

Table of contents

0 Revisions	1
1 Objective	2
2 Scope of application	2
3 Entry into force	2
4 Description	2
4.1 Exemptions and diverging procedures	2
4.1.1 Recurrent Trainings and Checking	3
4.1.2 Roster publication	5
4.1.3 Deviations from flight time specification schemes	5
4.1.4 Transport of Dangerous Goods for hand disinfection and contaminated blood samples	6
4.1.5 Line Checks	6
4.2 Precautions and measures due to EASA requirements	7
5 Assessment	8
6 Notes	8

0 Revisions

<i>Rev. No.</i>	<i>Date</i>	<i>Additions/Changes</i>
Rev. 0	13.03.2020	Initial issue
Rev. 1	16.03.2020	
Rev. 2	20.03.2020	
Rev. 3	23.03.2020	
Rev. 4	25.03.2020	
Rev. 5	22.04.2020	
Rev. 6	18.06.2020	
Rev. 7	15.07.2020	Addition of the notification to the authority to item 4.1.1 Adaptation of point 4.2 and 5 to EASA SD 2020-03

1 Objective

This Operational Notice (BTH), based on § 20h AOCV 2008 (BGBl. II Nr. 254/2008 as amended), specifies with reference to

- Article 71 (1) of Regulation (EU) 2018/1139 as well as
- ARO.GEN.120 (e) of Annex II (Part ARO) of Regulation (EU) No 965/2012

exemptions and Alternative Means of Compliance (AltMoC) in the context of combating the spread of coronavirus (COVID-19).

It also contains specifications published by the European Union Aviation Safety Agency (EASA) in the interest of safety in connection with the COVID-19 issue (e.g. SIB or SD).

2 Scope of application

This BTH applies to all operators covered by the scope of Regulation (EU) No. 965/2012 as amended.

Apart from the provisions of aviation law, other areas of law are not affected by this BTH (e.g. insurance, labour or health regulations).

3 Entry into force

This BTH shall come into force on 13 March 2020 and shall apply up to and including 12 November 2020, unless revoked earlier.

The possibility of extending the intervals of recurrent training and checking by a period of up to four months, as stipulated in the BTH, can be used until the BTH expires. In this case, the end of the extension period may also be outside the period of validity of the BTH.

Revision 1 is applicable from 16 March 2020.

Revision 2 is applicable from 20 March 2020.

Revision 3 is applicable from 23 March 2020.

Revision 4 is applicable from 25 March 2020.

Revision 5 is applicable from 22 April 2020.

Revision 6 is applicable from 18 June 2020.

Revision 7 is applicable from 15 July 2020.

4 Description

4.1 Exemptions and diverging procedures

As a result of the unforeseeable circumstances or in connection with the control of the spread of the coronavirus (COVID-19), temporary administrative measures must be taken to ensure that the operators concerned can continue flight operations without compromising the interests of aviation safety.

Austro Control GmbH does not see any immediate threat to aviation safety due to the time-limited application of the facilitations described in this section as a result of the exemptions and Alternative Means of Compliance.

The measures or facilitations described below may only be applied if this is required due to urgent operational needs resulting from the control of the spread of the coronavirus (COVID-19).

The references given in the following text refer to Regulation (EU) No 965/2012 as amended.

4.1.1 Recurrent Trainings and Checking

Within the framework of the recurrent trainings and checking

- i. the actual fitting of protective breathing equipment (PBE) may be dispensed with, provided that appropriate alternative training measures are applied, such as the provision of a detailed description of the use of PBEs or the use of appropriate video instructions (AltMoC to AMC1 ORO.FC.230 (a) (2) (ii) and exemption to ORO.CC.140 (d) (1) (i) B);
- ii. the actual use of the oxygen masks during trainings and checking on flight simulation training devices may be dispensed with, but the donning of the masks may need to be simulated;
- iii. exercises in an enclosed simulated smoke-filled environment may be refrained from (AltMoC to AMC1 ORO.FC.230 (a) (2) (iii) D and exception to ORO.CC.140 (d) (2) (iv) B);
- iv. the intervals within which the following trainings and checking elements are to be completed may be extended by the maximum period of 4 months:
 - Operator Proficiency Checks (OPC) in accordance with ORO.FC.230 (b) and ORO.FC.330;
 - Line Oriented Evaluation (LOE) in accordance with ORO.FC.A.245 (d), if applicable;
 - Trainings and checking on the use of emergency and safety equipment in accordance with ORO.FC.230 (d);
 - Theory and flight training in accordance with ORO.FC.230 (f);
 - Recurrent training and checking for cabin crew in accordance with ORO.CC.140;
 - Recurrent training for technical crew members in accordance with ORO.TC.135;
 - En-route flight checks in accordance with ORO.FC.230 (c);
 - Dangerous Goods training in accordance with ORO.GEN.110 (j) and, if applicable, SPA.DG.105(a);
 - Crew Resource Management (CRM) training in accordance with ORO.FC.230 (e) (1) and ORO.FC.230 (e) (2);
 - Recurrent trainings and checking in accordance with ORO.FC.130;
 - Recurrent trainings and checking to be carried out under Part SPAs (Special Permits), as applicable.

