

## Annex 6 Part III, Helicopter Operations – CASA/FAA lodged Differences.

If it wasn't so important it would be humorous. However, after **77 years complying with the Chicago Convention and its Annexes**, we still cannot get it right? Why won't government use the text of the Standards as stated by ICAO in the front of each Annex. As well as stating the level of safety.

**“Level of Safety.** *The Annex should ensure an acceptable level of safety to passengers and third parties (third parties meaning persons on the ground and persons in the air in other aircraft.”*

**Each Annex States:** *“Use of the Annex text in national regulations.*

*The Council, on 13 April 1948, adopted a resolution inviting the attention of Contracting States to the **desirability of using in their own national regulations, as far as practicable, the precise language of those ICAO Standards that are of a regulatory character** and also of indicating departures from the Standards, including any additional national regulations that were important for the safety or regularity of air navigation. Wherever possible, the provisions of this Annex have been written in such a way as to facilitate incorporation, without major textual changes, into national legislation.”*

***This concept was supported and reinforced by the Australian supported ICAO 1992 Resolution A29-3 – Harmonisation***

**The ICAO Assembly Resolution A29-3 states:**

- 1. Urges States [Australia] and Groups of States, which have not already done so, to take positive action to promote global harmonization of national rules** for the application of ICAO standards; (reason CASR Preamble refers to the FARs)
- 2. Urges States to use in their own national regulations, as far as practicable, the precise language of ICAO regulatory standards in their application of ICAO standards and seek harmonization of national rules** with other States in respect of higher standards they have in force or intend to introduce;”

**Note:** “Nil” in ‘Australian Reference’ means no CASR reference, whereas “Nil” in ‘Differences’ columns means ‘no differences’ are lodged.

It is interesting to read the USA notification of differences compared to Australia’s differences. Our legislation, instead of harmonising, goes out of its way to implement non-aviation terminology and processes and create a unique system that will never be recognised globally. No wonder GA is in a mess.

**Also note the ‘not defined’, ‘use different words’, and other such terms used in lodging differences. No wonder we are out of step globally.**

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## Annex 6 Part III, Helicopter Operations – CASA/FAA lodged Differences.

The following are Annex 6 Part III definitions and references to Annex requirements.

Annex 6 Pt III Items	Australian Reference	Australian Differences notified	FAA Differences Notified
<b>General</b>			
Aerial work	Part 1 of the CASR Dictionary (Vol 5 of CASR) CASR 138.010	Australian legislation <b>does not define</b> aerial work, but does define aerial work operations with reference to, ext load, dispensing and task specialist operations, which achieves an equivalent outcome.	Nil
Agreement summary	Part 1 of the CASR Dictionary (Vol 5 of CASR) Clause 37 of Part 2 of the CASR Dictionary (Vol 5 of CASR)	The term agreement summary <b>is not defined</b> in Australian legislation, but the transferring of functions is handled similarly	Nil
Aircraft operating manual	Part 1 of the CASR Dictionary (Vol 5 of CASR) Clause 37 of Part 2 of the CASR Dictionary (Vol 5 of CASR)	Australian legislation <b>uses the term</b> Aircraft flight manual instructions or flight manual, which has no practicable difference to this ICAO definition.	Nil
Alternate heliport	Part 1 of the CASR Dictionary (Vol 5 of CASR)	Australian legislation <b>does not define</b> alternate heliport, but defines and uses the term alternate aerodrome the same as ICAO and this includes any reference to heliports.	Nil
Approach and landing phase — h	Part 1 of the CASR Dictionary (Vol 5 of CASR) CASR Part 133 Manual of Standards, chapter 10, sections 10.01, 10.04, 10.05, 10.06, 10.36, and 10.40	Australian legislation does define approach and landing phase for helicopters, however the term Approach and landing and baulked landing stage is used instead.	Nil
Appropriate airworthiness requirement	CASR 21.017	Australian legislation <b>does not specifically define</b> the term ‘appropriate airworthiness requirements’ but regulation 21.017 clearly specifies the airworthiness requirements for different classes of aircraft.	Nil
Commercial air transport operations	Part 2 of the CASR Dictionary (Vol 5 of CASR) Clause 3.	Australian legislation defines the term air transport operation, as passenger, cargo and medical transport for hire and reward.	Nil
Congested area	Part 1 of the CASR Dictionary (Vol 5 of CASR) (populous area)	Australian legislation <b>does not define</b> congested area but achieves an equivalent result.	Nil
Congested hostile environment	Part 1 of the CASR Dictionary (Vol 5 of CASR) (populous area) CASR 133.010	Australia <b>does not define this term</b> in this exact manner but achieves an equivalent result.	Nil

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Continuing airworthiness record	CASR 42.015	The definition in regulation 42.015 of CASR is more exacting but <b>the term is not used or defined</b> in CAR 1988.	Nil
Continuous descent final appro	AIP GEN 2.2.1, AIP ENR 1.5 paragraph 2.4.3.	Australian legislation defines CDFA, but <b>does not specifically</b> include CDFA to the circling altitude.	The FAA does not believe “circling or visual flight maneuver” needs to be added to the definition of a CDFA. The primary reason for a CDFA is to maintain a continuous rate of descent from the FAF, through the MDA until 50 feet above the threshold in the FAS of an NPA. A circle or visual flight maneuver is contrary to the CDFA, the aircraft must stop at the MDA and transition to level flight in order to accomplish the circling or visual flight maneuver to landing. The FAA does recognize that a constant descent rate, not to exceed 1000 ft/min, is normally used to accomplish the descent from the FAF to the circling MDA where level flight is maintained to accomplish the maneuver. This rate of descent may vary due to the design of the circle and/or category of the aircraft. The procedure for accomplishing a circling maneuver has not changed over time, versus, changing the technique for flying a FAS from a “dive and drive” maneuver to a CDFA.
Crew member	Part 1 of the CASR Dictionary (Vol 5 of CASR)	Australian legislation <b>further defines</b> crew member to carry out a function related to the operation, maintenance, use or safety of the aircraft, who has been trained for the function, including those being trained, tested or auditing the same.	Nil
Elevated heliport	CASR Part 133 Manual of Standards (MOS) section 10.33 Advisory Circular 139.R-01 v1	Australian legislation uses the term elevated aerodrome, which has no practicable difference to this ICAO definition. Australian legislation requires rotorcraft operating in Performance Class 1 to clear the structure edge by 4.5 m	Nil
Emergency locator transmitter	CASR Part 91 Manual of Standards (MOS) Division 26.12	Australian legislation <b>does not define</b> the term emergency locator transmitter, but uses the term and abbreviation as per ICAO definition. Automatic ELT and Survival ELT are defined and in practice there is no practical difference in this concept.	Nil
Engine	Nil	Engine <b>not defined</b> in Australian legislation, but its use is as per ICAO definition, hence no practical difference	Nil
Enhanced vision system (EVS)	Nil	Australia <b>does not define</b> enhanced vision system, but the abbreviation EVS is defined as enhanced vision system	Nil

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En-route phase	CASR Part 133 Manual of Standards (MOS) Chapter 10.	Australian legislation <b>does not define</b> "enroute phase" but instead uses the term "enroute stage" and requires the rotorcraft to achieve a 50 ft per minute rate of climb OEI ..	Nil
Fatigue	Civil Aviation Order (CAO) 48.1 (Instrument 2019) Section 6.1	Australia legislation defines fatigue in the context of a Flight Crew Member not all persons conducting safety related operational duties.	Nil
Flight duty period	Civil Aviation Order (CAO) 48.1 (Instrument 20193) Section 6.1	Australian requires a fifteen minute period after the flight has ended before the flight duty period ends as a minimum	Nil
Flight safety documents system	Civil Aviation Act 1988, Section 27AB and Section 28BH. Civil Aviation Regulations 1988 Regulation 42ZY.	Legislation <b>does not currently contain this definition</b> . Australia requires submission of documents as a set which are similar to that defined by ICAO as a Flight safety documents system.	Nil
Flight time — helicopters	CASR 61.010	Australian legislation defines flight time for helicopters or powered-lift aircraft as "duration of flight" which has no practicable difference to this ICAO definition	Nil
General aviation operation	Nil	General aviation <b>is not specifically defined</b> in Australian legislation, but its use usually describes non airline operations	Nil
Ground handling	Nil	Ground handling <b>is not defined</b> in Australian legislation, but is used in reference to training required for ground handling agents in various functions.(CASR 133.115)	Nil
Helideck	Part 1 of the CASR Dictionary (Vol 5 of CASR)	Australia includes a ship as a possible location of a helideck.	Nil
Heliport	Advisory Circular 139.R-01 v1.0 CASR 91.410(3) Advisory Circular 139.R-01 v1.0 CASR 91.410(3)	Australian legislation <b>does not define</b> heliport, but heliports are included in the definition of an aerodrome in the Civil Aviation Act 1988, this is also supported by subregulation 91.410(3) of CASR.	Nil
Heliport operating minima	CASR Part 173 Manual of Standards (MOS) section 8.1.8	Australian legislation <b>does not define this term</b> , but uses aerodrome operating minima (AOM). There is no practical difference in its use.	Nil
Hostile environment	CASR 133.010	Australian legislation <b>does not define</b> hostile environment, but does define suitable forced landing area, which has a similar outcome. See CASR 133.010 and 135.015	Nil
Human Factors principles	Part 1 of the CASR Dictionary (Vol 5 of CASR)	Wording in the Australian Legislation definitions <b>is slightly different</b> to ICAO but the intent is the same.	Nil

