

28<sup>th</sup> July 2015

Mr Steve Moore,  
Civil Aviation Authority of NZ  
Wellington.

Dear Sir,

**Re: 137 Record Keeping**

Thank you for meeting with Alan Beck and myself last week. An outcome of the meeting was that NZAAA was required to draft alternative requirements to what CAA had produced late last year.

**Daily Flying Record**

CAA offered the following advice in respect of completing the DFR:

“Rule Part 91.112 says that Daily Flight Records contain the following:

- (1) The name of the operator
- (2) The name of the pilot in command
- (3) The names of other crew members
- (4) The registration markings of the aircraft
- (5) The date of the flight
- (6) The purpose of the flight
- (7) The time of the commencement of the flight
- (8) The name of the departure aerodrome
- (9) The flight time

The other information about product etc does not have to be recorded on the DFR providing it is recorded somewhere.

You must make an entry for each flight as required by the rule i.e. ferry flights, test flights etc., except when recording daily productive agricultural flights.

In respect of these it is far too onerous to record every take-off so CAA has advised that the following meets the approval of the Director:

Each series of productive flights (sorties) may be recorded separately as one entry, the series of productive flights (sorties) are considered to be those flights that are for example the flights between refuels, meal breaks, rest periods or whenever the pilot stops for a period of time, or alights from the aircraft etc. The entry showing the series of flights must also show the departure point/airstrip or loading area, the purpose of the flights, ie. Spraying, topdressing,

VTA, also the commencement of flight time for each of the series of flights until the series of flights ceases. The number of flights for that series must also be recorded.”

NZAAA is grateful for the dispensation from recording the take off time for each flight as detailed in the underlined area above. NZAAA accepts that some operators may elect to record the take-off time for each flight because they may base other business activities upon that information. E.g. Charging. Others may have technology that automatically records loads and time. But still many others are telling NZAAA that completing the records in the detail that is specified in the underlined section above is creating a dangerous safety situation where the pilots’ focus is taken away from the job in hand. In particular, spraying operations are often subjected to a lot of stopping and starting. Problems with filtration, refuelling every 20 minutes, getting further advice from the client, changing nozzle configuration to treat a sensitive area, are just a few of the examples that mean the pilot is in and out of the cockpit often. All of these things are creating distraction and recording times on each of these occasions makes for even further distraction.

All distractions threaten the safety of a flight.

For that reason NZAAA asks that for those pilots who so choose, they can record the take-off time when productive operations commence and record the landing time when the productive operation finishes. The actual flight time will be recorded in the usual way whether that be by stop watch, air switch, collective switch or soon a TiSR.

Making separate entries for ferry flights, test flights, block inspections and so on do not create extra risk because the pilots are not focussing on the low level risks they have to manage while working in the low level environment.

### Pilot Logbooks

With respect to Pilot Logbooks, CAA has advised:

“The purpose for the flight e.g. ferry, test flight, topdressing, spraying or VTA etc., needs to be recorded in your Logbook, preferably as a separate entry on a separate line. In this case the flight time is required to be recorded in the flight time column appropriate to the aircraft type i.e. single engine or multi engine as PIC or dual

Some pilots prefer to use one line. In this case if the required information can be recorded accurately and legibly, CAA will accept that providing the flight time for both purposes (ferry and productive) is recorded in the appropriate flight time column as mentioned above. If the one line scenario is used for both purposes, then the agricultural flight time productive component must be separated out by recording this in column 16 or 17 on the far right hand side of the logbook.

The ferry flight details must include the purpose of the flight, including the place of departure, any intermediate landing, and the place of arrival. CAA will accept as one entry the whole days ferry flight activity e.g. Ferry – RO – HN – Tirau – Mamaku – RO. Place names must be referenced as known topographical areas not clients' names, and may be abbreviated providing the pilot's logbook contains a key to the abbreviations.

The recording of productive flight details should be recorded as spraying, topdressing or VTA. Some pilots choose to include the client's name but this is an individual choice. All productive flying accumulated on the same day may be recorded as one entry. The topographical area of the agricultural activity is not required to be included twice if the ferry and productive flights were accumulated on the same day because the ferry flight details already describe the location of the agricultural operations."

The area of concern is the area that is underlined above.

Requiring that this information is recorded in the pilot logbook is nothing more than a DUPLICATION of what has already been written on the DFR as required by items (1) through to (9). This is another task the pilots typically have to perform at night when they should be resting.

What is the risk that CAA is trying to manage by requiring that the information on ferry flights be recorded twice?

What is the risk that CAA is trying to manage by requiring that a topographical area name be recorded? The departure aerodromes (8) for both ferry and productive are already listed on the DFR. And we would remind CAA that a large percentage of Agricultural Operations are carried out by helicopters that do not use airstrips (departure aerodromes) but will land beside any dam, creek or other waterway that meets their needs. We believe that the property name meets the needs of defining the area.

We remind you that a large number of our members have raised the need for a change based upon flight safety issues.

Yours faithfully,

NZAAA Executive Officer