

Maritime and Coastguard Agency Urgent Operational Requirement (North Wales)

Final Submission (Stage 4)

Date:- July 2021

Introduction

This document details a proposed temporary change to airspace in the vicinity of Caernarfon Airport, the Lleyn Peninsula and the West Anglesey Coast to support UAS operations conducted by Bristow Helicopters Limited on behalf of the Maritime & Coastguard Agency.

This document intends to:

- 1. Define the State requirement.
- 2. Inform you of the Unmanned Aircraft System (UAS) to be deployed.
- 3. Inform you of the areas of high incident rate as defined by HM Coastguard.
- 4. Inform you of the proposed duration of the of the change.
- 5. Airspace Management
- 6. Stakeholder Engagement
- 7. Engagement Period
- 8. How to respond
- 9. Regional Aviation Stakeholders
- 10. Summary
- 11. Final, agreed airspace solution post stakeholder engagement
- 12. Draft Briefing Sheet
- 13. Stakeholder Engagement Summary.

1. FORMAL STATE REQUIREMENT - CAERNARFON AND NORTH WALES

This statement confirms the essential State operational requirement that will be addressed by Bristow Helicopters Limited (BHL) utilising unmanned aircraft systems (UAS) deployed from Caernarfon Airport.

The Department for Transport (DfT) has been requested to reinstate routine, pro-active beach patrols in busy areas as result of the anticipated increased levels of visitors to the coast this year. Crewed SAR helicopters are currently being used to proactively patrol popular tourist areas as a strategic measure in high-risk locations, providing safety overwatch and real time operational intelligence to HM Coastguard operational commanders, and offering reassurance to those enjoying coastal leisure activities. These proactive presence flights potentially remove these assets from their primary life-saving function to those in immediate distress.

The Requirement:

• In Summer 2020 the easing of lockdown restrictions saw an overwhelming increase in visitors to the coast and a subsequent surge in incidents.

• The surge in incidents corresponded to a rise in 'Regulation 28 Reports to Prevent Future Deaths' in coastal locations in 2020 compared to previous years.

• Statistics published by Visit Britain, predict a further increase in domestic overnight trips in Summer 2021 compared to 2020 with a considerable proportion intending to visit/stay in traditional coastal/seaside towns and rural coastline locations.

• The coast of North Wales is the second busiest area of the UK in terms of MCA recorded incidents.

HM Coastguard has been working closely with local authorities and emergency services to utilise resources effectively to cope with the predicted increase in SAR Incidents. Deploying Bristow's UAS for beach patrols and safety overwatch in areas of North Wales provides operational staff at HM Coastguard with vital intelligence which can be shared with the other local organisations, ensuring effective deployment of ground resources and allowing for preventative measures to be put in place. The SAR Helicopter is therefore relieved of these duties and remains on standby to deliver its primary lifesaving function in support of HM Coastguard, North Wales Police and the Welsh Ambulance Service.

The proposed airspace design will be formally articulated via the agreed route in due course. The areas have been selected based on operational statistics collated by Holyhead Coastguard and the HM Coastguard Drowning Prevention Team. An overview of these statistics is included below. The intended airspace will incorporate standard operating procedures that have been used consistently and effectively for the past year by Bristow, with minimal impact to other airspace users, and include areas that will be needed to support areas of concern, again based on historical incident locations. The MCA is keen to embrace innovative technology in aviation that can improve the efficiency and effectiveness of SAR, reduce the risk to MCA personnel and ultimately save lives, and with that we have worked closely with the CAA to ascertain and develop the regulatory requirements to safely incorporate UAS technology into the future of aviation and hope to use this opportunity to continue that work.



HM Coastguard Historic Incident Data – North Wales (Zones 30 & 31)

These charts show the number of HM Coastguard incidents in the North Wales and Anglesey area for 2019, 2020 and 2021 so far. The yellow line shows how the number of HM Coastguard incidents were heightened in Summer of 2020, with a significant surge correlating with the relaxation of lockdown measures and the start of the Summer Holidays. The orange line clearly displays a further increase in 2021 and, as well as following the annual surge during the Summer Holidays, the incident numbers are widely predicted to continue to be inflated due to the restrictions on foreign travel and the UK's recovery from the pandemic.

