

SMART SKIES, LEGAL HORIZONS

«Impact of the New European Regulation on HEMS Operations in Italy»

Rome June 12-13 2025





Sharing EU Safety Standard Pillars

AIR OPS and HEMS Regulation

- Standardize operational rules across all EU members to ensure high and uniform level of safety
- Cover both commercial and non-commercial operations including CAT and SPO
- o Define common requirements such as for:
 - Operator responsibilities
 - Crew qualification and duties
 - Flight planning and in-flight procedures
 - Aircraft performance and maintenance
 - Safety Management System (SMS)

AIR OPERATIONS (EU) No 965/2012

REGULATION
3023/1020

Amending regulation adopted in 2023, which updates Air Ops with specific improvements for HEMS.

Improvement in tailoring existing operative rules to unique operational challenges driven by HEMS.





Sharing EU Safety Standard Pillars

HEMS Regulation: How ENAC exercises implementation and oversight duties



HEMS scope extension including mountain rescue

Operations on PIS (Public Interest Site)

HEMS operations using cargo hooks and sling

Oxygen requirements for mountain operations at high altitudes

Night vision imaging systems (NVISs) operations

Simplification of the HEMS VFR operating minima and Obstacle awareness and avoidance

Crew composition and HEMS technical crew member (TCM) seating postion

Operative Procedures and Risk Assessment



enac

ITO





OPERAZIONI CAT CON ELICOTTERI IN AMBIENTE OSTILE
AL DI FUORI DI AREE CONGESTIONATE

FAQ

SO23/1020

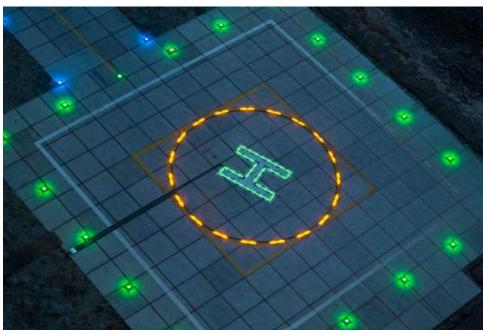
Regulations

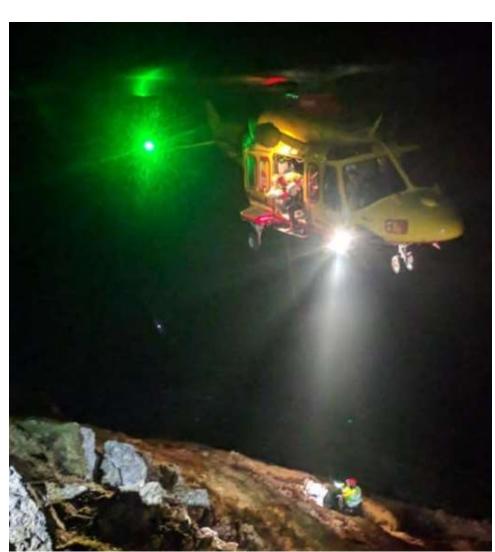
or 13/06/2023)



The HEMS operations in Italy











EU Safety Standards in Italy

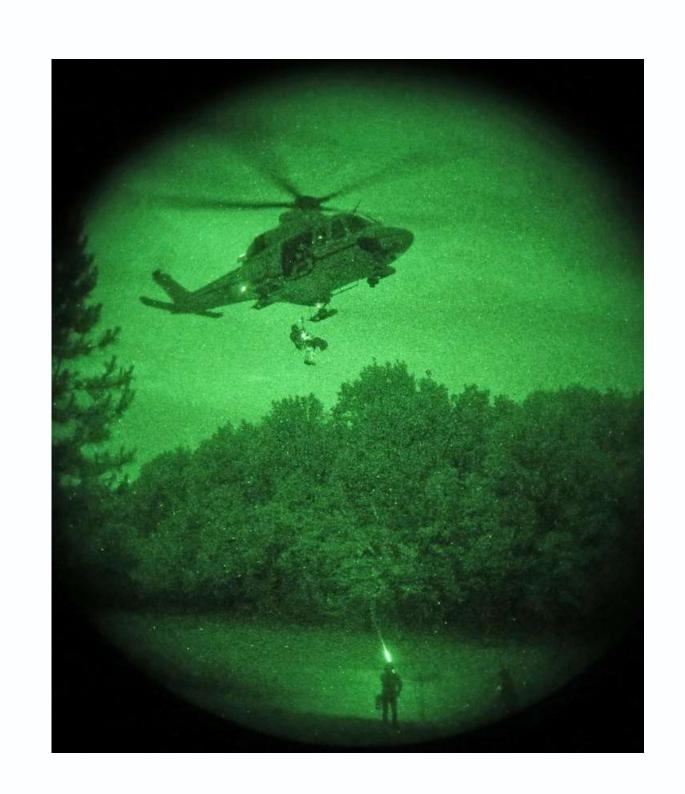
- •The operations are extremely heterogenous driven by the specific local environment and medical requirements including:
 - Extended overwater operations
 - High mountain operations
 - Hoist operations including night hoist operations in unknown sites
- oThe system is well established and developed with an historical pedigree dating back to the the 14th of June 1986 when the first rescue mission took place in Emilia Romagna region
- •Since its introduction the service has evolved from pure daylight scoop&run to 24/7 with special operations and intensive care transportation