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Instrument meteorological condition	Part 1 of the CASR Dictionary (Vol 5 of CASR)	<b>Use is equivalent</b> to ICAO definition. Australian legislation defines IMC as meteorological conditions other than VMC, where VMC criteria is defined in 91 MOS 2.07	Nil
Integrated survival suit	Nil	Australian legislation <b>does not define</b> 'Integrated Survival Suit'	Nil
Low-visibility operations (LVO).	Nil	Nil	FAA defines LVO only as a condition regarding ground operations; not as it pertains to approach and takeoff operations. Further, the FAA sets the threshold for LVO at an RVR of 1200 feet or 350 meters
Maintenance release	CAR 2, CAR 43	CASR <b>does not use the term</b> 'maintenance release' and instead uses the term 'certificate of release to service' which is equivalent to the maintenance release defined in Annex 6. CAR uses the term maintenance release and it defines it under regulation 2. However, the maintenance release in CAR is different in character	Nil
Maximum mass	Nil	Australian legislation <b>does not define</b> this term, but uses the term maximum weight in regard to rotor craft performance classes, or more commonly maximum take-off weight	Nil
Modification	Nil	Australian legislation <b>does not include</b> the definition of modification.	Nil
Non-congested hostile environm	Part 1 of the CASR Dictionary (Vol 5 of CASR) - Definitions (populous area) CASR 133.010	Australian legislation <b>does not define</b> "Non-congested hostile environment", but does define and use the terms populous area (congested) and suitable forced landing area (non-hostile) in regard to rotorcraft performance. See 133 MOS Chapter 10	Nil
Non-hostile environment	CASR 133.010	Australian legislation <b>does not define</b> "non-hostile environment", but does define suitable forced landing area, which has a similar outcome. See CASR 133.010 and 135.015	Nil
Offshore operations	Part 1 of the CASR Dictionary (Vol 5 of CASR)	Australian legislation uses the term offshore operations but <b>it is not defined</b> . Rather it defines offshore installation and specialised helicopter operations in the CASR Dictionary to achieve an equivalent result	Nil
Operations manual	Part 1 of the CASR Dictionary (Vol 5 of CASR)	Australia legislation <b>defines this term differently</b> however it achieves an equivalent result.	Nil
Point of no return	Advisory Circular AC 91-15	Point of no return <b>not defined</b> in Australian legislation, but its use is as per ICAO definition, hence no practical difference.	Nil

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Repair	Nil	Australian legislation <b>does not define</b> 'repair', but CASR Part 21 implements the ICAO definition.	Nil
Rest period	Civil Aviation Orders 48.1	Australia <b>defines this term differently</b> however it achieves an equivalent result	Nil
Safe forced landing	Part 1 of the CASR Dictionary (Vol 5 of CASR) (approved)	Australia <b>does not define</b> the term specific approval it defines the term "approved" which means approved by CASA. Therefore, any approval documented in an operations specification is an approval specifically issued by CASA for the purpose.	Nil
State of the Aerodrome	Nil	<b>Not defined</b> in Australian legislation. Used in practice	Nil
State of the Operator	Nil	<b>Not defined</b> in Australian legislation. Used in practice.	Nil
State of the principal location	Nil	Australia <b>does not define this term.</b>	Nil
Synthetic vision system (SVS)	Nil	<b>Not defined in</b> Australian legislation although the term is found in common use.	Nil
Take-off and initial climb phase	Nil	Australian legislation <b>does not define this term</b> , but does refer to take-off and initial climb stage when discussing rotorcraft performance which has an equivalent outcome.	Nil
Take-off decision point (TDP)	CASR Part 133 Manual of Standards (MOS) section 10.01	Australian legislation <b>defines this term in different words</b> , but for practical purposes they have the same meaning. The note applying the term to Performance Class 1 is omitted.	Nil
Visual meteorological conditions	Part 1 of the CASR Dictionary (Vol 5 of CASR)	Australian legislation <b>defines VMC differently</b> , but its use is equivalent to this ICAO definition.	Nil
<b>Commercial Air Transport</b>			
1.1.4	CASR 133.125	Australian legislation <b>does not require</b> operational control to be limited to the pilot in command, flight dispatcher or operational control officer, but requires the operator's exposition to include procedures to determine how and by whom it is to be exercised. In practise this is no different to ICAO.	Nil
1.3.1	CASR 119.195, CASR Part 91 Manual of Standards (MOS) section 26.33	Air transport operators of rotorcraft with a maximum take-off weight exceeding 7 000 kg, or more than 9 passenger seats with a	Nil

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		requirement to carry a FDR. FDR requirements specify turbine engined rotorcraft.	
1.3.3	Civil Aviation Act 1988 Section 32AO and 32AP. CASR 42.1105 Part 6 TSI Act 2003	Section 32AP of the Act 1988 does not permit the release of CVR data to SMS investigations. Australia permits the use of recordings of sound or images of persons on the flight deck of an aircraft in certain civil and criminal proceedings as outlined in the Civil Aviation Act. Whilst there are protections in place, they are less protective than the SARP requires.	Nil
1.3.4	Civil Aviation Act 1988 Sections 32AN, 32AO and 32AP. CASR 42.1105 Part 6 TSI Act 2003	Protection of CVR recordings/transcripts only. Section 32AP of the Act 1988 <b>does not permit</b> the release of CVR data to SMS investigations. Definition of CVR as per Section 32AO of the Act 1988 captures recording of sounds or images, or sounds and images of persons on the flight deck of an aircraft. .CASA does not define in the Act Class B and Class C AIR or AIRS, but it would be captured under the definition of CVR	Nil
2.2.1.3.1	CASR 119.205 and 119.220	Australia <b>does not promulgate</b> this specific standard, but requires operator policies and procedures to apply to all personnel who are employees of the operator, or persons engaged by the operator to provides services.	Nil
2.2.1.5	Nil	Even though this standard is implemented in practice, it <b>has not been incorporated</b> into national regulations	Nil
2.2.1.6	Nil	Australia <b>does not require</b> the issuance of different operations specifications for each separate aircraft type/model. Some simple aircraft are grouped such as aircraft within licensing based single engine or multi-engine class groups. Additionally, Australia's implementation of this standard has not been incorporated into national regulation	Nil
2.2.1.7	Nil	Australia <b>does not require</b> the issuance of different operations specifications for each separate aircraft type/model. Some simple aircraft are grouped such as aircraft within licensing based single engine or multi-engine class groups. Additionally, Australia's implementation of this standard has not been incorporated into national regulations. There is normally no differentiation between passenger and cargo in air transport operations on the Australian AOC. If an operation is to be limited to cargo only that will be specified on the AOC	Nil
2.2.8.1.1	CASR 91.315	Australia only authorises operational credits in the kinds of limited circumstances referred to in ICAO Doc 9365 "other than	Nil

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		standard Category I operations" and "other than standard Category II operations"	
2.2.8.1.2	Nil	Australia <b>does not specify</b> these requirements in legislation	Nil
2.2.8.3	CASR Part 173 MOS – section 8.1.6.2A and Table 8-1A AIP GEN 2.2-17 CASR 91.307	Australia <b>has not amended</b> the description of the types of category III precision approaches to reflect the change in the definitions of CAT IIIA, CAT IIIB and CAT IIIC to generic category Iii form in the SARPs, however our minimum decision heights and RVRs are the same as those specified. From the minima, Australia does not permit a continued approach operation without the required visual reference for the approach. Approaches with a visibility of less than 75m RVR are not applicable in the Australian environment.	Nil
2.2.9.1	CASR 133.Division 133.D6, 119.205(h)	Australian legislation <b>does not specifically require</b> oil records to be maintained in this exact manner but achieves an equivalent result.	Helicopter operators are not required to maintain fuel and oil records showing that the requirements of 2.3.6 have been met.
2.2.9.2	Nil	Australian legislation <b>does not require</b> ditching certification. Part 133 MOS section 11.51 which applies to a flight of a rotorcraft over water, (other than a rotorcraft designed to take-off from and land on water), which is a passenger transport operation requires the fitment of emergency floatation systems for such operations.	Helicopter operators are not required to keep fuel and oil records for three months, though there is a requirement that load manifests be retained for 30 days.
2.3.1	CASR Part 133 Manual of Standards (MOS) Chapter 3. CASR 133.085	Australian legislation only requires flights that begin or end out of Australia to have a signed flight preparation form	Nil
2.3.2	Nil	Nil	The pilot-in-command is not required to ensure that all persons on board are aware of the location and general manner of use of the principal emergency equipment carried for collective use. The United States requires that flight preparation forms must be retained for 30 days, not three months.
2.3.3.1	CASR 133.135	Australian legislation <b>does not require</b> VFR flights by day remaining within 50 nautical miles of the departure aerodrome to prepare an operational flight plan.	Nil
2.3.3.2	Nil	Nil	The United States does not require that the operations manual describe the contents and use of the operational flight plan, but does require establishing procedures for locating each flight.
2.3.4.2.1	Part I of the CASR Dictionary (Vol 5 of CASR), CASR 91.235. CASR Part 91 Manual of Standards	In principle Australia agrees with (a), however, we do not use the term reasonable certainty, but provide prescriptive criteria that defines what would provide reasonable certainty. Australian legislation <b>does not refer specifically</b> to a set of procedures for	Nil