These Heat Maps show the distribution of incidents in the North Wales and Anglesey area for 2019 and 2020 and demonstrate how the decision regarding airspace is being made. It is important to note that the area of Colwyn Bay is well covered by a good quality webcam which can provide overwatch within the HM Coastguard Operations Room so there is no requirement for airspace in that area at this time.





2. Unmanned Aircraft System (UAS) to be deployed.

Currently based at Caernarfon Airport, Bristow Helicopters Ltd hold a CAA Operation Authorisation to operate the Schiebel S-100 Camcopter. Bristow routinely perform complex UAS operations with UK SAR(H) and have displayed to the UK regulator and MCA aviation assurance teams the ability to integrate within busy, known air traffic environments. Bristow UAS have also displayed viable and effective operational capability during legacy Safety Overwatch taskings undertaken in North Wales at the request of the MCA. The DfT have been requested to reinstate these routine assurance patrols and therefore the MCA have formally requested that Bristow's UAS support to the emergency services in the wake of the UK's ongoing recovery from the Covid-19 pandemic.



Bristow S-100 Camcopter on HM Coastguard operations

The Schiebel S-100 Camcopter is a sub 150kg (dry) UAS employed by military and civilian organisations alike with some 400+ units operating worldwide. It has accrued in excess of 80,000 flying hours.

The aircraft can operate for up to 6 hours during both day and night under adverse weather conditions. The UAS has a potential operating range of 100 km using current Bristow capability, both over land and at sea.

Electronic conspicuity is provided by a dedicated transponder module consisting of a Mode S/ADS-B transponder (In/Out). The Bristow UAS ground station is also equipped with a VHF radio to allow UAS crews, air traffic control agencies and other manned aircraft to communicate directly on the appropriate channel. In addition to its main EO/IR payload, the S-100 is also fitted with a forwardlooking camera, permanently displayed and monitored in the ground control station to assist in terrain, obstacle and traffic avoidance. Live payload feed from on board sensor suites can be exported securely to command centres and ground teams.

Bristow's current UAS Operational Authorisation details standard operating procedures closely mirroring that of manned aviation. As such, this allows suitably equipped air navigation service providers (ANSP's) to control a known airspace environment allowing other collaborative aircraft to pass through any required temporary danger areas, significantly reducing the impact to other air users

- 3. Areas of high incident rate as defined by HM Coastguard
- a) West Anglesey



West Anglesey area/s of high incident rate as collated by HMCG.



b) Lleyn Peninsula/Portmadog

Lleyn Peninsula area/s of high incident rate as collated by HMCG.

4. Proposed Duration of the Change

In line with regional incident statistics, UAS capability has been requested to cover the period from the 1st of August 2021 to the 19th of September 2021. The UAS has a flight endurance of around 5 hours and will be tasked in accordance with HM Coastguard operational requirements. Bristow currently expect routine flights in the region of 3-4 days per week to include night operation as requested by HMCG.

Expected hours of routine operation for proactive beach patrols.

In order to maximise the use of the UAS in terms of providing cover during *likely* incident occurrence times around beaches there are two factors – a) A rising tide (causing cut off type incidents) and b) Midafternoon (where a typical peak occurs in numbers regardless). Both weekday and weekend operations are anticipated. The West Anglesey area will only be activated at times when RAF Valley are closed or during emergency tasking.

5. Airspace Management

Airspace management will be in accordance with Bristow's extant UAS Operational Authorisation. The CAA remains supportive of BHL UAS control within the air traffic control zones and therefore there is no requirement for further segregation of airspace within Caernarfon Airport ATZ. UAS will arrive, depart, penetrate, and cross under the control of the appropriate controlling authority. This will be coordinated via VHF comms as per manned aircraft operation or by redundant means should VHF become unviable due to range, atmospherics, equipment failure etc. This operational model is currently in daily use without issue and successfully limits any potential impact to regional GA and military flying operations.

The CAA's policy on managed and flexible segregation requires TDAs to be broken down into sectors. While these are less easy to plot, and to draw to the attention of traffic unfamiliar with them, they will be much less restrictive to those who regularly and routinely use the airspace and means that other traffic need only avoid the sector that the UAS is within at that time. This will be managed by the nominated controlling authority as NOTAM'd.

Provision to pass under or over a TDA sector has also been built in through the construction of 'floating' TDA's sectors which do not extend to surface and capped TDA ceilings. Again, this mirrors Bristow's current operational UAS airspace model.