When applying the possibility to extend intervals accordingly, the operator shall determine appropriate mitigation measures after carrying out respective risk analyses according to the procedures presented in its operations manual (based on ORO.GEN.200). However, the mitigation measures shall at least meet the following requirements:

- In case of extension of intervals concerning
 - Operator Proficiency Checks (OPC) in accordance with ORO.FC.230 (b),
 - Line Oriented Evaluation (LOE) in accordance with ORO.FC.A.245 (d), and
 - Line Check in accordance with ORO.FC.230 (c),

the respective conduct of refresher trainings followed by checking shall be mandatory. Where applicable, the refresher training shall also include relevant elements as specified in the Part SPA.

The respective operator shall determine the relevant programmes and decide on the appropriate methods and means to be used.

- In case of extension of intervals concerning
 - trainings and checking concerning the use of emergency and safety equipment in accordance with ORO.FC.230 (d),
 - theory and flight training in accordance with ORO.FC.230 (f),
 - Operator Proficiency Checks (OPC) in accordance with ORO.FC.330,
 - recurrent trainings and checking for cabin crew in accordance with ORO.CC.140,
 - recurrent training for technical crew members in accordance with ORO.TC.135,
 - Dangerous Goods training in accordance with ORO.GEN.110 (j) and, if applicable, SPA.DG.105 (a),
 - Crew Resource Management (CRM) training in accordance with ORO.FC.230 (e) (1) and ORO.FC.230 (e) (2),
 - recurrent trainings and checking in accordance with ORO.FC.130,

the provision of additional training is mandatory. The operator concerned shall define the relevant programmes and decide on the appropriate methods and means to be used. The training may include the use of videos, computer-based training (CBT) or the publication of bulletins or leaflets.

The described facilitations therefore only apply to **recurrent** trainings and checking. After the expiry of the BTH, the next training must be carried out in its entirety. The recurrent trainings and checking affected by a maximum 4-month extension of the respective interval shall be returned to the interval specified by the relevant requirements as soon as possible, in any case by 31 March 2021.

Operators claiming an extension of the intervals according to point 4.1.1 shall notify Austro Control GmbH in writing, submitting the adapted training programmes and syllabi as well as the risk analysis including any mitigation measures.

4.1.2 Roster publication

The time limit specified in AMC1 ORO.FTL.110(a) may be reduced accordingly. A reduction requires a justification, which must be submitted in writing to the responsible flight operations inspector (POI) without being requested.

4.1.3 Deviations from flight time specification schemes

With regard to the flight time specification schemes approved in accordance with ORO.FTL.125 and presented in the relevant operator's operations manual, deviations may be made on a case-by-case basis as follows:

The respective limitations on flight duty time (ORO.FTL.205) may be extended for flights serving the evacuation of passengers as well as the carriage of cargo, subject to the following conditions:

- The evacuation or cargo flights are directly related to the circumstances arising solely from the control of the spread of the coronavirus (COVID-19);
- In each case, the operator shall carry out a risk analysis in accordance with the procedures set out in its operations manual (based on ORO.GEN.200 / Management System) and subsequently define
 - the maximum flight duty period to be applied (ORO.FTL.205), as well as
 - any additional measures to maintain the safety level (mitigation measures).
- The deviation as well as its justification including the mitigation measures taken shall be notified to Austro Control GmbH in writing.

The deviation may only be applied after it has been accepted by the authority. (Note: In case of non-acceptance, the authority shall issue a decision).

For those operators who are subject to the relevant provisions of Subpart Q of Annex III to Regulation (EEC) No 3922/91 (EU-OPS), the specified facilitations and their conditions shall apply mutatis mutandis.

4.1.4 Transport of Dangerous Goods for hand disinfection and contaminated blood samples

Transport of dangerous goods intended for hand disinfection:

By way of derogation from the requirements of CAT.GEN.MPA.200 (a) or NCC.GEN.150 (a) in conjunction with the Technical Instructions for the Safe Transport of Dangerous Goods by Air (ICAO Doc. 9284), operators may make use of the possibility to carry on board the following dangerous goods for hand disinfection:

- UN1987 Alcohols, n.o.s.; and
- UN1170 Ethanol solution.

The transport of substances containing the dangerous goods in question, is only permitted under the following conditions:

- The dangerous goods are carried on board in such a way as to avoid accidental leakage of the substance and fire hazards;
- The operator shall carry only such quantities of the substances concerned as are necessary to fulfil the purpose of their carriage;
- The net quantity per container shall not exceed 0.5 litres, with a total quantity of 10 litres shall not be exceeded.