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	(MOS) Section 8.02, 8.04 and 8.08.	calculation of a PNR when a heliport is isolated. It instead requires an alternate to be carried in such situations for IFR operations when conditions are below the stipulated alternate minima or in the case where the destination may not be available for other reasons.	
2.3.4.2.2	CASR 91.235 CASR 91.235, CASR Part 91 Manual of Standards (MOS) Section 8.04	For an aerodrome/heliport to be nominated as an alternate, forecast visibility and cloud base must meet a higher specified standard than operating minima	Nil
2.3.4.2.3	CASR 91.235, CASR Part 91 Manual of Standards (MOS) Chapter 8	Australian legislation <b>only requires</b> a single alternate that is a suitable destination for the flight which is at or above aerodrome alternate minima as per the Instrument Approach Plate.	Nil
2.3.5.3	AIP ENR 1.5-5, CASR 91.307, 91.315, Part 91 Manual of Standards (MOS), Chpt 15, MOS 173.8.1.9	Australia specifies the incremental value to be added to the operating minima in addition to this, operators may increase this further	Nil
2.3.6.3	Nil	Nil	The fuel requirements for commuter and on demand operations are expressed in terms of flight time and do not include a specific altitude requirement.
2.3.6.3.1	Nil	Nil	The United States does not require IFR helicopter operations to maintain a specific altitude above a destination.
2.3.6.3.2	Nil	Nil	Fuel reserves for IFR helicopter operations is 30 minutes at normal cruise speed beyond the alternate heliport
2.3.6.3.3	Nil	Nil	The U.S. has no provisions addressing when a suitable alternate is unavailable. If the destination weather so requires, an alternate must be specified and 30 minute fuel reserved must be carried.
2.3.6.4	Nil	Nil	The operations manual does not include procedures for loss of pressurization and other contingencies.
2.3.7.1	CASR 133.195	Australia <b>does not prohibit</b> the replenishment of oxygen or passengers embarking or disembarking whilst refuelling is being conducted	Nil
2.3.7.2	CASR 133.195, AC 91 - 25 v1.0	Australian legislation <b>does not require</b> passengers to be briefed but are required to ensure passenger safety while performing refuelling operations	Nil
2.3.7.5	CASR 91.495 and 133.195, AC 91 - 25 v1.0	Australia <b>does not prohibit</b> fuelling with AVGAS whilst passengers are onboard if an operator has a specific approval to do so from CASA.	Nil

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2.3.7.6	CASR 91.495, 91.510, 133.195, AC 91 - 25 v1.0 and Part 1 of the CASR Dictionary	Australia <b>does not prohibit</b> fuelling with AVGAS whilst passengers are onboard	Nil
2.3.8.1	Nil	Nil	The United States does not require oxygen at all times for passengers experiencing cabin pressure altitudes above 13,000 ft (620hPa). Oxygen for all passengers is not required until 15,000 ft (4,572m).
2.3.8.2	CASR Part 133 Manual of Standards (MOS) Section 11.34	Australia <b>has more exacting</b> requirements for flight crew, has no difference for other crew and is less protective for passengers.	The United States does not require oxygen at all times for passengers experiencing cabin pressure altitudes above 13,000 ft (620hPa). Oxygen for all passengers is not required until 15,000 ft (4,572m).
2.4	Nil	Nil	The pilot-in-command is not specifically required, prior to commencing a flight, to be satisfied that any load carried is safely secured.
2.4.1.1	CASR 91.307, 133.165, 91.235, 133.145, CASR Part 91 Manual of Standards (MOS) Section 8.04, 15.03	Australia defines the term aerodrome which includes a heliport. A flight with no destination alternate can continue to destination if advised that weather is below the alternate minima but not below the landing minima if within 30 minutes of the ETA.	Nil
2.4.1.2	CASR 91.310, CASR Part 91 Manual of Standards (MOS) Section 16.02, 16.03	Australia <b>defines the term aerodrome which includes a heliport.</b>	Nil
2.4.1.3	CASR 91.310, CASR Part 91 Manual of Standards (MOS) Section 16.02, 16.03	Australia defines the term aerodrome which includes a heliport.	The United States does not utilize a 1,000 ft minimum for non-precision approaches
2.5.1	CASR 91.215, 91.220	Australian legislation states that 'pilot in command' duties and responsibilities apply from the time the aircraft doors are closed, before take-off and until the doors are opened after landing	Nil
2.6.1	CASR 119.180, 119.205, 133.125 and 133.140	Where flight operations officers/flight dispatcher are employed, their duties and responsibilities are to be outlined in the operators exposition which will include details of the procedures, plans, processes, programs and systems implemented by the operator to safely manage their operation. Training in human factors and NTS required for flight dispatchers.	Nil
2.6.2	CASR 119.180, 119.205, 133.125 and 133.140	The functions of a flight operations officer/flight dispatcher are the responsibility of the AOC holder. Where employed, their duties and responsibilities are contained in the operators exposition as per CASR 119.205. Training in human factors and NTS required	The United States allows for meteorological conditions at the estimated time of arrival and for one hour after the estimated time of arrival, not two hours.

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2.6.3.2	Nil	Nil	The United States allows the continuation of an approach regardless of the reported weather.
2.8.1	Civil Aviation Order 48.1 Instrument 2019	Australian legislation <b>does not regulate</b> the management of cabin crew fatigue.	Nil
2.8.2	Civil Aviation Order 48.1 Instrument 2019 Appendix 7	Australian legislation <b>does not regulate</b> the management of cabin crew fatigue.	Nil
2.8.3	Civil Aviation Order 48.1 Instrument 2019 Section 14.6	Australian legislation <b>does not regulate</b> the management of cabin crew fatigue.	Nil
2.8.3.1	Nil	Nil	The United States does not require that a specific altitude above the alternate be maintained.
2.8.4	Nil	Nil	The U.S. does not require that the procedures for loss of pressurization, where applicable, or failure of one power-unit while en route, be part of the required fuel and oil computations.
2.8.3.2	Nil	Nil	The United States does not require that a specific altitude above the alternate be maintained.
2.10	Nil	Nil	The U.S. requirement for use of breathing oxygen by flight crew members applies only to altitudes above 14000 ft (4,267m).
2.11	Nil	Nil	During an emergency, the pilot-in-command is not required to ensure that all persons on board the aircraft are instructed in emergency procedures.
2.14	Nil	Nil	The pilot-in-command is not specifically required to discontinue a flight beyond the nearest suitable aerodrome when flight crew member's capacity to perform functions is significantly reduced by impairment of faculties from causes such as fatigue, sickness, and lack of oxygen.
3.1.1	Nil	Nil	US does not specify or restrict helicopter operations based on performance, class or category. (See definition of performance class in Annex 6, Part III, Section 1).
3.1.2	CASR 133 Subpart F CASR Part 133 Manual of Standards (MOS) Chapter 10, Division 3 and 4.	Australian legislation defines PC1 and PC2 which fully comply with this SARP, but PC3 is only required to minimise the time over a populous area where a suitable forced landing is not available.PC2 with exposure also allows a short period of time where a suitable forced landing area is not available.	Nil
3.1.4	CASR 133 Subpart F CASR Part 133 Manual of Standards (MOS) Chapter 10	IMC PC3 operations modelled on the requirements of section 3.4 are only permitted for cargo only operations. All IFR Passenger transport operations must be PC2 with exposure or above for take-off and landing and PC1 for en-route operations.	Nil