DAAIS/DACS

In line with current and established Bristow airspace management and during their normal operating hours, RAF Valley will act as the controlling authority for the complex providing both a DAAIS and DACS. DACS will only be provided where a full airspace surveillance picture is available and the increase in workload does not adversely affect normal RAF Valley operations.

In periods when RAF Valley are closed or unable to provide DAAIS/DACS i.e weekend/evening operation, this function will be carried out by London FIS. Due to having no radar capability in the region, London FIS will not provide a DACS.

TDA Activation

TDA's by their very nature, would **not be** permanently active but would instead be activated by utilising Notice to Airmen (NOTAM). All efforts will be made to provide a minimum of 24 hours' notice prior to use although this may be less due urgent HMCG tasking. The activation of the entire complex on the same day may not be required. Only the minimum amount of airspace required will be activated to satisfy tasking objectives.

TDAs will **only be activated for the duration of the UAS tasking window** and would be deactivated on completion. Bristow do not intend to task more than one unmanned air vehicle at a time. This is very much driven by operational requirement, but routine flights are expected to be between 3-5 hours.

Notification

In addition to normal channels, details of published AIC's, briefing sheets and NOTAM'd UAS activity can be located at <u>https://uas-ops.co.uk</u>.

It is not the MCA's or Bristow's intent to deny airspace. Mirroring manned aircraft traffic management, the DAAIS/DACS will manage all airborne assets in and around the complex and allow access through, under or over the sector in question if deemed safe to do so by the managing authority. The S-100 Camcopter's positional accuracy has been verified by RAF Valley LARS during previous collaborative flight trials. This will be achieved through effective communication between the UAS crew, the air traffic controlling authority offering DAAIS/DACS and by utilising the known airspace picture provided by electronic conspicuity. (ADS-B/Mode-S).

S-100 Camcopter UAS Electronic Conspicuity (EC) is provided by an integrated MODE S/ADS-B transponder module providing visibility, tracking and real time location of the UAS. This system also integrates with detect and avoidance technology such as the Traffic Collision Avoidance System (TCAS II), as fitted to Bristow SAR(H). The S-100 is also fitted with a EO/IR turret and forward-looking camera, permanently displayed, and monitored in the ground control station to assist in terrain, obstacle and traffic avoidance.

Emergency Access

In the event emergency access is required for take-off/landing or access into the TDA by other manned aircraft such as Bristow SAR(H) or HEMS, then this would be facilitated and coordinated by the relevant and managing air traffic authority. Bristow UAS crews can be contacted directly on Caernarfon Radio, RAF Valley or UAS GCS freq. In addition, established telephone and ground radio comms provide redundancy.

6. Stakeholder Engagement

Targeted and ongoing engagement will be managed via the Bristow Stakeholder Management Tracker. This has been established to identify and maintain a record of all aviation stakeholders' responses to evidence engagement, feedback and also to capture any concerns and complaints. BHL have made a conscious effort to reduce the impact to all stakeholders to as low as reasonably practicable, making concessions were at all possible (see chapt 11) and utilising 'floating TDA' sectors to limit the impact to other air users whilst maintaining the MCA's desired operational coverage within North Wales.

7. Engagement Period

In submitting this proposal, Bristow and the MCA welcome your engagement. Due to urgent State requirement, this process is supported by a rationale for scaled engagement which begins on the 22nd of July 2021 and closes on the 31st of July 2021. In addition to emailed returns in accordance with Chapter 8 below, should you wish to engage directly with the MCA and Bristow team, all identified aviation stakeholders are cordially invited to attend a Teams meeting to discuss the requirement and proposal on the 27th of July at 1400.

8. How to respond

Please provide your responses via the following email address. Should you have no comment or concerns, notification of nil returns would be very much appreciated.

airspacetrialconsultation@bristowgroup.com

9. Regional Aviation Stakeholders

UAS Tasking/Operation

- RAF Valley
- Caernarfon Airport
- London FIS
- Holyhead CGOC
- ARCC

<u>Military</u>

- RAF Valley DAATM
- RAF Shawbury DAATM

Aviation Stakeholders

- RAF Valley
- Caernarfon Airport
- Snowdonia Aerospace Centre
- North Wales Helimed (Caernarfon HEMS)
- Babcock Mission Critical Services Onshore (HEMS UK)
- National Police Air Service NPAS
- PDG Aviation
- West Wales Airport
- British Helicopter Association
- Airspace4All
- AOPA
- General Aviation Alliance (GAA)
- Light Aircraft Association (LAA)
- BGA
- BHPA
- NATS

10. Summary

The MCA and Bristow propose the establishment of a short term, temporary danger area complex to support the urgent operational requirement defined in this document as requested by the DfT. The TDA complex and the management thereof, have been designed to minimise the impact on other airspace users to as low as reasonably practicable whilst providing maximum operational benefit to HM Coastguard and other regional emergency services. Following a highly successful stakeholder engagement campaign, we submit this final version for CAA consideration.