Transport of contaminated blood samples:

In cases where full compliance with CAT.GEN.MPA.200 in conjunction with the Technical Instructions cannot be established to transport COVID-19 infected blood specimens, operators who are not authorised to transport dangerous goods may transport such specimens for medical research and testing purposes by domestic air transport only until 30 June 2020.

This transport must be carried out in accordance with the conditions for UN3373 (biological substances, category B) in compliance with Packing Instruction 650 of the Technical Instructions. In addition, the operator must implement appropriate procedures and ensure that all relevant information is communicated (e.g. by briefing) to the persons involved in the transport, including the flight crew.

4.1.5 Line Checks

In accordance with a requirement contained in AMC1 ORO.FC.230 (b)(3)(v), those commanders conducting line checks shall occupy the observer seat, if one is installed.

Notwithstanding the foregoing, the operator's designated commander(s) may also perform line checks as part of the active flight crew provided that the respective operator makes any necessary adjustments to the relevant procedures, in particular with regard to the assessment of CRM-relevant elements, as part of an appropriate evaluation (including risk analysis).

4.2 Precautions and measures due to EASA requirements

Due to EASA SD 2020-03 dated 25 June 2020, which replaces EASA SD 2020-01, measures shall be taken to prevent the spread of COVID-19 when transporting persons.

These measures are designed to minimise the risk of COVID-19 infection to passengers, crew members and other affected aviation personnel.

Operators involved in commercial air transport shall therefore clean and completely disinfect their aircraft with substances suitable for aviation as follows:

- i. based on a risk analysis which takes into account the operational circumstances, including their routes, and the duration of the disinfectant effect of the substance used, but at least once in any 24 hours interval, unless the aircraft has not been used for passenger transport since the previous cleaning and disinfection;

Note: Appropriate substances are, e.g., those recommended by the ECDC (European Center for Disease Prevention) or the national public health authorities. Suitability of the substance(s) should be checked against the aircraft manufacturers' documentation.

- ii. before a long haul flight;
- iii. before the next flight that takes place after a long haul flight.

Note: For the purpose of this requirement, a long haul flight is any flight, or series of flights where passengers and their luggage are not fully disembarked, involving commercial air transport of passengers and lasting 6 hours or more, measured from the time the aircraft is scheduled to move from its parking position at the beginning of a (series of) flight, to the time the aircraft is scheduled to reach its parking position at the end of a (series of) flight.

Any aircraft, operated by aircraft operators involved in commercial air transport of passengers, on which a COVID-19 suspect case has been identified on board, shall not be operated for commercial air transport of passengers unless, after that identification, the aircraft is cleaned and disinfected using substances suitable for aviation use.

Further information on cleaning and disinfection has been published by EASA on their website.

It should be noted that operators outside the commercial air transport sector are also required to take appropriate measures to prevent COVID-19 infection.

5 Assessment

The exemptions on which this BTH is based

- according to Article 71 (1) of Regulation (EU) 2018/1139 from the respective provisions of Regulation (EU) No 965/2012, as well as
- the respective Alternative Means of Compliance

were issued by Austro Control GmbH after careful evaluation in order to take account of operational needs in connection with combating the spread of the coronavirus (COVID-19). Austro Control GmbH does not consider the temporary application of the precautionary measures and facilitations described in this BTH to pose an immediate threat to aviation safety.

The prescribing of procedures with regard to the cleaning and disinfection of aircraft is in accordance with the requirements of the Safety Directive of EASA SD 2020-03 of 25 June 2020.

6 Notes

The European Union Aviation Safety Agency (EASA) shall be informed on

- the exemptions according to Article 71 (1) of Regulation (EU) 2018/1139 and
- these official Alternative Means of Compliance (AltMoC) pursuant to ARO.GEN.120 (e) (2) of Regulation (EU) No Nr. 965/2012 as amended.

This BTH will be published in the usual aviation manner on the website of Austro Control GmbH and thus made available to all operators concerned (ARO.GEN.120 (e) (1)).

The use of AltMoCs is a possible alternative to the existing AMC, i.e. operators are free to apply either AMC or AltMoC. Similarly, an exemption provides the possibility, but not the obligation, to deviate from the relevant regulations accordingly.

It is expressly pointed out that the obligations standardised in ORO.GEN.200 remain valid. It follows that the measures described in this BTH, which are to be applied exclusively to maintain operation in connection with the COVID-19 pandemic, can only be applied after the respective operator has carried out corresponding risk analyses including any necessary mitigation measures.

Finally, it is pointed out that EASA has published a lot of information on its website on various topics related to COVID-19: <https://www.easa.europa.eu/the-agency/coronavirus-covid-19>