



RPAS OPERATOR EMERGENCY RESPONSE PLAN (ERP)

SECTION 1 GENERAL

1.1 PURPOSE

The purpose of this advisory circular is to provide guidance to the RPAS Operator regarding the development and submission of an effective and efficient Emergency Response Plan (ERP) which outlines what shall be done before, during and after the event of a crises or an accident as required by the Ghana Civil Aviation Directives.

1.2 STATUS OF THIS ADVISORY CIRCULAR

This AC is an original issuance.

1.3 BACKGROUND

- 1) Safety has always been the overriding consideration in the conduct of all aviation activities
- 2) In 2013, ICAO published guidance in Appendix 3 to Chapter 5 of ICAO Doc. 9859 3rd Edition concerning the requirement for aviation organizations to have effective plans in place to manage events during or following an emergency or crisis.

1.4 APPLICABILITY

This advisory circular is applicable to all Ghana Remotely Piloted Aircraft Systems (RPAS) Operator Certificate Holders as well as those Operators identified under the Ghana Assessment of Risk for RPAS Operators (ARRO) Methodology.

1.5 RELATED DIRECTIVES

The following directives are directly applicable to the guidance contained in this advisory circular—

- Ghana Civil Aviation Directives Part 28 Subsection 28.8 (3).
- AC 09-005: Preparation of an Acceptable Safety Management System
- ICAO Doc. 9859 3rd Edition, Safety Management Manual

1.6 RELATED READING MATERIAL

- 1) ICAO Circular 285
- 2) IATA Emergency Response Plan, A template for Air Carriers
- 3) Safety Management Systems (SMS) for organizations, CAP 795, CAA

1.7 ACRONYMS

The following acronyms and abbreviations are used in this advisory circular—

- 1) **AC** – Advisory Circular
- 2) **AIB** – Accident Investigation Bureau
- 3) **CONOPS** – Concept of Operations
- 4) **ERP** – Emergency Response Plan
- 5) **GCAA** – Ghana Civil Aviation Authority
- 6) **GCADs** – Ghana Civil Aviation Directives
- 7) **ROC** – RPAS Operator Certificate
- 8) **ROM** – RPAS Operator Manual
- 9) **RPAS** – Remotely Piloted Aircraft Systems

SECTION 2 EMERGENCY RESPONSE PLAN

2.1 DEFINITION

- (1) An emergency response plan (ERP) outlines in writing what should be done after an accident or during an aviation crisis and who is responsible for each action. Among different product and service providers, such emergency planning may be known by different terms such as contingency plan, crisis management plan and continuing airworthiness support plan.
- (2) Perhaps because aviation accidents are rare events, few organizations are prepared when one occurs. Many organizations do not have effective plans in place to manage events during or following an emergency or crisis. How an organization fares in the aftermath of an accident or other emergency can depend on how well it handles the first few hours and days following a major safety event.

2.2 AIMS AND OBJECTIVES OF THE ERP

2.2.1 BACKGROUND AND AIM

- (1) ERP is essentially an integral component of an organization's safety risk management procedure to address all possible safety or quality-related emergencies, crises or events that its product or services could contribute to or be associated with.
- (2) The ERP should hence address all possible/likely scenarios and have appropriate mitigating actions or processes put in place so that the organization, its customers, the public and/or the industry at large may have a better level of safety assurance as well as service continuity.
- (3) Successful response to an emergency begins with effective planning. An ERP provides the basis for a systematic approach to managing the organization's affairs in the aftermath of a significant unplanned event — in the worst case, a major accident.

2.2.2 OBJECTIVES OF ERP

- (1) GCAA does not require the use of a specific planning approach or method for the planning of an ERP, however, it must be developed in a deliberate and collaborative manner.
- (2) The objectives of an emergency response plan shall ensure:
 - a) delegation of emergency authority;
 - b) assignment of emergency responsibilities;
 - c) documentation of emergency procedures and processes;
 - d) coordination of emergency efforts internally and with external parties;
 - e) safe continuation of essential operations while the crisis is being managed;
 - f) prevention and mitigation of secondary damage to life, property or the environment; and
 - g) proactive identification of all possible emergency events/scenarios and their corresponding mitigation actions, etc.