11. Final, agreed airspace solution.

Post stakeholder engagement amendments.

Northern Operating Area (Op Area 1 - 4)

 The GAA requested RAF Valley consider providing DACS at the weekend. RAF Valley and DAATM advised this is not possible due to current resource levels. This matter would need to be resolved at parliamentary level via MAACAA request. The MCA reiterated they are happy with the agreements made with the MoD and RAF Valley and accept operations in this region can only be conducted at times when RAF Valley are closed. No further requests for change received from stakeholder engagement.

HM Coastguard Temporary Danger Area Complex - Controlling Authority: - RAF Valley/London FIS

In order to facilitate regular and routine UAS beach patrol/reassurance missions in the region, the following TDA complex is proposed to support UAS Safety Overwatch operations. These areas have been chosen following assessment of regional incident data in collaboration with the MCA and HM Coastguard.



Fig 1:- Agreed UAS Northern Operating Area 1-4

Post stakeholder engagement amendments.

Southern Operating Area (Op Area 1-7)

- During pre-engagement activity and on advisement from Caernarfon Airport and the CAA, consideration was given to the effect of funnelling and the potential impact to Snowdonia Aerospace Centre's current airspace change proposal. It was agreed that BHL and the MCA would accept the removal of a transit corridor and the Portmadog area of operation. As this was agreed pre-submission it was not included in the official stakeholder engagement documentation.
- At request of the BGA Southern Area 2 has been moved offshore to reduce the potential impact to gliders using this airspace for soaring. This has been gratefully accepted.



Fig 2:- Agreed Southern Operating Areas 2-7

 At request of Caernarfon airport and to limit the impact on their ATZ over times when RAF Valley are able to provide DACS Caernarfon requested modification of the southern Area 1 to increase access to the ATZ. This was agreed and shown below.



Fig3:- Modified Southern Area 1(visualisation only danger areas do not penetrate ATZ) Page 13 of 18

 MOD Aberporth has no objection to the proposal but it is assumed there will be adequate mechanisms in place to ensure the UAS does not stray into D201J. Any contacts observed along the boundary of the danger areas will be assessed and considered in the same manner as other (manned) aircraft, using existing procedures. Given the position of the areas it would be unlikely for the Bristow UAS to trigger any trip wires, unless the Bristow UAS enters D201J. In response to this Southern Operating Areas 5,6 and 7 have been modified to move these areas further North away from D201J



Fig 4:- Modified Southern Areas

- In light of information surrounding Caernarfon's ability to provide a DAAIS function, this will now be delivered by London FIS.
- On direction from the CAA, emergency activation of TDA sectors to support dynamic HMCG tasking has been removed. As a result, only routine pre-planned sorties will be undertaken as NOTAM'd. This concept of operation will be revisited at a later date.

12. Draft Briefing Sheet

TEMPORARY DANGER AREA (TDA 'As designated') Caernarfon TDA COMPLEX – Urgent State Requirement - HM Coastguard.

1 Introduction

1. An 11-part Temporary Danger Area (TDA) complex will be established during notified periods from the 1st Aug 21 to the 19th of September 2021. The airspace is required to facilitate State BVLOS Remotely Piloted Air System (RPAS) operations in support of HM Coastguard in North Wales. Bristow Helicopters will operate the Schiebel S-100 Camcopter from Caernarfon Airport (EGCK).

1. The UAS will be operating BVLOS in wholly class G airspace. In the absence of a tested and verified Detect and Avoid system, such flights are required to operate within segregated airspace.

2 Timings

2.1 Multiple flights are anticipated to take place. Actual times of TDA activation will be promulgated by NOTAM.

2.2 Due to emergency tasking or other operational reasons, less than 24 hours' notice may be provided for the activation of the required TDAs.