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3.2.1	Nil	Nil	The United States does not specify or restrict helicopter operations based on performance class or category (see definition of Performance Class in Annex 6, Part III, Section 1)
3.2.7	Nil	Nil	US does not require the helicopter weight limitations found in 3.2.7 a), c), and d).
3.2.7.1.3	CASR 133 Subpart F CASR Part 133 Manual of Standards (MOS), sections 10.26, 10.41, 10.42, 10.43 & 10.44	Australia's PC3 operations utilise the requirements of 3.1.3 to which 3.1.2 is subject to with respect to routes and diversion that permit a safe forced landing to be executed.	Nil
3.2.7.2.2	CASR 133.040, CASR 133 Subpart F CASR Part 133 Manual of Standards (MOS), sections 10.43 & 10.44	Australia's PC3 operations utilise the requirements of 3.1.3 to which 3.1.2 is subject to with respect to routes and diversion that permit a safe forced landing to be executed.	Nil
3.2.7.3.3	CASR 133 Subpart F CASR Part 133 Manual of Standards (MOS), section 10.43	Australia's PC3 operations utilise the requirements of 3.1.3 to which 3.1.2 is subject to with respect to routes and diversion that permit a safe forced landing to be executed	Nil
3.4.1	CASR 133.335, CASR Subpart F CASR Part 133 Manual of Standards (MOS), Chapter 10	IIMC PC3 operations modelled on the requirements of section 3.4 are only permitted for cargo only operations. All IFR Passenger transport operations must be PC2 with exposure or above for take-off and landing and PC1 for en-route operations.	Nil
3.4.2	CAR 39, CAR 42L, 42M CASR 133.335. CASR Part 133 Manual of Standards (MOS), Chapter 10, Section 10.26, 10.29(4). Division 3 and 4	Under Australian Legislation cargo only operations are permitted in single engine IFR certified helicopters. IFR passenger transport operations permitted in a Category A rotorcraft, in PC2WE or higher performance class	Nil
3.4.3	CAR 39, 42L, 42M CASR 133.335, 133.340	Australia only permits cargo transport operations in IMC in PC3. Australia <b>does not require</b> engine trend monitoring for operations in IMC	Nil
3.4.4	Nil	Australian legislation <b>does not specifically require</b> vibration health monitoring of the tail rotor	Nil
4.1.2	Nil	Nil	US does not require carriage of a copy of the air operator's certificate
4.1.3	CASR 91.930, 91.935, 133.035 CASR Part 133 Manual of Standards (MOS), Section 3.01	Australian legislation requires the carriage of an MEL for an IFR flight or a flight that begins or ends outside of Australia.	Nil
4.1.4.1	Nil	Nil	The United States does not require break-in points
4.1.4.2	Nil	Nil	The United States does not require break-in points.

## Annex 6 Part III, Helicopter Operations – CASA/FAA lodged Differences.

Annex 6 Pt III Items	Australian Reference	Australian Differences notified	FAA Differences Notified
4.1.5.1	Section 4A of the Civil Aviation Act 1988, CEO Regulatory Policy – PN008-2010	Current legislation <b>does not use the term</b> agreement summary or equivalent document in its procedures. Therefore, the helicopter cannot carry a certified true copy of this document. CEO Policy is an interim measure	Nil
4.1.5.2	Civil Aviation Act 1988 Section 4A. Management of Article 83 Bis Applications CEO PN008-2010	Australia, if it is the State of Registry, registers the Article 83 bis Agreement with the Council of ICAO. At this point the procedure <b>does not include</b> the agreement summary document so this cannot be made available to an inspector. CEO Policy is an interim measure	Nil
4.1.5.3	Civil Aviation Act 1988 Section 4A. Management of Article 83 Bis Applications CEO PN008-2010	Australia, if it is the State of registry, registers the Article 83 bis Agreement with the Council of ICAO. At this point the procedure does not include the agreement summary document. CEO Policy is an interim measure.	Nil
4.1.5.4	Management of Article 83 Bis Applications CEO PN008-2010	Australia does not include the agreement summary in its procedures. CEO Policy is an interim measure.	Nil
4.2.2	CASR 133.360, 133.240, CASR Division 91.D.7 CASR Part 133 Manual of Standards (MOS), Chapters 7, 9 and 11	Australian legislation <b>does not require</b> the carriage of a universal precaution kit or spare fuses but first-aid kits will be required from 2 Dec 2023	a) first aid equipment is not required on helicopters b) US has no provisions that fire extinguishers, when discharge, will not cause dangerous contamination of the air within the helicopter c) (3) US has no provisions for a safety harness device to prevent interference with flight controls should a pilot become incapacitated.
4.2.3	CASR 133.050, 133.060, CASR Part 133 Manual of Standards (MOS), Section 3.01, Part 133 AMC-GM	Australian legislation <b>does not require</b> the carriage of the operations manual. The relevant sections of the exposition must be available to crew members before flight. However, the note to section 3.01 outlines "An exposition that meets the requirements in subsection (2) could be carried on board instead of the flight manual".	Nil
4.2.4.1	CASR 90.605(5)	Australian legislation requires the exterior marking of emergency exits, without referring specifically to "break in points". The common practice is to mark the break-in points in either red or yellow to contrast the background. They are also marked with words	The US does not require marking of break-in points
4.2.4.2	Nil	Australian legislation <b>does not refer</b> to the marking of "break in" points however the general practice is to so mark any break-in points as per the ICAO requirement	The U.S. does not require marking of break-in points.
4.3.1.1.1	TSO C51, TSCO C84 Civil Aviation Order 103.19 Instrument 2007 Section 2.2.	Australian legislation <b>does not refer</b> to FDRs by Type, but specifies the parameters to be recorded. Only Helicopters over 5700kg are required to have an FDR	Nil

## Annex 6 Part III, Helicopter Operations – CASA/FAA lodged Differences.

Annex 6 Pt III Items	Australian Reference	Australian Differences notified	FAA Differences Notified
	CASR Part 133.360, CASR Part 133 Manual of Standards (MOS), Chapter 11 Div 7		
4.3.1.1.2	CASR 133.360, CASR Part 133 Manual of Standards (MOS), Chapter 11 Div 7	Australian legislation currently requires FDRs for helicopters with a MTOW of greater than 5700kgs, turbine powered and certified after July 1965. <b>Does not refer</b> to passenger numbers. Australia only requires th FDR to record 20 parameters	Nil
4.3.1.1.3	CASR 133.360, CASR Part 133 Manual of Standards (MOS), Chapter 11 Div 7	Australian legislation currently requires FDRs only for helicopters with a MTOW of greater than 5700kgs turbine powered and certified after 1965. Parameters required to be recorded specified, however, <b>not all parameters specified are recorded</b> , engine power or configuration and operation not required by CAO.	Nil
4.3.1.1.4	CASR 133.360, CASR Part 133 Manual of Standards (MOS), Chapter 11 Div 7	Australia currently does not require all turbine engine helicopters with a maximum certified take-off mass over 2250 kg, up to and including 3175 kg to be fitted with FDR/AIR or ADRS. Australian legislation <b>does not refer</b> to FDRs by type.	Nil
4.3.1.1.5	CASR 133.360, CASR Part 133 Manual of Standards (MOS), Chapter 11 Div 7	Australia currently <b>does not require</b> all helicopters of a maximum certificated take-off mass of 3175 kg or less to be fitted with FDR, AIR's or an ADRS. Australian legislation does not refer to FDRs by type.	Nil
4.3.1.1.6	CASR 133.360, CASR Part 133 Manual of Standards (MOS), Chapter 11 Div 7. Civil Aviation Order 103.19 Instrument 2007	Australian legislation currently requires FDRs only for helicopters with a MTOW of greater than 5700kgs turbine powered and certified after 1965. Current legislation <b>does not require</b> all the listed parameters in Appendix 4. (E)TSO-C124a requires 30 parameters and CAO 103.19 requires 20 parameters.	Nil
4.3.2.3	Nil	Nil	Life-saving rafts are not required on helicopters operating on flights over water.
4.3.1.1.7	CASR Part 133 Manual of Standards (MOS), Chapter 11 Div 7. Civil Aviation Order 103.19 Instrument 2007	Australian legislation currently requires FDRs only for helicopters with a MTOW of greater than 5700kgs turbine powered and certified after 1965. Current legislation <b>does not require</b> all the listed parameters in Appendix 4. (E)TSO-C124a requires 30 parameters and CAO 103.19 requires 20 parameters.	Nil
4.3.1.3	CAO 103.20	FDR type not specified. Legislation requires data to be retained for the last 25 hours rather than 10 hours of operation	Nil
4.3.2.1.1	Civil Aviation Order 103.20 Instrument 2007 CASR Part 133 Manual of Standards (MOS), Chapter 11 Div 7.	Australian legislation requires CVRs to be fitted to all helicopters with a MTOW greater than 5700kgs (airworthiness is first issued on or after 1 July 1965). CVR must be approved by CASA.	Nil