SECTION 3 EMERGENCY RESPONSE MANUAL

- (1) There is the need for the Emergency Response Plan to be documented and submitted to the Ghana Civil Aviation Authority for evaluation and subsequent acceptance.
- (2) The RPAS Operator may include the procedures of the Emergency Response Plan as a subsection of the ROM/CONOPS or may be a standalone document which should set out the responsibilities, roles and actions of the various agencies and personnel involved in dealing with specific emergencies and must cover at least the following:
 - a) **Governing policies.** The ERP should provide direction for responding to emergencies, such as governing laws and regulations for investigations, agreements with local authorities, company policies and priorities.
 - b) **Organization.** The ERP must reflect key issues such as designation of leadership in response teams, reporting lines, roles and responsibilities, designation of corporate spokespersons and company representative for formal investigation by state agencies and authorities. An organizational chart could be used to show organizational functions and communication relationships.
 - c) **Notifications.** The plan should specify who in the organization should be notified of an emergency, who will make external notifications and by what means. The notification needs of Management, State Authorities (Search and Rescue, GCAA & AIB), local emergency response, relatives of victims, media, company personnel and legal or insurance organizations should be taken into consideration.
 - d) **Initial response.** Depending on the circumstances, an initial response team may be dispatched to the accident or crisis site to augment local resources and oversee the organization's interests. Procedures to be taken should be addressed.
 - e) **Additional assistance.** Employees with appropriate training and experience can provide useful support during the preparation, exercising and updating of an organization's ERP.
 - f) **Emergency management centre (EMC).** An EMC (normally on standby mode) may be established at the organization's headquarters once the activation criteria have been met. In addition, a command post (CP) may be established at or near the crisis site and should address staffing, communications, documentation etc. However, the services of a crises center can also be contracted out to specialist organizations.

- g) **Records.** In addition to the RPAS Operator's need to maintain logs of events and activities. The organization will also be required to provide information (which must include but is not limited to relevant records, details of personnel, notes of interviews and photographic evidence) to any State investigation team.
- h) **Accident site.** For a major accident, representatives from many jurisdictions may have legitimate reasons for accessing the site: for example, police; fire fighters; medics; coroners (medical examining officers) to deal with fatalities; AIB accident investigators; relief agencies such as the Red Cross and even the media. Although coordination of the activities of these stakeholders is the responsibility of the Police and/or AIB, the RPAS Operator should indicate how it intends to coordinate with all such agencies in implementing emergency response procedures. The RPAS Operator shall consider the different scenarios that could present itself and the mitigation and relief procedures that shall be implemented.
- i) **News media.** How the company responds to the media may affect how well the company recovers from the event. Clear direction is required regarding how the RPAS Operator intends to communicate to the media on the state of the crises or accident.
- j) **Formal investigations.** Guidance for company personnel dealing with State accident investigators and police should be provided.
- k) **Family assistance.** The ERP should also include guidance on the RPAS Operator's approach to assisting crisis victims or customer organizations. Note. — ICAO Circular 285, Guidance on Assistance to Aircraft Accident Victims and their Families, provides further guidance on this subject
- l) **Post-occurrence review.** Direction should be provided to ensure that, following the emergency, key personnel carry out a full debrief and record all significant lessons learned which may result in amendments to the ERP and associated procedures.
- m) **Checklists.** Everyone involved in the initial response to a major aviation event may be suffering from some degree of disorientation. Therefore, the emergency response process lends itself to the use of checklists. These checklists shall form an integral part of the emergency response manual. To be effective, these checklists must be regularly reviewed through exercises and updated to ensure that they meet with current emergency response needs.

SECTION 4 IMPLEMENTATION OF EMERGENCY RESPONSE PLAN

- (1) An ERP is a paper indication of intent. Hopefully, much of an ERP will never be tested under actual conditions. Training is required to ensure that these intentions are backed by operational capabilities. Since training has a short “shelf life”, regular drills and exercises are advisable. Some portions of the ERP, such as the call-out and communications plan, can be tested by “desktop” exercises. Other aspects, such as “on-site” activities involving other agencies, need to be exercised at regular intervals. Such exercises have the advantage of demonstrating deficiencies in the plan, which can be rectified before an actual emergency. For certain Operators the periodic testing of the adequacy of the plan and the conduct of a full-scale emergency exercise may be mandatory.

- (2) To be effective in implementation, the RPAS Operator’s ERP should meet the following criteria:
 - a) be appropriate to the size, nature and complexity of the organization;
 - b) be readily accessible to all relevant personnel and other organizations where applicable;
 - c) include checklists and procedures relevant to specific emergency situations;
 - d) have quick-reference contact details of relevant personnel;
 - e) be regularly tested through exercises;
 - f) be periodically reviewed and updated when details change, etc.

End of Advisory Circular