3 Temporary Danger Areas

Identification and Lateral Limits	Upper Limit Lower Limit	Remarks
1	2	3

North Area 1 530956N 0042902W 530731N 0042235W Anticlockwise arc of a circle of radius 2 nautical miles centred on 530607N 0042015W between 530731N 0042235W and 530555N 0042333W Then straight lines joining 530555N 0042333W 530759N 0043115W 530956N 0042902W	Lower Limit: 1000ft AMSL Upper Limit: 2000ft AMSL	Activity: UAS Beyond Visual Line of Sight (BVLOS) Hours: When notified DAAIS/DACS: Valley Radar FREQ: 125.255 TEL: 01407 762241 ext. 7461 Sponsor: Bristow OR Hours: When notified DAAIS: London FIS FREQ: 124.750 TEL: 01489 617001
North Area 2 530956N 0042902W 530759N 0043115W 531327N 0044159W 531512N 0043922W	Lower Limit: 1500ft AMSL Upper Limit: 3000ft AMSL	Activity: UAS Beyond Visual Line of Sight (BVLOS) Hours: When notified DAAIS/DACS: Valley Radar FREQ: 125.255 TEL: 01407 762241 ext. 7461 OR Hours: When notified DAAIS: London FIS FREQ: 124.750 TEL: 01489 617001 Sponsor: Bristow
North Area 3 531327N 0044159W 531718N 0044843W 531955N 0044653W 531721N 0044155W 531512N 0043922W	Lower Limit: 1500ft AMSL Upper Limit: 3000ft AMSL	Activity: UAS Beyond Visual Line of Sight (BVLOS) Hours: When notified DAAIS/DACS: Valley Radar FREQ: 125.255 TEL: 01407 762241 ext. 7461 OR Hours: When notified DAAIS: London FIS FREQ: 124.750 TEL: 01489 617001 Sponsor: Bristow
North Area 4 531955N 0044653W 532212N 0044338W 531930N 0043821W 531721N 0044155W	Lower Limit: 1500ft AMSL Upper Limit: 3000ft AMSL	Activity: UAS Beyond Visual Line of Sight (BVLOS) Hours: When notified DAAIS/DACS: Valley Radar FREQ: 125.255 TEL: 01407 762241 ext. 7461 OR Hours: When notified DAAIS: London FIS FREQ: 124.750

		TEL: 01489 617001
South Area 1 530507N 0042307W Anticlockwise arc of a circle of radius 2 nautical miles centred on 530607N 0042015W between 530507N 0042307W and 530408N 0042025W Then straight lines joining 530408N 0042025W 530317N 0042026W 530329N 0042425W	Lower Limit: 1000ft Upper Limit: 2000ft AMSL	Sponsor: Bristow Activity: UAS Beyond Visual Line of Sight (BVLOS) Hours: When notified DAAIS/DACS: Valley Radar FREQ: 125.255 TEL: 01407 762241 ext. 7461 OR Hours: When notified DAAIS: London FIS FREQ: 124.750 TEL: 01489 617001
530507N 0042307W		Sponsor: Bristow
South Area 2 530329N 0042425W 525815N 0043508W 525653N 0043248W 530317N 0042026W	Lower Limit: 1500ft AMSL Upper Limit: 3000ft AMSL	Activity: UAS Beyond Visual Line of Sight (BVLOS) Hours: When notified DAAIS/DACS: Valley Radar FREQ: 125.225 TEL: 01407 762241 ext. 7461 OR Hours: When notified DAAIS: London FIS FREQ: 124.750 TEL: 01489 617001
		Sponsor: Bristow

South Area 3 525815N 0043508W 525605N 0043122W 525358N 0043534W 525614N 0043925W	Lower Limit: 2000ft AMSL Upper Limit: 4000ft AMSL	Activity: UAS Beyond Visual Line of Sight (BVLOS) Hours: When notified DAAIS/DACS: Valley Radar FREQ: 125.225 TEL: 01407 762241 ext. 7461
		OR
		Hours: When notified DAAIS: London FIS FREQ: 124.750 TEL: 01489 617001
		Sponsor: Bristow

