**NZAAA CONFERENCE - ROTORUA - 5 August 2012**

I am not going to preach the rules to you, as “E” Cat instructors you should be familiar enough with them to know where to find them and re familiarise yourselves ,and ask if unsure.

But I would like to share some examples of what I’ve found within industry since I’ve been employed as a Flight Operations Inspector with CAA, some of these situations are very recent also. You can be the judge and decide where and how they fit within the Ag industry of today and sit with the theme, “Culture and Professionalism”.

Some of these examples may be sensitive to persons within this room, they are not intended to be aimed personally at anyone and shouldn’t be taken that way. The purpose is to create awareness and give you an overview of what’s happening out there within industry. It is not as tidy as you may think.

Some of these situations involve NZAAA members and some involve senior “E” Cat instructors.

* A CEO of an organisation with a PPL (H) was doing Ag Ops for hire and reward in a turbine helicopter – no turbine rating and no official rating on the helicopter.
* A Chief Pilot of an organisation was flying Ag Ops without a current medical certificate – the certificate had been suspended due to health reasons.
* I have found numerous fixed wing “E” Cat instructors without any real knowledge of Appendix B or its application. The rule actually tells you how to apply it if you care to read it. Some don’t know what the “original load factor” is for an aeroplane or where to find it, and these guys are currently doing competency checks.
* One “E” Cat fixed wing instructor who had recently issued a check in the previous few days had absolutely no idea, I handed him the rule and asked him to talk me through it. He looked bewildered and looked at it blankly for a few minutes, then informed me that he never passed school C English. I presume he knew enough to pass his CPL theory.
* We had a senior “E” Cat instructor completing an annual competency check who wasn’t rated on the aircraft being used for the check, and also hadn’t completed the 10 hours of the same type of flying in the preceding 90 days as required. His knowledge of the operation wasn’t in question, it was the fact he didn’t comply with the rules and decided to modify the rules to suit himself, apparently all in the name of safety.
* We have had competency checks issued where nothing has been done apart from the “E” Cat engaging in general chit chat regarding the state of the industry, then ground observing the pilot doing a circuit. No other checks, questions or documentation completed, except an entry made in the Pilots Log Book to say he’s competent and has passed. Some pilots haven’t even presented their licences, current medical certificates or Log Books, and have been told not to worry - I’ll post a Log Book sticker out.
* How can you pass a pilot as competent if you haven’t checked him or her, you don’t know what you are going to find until you actually check someone.
* The general standard of compliance overall appears to be good, the helicopter fraternity that I have had anything to do with appear to be doing checks to a good standard. The larger fixed wing operators also appear to be maintaining good standards overall, along with some of the smaller more professional operators. It appears, that is a small number of “E” Cats at this stage that are noticeably letting the side down. If a pilot is not up to standard, fail him. I know of one Rotary “E” Cat that does, he says at least he can sleep at night.
* One thing noticeably missing is the lack of documentation relating to competency checks and Ag rating flight tests with some operators – no check sheets/ records completed or kept. There is no excuse for this, especially amongst NZAAA members. The NZAAA produced a manual called the “Code of Practice for Training” in August of 2007, this included check sheets for Ag ratings and annual competency checks both fixed wing and rotary. I understand this is currently under review. As part of the CAA audit, we audit training records – documentation must be kept as evidence to show what was done.
* We have an example where a CEO/Chief Pilot of an organisation who doesn’t hold an “E” Cat has had one of his pilots rated on a turbine aircraft by a qualified and current “E” Cat. The CEO/Chief Pilot without the “E” Cat rating then decided to conduct further training and sit with the newly rated pilot for a period of time until he was satisfied the pilot was competent to conduct Ag ops in the aircraft on his own.
* We have an example of a helicopter operator where the spray gear supplement in the Flight Manual failed to contain the weight of the spray gear. They had been spraying like that for a very long time – they had no real idea or way of knowing whether they were operating the helicopter within MCTOW or not.
* They also didn’t know the weight of the fertiliser buckets that they used. The CEO/Chief Pilot stated “you can’t overload it, when it’s too heavy it won’t lift it”. Yeah Right, that statement would go well on a Tui beer billboard. They were running a multimillion dollar operation and had recently suffered a near tragic accident where one helicopter was destroyed.
* They had also stopped recording Role equipment changes as required under rule Part 43. The explanation given was that since the accident, both pilots are so busy sharing the one helicopter we don’t have time to do them anymore. A sound “Culture and Professionalism” attitude is definitely lacking here, with those attitudes it makes you wonder how long until the next accident.
* **Type Ratings.** We have two examples of pilots having received Cresco type ratings from an “A” Cat instructor, the Cresco’s were configured in the parachute role at the time. One of the pilots had had Walter Fletcher experience and the “A” Cat decided a full rating was not required under the circumstances. The pilot went on to topdress in a Cresco and I observed him operating in the Ag role from an airstrip, also observing the refuelling process. The pilot commented that he only ever refuelled one rear tank at refuel when doing Ag ops and left the leading edge tanks empty. This is contrary to the limitations section in the aircraft Flight Manual which states, “Flight is not permitted with fuel in the rear tanks unless the front tanks are completely full”. There are good safety reasons for this, which will be obvious to properly rated Cresco pilots. Although the Walter Fletcher and Cresco may be similar as far as having tricycle undercarriage and be powered by a turbine engine, they are two different animals with different fuel systems, tail section and flight characteristics. They are a separate aircraft type and pilots require separate type ratings, it is obvious the “A” Cat didn’t understand the Walter or its flight characteristics otherwise he may have hopefully treated the rating differently. The second pilot, who also had received a similar rating, had recently turned up to fly a Cresco for a few months for an operator, and claimed he already had a rating and was all set to go. Fortunately the conscientious Chief Pilot of the organisation decided to stick with company policy and procedures and checked him out in the aircraft. He found he knew virtually nothing about the aircraft and was put through the full rating process properly. The pilot in the end appreciated the training and went on to fly the aircraft safely with confidence. It is important that aircraft type ratings are done fully in accordance with the CAR 61.53. The rating should include all normal, abnormal manoeuvres and emergency procedures, including a MAUW check up to MCTOW, not Appendix B weights in the case of aeroplanes. Comprehensive documentation involving the theoretical and practical sides of the rating are required and these records should to be kept for auditing purposes.
* **Log Books.** This subject is something that CAA get a lot of resistance from, it is a legal requirement and the book needs to show compliance – it’s not hard to do. A lot of it comes down to what the pilot has been taught by the “E” Cat in the course of his or her training. From my experience Ag Pilots, especially the older ones in the past have been reluctant to read to read rules and Flight Manuals and adopted the “monkey see monkey do” approach. If the “E” Cats don’t know the rules, or are not prepared to pass the information on, the side is let down once again, and this has a cultural flow on affect within industry. It is up to the “E” Cat, to create awareness and educate, especially at competency check time. CAA have been very forgiving with a lot of rules, a Log Book not kept accurate or filled out correctly is an offence under the Civil Aviation Act and carries a $500 fine to an individual and a $2500 fine to a company. We are still finding Log Books not up to date and columns not tallied or pages not certified when presented to CAA for inspection, this also is an offence under the rules.
* A CEO/Chief Pilot of a small organisation was spot checked. He was actually telephoned the evening prior to give him some warning of the intended visit. His Pilots Log Book was found not to have been filled out since the last audit, which was 12 months prior – so much for the 7 day rule. The aircraft Tech Log was also not kept in the aircraft and had not been filled in since the last inspection, he had 32 hours recorded on a piece of scrap paper in his dairy.

