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**Agenda Item 4:**

**ICAO / Member State / Industry Presentation**

**REGULATORY OVERSIGHT AND SUPPORT FOR THE  
INDUSTRY'S SERVICE RESUMPTION**

*(Presented by Hong Kong, China)*

**SUMMARY**

The COVID-19 epidemic has brought unprecedented impacts to the aviation industry in the past two years. The demand for international travel has significantly reduced whereby airlines have to make continual adjustments in the provision of passenger services in response to the market situation. A large number of passenger aircraft have consequently been put on long-term parking or storage. A reduced number of air crew were maintained in the active operational pool to support the limited passenger operations.

While the industry has been preparing for traffic and service resumption, Hong Kong, China recognizes that there are key steps that both the regulators and airline industry must take in order to ensure safe and orderly resumption of operations. Through this paper, Hong Kong, China shares our experiences from the airworthiness and flight operations perspectives. The Civil Aviation Department of Hong Kong, China (HKCAD) will continue to work closely with the airlines to facilitate their service resumption plan.

**1. INTRODUCTION**

1.1 Due to the impact of COVID-19, the demand for international travel has been significantly reduced whereby airlines have to make continual adjustments in the provision of passenger services in response to the market situation. As a result, a large number of aircraft was put on long-term parking or storage. A reduced number of air crew were maintained in the active operational pool to support the limited passenger operations.

1.2 In view of the latest development of the epidemic situation, and as States and Administrations gradually adjust and streamline their travel restrictions and anti-epidemic measures, the industry anticipates and prepares for traffic and service resumption. Hong Kong, China recognizes that there are key steps that both the regulators and airline industry must take in order to ensure safe and orderly resumption of operations.

1.3 Through this paper, Hong Kong, China shares our experiences from the airworthiness and flight operations perspectives.

## 2. DISCUSSION

2.1 Due to the reduced service requirements by the airlines during COVID-19, some air crew have been unable to maintain their recency and competency requirements. At the same time, a large number of passenger aircraft have been parked or stored either at the Hong Kong International Airport or at locations outside Hong Kong, China for an unusually long period of time. Without adequate maintenance resources in some storage locations, this may result in unavoidable lapses of maintenance actions beyond the approved maintenance schedules. The logistics and resources required to bring a large number of parked or stored aircraft and air crew back into service in an orderly manner warrants detailed planning and coordination both within the industry as well as with the regulators concerned.

2.2 Recognising the above and the on-going challenges faced by the industry, the HKCAD takes a facilitating yet prudent approach to assist the industry, including but not limited to providing advance regulatory guidance and prioritising the various regulatory oversight activities to facilitate the resumption plans of airlines. The focuses of HKCAD's regulatory actions are as follows :

- (i) ensuring the airworthiness of aircraft;
- (ii) ensuring the operational readiness and competency of the aviation personnel, including air crew, ground handling personnel and staff; and
- (iii) ascertaining their service resumption plans are in line with the relevant guidance and requirements by the HKCAD, ICAO and the States of the aircraft manufacturers as well as the aircraft manufacturers themselves.

### 2.3 **Passenger Aircraft Reactivation Plan**

2.3.1 At its peak, over 70% of the passenger aircraft of Hong Kong, China were put into long term parking or storage. Around half of these aircraft were parked or stored overseas.

2.3.2 For the gradual reactivation of aircraft, particularly those parked or stored outside of Hong Kong, China, the HKCAD has since 2020, been reviewing with the airlines regularly with the aim of facilitating better coordination and providing timely regulatory advice. Detailed guidance on the safety considerations and procedures required for re-establishing aircraft operations after long term parking or storage with an easy-to-use checklist, has been developed and provided for airlines to follow based on the international guidance and experiences, such as ICAO and IATA.

2.3.3 For those aircraft that carry a valid Certificate of Airworthiness ("C of A"), it would typically require approximately a month's time for the necessary checks and maintenance tasks to be completed for the re-positioning flight to take place from where the aircraft is parked or stored to return to Hong Kong, China. The HKCAD is of the view that the airlines shall endeavour to complete all the mandatory tasks to ensure the validity of the C of A before aircraft reactivation.

