

HCAA Guidance for Specialised Operations (SPO)

Regulation (EU) No 965/2012 lays down technical requirements and administrative procedures related to air operation. Operations other than commercial air transport where the aircraft is used for specialised activities such as agriculture, construction, photography, surveying, observation and patrol, aerial advertisement are included in this regulation.

Declaration

SPO operators engaged in commercial specialised operations or engaged in non-commercial specialised operations using a complex motor-powered aircraft shall submit a declaration to the HCAA about their operations. The declaration is required in order to establish and maintain the required oversight programme for SPO operators.

The declaration shall be submitted to info@hcaa.gov.gr before the operations start (Declaration Template).

Commercial specialized operations

Operators shall only operate an aircraft for the purpose of commercial specialised operations as specified in Annexes III (Part-ORO) and VIII (Part-SPO) of [Regulation \(EU\) No 965/2012](#).

High risk commercial specialised operation

'High risk commercial specialised operation' means any commercial specialised aircraft operation carried out over an area where the safety of third parties on the ground is likely to be endangered in the event of an emergency, or, as determined by the competent authority of the place where the operation is conducted, any commercial specialised aircraft operation that, due to its specific nature and the local environment in which it is conducted, poses a high risk, in particular to third parties on the ground.

Upon receiving an application for the issue of a high-risk commercial specialised operations authorisation, the HCAA will review the operator's risk assessment documentation and standard operating procedures (SOPs), related to one or more planned operations and developed in accordance with the relevant requirements of Annex VIII (Part-SPO).

When satisfied with the risk assessment and SOP, the HCAA will issue the authorisation, as established in Appendix VI of Annex II (Part-ARO). The authorisation will be issued for a limited or an unlimited duration. The conditions under which an operator is authorised to conduct one or more high risk commercial specialised operations will be specified in the authorisation.

Any changes which could impact risk assessment and SOP shall be identified by the operator and updates shall be submitted to the HCAA prior to implementing those changes.

List of high-risk activities in Greece

Each activity will need to be assessed by the operator. If the operator believes the activity is to be considered as a high risk (as per definition above), an application shall be made to the HCAA or the operator's EASA member state Competent Authority for a High-Risk Authorisation.

In Greece, the following activities are considered as "high risk":

- HESLO;
- HEC;
- Fire fighting;
- Aerial photography and mapping flights over congested area and open-air assembly of persons and below 3000 AGL;
- Aerial advertising flights over congested area and open-air assembly of persons and below 3000 AGL;
- Construction work flights, including stringing power line operations, clearing saw operations over congested area and open-air assembly of persons;
- Survey operations, including aerial mapping operations, pollution control activity over congested area and open-air assembly of persons and below 3000ft AGL; 8
- News media flights, television and movie flights over congested area and open-air assembly of persons and below 3000 AGL;
- Special events flights, including such as flying display and competition flights
- Flights over congested area and open-air assembly of persons where the minimum flight altitude is not respected.
- Any helicopters specialized operation carried out over congested areas (ref. SPO.POL.146).
- Line-control-flights (e. g. flights to control power-lines, gas-lines, pipelines)
- Any specialized operation performed below the SERA minimum heights;
- Special events flights, including such as flying display and competition flights;
- Aerobatic flights;
- Animal herding, animal rescue flights and veterinary dropping flights;

- Helicopter operations where risks for failure are elevated, among others; due to height/speed ratio (ref H/V diagram);
- Agricultural flights;
- Cloud seeding;
- Parachute operations and skydiving;
- Flights over congested areas or over an open-air assembly of persons, where a safe forced landing cannot be made, or for multi-engine aircraft, the flight cannot be continued safely after failure of one engine;
- Towing of aircraft and other objects, excluding sailplane and glider towing

This list may be subject to amendment.

Additional information

In case of questions related to SPO regulation, please consult EASA SPO page:

<https://www.easa.europa.eu/domains/air-operations/specialised-operations-spo>

or send an e-mail to: info@hcaa.gov.gr

DECLARATION

in accordance with [Commission Regulation \(EU\) No 965/2012](#) on air operations

Operator

Name:

Place in which the operator has its principal place of business or, if the operator has no principal place of business, place in which the operator is established or residing and place from which the operations are directed:

Name and contact details of the accountable manager:

Aircraft operation

Starting date of operation and applicability date of the change:

Information on aircraft, operation and continuing airworthiness management organisation ⁽¹⁾:

Type(s) of aircraft, registration(s) and main base:

Aircraft MSN ⁽²⁾	Aircraft type	Aircraft registration ⁽³⁾	Main base	Type(s) of operation ⁽⁴⁾	Organisation responsible for the continuing airworthiness management ⁽⁵⁾

The operator shall obtain a prior approval ⁽⁶⁾ or specific approval ⁽⁷⁾ for certain operations before conducting such operations.

