Summary of Stakeholder Engagement

ACP-2020-29

12th June 2020

CONFIDENTIAL

1. INTRODUCTION

Flylogix have been contracted for up to 6 Unmanned Aircraft (UA) flights to 3 oil and gas facilities west of Shetland in August/September 2020. The operations will be conducted from Scatsta airfield – which will, by August, be closed to manned aviation. The operations will be conducted in a Temporary Danger Area (TDA). Flylogix have submitted an airspace change request (ACP-2020-29) to establish this TDA.

2. OBJECTIVES OF ENGAGEMENT AND THIS DOCUMENT

Flylogix engaged with aviation stakeholders (airspace users, air navigation service providers and aerodromes) on the safety and operational viability of the proposed TDA. The strategy of this engagement is outlined in *Stakeholder engagement strategy ACP-2020-29* which was submitted to the CAA and uploaded to the Airspace Change Portal.

This document summarises the results of the engagement.

3. STAKEHOLDERS

Organisation	Name and role	Reason for engagement
Highlands and Islands Airports	[redacted]	Operator of Sumburgh Airport
Shetland Council	[redacted]	Owner/operator of Tingwall, Papa Stour and Foula airports
DAATM	[redacted]	Co-ordinate MoD response
ARCC	[redacted]	Task SAR helicopter
Loganair	[redacted]	Operate commercial flights from Sumburgh

Airtask	[redacted]	Operate Inter Island Service, Fishery protection aircraft and NCAS Research aircraft
NATS Aberdeen	[redacted]	ANSP for area and operate Sumburgh Radar who are providing Danger Area Crossing Service
BP HeliOps	[redacted]	BP are the operator of the oil facilities and the aviation team sign off the BP risk assessment
Bristow	[redacted]	Operate helicopters from Shetland to offshore oil and gas facilities, including for BP
CHC	[redacted]	Operate helicopters from Shetland to offshore oil and gas facilities
NHV	[redacted]	Operate helicopters from Shetland to offshore oil and gas facilities
Babcock	[redacted]	Operate helicopters from Shetland to offshore oil and gas facilities

4. SUMMARY OF FEEDBACK

4.1 Highlands and Islands Airports

Proposed changes to TDA design	Notification of flight required, or additional procedures requested	Other feedback
None	Not required	Supplied details of other air users who should be engaged. These were subsequently contacted.

The [redacted] at Sumburgh had no specific feedback on the TDA. He shared details of other air users who should be consulted. This included some who had already been contacted and also three (CHC, NHV, Babcock) who had not. These air users were contacted subsequently.

He forwarded details of the proposed TDA to the [redacted] and no feedback was received.

The full correspondence has been submitted to the CAA

4.2 Shetland Council

Proposed changes to TDA design	Notification of flight required, or additional procedures requested	Other feedback
None	Not required	None

Shetland Council, as operators and owners of Tingwall, Papa Stour and Foula airfields reported that the TDA "should have no impact on operations" and reported they currently have low traffic.

The full correspondence has been submitted to the CAA

4.3 DAATM

Proposed changes to TDA design	Notification of flight required, or additional procedures requested	Other feedback
None	Yes – procedures being finalised with RAF Lossiemouth	Asked for clarity on lost link and transponder

DAATM collated feedback from across the MOD. They had no comments on the design of the TDA itself.

They highlighted that there may be an operational requirement (not a training mission) for an MOD Aircraft to operate in the vicinity or within the boundaries of the TDA. Therefore they require a local agreement to be set up with the team at RAF Lossiemouth. A draft agreement has been sent to RAF Lossiemouth for discussion and will be finalised before the flight.

Additionally DAATM asked if the lost link behaviour would ensure the aircraft would remain in the TDA and if the aircraft would have a transponder. We explained how the lost link behaviour worked and reported that the safety case did not include a transponder but the UA can carry a transponder and it may be fitted.

The full correspondence has been submitted to the CAA

4.4 ARCC

Proposed changes to TDA design	Notification of flight required, or additional procedures requested	Other feedback
None	Temporary Operating Instructions for SAR aircraft entering the TDA required. Draft version sent	None

ARCC contfirmed the TDA dimensions and locations did not impact SAR except in the event of an emergency within the TDA.

In line with other UA operations within TDAs they proposed Temporary Operating Instructions (TOI) were developed to cover the situation where a SAR aircraft needed to enter the TDA when it was active.

Based on previous procedures Flylogix sent a draft TOI. ARCC and Flylogix have discussed the procedure and ARCC are currently producing a final version of the TOI.

The full correspondence has been submitted to the CAA

4.5 Loganair

Proposed changes to TDA design	Notification of flight required, or additional procedures requested	Other feedback
None	Not required	None

Loganair reported that the operation and TDA was clear of their operations from Sumburgh and would not impact them.

The full correspondence has been submitted to the CAA

4.6 Airtask

Proposed changes to TDA design	Notification of flight required, or additional procedures requested	Other feedback
Yes – suggested increasing ceiling of TDA to 1,300ft to	Yes. Agreed procedures to liaise with NCAS research	No

allow 500ft of separation to UA operating at 800ft	aircraft and fishery protection to avoid impacting their operations	

Airtask provided feedback on the TDA and suggested that the ceiling of the TDA be raised to 1,300ft. to give 500ft of separation between the UA operating at a maximum of 800ft and other aircraft.

Increasing the distance between the maximum altitude of the unmanned aircraft and the ceiling of the TDA would increase the volume of airspace in the TDA – risking restricting other air users. Flylogix's safety case is built around remaining within the TDA and we have put in place mitigations including a geofence to ensure this. The TDA is within Class G airspace, which has no fixed separation and other air users are able to select their own separation.

