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June 16, 2016

Ms. Marie-Anne Dromaguet
Chief, Regulatory Affairs
AARBH Transport Canada Civil Aviation
330 Sparks Street, Ottawa, ON, KIA ON5

Via Email: marie-anne.dromaguet@tc.gc.ca

Subject: Comments on the Revised NPA on Crew Resource Management (CRM)

Re: CARAC Activity Reporting Notice: 2014-021 dated May 9, 2016

Dear Ms. Dromaguet:

First of all thank-you for the extended opportunity to comment, and for the revisions that took place since the initial consultation with stakeholders on April 11, 2016. The changes that have been incorporated since the initial consultation have vastly improved the NPA. We do however have a few comments that have been raised by members in response to the revised document.

HAC participated on the August 2010 Risk Assessment of this subject. We believe that the effective management of available Crew Resources is essential to the operation of any aircraft. In the 2010 Risk Assessment, this Association was outspoken on the need to rationalize the requirements of other mandatory training to avoid duplication or triplication of CRM training elements in pre-existing elements of other required training – including PDM and Low Vis training, Safety Management System training, Human Factors for Elementary Work and Servicing, for example. We applaud Transport Canada's willingness to examine and remove redundant elements of training found elsewhere, before moving forward with a new requirement for CRM training.

Transport Canada's Cabin Safety section often insists upon pre-flight safety briefings for Medical personnel prior to *each* flight, notwithstanding that the same flight crews and Medical Personnel often fly together. We see no reason, when Flight Crews and Medical Crews fly together with regularity, why the safety briefing for these personnel needs to be repeated before *every* flight. Sections 3.1, 3.2 and 3.7 of the NPA call for CRM training that would include the "use of on board fire extinguishers" and "...entry and exit under normal and emergency conditions...". This association believes that this would impose an addition requirement for repetitive training that is already part of multiple redundant Safety Briefings.

The NPA makes reference to training that is required for "Ground Crew". This reference is ambiguous and could be interpreted to include, Stores Personnel, Office Personnel or Administrative Personnel who are unlikely to have any direct contact with the aircraft or flight crews. Furthermore, there should be no requirement for combined training at any level of the helicopter industry. The use of Contractors (who may start and finish their employment at any time) in our industry and the fact that many operations are conducted from skeleton bases in remote areas would present significant logistic challenges.

Section 1.4 of the NPA entitled "*Relevant to the entire aircraft crew*" should apply only to Flight Crew. With the exception of section 1.4.3, the issues identified in the subsections that follow appear to have little relevance to operations that would include crew members in the cabin of the helicopter, including for example, survey equipment operators, Medical Personnel, or Firefighters.

In *Initial Operator's Training* it is unclear what training in "synergy", or "actions" in section 1.4.4 would require.

Section 4.3 "Assessment" as it applies to the CRM Trainer does not call for the circumstances that would require an assessment. The assessment requirement should be applied only periodically, so as not to unduly burden the operator or the Trainer.

The Program Assessment of Crew in section 5 should only be carried out as part of a PPC for helicopter operators.

Finally, thank-you for the opportunity comment. If you have any questions or concerns, we would be pleased if you contacted this office directly.

Regards,



Fred L. Jones BA LLB
President & CEO