Pilots Log Books are taken very seriously and we are still finding a large percentage of Ag Pilots Log Books don’t comply. It may be time to seriously adjust attitudes towards Log Book compliance and leave the old cultural feelings behind. It’s all covered in Rule 61.29, if you need help with it give me a call. We find an incorrectly filled out Log Book or sloppy record keeping generally leads to other things and we then start digging deeper.

* I have two examples where two pilots had fallen behind with their record keeping, where random samples were taken during an audit. One of the pilots was known not to be a scholar with book keeping and when checking the flight times against the Tech Log/Daily Flight records and pilots Log Book to track the daily hours it was discovered the only entry found was in the Tech Log for the day. No entry for the day’s activity was found recorded in the Pilots Log Book and we couldn’t find a Daily Flight record either – you know what that means, the job wasn’t charged out. Another one with the same company involved a pilot that was considered to be a very meticulous pilot in all respects. He had a system where he completed his Tech Log, Pilots Log Book and Daily Flight record together from his dairy after the flying activity for the day. When he has completed the Daily Flying record he puts a tick in his dairy showing the job has been recorded. Unfortunately due to fatigue/distraction or whatever the Daily Flight record didn’t get filled out on this occasion – we couldn’t find it recorded anywhere.
* The operator is very happy with the CAA audit process as we found several thousands of dollars of work that may have otherwise not been charged out. So there is a good side to keeping accurate Log Books and associated records up to date.
* CAA has identified the standard of Ag training, or lack of in some areas, has been a contributing factor in the accident/incident rate within industry over the years and is currently under review. So you can possibly expect to see some changes at some stage. One thing to remember is that the “E” Cat privileges can only be exercised under a Part 137 Agricultural Aircraft Operators Certificate or a Part 141 Training Organisation Certificate, providing the organisation has been approved for training, and the certificate has been endorsed with the appropriate training authorisations and limitations.
* The rules have been written for a purpose and need to be complied with, we may not all agree with them from time to time, but if we want change, there is a process to go through to seek change. At the end of the day when you elected to enter the CAA system and became a document holder, namely a certificate holder, or the holder of a Pilot’s Licence etc. you agreed to play by the rules – not to ignore them or modify them to suit yourself. If you don’t want to comply with them you should hand your document in, and exit the system. Operating in the Agricultural Aviation Industry along with the Civil Aviation Rules is like a game of rugby – you’ll never be successful in the game unless you know the rules and play by them. Take some time out and read them – if in doubt ask – we are happy to help.
* If you are in compliance you should have very few problems.