2.3.4 However, in situations where limited maintenance resources are available in where aircraft is parked or stored and the C of A of the aircraft cannot be maintained, a longer lead time would be required for the aircraft status to be assessed from an airworthiness perspective. In circumstances where there are deviations from the approved maintenance schedule, the HKCAD will require the airline to consult the aircraft manufacturer for alternate means of compliance that would provide an equivalent level of safety. This could result in additional maintenance tasks. To obtain the necessary regulatory approval, the HKCAD will also require the airlines to provide an individual safety risk assessment to support each application, including but not limited to the evaluation of any restricted flight conditions and operational limitations where applicable. Substantial preparation, planning and coordination by the airline will have to be made, and ample lead time should be allowed for the reactivation of these aircraft. From experience, the whole process could take up to four months.

## 2.4 Crew and Operations Reactivation Plan

2.4.1 On the crew and operations side, ensuring sufficient air crew resources, recency and competency is another key aspect to support safe and orderly service resumption. With reference to international practices together with the guidelines and recommendations issued by ICAO through the Council Aviation Recovery Taskforce (CART) guidelines, the HKCAD has been working closely with the airlines to provide regulatory support and safety oversight for their continuation of the existing limited service, as well as their plans to address immediate and future training and operational needs.

2.4.2 Airlines have to formulate resumption plans to track and verify their readiness continuously. The following are some of the salient aspects that need to be considered by the airlines under the facilitation from the HKCAD flight operations and safety perspective:

- (i) Ensure the availability of air crew (flight crew and cabin crew) and staff for each fleet vis-à-vis the planned level of resumed services. This may necessitate the advance preparation of the airlines' human resources plan and timely launch of relevant recruitment and training exercises;
- (ii) Develop and provide comprehensive "reactivation" training programmes tailored to different levels of crew and staff who have not performed their operational duties for a prolonged period of time. Whereas sufficient lead time should be allowed for the development and implementation of the training programme, a balance should also be struck to minimise the lag time between reactivation training and line operations to ensure the effectiveness of the training and competency of reactivated crew and staff;
- (iii) Enhance the competency of operational staff through strategic planning on the crew composition and pairing; and
- (iv) Ensure the availability of return-to-work counselling and support programme for the crew after long-idle, promote counselling training and encourage their usage should such need arise.

## 2.5 Route / Port Resumption and Ground Handling Plan

2.5.1 In addition, experience has shown that in preparation for service resumption on any route, ensuring the readiness of route and outstation support is equally important. In this connection, airlines have been requested to review and ensure their ground handling support and operating procedures, respective Operational Manuals and internal audit checklists remain current and valid for the resumed services and adjusted operations. Emphasis was made on the awareness of potential threats and adequacy of training and experience level in the scope of ground handling, security and loading. These documents are subject to inspection and surveillance by the HKCAD. Safety Management System (SMS) and Quality Management System (QMS) principles were required to be adopted throughout the process.

2.5.2 From the safety oversight perspective, while the conventional physical form of audits to outstations and ground handling support were mostly impractical due to the travel restrictions during COVID-19, online and/or hybrid audits have become an effective means of conducting outstation audits, in line with the latest industrial standard and auditing practices. To complement those audits, the HKCAD has also initiated collaborative oversight arrangements with various civil aviation authorities which have kindly agreed to collaboratively share the resources and information required to support and augment the audit and inspection activities. The collaborative efforts so made were constructive to ensure that safety standards are not compromised and safety oversight requirements are fulfilled.

### **3. OVERALL REVIEW OF 2022**

3.1 During the year, the HKCAD closely monitor the airlines' resumption plans on a monthly basis to ensure safe and orderly service resumption. An enhanced safety oversight and surveillance programme has been formulated to conduct additional aircraft surveys, site and document inspections, and observe flight and cabin crew training, etc. to strike a better balance between ensuring operational safety and airworthiness of aircraft.

3.2 An overall review of 2022 conducted by the HKCAD indicated that there was no degradation of the safety standards maintained by the multi-disciplinary aviation industry in Hong Kong, China during the course of recovery. The HKCAD will continue to work closely with the airlines to facilitate and regulate their service resumption.

### **4. ACTION BY THE MEETING**

4.1 The Meeting is invited to note Hong Kong, China's proactive efforts in the process of regulating and facilitating the passenger service resumption of airlines and other aviation activities. Member States/Administrations are encouraged to share their experiences and national best practices on this important topic as well as their considerations and plans.

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