as «shall, must, will, may, should, could, etc.» shall have the meaning as defined in the [English Style Guide](#) of the European Commission.

0.2 Legal References

Commission Regulation (EU) No 965/2012:

- SPA.HEMS.110 / SPA.HEMS.130 / SPA.HEMS.140
- SPO.SPEC.HEC.100 / SPO.SPEC.HEC.105

1 Implementing Rule

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.

1.1 Acceptable Means of Compliance

1.1.1 AltMoC 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“.

1.1.2 AltMoC 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.

1.1.3 AltMoC 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.

2 Summary of the AltMoC Assessment

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 it is not possible to land the helicopter close enough to 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. 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 Alpes, HEMS operations with cargo hook have been authorised and performed for more than 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.