» "Otherwise, you could be quite close to traffic in controlled airspace without actually realising it."

David says some of the problem is exacerbated by pilots' increasing trust in technology.

"There's such a huge reliance on, say, moving maps and GPS in the aircraft, that it encourages pilots to fly closer to the edge of airspace than they would without those devices.

"That's all well and good, but – particularly as a VFR pilot – you're meant to be looking out the window. You should know your position in relation to airspace boundaries and the actual ground you're over."

David says there's also the risk that airspace data on a moving map might be out-of-date.

"A lot of airspace is designed off prominent visual features, like roads or big factories – things a pilot can easily identify.

"So regardless of having a moving map, you should be looking outside because that's a really good way of keeping a certain distance away from boundary trouble."

David says that, while flying close to the uncontrolled/ controlled airspace boundary is permissible, the danger is the aircraft unwittingly wandering across that boundary.

He likens it to the centreline of a road.

"It's permissible to drive just to the left of that white line, but most people would think that was a pretty dangerous thing to do, because it's easy to dawdle over it, and if an approaching car is doing the same thing..."

David says proper preflight planning is essential.

"Pilots should know where they're going to fly and think about all the airspace considerations *before* their flight – identify those prominent features that will help you stay clear of the airspace boundaries."

The statistics indicate most airspace busts happen during the cruise – about four times as many as during the climb.

"The cruise is where pilots tend to relax a bit," says David. "But stay ahead of the aircraft, know where you are, and always be anticipating what you have to do next.

"Otherwise, you lose situational awareness, and end up with little idea of where you are – including near busy controlled aerodromes." \succeq

Comments or queries? Email david.harrison@caa.govt.nz

DANGEROUS GOODS AC HAVE YOUR SAY

The CAA is in the middle of a massive project to make the carriage of dangerous goods easier to understand.

he revamped Advisory Circular AC92-2 (Carriage of dangerous goods on domestic VFR flights in unpressurised aircraft not exceeding 5700 MCTOW) will soon be out for public consultation.

Go to **aviation.govt.nz/subscribe** and sign up to 'Part 92' to be notified when the advisory circular is ready for comment.

The AC includes guidance on rule 92.11 *Exceptions* (that's carriage of DG by police, carriage of class 1



Items like these can be dangerous in the air. They might be banned and taken off you before you board. Some items might be allowed if packed correctly. Avoid prosecution. **Ask your airline for advice.**



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explosives for avalanche control, and carriage of DG for the recreational use of passengers). It also has guidance on carrying dangerous goods for medical use in flight, procedures for carriage of DG by helicopters operating in remote areas and by underslung load, and it contains lists of commonly carried DG items.

Simplifying it

The updated AC92-2 is part of a large CAA project to make it easier to understand the rules on carrying dangerous goods. Part 92 *Carriage of dangerous goods* sets out the legal requirements of flying with DG aboard. This is, in turn, based largely on ICAO's *Technical instructions for the safe transport of dangerous goods by air*, which isn't the easiest document to understand and apply.

Consequently, there's been significant misunderstanding of this issue, and we recognise the difficulties involved – particularly for smaller operators and private pilots – which is why the advisory circular has been simplified.

Help with writing manuals

Also being drafted is a new advisory circular, designed to help operators write their dangerous goods manuals, or that section of their exposition dealing with dangerous goods. This AC will have a template which should reduce the time and effort needed to create a manual, and it should also greatly improve the quality of the manuals already in use. We'll let you know when this draft AC is ready for public consultation.

More relevant training

Parts 119 and 141 DG training organisations should now be reassessing their programmes, after ICAO introduced competency-based training for staff handling DG.

Competency-based training (CBT) is a major step forward because it makes training requirements more relevant to the nature of each operation and the items they actually carry. In many cases, training organisations will need to submit to the CAA an amended exposition to align with CBT requirements.

There's guidance on this in the rewritten AC92-1 Dangerous goods training (published in November 2021).

Consistent advice

CAA staff are also being trained to ensure DG issues are dealt with consistently and in accordance with established procedures. This is an area we're aware was not done particularly well in the past.

Reporting

To help CAA make robust decisions about where most risk lies, it's really important you report all dangerous goods incidents. Those incidents include DG that are incorrectly declared, packaged, labelled, marked, or documented, as well as incidents that damage the packaging or something else, or cause the contents to spill or leak.

To report such an incident, complete a CA005 *Occurrence report* form at **aviation.govt.nz/forms**, and email to **isi@caa.govt.nz**.

Or mail a completed print version PO Box 3555, Wellington 6011.

Or use the online reporting form available via **aviation.govt.nz/report**.

For more information on reporting, have a look at Part 12 Accidents, Incidents and Statistics and Advisory Circular AC12-1 Mandatory occurrence notification and information.

Suggestions?

If you have a concern or suggestion outside of the advisory circulars, email CAA's senior advisor for dangerous goods. jim.finlayson@caa.govt.nz 📥