## Annex 6 Part III, Helicopter Operations – CASA/FAA lodged Differences.

Annex 6 Pt III Items	Australian Reference	Australian Differences notified	FAA Differences Notified
4.3.2.1.2	CASR Part 133 Manual of Standards (MOS), Chapter 11 Div 7. Civil Aviation Order 103.19 Instrument 2007	Australian legislation <b>does not require</b> CVRs for helicopters over 3175Kg and less than 5700 Kg but requires CVRs to be fitted to all helicopters with a MTOW greater than 5700kgs (airworthiness is first issued on or after 1 July 1965).	Nil
4.3.2.2	Civil Aviation Order 103.20 Instrument 2007	Australian legislation permits the use of analogue recorders meeting FAA TSO C84. <b>No requirement</b> to discontinue use of magnetic recorders by January 2016.	Nil
4.3.2.3	Civil Aviation Order Instrument 2007 Section 103.20	<b>No provision</b> in legislation from 1 January 2016 for helicopters required to be equipped with a CVR capable of retaining the last two hours of operation. Current requirements are the last 30 minutes must be retained.	Nil
4.3.3.1.1	Nil	Australian legislation <b>makes no provision</b> for the recording of datalink messages from 2016	Nil
4.3.3.1.2	Nil	Australian legislation <b>makes no provision</b> for the recording of datalink messages from 2016	Nil
4.3.3.1.3	Nil	Australian legislation <b>makes no provision</b> for the recording of datalink messages from 2016	Nil
4.3.3.2	Nil	Australian legislation <b>makes no provision</b> for the recording of datalink messages from 2016	Nil
4.3.3.3	Nil	Australian legislation <b>makes no provision</b> for the recording of datalink messages from 2016	Nil
4.3.4.1	Civil Aviation Order Instrument 2007 Section 103.19-2.3, 2.12, and 103.20-3.5,	Recorders must meet FAA TSO C51a and TSO C84 which meets EUROCAE ED-112 FDRs installed as per para 2.3 of CAO 103.19 do not meet the fire protection requirement of Annex 6 due to requirement to fit of TSO-C51a. Crash worthiness requirements for CVRs are met by para 3.5 of CAO 103.20. CVRs installed as per para 2.3 of CAO 103.20 <b>do not meet</b> the fire protection requirement due to requirements to fit TSO-C84	Nil
4.3.4.4	CASR Part 21 AC 21-24	New generation aircraft are equipped with FDRS type certificated under the ARINC 647A standard which complies with this recommendation. Older aircraft that are not fitted with FDRs under the ARINC standard may still use paper-based reporting systems	Nil
4.4	Nil	Nil	Helicopters operated over land areas designated as areas in which search and rescue would be especially difficult are not required to be equipped with signaling devices or life-saving equipment. The U.S. does not designate areas in which search

## Annex 6 Part III, Helicopter Operations – CASA/FAA lodged Differences.

Annex 6 Pt III Items	Australian Reference	Australian Differences notified	FAA Differences Notified
			and rescue would be especially difficult and therefore does not require such additional equipment.
4.4.2	CASR 133.360, CASR Part 133 Manual of Standards (MOS), Section 11.06, CASR Part 133 Manual of Standards (MOS), Chapter 11, Div 5.	Rather than the requirement for 2 landing lights, a single light is acceptable if it has 2 separately energised illumination sources.	Helicopters flown over water in passenger operations are not required to be certified for ditching but only to be equipped with flotation devices.
4.4.2.1		Australian equipment standards <b>do not require</b> one of the landing lights to be trainable at least in the vertical plane.	Nil
4.5.1	CASR 133.010, 133.360, CASR Part 133 Manual of Standards (MOS), Section 11.51.	Required for single engine helicopters when operated beyond auto rotational gliding distance from land. Required for all rotorcraft regardless of performance class operating to helidecks which will have an approach and landing or baulked landing stage, or a take off and initial climb stage, over water. Required outside of these requirements for multi-engine rotorcraft (regardless of performance class) not operated with a performance capability in which they can with one engine inoperative reach a suitable forced landing area on land. accordance with one-engine operative accountability. Australian legislation does not specify a distance from land for fitting flotation systems when operating in performance class 1 and only applies to passenger transport operations.	Nil
4.5.2.1	Civil Aviation Orders (CAO) 29.11 CASR 133.010, 133.360, CASR Part 133 Manual of Standards (MOS), Section 11.11, 11.49, 11.50.	In Multi-engine helicopter operations Life rafts are not required to be carried unless a helicopter flies beyond 50 NM or 30 minutes flying time from land, whichever is less. The overload criteria in para 4.5.2.1(c) is not incorporated into Civil Aviation Orders 20.11 Section 5.2, but is covered in the new legislation. Australian legislation <b>does not refer</b> to performance classes of helicopters. It requires life jackets to be carried but does not refer to survival suits.	B) and C) Life saving rafts and pyrotechnic devices are only required for extended over-water operations. That is in respect to helicopters in operations over water with a horizontal distance of more than 50 NM from the nearest shore line and more than 50 NM from an off-shore heliport structure.
4.5.2.2	CASR 133.360, CASR Part 133 Manual of Standards (MOS), Section 11.49.	Australian legislation requires the wearing of the lifejacket for the described circumstances other than for take-off and landing at an aerodrome; and (b) the rotorcraft is flown in accordance with a navigational procedure that is normal; (i) for the take-off, or take-off and initial climb, stage of the flight; or (ii) from 1 000 ft during the approach and landing, or baulked landing stage of the flight.	Nil



## Annex 6 Part III, Helicopter Operations – CASA/FAA lodged Differences.

Annex 6 Pt III Items	Australian Reference	Australian Differences notified	FAA Differences Notified
4.5.2.2.1	CASR 133.360, CASR Part 133 Manual of Standards (MOS), Section 11.49.	Australian legislation requires life jackets to be worn but <b>does not refer</b> to integrated survival suits.	Nil
4.5.2.3	Civil Aviation Orders (CAO) 20.11 CASR 133.360, CASR Part 133 Manual of Standards (MOS), Section 11.49, 11.50.	Life rafts are <b>not required to be</b> carried unless a helicopter proceeds beyond the permitted distance of 100NM or 30 minutes flight time from land, whichever is less. However life jackets must be worn and emergency flotation system fitted to the helicopter.	Nil
4.5.2.5	CASR 133.360, CASR Part 133 Manual of Standards (MOS), Section 11.02(1)	Australia requires compliance with ATSO-1C13a which requires the life preserver to meet the standards of FAA TSO C13g which requires electric illumination, plus the fitment of a whistle to the jacket.	Nil
4.5.2.6	CASR 133.360, CASR Part 133 Manual of Standards (MOS), Section 11.50	Australian legislation <b>will not require</b> rafts to be deployed by remote control until the transitional requirements have expired in December 2023.	Nil
4.5.2.7	CASR 133.360, CASR Part 133 Manual of Standards (MOS), Section 11.50	Australian legislation <b>will not require</b> rafts to be deployed by remote control until the transitional requirements have expired in December 2023.	Nil
4.5.2.8	CASR 133.360, CASR Part 133 Manual of Standards (MOS), Section 11.50	Australian legislation <b>will not require</b> rafts to be deployed by remote control or with mechanical assistance until the transitional requirements have expired in December 2023.	Nil
4.5.3.2	CASR 133.100, 133.105, 133.260, CASR Part 133 Manual of Standards (MOS), Section 11.11.	Australian legislation <b>does not refer</b> to specific provisions for Offshore Operations and Survival suits. Australian legislation requires the carriage of appropriate survival equipment for sustaining life when there is a requirement to carry a life raft	Nil
4.6	Nil	Nil	The U.S. <b>does not require</b> helicopters to carry a specific document attesting noise certification. However, the helicopter's type certificate is the de facto document that the helicopter complied with the noise certification requirements at the time it received FAA type certification. Helicopters operated over land areas designated as areas in which search and rescue would be especially difficult are not required to be equipped with signaling devices or life-saving equipment. The U.S. does not designate areas in which search and rescue would be especially difficult and therefore does not require additional equipment.
4.7.1	Civil Aviation Order 20.11(6) CASR 133.360, CASR Part 133 ,	Performance class 1 and 2 <b>is not described</b> in Australian legislation for the carriage of ELTs.	Nil