South Area 4 525614N 0043925W 525358N 0043534W 524851N 0044518W 525118N 0044916W	Lower Limit: 2000ft AMSL Upper Limit: 4000ft AMSL	Activity: UAS Beyond Visual Line of Sight (BVLOS) Hours: When notified DAAIS/DACS: Valley Radar FREQ: 125.225 TEL: 01407 762241 ext. 7461 OR Hours: When notified DAAIS: London FIS FREQ: 124.750 TEL: 01489 617001
South Area 5 525118N 0044916W 524851N 0044518W 524550N 0044520W 524737N 0045223W	Lower Limit: 2000ft AMSL Upper Limit: 4000ft AMSL	Sponsor: Bristow Activity: UAS Beyond Visual Line of Sight (BVLOS) Hours: When notified DAAIS/DACS: Valley Radar FREQ: 125.225 TEL: 01407 762241 ext. 7461 OR Hours: When notified DAAIS: London FIS FREQ: 124.750 TEL: 01489 617001
South Area 6 524550N 0044520W 524851N 0044518W 524747N 0043851W 524520N 0044018W	Lower Limit: 2000ft Upper Limit: 5500ft AMSL	Sponsor: Bristow Activity: UAS Beyond Visual Line of Sight (BVLOS) Hours: When notified DAAIS/DACS: Valley Radar FREQ: 125.225 TEL: 01407 762241 ext. 7461 OR Hours: When notified DAAIS: London FIS FREQ: 124.750 TEL: 01489 617001 Sponsor: Bristow

South Area 7 524747N 0043851W 524757N 0043441W 524540N 0043000W 524520N 0044018W	Lower Limit: 4500ft Upper Limit: 6500ft AMSL	Activity: UAS Beyond Visual Line of Sight (BVLOS) Hours: When notified DAAIS/DACS: Valley Radar FREQ: 125.225 TEL: 01407 762241 ext. 7461
		OR Hours: When notified DAAIS: London FIS FREQ: 124.750 TEL: 01489 617001

		Sponsor: Bristow
Caernarfon ATZ	Lower Limit: SFC	Activity: UAS Beyond Visual
530607N 0042015W	Upper Limit: 2000ft	Line of Sight (BVLOS)
	AMSL	Hours: When notified
	2nm Rad	
		FREQ: 122.250
		TEL: 01286 830800

4 Operating Authority - DAAIS/DACS

4.1 The Operating Authority for the TDA areas will be RAF Valley or London FIS as designated in the NOTAM. A Danger Area Activity Information Service (DAAIS) and Danger Area Crossing Service (DACS) will be available during ATC hours of operation from Valley Radar on 125.225MHz and telephone number 01407 762241 ext. 7461. London FIS DAAIS on 124.750MHz and telephone number 01489 617001. No DACS will be offered by London FIS.

5 Caernarfon AD Operations

5.1 Caernarfon Airport is strictly a PPR airport.

5.2 When pilots contact the airport for PPR, they will be advised of the TDA activations and direct them to the Bristow's website <u>https://uas-ops.co.uk/</u> detailing the published NOTAMs and TDAs in use.

5.3 Aircraft may be requested to remain outside the ATZ until the RPAS has exited the ATZ into the relevant Temporary Danger Areas.

5.4 Pilots should also plan to contact RAF Valley on 125.225MHz and London FIS on 124.750MHz who will advise pilots of the status and usage of the relevant Temporary Danger Areas.

6 Notification

6.1 The sponsor will promulgate TDA activations by NOTAM in accordance with chapter 2 of this briefing sheet.

7. Sponsor

7.1 Enquiries relating to the subject TDA should be directed to AR Ops 01293 768202 in the first instance.

8. AIS Notification

8.1 Between the dates of TBC August 2021 and TBC 2021, this document will be available as a Briefing Sheet.

8.2 Between the dates of TBC and TBC 2021, this document will be available as an Aeronautical Information Circular.

TO BE CHARTED

13. Post stakeholder engagement Summary

Following consultation with the CAA, 17 external stakeholders were identified, contacted and provided with the ACP engagement documentation. In addition to this, all external stakeholders were invited to engage directly with Bristow and the MCA team on the consolidated stakeholder engagement meeting that took place via Microsoft teams. This meeting was attended by 11 of the 17 invited stakeholders and recorded and fully minuted. To date Bristow have received 15 positive responses to this proposal which indicates a very high level of support to this State request. Of the two returns not yet received, one of the stakeholders in question was present on the consolidated stakeholder meeting and their views recorded and provided to the CAA via the meeting minutes. Bristow present this proposal to the CAA for final decision.