

ICAR 2015 Ireland

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The EASA Certification Memorandum “CM-CS-005 PCDS” (based on the CS-27./29.865) for so-called “Personnel-Carrying Device Systems” (PCDS) of simple design includes almost all EN standards for PPE against falls from a height as well as standards for mountaineering equipment such as karabiners and harnesses. This means that EASA has accepted EC directive 89/686/EEC on personal protective equipment and most harmonised EN standards for PPE against falls from a height as a basis for approval.

In 99.9% of all cases, the personal protective equipment employed by air rescuers, practitioners, winch operators, alpine rescuers, dog handlers, fire fighters, etc. meets the requirements. To express it differently; the users on the European market almost exclusively employ certified PPE equipment = simple PCDS.

EASA has now come forward with two new conditions: for demonstration of compliance:

1. PPEaf must be registered on the basis of a “minor change” classification by the flight operator who must provide a list of the simple PCDS indicating their precise function as well as the helicopter type with which these are used (cross reference matrix);
2. PPEaf must be supervised by a maintenance organisation.

The higher standardisation of the flight operators’ equipment and the fewer varieties of devices employed, the easier the procedure is.

The problem is that external collaborators not belonging to the flight operation company, e.g. alpine rescuers, dog handlers, fire fighters, etc. cannot be included in this registration process. Moreover, the wide range and variety of equipment makes it impossible for the helicopter operators to record and survey all equipment in use. REGA, for example, employs 100 helicopter rescuers but collaborates with 3000 further rescuers belonging to the Swiss Alpine Rescue ARS and the Swiss Alpine Club SAC.

Although expensive and very laborious, the certification of complex PCDS and the demonstration of compliance for simple PCDS are feasible for helicopter companies – the inclusion of third parties (patients also) plus their equipment in helicopter operations, however, is almost impossible to handle.

The claim EASA issues in their operational instructions regarding PCDS of Proposed AD 15-117 is totally inappropriate, namely, that prior to the attachment of a patient, the crew should get out and verify if the third party, i.e. the patient, is in possession of approved PPE/simple PCDS.

For this reason, all representatives of Switzerland and the international confederations have joined in a common effort to achieve an exemption permitting all PPE to be hooked to the HEC system or the helicopter winch.