## Annex 6 Part III, Helicopter Operations – CASA/FAA lodged Differences.

Annex 6 Pt III Items	Australian Reference	Australian Differences notified	FAA Differences Notified
	Manual of Standards (MOS), Sections 11.41 and 11.45		
4.7.2	Civil Aviation Order 20.11(6) CASR 133.360, CASR Part 133 , Manual of Standards (MOS), Sections 11.41 and 11.45	Performance class 3 <b>is not described in</b> Australian legislation for the carriage of ELTs.	Nil
4.9.1	Nil	Nil	The U.S. requires transponders only in certain airspace
4.10.1	Instrument Number DADR 4/1994 and AIP GEN 1.5 section 4, CASR 133.250, 133.360, CASR Part 133 CASR Part 133 Manual of Standards (MOS) Section 11.20, 11.21.	Australian legislation applies only to passenger and medical transport operations on IFR flights in rotorcraft above 5700kg	Nil
4.11	Nil	Nil	The U.S. does not require helicopters to carry a specific document attesting noise certification. However, the helicopter's type certificate is the de facto document that the helicopter complied with the noise certification requirements at the time it received FAA type certification
4.13	Nil	Nil	The U.S. requires transponders only in certain airspace
4.14	Nil	Nil	The U.S. does not require crew members flight deck duty to communicate through boom or throat microphone
4.15.1	CASR 133..015, 133.325, CASR Part 133 Manual of Standards (MOS) Section 10.13	Australia <b>does not require</b> CAT helicopters in excess of 3175 kg take-off mass or configured for more than 9 passengers to be fitted with a vibration, health and usage monitoring system (VHUMS). Australian legislation does require rotorcraft operating in PC2WE to be fitted with a usage monitoring system.	Nil
4.16	Nil	Australia <b>does not specify</b> these criteria in State rules.	Nil
5.1.1	Nil	Nil	Except when operating under controlled flight, helicopters are not required to have radio communications for night operators.
5.1.2	Nil	Nil	The U.S. does not require that the radio communications equipment specified in 5.1.1 be independent of the other or others to the extent that failure in my any one will not result in failure of any other.
5.1.4	Nil	Nil	Except when operating under controlled flight, helicopters on extended flights over water or on flights over underdeveloped land are not required to have radio communications equipment.

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Annex 6 Pt III Items	Australian Reference	Australian Differences notified	FAA Differences Notified
5.2.1	Nil	Nil	<p>The U.S. has no provision that visual landmarks used in VFR be located at least every 60 NM (110km).</p> <p>The United does not require a helicopter to be provided with navigation equipment in accordance with RNP types for navigation with the United States. However, the United States does provide information and operations specifications for IFR operating requirements when U.S. operators and aircraft conduct operations in the European Airspace Designated for Basic Area Navigation (RNP-5 and 10).</p>
5.2.2	CASR 91.810, 91.930 CASR Part 91 Manual of Standards (MOS) Section 14.01(2), 14.02(2), 26.04, 28.03(1)(c) C373	In Australian operations MELs are required for IFR flights, and flights that begin or end outside of Australia provided there is a "master minimum equipment list" for the rotorcraft. Australia <b>defines PBN and equipment requirements differently</b> , but achieves the same outcome.	Nil
6.1.1	Nil	Nil	All United States helicopters used in commercial air transport are certified as commuter or on demand operations. Maintenance on United States commuter and on demand helicopters may be performed by either an approved maintenance organization, a certified mechanic, or by persons under the supervisions of a certified mechanic.
6.1.2	CASR 42.030(2)(b) & CASR 42.080, CAR 42ZC–ZD	CASR provided full compliance with the standard but CAR does not require an operator to ensure that there is a maintenance release each time maintenance carried out.	Nil
6.2.1	CAR 42ZY, Advisory Circular AC 119-12 v1.0 CASR 42.605	Australian legislation <b>does not require the</b> design of the maintenance control manual to observe human factors principles.	Nil
6.2.2	Nil	Nil	The U.S. requires that records of work must be retained until the work is repeated, superseded by other work, or for one year after the work is performed.
6.3.1	Nil	Nil	The U.S. does not require an operator's maintenance training program to include training in knowledge and skills related to human performance.
6.4.2	Nil	Nil	The U.S. requires that records of work be retained until the work is repeated, superseded by other work for one year after the work is performed, but does not require the records be retained after the until has been permanently withdrawn from service.

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Annex 6 Pt III Items	Australian Reference	Australian Differences notified	FAA Differences Notified
6.5.1	CAR 50, 51, 51B, 52, 52A, CASR 21.003 & CASR 42.C.4	Australian legislation requires all major defects to be reported to CASA	Nil
6.7.1	CASR 42.030(2)(b) & 42.725(3). CASR 42.H.3 CASR Part 145 Manual of Standards (MOS) Section 145.A.50	CASR provides full compliance with the standard but CAR <b>does not include</b> a requirement either for the maintenance organisations or for the operator to ensure a maintenance release is issued each time maintenance is carried out by maintenance organisation	Nil
6.7.2	CASR 42.030(2)(b) & 42.725(1). CASR 42.H.3	CASR provides full compliance with the standard but CAR <b>does not include</b> a requirement either for the licence holder or for the operator to ensure a maintenance release is issued each time maintenance is carried out outside a maintenance organisations by a licence holder	Nil
6.7.3	CASR 42.760-765	Under CASR, a certificate of release to service which is equivalent to maintenance release does not have to include details of maintenance carried out. These details are included in the individual maintenance record for each maintenance task. CAR does not include a requirement either for the licence holder or for the operator to ensure a maintenance release is issued each time maintenance is carried out outside a maintenance organisations by a licence holder.	Nil
6.8.2	Nil	Nil	The U.S. requires that records of work must be retained until the work is repeated, superseded by other work, or for one year after the work is performed.
7.4.2.2	Nil	Nil	Helicopter pilots are not required to demonstrate to the operator an adequate knowledge of the specific areas described in 7.4.3.2
7.5	Nil	Nil	The U.S. practice is to require a spare set of correcting lenses only when a flight crew member's defective visual acuity necessitates a limitation on the pilot's medical certificate.
8.1	Nil	Australian legislation <b>does not require</b> flight operations officers/flight dispatchers to be licensed	Nil
8.2	CASR 119 Subpart. E.	Australian legislation <b>does not specify</b> licensing requirements for flight operations officer/flight dispatchers	Nil
8.3	CASR 119 Subpart E	CASR Subpart 119.E, requires Flight Dispatchers duties to be detailed in the company operations manual. CAR 213 CASR 119.170 requires trained staff, however, <b>the content of the training course is not specified.</b>	Nil

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Annex 6 Pt III Items	Australian Reference	Australian Differences notified	FAA Differences Notified
8.4	CASR 119.170.	Australian legislation requires the operator be responsible for the ongoing competence of any persons undertaking the functions of flight planning and flight dispatch.	Nil
8.5	CASR 119.170.	Australian legislation requires the operator be responsible for the ongoing competence of any persons undertaking the functions of flight planning and flight dispatch.	Nil
9.4.2	CASR 133.075	Australian legislation <b>does not specify</b> that trip records must be completed in ink or indelible pencil.	Nil
9.5	Nil	Nil	The U.S. does not require that an operator keep a list of the emergency and survival equipment carried on board any of their helicopters engaged in international air navigation
11.1	Nil	Nil	A checklist containing procedures to be followed in searching for a suspected bomb is not required to be aboard the aircraft. The U.S. requires that crew members be trained in dealing with explosives that may be on board an aircraft, but this does not necessarily include training on how to search for an explosive.
11.2.1	Nil	Nil	The U.S. does not require an operator to establish and maintain a training program that enables crew members to act in the most appropriate manner to minimize the consequences of acts of unlawful interference.
11.2.2	Nil	Nil	The U.S. does not require an operator to establish and maintain a training program that enables crew members to act in the most appropriate manner to minimize the consequences of acts of unlawful interference.
11.3	Nil	Nil	The pilot-in-command is not required to submit, without delay, a report of an act of unlawful interference to the designated local authority
12.3	Civil Aviation Act section 23B. CASR 92.040, 92.045, 92.055, 92.085, 92.095, 92.100, 92.105, 92.110, 92.115 and 92.120.	For standard 12.3(a), Australia does require a dangerous goods training program. For standard 12.3(b), Australia does not specify this standard in its rules. Instead, these requirements are included in advisory material and inspector assessment documentation.	Nil
12.4.1	Civil Aviation Act section 23B. CASR 92.040, 92.045, 92.055, 92.085, 92.095, 92.100, 92.105, 92.110, 92.115 and 92.120.	For standard 12.4.1(a), Australia does require a dangerous goods training program. For standard 12.4.1(b), Australia <b>does not specify</b> this standard in its rules. Instead, these requirements are included in advisory material and inspector assessment documentation	Nil

