EUROPEAN HELICOPTER ASSOCIATION

Proportional First Aid Kit (FAK) Requirements for Small Helicopter Operations

Executive Summary

Small-scale helicopter operations conducted under Part-SPO or -CAT with ≤8 passenger seats typically fly short sectors, land frequently, and have rapid access to professional medical care at aerodromes or operating sites. In many types, the First Aid Kit (FAK) is stowed outside the cabin (e.g., in baggage compartments), precluding in-flight access.

The current EASA AMC1 CAT.IDE.H.220 and AMC SPO.IDE.H.165 contents—derived from airline use-cases—include medications and equipment that are disproportionate to the risks and operational reality of small helicopters.

This paper proposes an alternative, risk-based FAK specification for small helicopter operations that:

1. Aligns with widely recognised vehicular first-aid standards used across Europe (e.g., DIN 13164; BS 8599-2) to ensure availability, quality, and harmonisation.
2. Removes medications (which flight crew are generally not authorised to dispense) and focuses on bleeding control, basic wound care, and hypothermia prevention until professional care is reached.
3. Clarifies installation and accessibility when the kit must be stowed outside the cabin and sets pragmatic maintenance/training expectations.

The EHA invites EASA to recognise this proposal as a revision to the published Acceptable Means of Compliance (AMC) applicable to SPO and CAT helicopter operations with ≤8 passenger seats (excluding HEMS/air ambulance, where medical equipment supersedes the FAK by a significant margin).

1. Scope and Applicability

This position paper applies to specialised (SPO) and commercial air transport (CAT) helicopter operations conducted VFR/IFR by day/night within EASA Member States using helicopters configured for ≤8 passenger seats.

Exclusions: HEMS and air ambulance operations; offshore helicopter operations carrying specialised medical kits and operations where a medical professional is routinely on board.

Storage: Where cabin installation is impracticable, carriage in an external luggage bay is acceptable provided the kit is clearly placarded, protected from environmental degradation, and readily accessible on the ground post-landing.

2. Proposed Alternative Specification (Proportional FAK)

The EHA proposes the following FAK content for the above scope. Two equivalent compliance pathways are offered to accommodate operator preference and national practices:

Path A – DIN 13164-Compliant Vehicle First Aid Kit (2022 revision or later) - Complete kit compliant with DIN 13164 (current published revision), contained in a sealed, tamper-evident soft pouch or hard case.

Path B – BS 8599-2 Compliant Motor Vehicle First Aid Kit (Small/Medium; select size based on seat count up to 8) - Complete kit compliant with BS 8599-2 (current published revision), contained in a sealed, tamper-evident soft pouch or hard case.

Minimum functional capability (common to both paths): Control of external bleeding (assorted dressings/bandages and adhesive plasters) - Wound cleaning (sterile wipes) - Immobilisation/support (triangular bandage) - Cutting tool (scissors suitable for dressings) - Barrier protection (nitrile gloves) - Hypothermia prevention (emergency foil blanket) - Simple contents list and brief first-aid guidance booklet/card.

Explicitly not required for this scope: Medications of any type - Resuscitation pocket masks or bag-valve masks (BVM) - Airway adjuncts, thermometers, tweezers, biohazard bags (unless chosen by the operator).

3. Operational Conditions and Procedures

Accessibility. If stowed outside the cabin, the operator shall ensure the FAK is readily accessible immediately after landing and that crew know the exact location. Placarding shall be provided in the cabin (e.g., on the pilot checklist card and cabin placard) indicating the FAK location.

Inspection & Maintenance. Align with AMC2 CAT.IDE.H.220 and AMC3 SPO.IDE.H.165 principles: Periodic inspection, replacement of expired/used items, and tamper-seal integrity checks. Establish a replacement cycle consistent with the chosen standard and manufacturer guidance.

Training. Flight crew should complete initial and recurrent first-aid training appropriate to their operating environment (e.g., bleeding control, recognition of life-threatening conditions, and hypothermia prevention). Quick-reference cards are recommended but not mandatory given recurrent training.

Records. Maintain a record of kit serial/batch, inspection dates, and any replenishment.

4. Rationale and Risk Justification

Proximity to Care & Short Sectors. Small helicopter sectors are typically short, with rapid access to professional care at the destination or operating site. In-flight medical intervention capability is inherently limited due to cabin size and restraints, and treatment is more safely rendered after landing.