Flylogix therefore have decided to keep the ceiling of the proposed TDA at 1,000ft to minimise the utilisation of airspace

The NCAS atmospheric research aircraft and fisheries protection aircraft may be operating west of Shetland at low level in August and early September. We have therefore agreed with Airtask to contact these teams by email before activating the TDA by NOTAM to ensure we are not impacting their operations.

The full correspondence has been submitted to the CAA

4.7 NATS Aberdeen

Proposed changes to TDA design	**Notification of flight required, or additional procedures requested**	**Other feedback**
None	Procedures agreed in advance of Engagement and included in OSC Temporary Operating Instructions for controllers will be updated from 2019 version	Enquired if UA would have a transponder fitted to gather data on performance

NATS Aberdeen, who operate Sumburgh Radar, have provided a Danger Area Crossing Service for Flylogix's two previous operations from Scotland. The procedures for communicating with ATC were agreed in advance of the ACP process and included in the OSC for the operation.

There was no feedback on the proposed TDA design. Aberdeen ATC will update the Temporary Operating Instructions with details of the TDA once it is published in the AIC.

NATS enquired if the UA would be equipped with a transponder. They would like to be able to gather data on performance of the transponder before trials later in 2020.

The full correspondence has been submitted to the CAA

4.8 BP HeliOps

Proposed changes to TDA design	Notification of flight required, or additional procedures requested	Other feedback
None	In place through Method Statement	None at this stage

BP operate the facilities that are being surveyed by the unmanned aircraft. The BP environmental team, offshore teams on the facilities and HeliOps team have all been involved in the planning of the operation. The BP internal Risk Assessment will be signed off by the HeliOps team and a method statement detailing the procedures for the flights has been developed with the offshore teams.

The HeliOps team were consulted on the TDA design and had no feedback.

The full correspondence, draft risk assessment and method statement have been submitted to the CAA

4.9 Bristow

Proposed changes to TDA design	Notification of flight required, or additional procedures requested	Other feedback
None	Email notification requested when TDA activated	Procedures with ARCC will cover SAR flights Flights should occur at the weekend if possible to reduce oil and gas helicopter impact

There was no feedback from Bristow on the design of the TDA.

Bristow had questions on how other air users were notified and how a SAR helicopter, which they operate, could be tasked. We discussed the procedures in place with ARCC on a call and they confirmed by email.

The full correspondence has been submitted to the CAA

4.10 CHC

Proposed changes to TDA design	Notification of flight required, or additional procedures requested	Other feedback
None	Not required	None

CHC operate helicopter for oil and gas operators from Sumburgh. They had no comments or feedback on the proposed TDA

The full correspondence has been submitted to the CAA

4.11 NHV

Proposed changes to TDA design	Notification of flight required, or additional procedures requested	Other feedback
None	Flylogix will contact before first flight to confirm drilling operations have not moved locations	Highlighted that helicopter traffic is lower at the weekends

NHV operate helicopters from Sumburgh for oil and gas customers. They had no objections to the proposed TDA. They highlighted that there were drilling operations close to the TDA that they are supporting by helicopter. They highlighted that this drilling operation could move and be within the TDA. Flylogix will contact NHV before the first flight to confirm the position of the drilling.

NHV also pointed out that conducting the operations at weekends would reduce the impact on helicopter flights.

The full correspondence has been submitted to the CAA

4.12 Babcock

Proposed changes to TDA design	Notification of flight required, or additional procedures requested	Other feedback
None	Not required	None

Babcock are a helicopter operator. They reported they are not planning to operate west of Shetland in August and September and had no feedback on the TDA.

The full correspondence has been submitted to the CAA

5. CONCLUSION AND ACTIONS

5.1 TDA design

There was one comment on the TDA design – suggesting that the ceiling of the TDA be increased to 1,300ft to allow 500ft separation between the ceiling and unmanned aircraft.

Flylogix have decided to keep the proposed ceiling at 1,000ft in line with previous TDAs and to minimise the amount of airspace within the TDA.

5.2 Notification and procedures

Some air users asked for notification, in addition to the NOTAM, or formal procedures to allow access to the airspace if required.

Actions to consult on timing of flights

- BP HeliOps – The procedures co-ordinating with BP HeliOps on the timing of the flights are included in the Method Statement
- Airtask- Flylogix will email Airtask to ensure that there is no conflict with planned operations by NCAS or Fisheries Protection before activating the TDA through NOTAM
- Aberdeen ATC – Flylogix will contact Aberdeen ATC by telephone to ensure they can provide a Danger Area Crossing Service before issuing a NOTAM to activate the TDA
- NHV - Before the first flight Flylogix will confirm with NHV by email that the drilling activity near the TDA has not moved into the TDA

Actions to notify the TDA is active

- Bristow – Flylogix will email Bristow to notify them of the activation of the TDA

Actions for setting up procedures to allow an aircraft to access the active TDA if required

- ARCC – Flylogix will finalise a TOI so that ARCC task a SAR helicopter into the airspace if required
- RAF Lossiemouth – Flylogix will finalise a Local Agreement with RAF Lossiemouth so they can access the airspace for operational reasons if required

5.3 Transponder

Equipping with an ADS-B and Mode-S transponder would give other air users additional situational awareness. The OSC Flylogix has submitted does not include a transponder but the aircraft is set

up to carry one. Flylogix will consult the CAA UAS Sector Team to determine if the UA can be equipped with a transponder.

APPENDIX 1 COMMUNICATION WITH STAKEHOLDERS

FULL COMMUNICATION WITH ALL STAKEHOLDERS WAS SUBMITTED TO THE CAA BUT IS REMOVED IN THIS REDACTED VERSION