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Annex 6 Pt III Items	Australian Reference	Australian Differences notified	FAA Differences Notified
<b>General Aviation</b>			
1.1.5	AIP-ERSA (EMERG) CASR 91.C.5.	This requirement <b>is not defined</b> in CASR Part 91 legislation.	Nil
2.2.1.1	CASR 91.315	Australia only authorises operational credits in the kinds of limited circumstances referred to in ICAO Doc 9365 "other than standard Category I operations" and "other than standard Category II operations".	Nil
2.2.1.2	Nil	Australia <b>does not specify</b> these requirements in State rules.	Nil
2.6.1	CASR 91.230, 91.235, , CASR Part 91 Manual of Standards (MOS) Section 7.02, 7.03	Australian legislation requires that all flights will study authorised weather forecasts and reports before flight commences.	Nil
2.6.2.2	AIP ENR 1.1. paragraph 10.7.2. CASR 91.230, 91.235, 91.245, CASR Part 91 Manual of Standards (MOS) Section 7.02, 7.03, 8.04(4),	Australian legislation only requires 30 minute time buffers. Australia <b>does not legislate</b> the 2 hour requirement.	Nil
2.6.3.1	CASR 91.307, 91.310, 91.315, CASR Part 91 Manual of Standards (MOS) Section 20.6, 15.09, and Chapter 16.0.	Australian legislation <b>does not specifically</b> prohibit the commencement of a flight. Pilot can continue towards aerodrome if on reasonable grounds believes that the weather will be above minima at time of arrival.	Nil
2.7.1	CASR 91.235, 91.245, 91.410, CASR Part 91 Manual of Standards (MOS) Section 8.04	Australia requires all IFR flights to provide an alternate landing location if the weather conditions require it regardless of the destination being isolated. Isolated aerodrome requirement are not specified. A helideck is not suitable as an alternate aerodrome. Australian legislation does not use the term "PNR" but instead defines "point of in-flight replanning" which allows fuel to divert to an en route alternate but not the departure aerodrome and not specifically in relation to an off-shore destination.	Nil
2.7.2	CASR 91.235, 91.245, 91.410, CASR Part 91 Manual of Standards (MOS) Section 8.04.	Australian legislation relating to alternate requirements does not refer specifically to offshore alternates. A helideck is not suitable as an alternate aerodrome	Nil
2.7.3	Nil	Australian legislation relating to alternate requirements <b>does not refer specifically</b> to offshore alternates. A helideck is not suitable as an alternate aerodrome.	Nil
2.8.2	CASA 29/18 - Civil Aviation (Fuel Requirements) Instrument 2018, CASR 91.455, 91.460,	Australian legislation <b>does not specify</b> an amount of contingency fuel to be carried for rotorcraft.	Nil

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Annex 6 Pt III Items	Australian Reference	Australian Differences notified	FAA Differences Notified
	CASR Part 91 Manual of Standards (MOS) Chapter 19.		
2.8.3.1	CASA 29/18 - Civil Aviation (Fuel Requirements) Instrument 2018, CASR 91.455, 91.460, CASR Part 91 Manual of Standards (MOS) Chapter 19.	Australian legislation <b>does not specify</b> an amount of contingency fuel to be carried for rotorcraft.	Nil
2.8.3.2	CASA 29/18 - Civil Aviation (Fuel Requirements) Instrument 2018, CASR 91.455, 91.460, CASR Part 91 Manual of Standards (MOS) Section 1.07 (Definition of final reserve) and Chapter 19.	Australian legislation <b>does not specify</b> an amount of contingency fuel to be carried for rotorcraft.	Nil
2.8.3.3	CASA 29/18 - Civil Aviation (Fuel Requirements) Instrument 2018, CASR 91.455, 91.460, CASR Part 91 Manual of Standards (MOS) Chapter 19.	Australian legislation <b>does not define</b> "isolated alternate". Australia requires all IFR flights to provide an alternate landing location if the weather conditions require it regardless of the destination being isolated.	Nil
2.10.1	CASR Part 91 Manual of Standards (MOS) Div 26.11, Table 26.43 (2)	Australian legislation requires oxygen for all crew for any period exceeding 30 minutes between 12,300 ft and 14,000 ft, and any period of time above 14,000 ft. For passengers, oxygen is required for any period of time above 15,000 ft.	Nil
2.10.2	CASR 91.245, CASR Part 91 Manual of Standards (MOS) Sections 10.02 (j)(i), 26.43(2).	Australian legislation <b>does not specifically</b> refer to pressurized helicopters in requirements for oxygen when operating privately (ICAO General Aviation), but does specify oxygen requirements for any aircraft, for any period of time above FL140 for flight crew and FL150 for passengers, see 91 MOS 26.43	Nil
2.12	CASR 91.215 & 91.565 & 91.580, CASR Part 91 Manual of Standards (MOS) Section 20.06	Australian legislation <b>does not specifically</b> refer to emergency in flight instructions by the pilot-in-command, but does require safety briefing before flight, the PIC to be responsible for safety during flight and passengers to comply with instructions during flight. In practice there is no difference.	Nil
2.15	CASR 91.520, 91.215, 91.565.	Australian legislation <b>does not specifically</b> require the PIC to be responsible for crew members fitness for duty, but requires crew members to be responsible for their own fitness for duty and the	Nil

## Annex 6 Part III, Helicopter Operations – CASA/FAA lodged Differences.

Annex 6 Pt III Items	Australian Reference	Australian Differences notified	FAA Differences Notified
		PIC to be responsible for safety during flight. In practice there is no difference. If the operator believes that a crew member is unfit the crew member must not be assigned.	
2.20	CASR 91.795, 91.800, CASR Part 91 Manual of Standards (MOS) Section 24.03, 24.04, 24.05. 25.03, 25.04, 25.05.	Australian legislation <b>does not define</b> congested hostile environment but instead refers to a "populous area". Requirements are imposed on the PIC to ensure that before using a heliport in a populous area that they can avoid obstacles in flight or people and property on the ground in the event of an engine failure.	Nil
4.1.3.1	CASR 39.001(1)& AD/General/65 Amdt 5 Hand held portable fire extinguishers CASR 90.150, 91.095, 91.570, 91.545, 91.120, 91.105, 91.110, 91.115, AIP ENR 1.12 Intercept of Civil Aircraft. CASR Part 91 Manual of Standards (MOS) Section 26.54, .	Under Australian legislation for Part 91 operations first aid kits <b>are not required nor are spare fuses</b> . First-aid is required for air transport see 133 MOS 11.47. Journey log required for flights that begin or end outside Australian Territory. Fire extinguishers are only required for transport category.	Nil
4.1.4.1	Nil	The colour marking of break-in points <b>is not in</b> legislation, however the common practice is to mark the break-in points in either red or yellow to contrast against the background colour of the helicopter.	Nil
4.1.4.2	Nil	The corner markings distance <b>is not required</b> in legislation.	Nil
4.2.2.1	Nil	<b>No requirement</b> in legislation for the landing light to be trainable, at least in the vertical plane.	Nil
4.3.1	Nil	Australian legislation <b>does not mandate</b> the use of flotation equipment for Part 91 operations.	Nil
4.3.2.2	CASR Part 91 Manual of Standards (MOS) Section 26.59	The person is required to wear the life jacket rather than the jacket just being available.	Nil
4.3.2.3	CASR Part 91 Manual of Standards (MOS) Section 26.56.	Australia requires compliance with ATSO-1C13a which requires the life preserver to meet the standards of FAA TSO C13g which requires electric illumination, plus the fitment of a whistle to the jacket.	Nil
4.3.2.4	Nil	<b>No requirement</b> in Part 91 legislation for this provision.	Nil
4.3.2.5	Nil	<b>No requirement</b> in Part 91 for this provision in legislation.	Nil
4.3.2.6	Nil	<b>No requirement</b> in Part 91 for this provision in legislation	Nil