Medication Governance. In many jurisdictions, dispensing medications by non-medical personnel is restricted or prohibited. Removing medications avoids legal and training burdens while not materially reducing safety for short-haul helicopter missions.

Recognised, Widely Available Standards. DIN 13164 and BS 8599-2 are pan-European vehicular first-aid standards with rigorous content governance and supply chain availability. They emphasise trauma control and basic care—appropriate for short-reach ops—and are lightweight and compact, supporting mass/volume constraints in light helicopters.

Comparability to Road Passenger Transport. Overland buses and taxis operate with more passengers and longer sector times and commonly carry DIN/BS kits. Given helicopters' faster access to definitive care (via diversion/landing) and lower passenger counts (≤8), parity with vehicular standards is proportionate.

5. Proposed Regulatory Text (for proposed additional AMC Note)

Notwithstanding AMC1 CAT.IDE.H.220, for CAT helicopter operations with ≤8 passenger seats (excluding HEMS and operations where medical equipment is otherwise carried), the aircraft may carry a first-aid kit that complies with either **DIN 13164 (2022 or later)** or **BS 8599-2 (latest revision)**. Medications need not be carried. Where installation in the cabin is impracticable, stowage in a baggage compartment is acceptable provided accessibility on the ground is ensured and the location is placarded in the cabin. Inspection and maintenance shall follow AMC2 CAT.IDE.H.220 principles.

Notwithstanding AMC SPO.IDE.H.165, for SPO helicopter operations with ≤8 passenger seats, the aircraft may carry a first-aid kit that complies with either **DIN 13164 (2022 or later)** or **BS 8599-2 (latest revision)**. Medications need not be carried. Where installation in the cabin is impracticable, stowage in a baggage compartment is acceptable provided accessibility on the ground is ensured and the location is placarded in the cabin. Inspection and maintenance shall follow AMC3 SPO.IDE.H.165 principles.

6. Implementation Guidance for Operators

- Select **Path A** or **Path B** based on availability and national practice; document the choice in the Operations Manual and MEL as applicable.
- Identify stowage location(s); add cabin placard and crew checklist references.
- Establish an inspection schedule (e.g., at A-check or every 6 months, whichever occurs first) with an expiry tracker.
- Train crew during initial and annual recurrent training on: Bleeding control, shock/hypothermia management, and post-landing first-aid workflow.
- Keep a small spare kit in base stores to minimise AOG due to expired/used items.

7. Expected Safety Outcome

The proposed approach maintains safety by ensuring immediate capability for bleeding control and basic care until professional assistance is reached, while avoiding inappropriate medication carriage and training burdens. It leverages harmonised, widely used European standards and supports better compliance and reliability in small helicopter operations.

8. Request to EASA

The EHA requests that EASA:

- Accept this proportional FAK specification as a proposed additional means of compliance for AMC1 CAT.IDE.H.220 applicable to CAT helicopter operations and AMC SPO.IDE.H.165 for SPO helicopter operations with ≤8 passenger seats; and/or
- Publish AMC/GM clarification recognising DIN 13164 or BS 8599-2 kits as acceptable for the defined scope and clarifying external stowage acceptability where cabin installation is impracticable.

Annex A – Comparative Contents Table (AMC1 vs DIN 13164 vs BS 8599-2)

Category	AMC1 CAT.IDE.H.220/ AMC SPO.IDE.H.165 Typical Items	DIN 13164:2022	BS 8599-2:2014 (Small Vehicle)
Dressings & Bandages	Large, medium dressings; adhesive plasters	Yes – multiple sizes	Yes – multiple sizes
Adhesive tape	Included	Yes	Yes
Wound cleaning	Antiseptic wipes	Yes (cleansing wipes)	Yes (cleansing wipes)
Gloves	1 pair	2 pairs (nitrile)	2 pairs (nitrile)
Scissors	Yes	Yes	Yes
Triangular bandage	Yes	Yes	Yes
Foil blanket	Not specified	Yes	Yes
CPR mask	Required	No	Optional
Tweezers	Yes	Optional	Optional
Medication (painkillers, antiseptics)	Required	Not included	Not included
Eye wash	Required	Optional	Optional
Guidance leaflet	Required	Included	Included

Summary: The DIN/BS kits fully cover trauma-relevant items (bleeding, shock, immobilisation, hypothermia) while omitting medications and advanced airway/resuscitation devices that are impractical in small helicopter cabins. The content overlap supports equivalence for regulatory purposes.