

United Kingdom Overseas Territories Aviation Circular

OTAC 139-10
140-4

Relationship between the Aerodrome Certificate Holder and the Rescue & Fire-Fighting Service (RFFS)

Issue 5.00
8 December 2021

Effective: on issue

GENERAL

Overseas Territories Aviation Circulars are issued to provide advice, guidance and information on standards, practices and procedures necessary to support Overseas Territory Aviation Requirements. They are not in themselves law but may amplify a provision of the Air Navigation (Overseas Territories) Order or provide practical guidance on meeting a requirement contained in the Overseas Territories Aviation Requirements.

PURPOSE

This OTAC gives guidance to both the aerodrome certificate holder and the RFFS provider on their obligations to ensure that their respective regulatory responsibilities in relation to RFFS are met.

RELATED REQUIREMENTS

This Circular relates to OTAR Parts 139 and 140.

CHANGE INFORMATION

Minor OTAR reference changes to reflect OTAR 139 issue 9.00.

ENQUIRIES

Enquiries regarding the content of this Circular should be addressed to Air Safety Support International at the address on the ASSI website www.airsafety.aero or to the appropriate Overseas Territory Aviation Authority.

CONTENTS

1 INTRODUCTION3

**2 WHERE THE RFFS IS AN INTEGRAL PART OF THE AERODROME
CERTIFICATE HOLDER’S ORGANISATION.....3**

**3 WHERE THE RFFS PROVIDER IS NOT PART OF THE AERODROME
CERTIFICATE HOLDER’S ORGANISATION.....3**

1 Introduction

- 1.1 ICAO through OTAR Parts 139 and 140 places an obligation on the aerodrome certificate holder to ensure that RFFS complies with OTAR Part 140 and Annex 14.
- 1.2 This OTAC gives guidance to both the aerodrome certificate holder and the RFFS provider on this issue, since RFFS provision can take one of two forms.
- 1.3 In the simplest case, the RFFS is an integral part of the aerodrome certificate holder's own organisation. However, there may be instances where the RFFS is provided by an organisation external to the aerodrome certificate holder's own organisation, for example by the Territory government fire service or a private contractor. Guidance for these two circumstances is set out below.

2 Where the RFFS is an integral part of the aerodrome certificate holder's organisation

In this case the RFFS is an integral part of the aerodrome certificate holder's organisation. Thus, the RFFS is covered by the aerodrome certificate holder's Safety management system (SMS). In this case the RFFS manual forms a natural part of the aerodrome manual system. Some of the information required in RFFS manual relating to organisational structure would naturally be placed in the part of the aerodrome manual dealing with such matters.

3 Where the RFFS provider is not part of the aerodrome certificate holder's organisation

- 3.1 In this case the RFFS is basically a sub-contractor to the aerodrome certificate holder or operator, and consequently there must be a contract or Service Level Agreement (SLA) between the two parties.
- 3.2 Even if the RFFS is provided by a sub-contractor, the requirement to comply with OTAR Parts 139 and 140, and to support the aerodrome certificate holder appropriately, is a mandatory element of the aerodrome certificate. It is recommended that the RFFS provider includes a statement of compliance as part of the SLA. Note that the SLA should be included in the Aerodrome Manual.
- 3.3 Since the responsibility for ensuring that the RFFS complies with OTAR Parts 139 and 140 rests with the aerodrome certificate holder, the regulator will handle all issues related to the RFFS through the certificate holder.
- 3.4 Apart from any business-related material, the SLA should at least include provisions for the following issues:

3.4.1 The level of service provided

In terms of the ICAO Category and hours of service. This is a key issue and is stated in the aerodrome manual.

3.4.2 Procedures for changes in the level of service

This should cover any need to increase the level of service and arrangements in case of depletion of the RFFS available. Changes of a permanent character affect the aerodrome manual.

3.4.3 The organisational structure of the RFFS provider

As it pertains to the service provided for the aerodrome. Include names and responsibilities of the senior persons.

3.4.4 Minimum staffing levels

For the categories of service covered by the SLA.

3.4.5 Arrangements for the integration of RFFS SMS and Aerodrome SMS

In accordance with OTAR Part 140.29(d). Unless the RFFS is covered by the aerodrome certificate holder's SMS, there is a need to ensure appropriate integration between the two systems. Some elements that should be in place include, but are not limited to:

- (a) RFFS representation in the aerodrome safety committee, local runway safety team and other relevant safety groups.
- (b) Sharing of deviation reports and findings, including any follow-up actions.

3.4.6 Arrangements for auditing the RFFS

The aerodrome certificate holder has an obligation to perform audits of the RFFS in accordance with OTAR Part 139.77(b)(9). This is also one of the means by which the aerodrome certificate holder can assure themselves that the RFFS complies with the requirements of OTAR Parts 139 and 140.

The RFFS provider must make available all relevant manuals documents and records, including personal training records for the staff concerned. Similarly, the aerodrome certificate holder will need to make arrangements for these documents and records to be made available to the regulator by the RFFS provider during regulatory audits and as otherwise required by the regulator.

3.4.7 Arrangements for dealing with audit findings

Arrangements to ensure that any findings identified by the aerodrome certificate holder or raised by the regulator will be adequately dealt with through the aerodrome certificate holder or operator. This is to ensure that follow-up actions resulting from the audits referred to above will be implemented, complied with and can be monitored.

3.4.8 Arrangements for supplying the RFFS manual to the regulator

Arrangements must be made to provide RFFS manual, through the aerodrome certificate holder, to the regulator as required.

3.4.9 Participation in Emergency Planning Arrangements

In accordance with OTAR 139 Subpart F the RFFS provider must make available all suitable resources to engage with emergency planning arrangements including the emergency planning committee, specialist rescue services where it has been determined and to take a lead in emergency exercises.