## Annex 6 Part III, Helicopter Operations – CASA/FAA lodged Differences.

Annex 6 Pt III Items	Australian Reference	Australian Differences notified	FAA Differences Notified
4.5.2.1	CASR 91.245, CASR Part 91 Manual of Standards (MOS) Sections 10.02 (j)(i), 26.43(2)	Australian legislation <b>does not specifically</b> refer to pressurized helicopters in requirements for oxygen when operating privately (ICAO General Aviation), but does specify oxygen requirements for any aircraft, for any period of time above FL140 for flight crew and FL150 for passengers, see 91 MOS 26.43	Nil
4.7.1.1.1	CASR Part 91 Manual of Standards (MOS) Section 26.33.	Australian legislation currently requires FDRs only for helicopters with a MTOW of greater than 5700kgs turbine powered and certified after July 1965. <b>Does not refer to</b> passenger numbers. Australia only requires th FDR to record 20 parameters	Nil
4.7.1.1.2	CASR Part 91 Manual of Standards (MOS) Section 26.33.	Australian legislation currently requires FDRs for helicopters with a MTOW of greater than 5700kgs, turbine powered and certified after July 1965. <b>Does not refer to</b> passenger numbers. Australia only requires the FDR to record 20 parameters	Nil
4.7.1.1.3	CASR Part 91 Manual of Standards (MOS) Section 26.33	<b>No standards specified in</b> Australian legislation for helicopters between 3175kg and 5700kg, only aircraft above 5700kg require FDR. FDRs are not specified by Type.	Nil
4.7.1.3	Civil Aviation Order 103.19 CASR Part 91 Manual of Standards (MOS) Section 26.33	FDR type <b>not specified in legislation</b> . Legislation requires data to be retained for the last 25 hours rather than 10 hours of operation	Nil
4.7.2.1.1	Civil Aviation Order 103.20 CASR Part 91 Manual of Standards (MOS) Section 26.34, 26.35, 26.35.	Australian legislation requires CVRs to be fitted to helicopters with a MTOW greater than 5700kgs. Rotor speed not specifically required to be recorded. Pressurised rotorcraft less than 5700kg with more than total of 11 seats with Cof A issues after 1 Jan 1988 also required to have CVR	Nil
4.7.2.1.2	Civil Aviation Order 103.20 CASR Part 91 Manual of Standards (MOS) Section 26.34	Australian legislation requires CVRs to be fitted to helicopters with a MTOW greater than 5700kgs. Rotor speed not specifically required to be recorded	Nil
4.7.2.2	Civil Aviation Order 103.20	There <b>are no requirements</b> in legislation for the discontinuing use of magnetic tape and wire CVRs by 1 January 2016.	Nil
4.7.2.3	Civil Aviation Order 103.20 CASR Part 91 Manual of Standards (MOS) Section 26.36.	<b>No provision in</b> legislation from 1 January 2016 to record the last 2 hours of operation. Current requirements are the last 30 minutes must be retained.	Nil
4.7.3.1.1	Nil	Australian legislation <b>makes no provision</b> for the recording of data link messages from 2016.	Nil
4.7.3.1.2	Nil	Australian legislation <b>makes no provision</b> for the recording of data link communication messages.	Nil

## Annex 6 Part III, Helicopter Operations – CASA/FAA lodged Differences.

Annex 6 Pt III Items	Australian Reference	Australian Differences notified	FAA Differences Notified
4.7.3.1.3	Nil	Australian legislation <b>makes no provision</b> for the recording of data link communication messages	Nil
4.7.3.2	Nil	Australian legislation <b>makes no provision</b> for the recording of data link communication messages.	Nil
4.7.3.3	Nil	Australian legislation <b>makes no provision</b> for the recording of data link communication messages.	Nil
4.7.4.3	CASR Part 21 & AC 21-24	Australia <b>does not legislate</b> for continued serviceability checks but requires continual functional operation of the equipment.	Nil
4.7.4.4	4 CASR Part 21 & AC 21.24	New generation aircraft are equipped with FDRS type certificated under the ARINC 647A standard which complies with this recommendation. Older aircraft that are not fitted with FDRs under the ARINC standard may still use paper-based reporting systems.	Nil
4.8.1	CASR 91 MOS Division 26.12	Australian legislation <b>does not mandate</b> the use of ELT equipment by performance class for Part 91 operations. Flights over land are only required to carry an automatic ELT or a survival ELT.	Nil
4.8.2	CASR Part 91 Manual of Standards (MOS) Division 26.12	Australian legislation <b>does not mandate</b> the use of ELT equipment by performance class for Part 91 operations. Flights over land are only required to carry an automatic ELT or a survival ELT.	Nil
4.10.1	CASR Part 91 Manual of Standards (MOS) Section 26.41.	Australian legislation <b>only specifies</b> a boom or throat microphone in the case of single-pilot operations under IFR conditions. Headsets and boom microphones are recommended for all aircraft. In practice, virtually all helicopters are equipped to carry and do carry headsets with boom/throat microphones for all crew members	Nil
4.11	Nil	Australia <b>does not specify</b> these criteria in State rules.	Nil
4.12.2.2	CASR 91.100. AC 91-17	Part 91 operations <b>do not require</b> any specific authorisation for EFB use, provided the EFB does not replace any system or equipment required by the civil aviation rules.	Nil
4.13.1	Civil Aviation Act 1988 Section 4A	Current legislation <b>does not use the term</b> agreement summary or equivalent document in its procedures. Therefore, the helicopter cannot carry a certified true copy of this document.	Nil
4.13.2	Civil Aviation Act 1988 Section 4A	CASA, if it is the State of Registry, registers the Article 83 bis Agreement with the Council of ICAO. At this point the procedure	Nil

## Annex 6 Part III, Helicopter Operations – CASA/FAA lodged Differences.

Annex 6 Pt III Items	Australian Reference	Australian Differences notified	FAA Differences Notified
		<b>does not include</b> the agreement summary document so this cannot be made available to an inspector.	
4.13.3	Civil Aviation Act 1988 Section 4A	CASA, if it is the State of Registry, registers the Article 83 bis Agreement with the Council of ICAO. At this point the procedure <b>does not include</b> the agreement summary document	Nil
4.13.4	Civil Aviation Act 1988 Section 4A	Australia <b>does not include</b> the agreement summary in its procedures.	Nil
5.1.2	AIP GEN 1.5. section 1. CASR 27.001 and 29.001	Australian legislation refers to design and certification standards by referencing Part 23 of the FARs, EASA CS VLA or EASA CS 23 for airworthiness, design and certification standards for normal category, utility category, acrobatic category or commuter category aeroplanes, which achieves a similar outcome. For transport category aeroplanes Australian legislation likewise references relevant FAR and EASA regulations for transport category airworthiness standards	Nil
5.1.8	Nil	Australian legislation <b>does not require owners</b> , for non air transport flights (Part 91 operations), to document PBC procedures, specific PBC qualifications/training for crew or additional PBC maintenance requirements. See 133 MOS 12 for Australian air transport crew training requirements and AC 91-06 for PBCS guidance.	Nil
5.2.1	CASR Part 91 Manual of Standards (MOS) Section 13.02 & 14.02 AIP ENR 1.10 Appendix 2 Item 10	Australian legislation requires VFR position fixing at intervals of not more than 30 minute	Nil
5.2.2	CASR 91.810, 91.930 CASR Part 91 Manual of Standards (MOS) Section 14.01(2), 14.02(2), 26.04, 28.03(1)(c)	In Australian operations MELs are required for IFR flights, and flights that begin or end outside of Australia provided there is a "master minimum equipment list" for the rotorcraft. Australia defines PBN and equipment requirements differently, but achieves the same outcome	Nil
5.2.6	Part 91 Manual of Standards (MOS) Section 14.02 (4)	Aust leg allows for navigation system failure by defining appropriate procedures.	Nil
5.3.2	CASR Part 91 Manual of Standards (MOS) Section 26.68 & 26.68A	Australia <b>does not specify</b> surveillance requirements or capability in terms of an RSP specification or PBS. Instead, Australia specifies the surveillance equipment that must be carried for each type of aircraft operation.	Nil

## Annex 6 Part III, Helicopter Operations – CASA/FAA lodged Differences.

Annex 6 Pt III Items	Australian Reference	Australian Differences notified	FAA Differences Notified
5.3.3	Civil Aviation Order 20.18 CASR Part 91 Manual of Standards (MOS) Section 11.09, 26.04 AIP ENR 2.2.5 AC 91-06	Australia <b>does not specify</b> surveillance requirements or capability in terms of an RSP specification or PBS. Instead, Australia specifies the surveillance equipment that must be carried for each type of aircraft operation.	Nil
5.3.4	Nil	Australian legislation <b>does not require</b> owners, for non air transport flights (Part 91 operations), to document PBS procedures, specific PBS qualifications/training for crew or additional PBS maintenance requirements, outside of normal licencing and maintenance requirements. See 133 MOS 12 for Australian air transport crew training requirements and AC 91-06 for PBCS guidance.	Nil
6.1.2	CASR 42.030(2)(b) & CASR 42.080, CAR 42ZC-ZD	CASR provided full compliance with the standard but CAR <b>does not require</b> an owner or a lessee to ensure that there is a maintenance release each time maintenance carried out.	Nil
6.5.1	CASR 42.030(2)(b) & 42.725(1). CASR 42.H.3 CASR Part 145 Manual of Standards (MOS) Section A.50	CASR provides full compliance with the standard but CAR <b>does not include</b> a requirement either for the maintenance organisations or for the owner/lessee to ensure a maintenance release is issued each time maintenance is carried out by maintenance organisation.	Nil
6.5.2	CASR 42.030(2)(b) & 42.725(3). CASR 42.H.3	CASR provides full compliance with the standard but CAR <b>does not include</b> a requirement either for the licence holder or for the owner/lessee to ensure a maintenance release is issued each time maintenance is carried out outside a maintenance organisations by a licence holder.	Nil
6.5.3	CASR 42.760-765	Under CASR, a certificate of release to service which is equivalent to maintenance release <b>does not have</b> to include details of maintenance carried out. These details are included in the individual maintenance record for each maintenance task. CAR does not include a requirement either for the licence holder or for the owner/lessee to ensure a maintenance release is issued each time maintenance is carried out outside a maintenance organisations by a licence holder.	Nil