Where applicable, details of approvals held. Attach the list of specific approvals. Include:

- specific approvals granted by a third country, if applicable;
- name of operations conducted with operational credits (e.g. EFVS 200, SA CAT I, etc.).

Where applicable, details of specialised operations authorisation held (attach authorisation(s), if applicable).

Where applicable, list of alternative means of compliance (AltMoC) with references to the associated AMC they replace (attach AltMoC).

Statements

- The operator complies, and continues to comply, with the essential requirements set out in Annex V to [Regulation \(EU\) 2018/1139](#) of the European Parliament and of the Council and with the requirements of [Regulation \(EU\) No 965/2012](#).
- The management system documentation, including the operations manual, shall comply with the requirements of Annex III (Part-ORO), Annex V (Part-SPA), Annex VI (Part-NCC) or Annex VIII (Part-SPO) to [Commission Regulation \(EU\) No 965/2012](#) and all flights shall be made in accordance with the provisions of the operations manual as required by point [ORO.GEN.110\(b\)](#) of Part-ORO.

<input type="checkbox"/> All operated aircraft shall hold: <ul style="list-style-type: none"> — a valid certificate of airworthiness in accordance with Commission Regulation (EU) No 748/2012 or, for aircraft registered in a third country, in accordance with ICAO Annex 8; and — when used for SPO activities, a valid lease agreement as per ORO.SPO.100.
<input type="checkbox"/> All flight crew members shall hold a licence in accordance with Annex I to Commission Regulation (EU) No 1178/2011 as required by point ORO.FC.100(c) of Part-ORO, and cabin crew members shall, where applicable, be trained in accordance with Subpart CC of Part-ORO.
<input type="checkbox"/> (If applicable) The operator shall implement and demonstrate conformity to a recognised industry standard. Reference of the standard: Certification body: Date of the last conformity audit:
<input type="checkbox"/> The operator shall notify to the competent authority any changes in circumstances affecting its compliance with the essential requirements set out in Annex V to Regulation (EU) 2018/1139 and with the requirements of Commission Regulation (EU) No 965/2012 as declared to the competent authority through this declaration, and any changes to the information and lists of AltMoC included in and annexed to this declaration, as required by point ORO.GEN.120(a) of Part-ORO.
<input type="checkbox"/> The operator shall confirm that the information disclosed in this declaration is correct.
Date, name, and signature of the accountable manager
<p>(1) If there is not enough space to list the required information in the declaration, the information shall be listed in a separate annex. The annex shall be dated and signed.</p> <p>(2) Manufacturer serial number.</p> <p>(3) If the aircraft is also registered with an AOC holder, specify the AOC number of the AOC holder.</p> <p>(4) ‘Type(s) of operation’ refers to the type of operations conducted with this aircraft, e.g. non-commercial operations or specialised operations, e.g. aerial photography flights, aerial advertising flights, news media flights, television and movie flights, parachute operations, skydiving, maintenance check flights.</p> <p>(5) Information about the organisation responsible for the continuing airworthiness management shall include the name of the organisation, its address, and the approval reference.</p> <p>(6) (a) operations with any defective instrument or piece of equipment or item or function, under a minimum equipment list (MEL) (points ORO.MLR.105 (b), (f), and (j), NCC.IDE.A.105, NCC.IDE.H.105, SPO.IDE.A.105, and SPO.IDE.H.105).</p> <p>(b) Operations requiring prior authorisation or approval, including all of the following:</p> <ul style="list-style-type: none"> — for specialised operations, wet lease-in and dry lease-in of aircraft registered in a third country (point ORO.SPO.100 (c)); — high-risk commercial specialised operations (point ORO.SPO.110); — non-commercial operations with aircraft with an MOPSC of more than 19, which are performed without — an operating cabin crew member (point ORO.CC.100 (d)); — use of IFR operating minima that are lower than those published by the State (points NCC.OP.110 and SPO.OP.110); — refuelling with engine(s) and/or rotors turning (point NCC.OP.157); — specialised operations (SPO) without oxygen above 10 000 ft (point SPO.OP.195). <p>(7) Operations in accordance with Annex V (Part-SPA) to Regulation (EU) No 965/2012, including Subparts B ‘Performance based navigation (PBN) operations’, C ‘Operations with specified minimum navigation performance (MNPS)’, D ‘Operations in airspace with reduced vertical separation minima (RVSM)’, E ‘Low-visibility operations (LVOs) and operations with operational credits’, G ‘Transport of dangerous goods’, K ‘Helicopter offshore operations’ and N ‘Helicopter point-in-space approaches and departures with reduced VFR minima’.</p>