EU Safety Standards in Italy

- •Because of its peculiar geographical characteristics Italy requires an extensive use of hoist operations
- oOut of 52 bases performing hoist operations in Europe 41 are located in Italy alone, accounting for almost 80% of the entire European civil hoist operations market
- •Compared to the rest of Europe, the Italian HEMS cabin is typically more loaded, hosting on average a significant number of people on-board (1/2 pilots + 3 to 5 people in cabin)







Who is affected by the new Amendment IR (EU) 2023/1020

Certified Operator SPA-HEMS





NCA National Competent
Authority

Flight Crew Members





Technical Crew Members

Contractors services
HEMS (Asl-Asp-Regioni-





Ente Nazionale per l'Aviazione Civile

Italian Civil Aviation Authority







Legal and technical aspects HEMS PHILOSOPHY by EASA

ACCEPTABLE RISK concept iaw EASA Guidance Material

Who needs to be protected?

Third parties (people and things).
HIGH PROTECTION



Passengers, patients, doctors LOWER PROTECTION





Crew Members
LOWEST PROTECTION







RISK

Risk = Probability x Severity



Risk Matrix

Risk Probability	Risk Severity				
	Catastrophic A	Critical B	Moderate C	Minor D	Negligible E
5 - Frequent	5A	5B	5C	5D	5E
4 - Likely	4A	4B	4C	4D	4E
3 - Occasional	3A	3B	3C	3D	3E
2 - Seldom	2A	2B	2C	2D	2E
1- improbable	1A	1B	1C	1D	1E





Legal and technical aspects THE HEMS PHILOSOPHY GM1 SPA.HEMS.100(a)

The following principles of responsibility shall be adopted:

It is for the medical professional to decide between HEMS or air ambulance - not the pilot.

For that reason, medical staff who undertake to task medical sorties should be fully aware of the additional risks that are (potentially) present under HEMS operations (and the pre-requisite for the operator to hold a HEMS approval). (e.g. in some countries, hospitals have principal and alternative sites).

The patient may be landed at the safer ternative site (usually in the grounds of the hospital and a short the safer ternative site (usually in a grisk - against the small inconvenience of a short ulance tracker from the site to the hospital).

• Once the decision between HEMS or air ambulance has been taken by the medical professional, the commander makes an operational judgement over the conduct of the flight.





The ENAC Mission: Flight Safety Priority

SPA.HEMS.125 Performance requirements for HEMS operations



Helicopter performances for mountain operations never approved before (PC3) might now be accepted according to SPA.HEMS under following conditions:

•HEMS operating site located above 7.000 ft, using a helicopter certified under Category A or

•Using helicopters certified under **Category B** for missions not involving transport of patients or other pax or if Category A helicopters are not available due to involvement in other contemporary HEMS missions. The operator is approved according to CAT-POL-H.420 (therefore such operations shall be







Currently CAT.POL.H.420 HEMS Ops are not allowed in Italy: ENAC is not ignoring the new alleviation provided by EASA regulation, but at the same time cannot ignore hazards posed by the Italian hostile environment and operations at high altitude where a



SPA.HEMS.100 Entry into force and applicability

- 1 STEP 25-MAJ-2024
- Major amendments and AMC, GM
- 2 STEP 25-MAJ-2026
- Only AMC1 SPA.HEMS.145(b); GM1 SPA.HEMS.100(c))
- Night operations on HEMS Operating Sites outside congested areas with sufficient lighting.

(GM1 SPA.HEMS.100(c)

- Operations on HEMS Operating Bases. New weather information network.

AMC1 SPA.HEMS.145(b)

• 3 STEP 25-MAJ-2028

- Only AMC1 SPA.HEMS.110(e)(1); AMC1 SPA.HEMS.110(e)(2))
- Minimum equipment (VFR DAY) CAT IDE.H130 (Radio-altimeters with warning and autopilot systems with HDG)
 - Minimum SAS stabilisation equipment and autopilot



Conclusions

- •ENAC is Responsible for implementing and overseeing EASA regulations at the National level, adapting them to peculiar Italy's environment
- The Italian HEMS service is complex and extremely developed
- •ENAC mission is to minimize risk exposure without compromising HEMS effectiveness
- •Within its perimeter, ENAC is entitled to provide technical and operative instructions or FAQ to tailor EASA regulations in accordance with Italian specific environment

Thank you for your attention

