General update of the Air Operations Regulations, Specific Approval SPA.HOFO

Implementing Rule Changes & Associated AMC/GM

Comment Response Document (CRD) for Public Consultation

NB: The item numbers in brackets correspond to the item numbers in the public consultation.

Item	SPA.HOFO reference	Feedback Classification	Issue Identified	Proposed Solution / Amended Text	CAA Response

1(a)	SPA.HOFO.110(b)	Comment on the principle or policy associated with the proposed change	There are uncertainties regarding decision of the selection of suits according to sea temperatures and day/night flights and the mandate regarding these decisions. 1. According to which source shall sea temperatures be decided? 2. It's stated that "the insulation shall be sufficient for the prevailing conditions and not excessive". In Table 1 it is used a Key that is not corresponding to this wording. The Key is: o Optional o Minimum required for nigh flight, optional for day flights o Minimum required o Not recommended 3. What is classed as day and night flights? During winter and summer months the length of the day in e.g. Aberdeen by the Dec 21st is only 6:40 hrs, in comparison to 21st of June when its 17:55 hrs. 4. The PPE provider must always have equipment available for the operators. With variations in sea temperatures several options must be available. Having liners for different thermal classes available is an investment in extra liners and space to store them. It also implicates that more staff must be available to change liners depending on sea temperatures. Will the PPE provider get access to the operators' source of temperature forecasts, and how long in advance will the PPE provider get this information to prepare PPE for flights? The questions raised above must have common understanding across the whole sector, and who should decide? • Helicopter operators • Operators on installations • UK- CAA • Others, e.g. HR • Cooperation between several partners Before a final cut-off date of Grandfathered PPE is set, a collaboration between operations, authorities and manufacturers/PPE providers should be in place. This to ensure clear understanding regarding operational complexity, implications to existing fleet, additional capex, and operational costs and logistics. Due to above uncertainties, there should be allowed for a longer transition period, not a cut-off date 01. Jan 2026.	Before a final cut-off date of Grandfathered PPE is set, a collaboration between operations, authorities and manufacturers/PPE providers should be in place. This to ensure clear understanding regarding operational complexity, implications to existing fleet, additional capex, and operational costs and logistics. Due to above uncertainties, there should be allowed for a longer transition period, not a cut-off date 01. Jan 2026.	1. The sea temperature is derived from HeliBrief. 2. Sufficient = Minimum required/Optional; Excessive = Not Recommended. Clarification has been added to the text. 3. For UK operations "night", as defined in the Air Navigation Order 2016, means the time from half an hour after sunset until half an hour before sunrise (both times inclusive), sunset and sunrise being determined at surface level. There are almanacs available which provide timings for specific dates and locations. 4. For UK operations, it is anticipated that occupants will normally require either a Category 2 or Category 3 suit. Given the overlap in sea temperatures it is expected that suit category changes will be seasonal rather than day to day. The cut-off date is under review as the date for submission to UK Parliament has been deferred to May 2026. Note that the cut-off date applies only to newly manufactured equipment and not to existing equipment which may continue to be used until retired.

1(b)	SPA.HOFO.110(b)	Question/clarification	Re. item (3), how are these operational criteria defined (i.e. water temperature? rescue time) and documented for reference? A safety case for each destination?	None.	The sea temperature is derived from HeliBrief. Rescue time is to be determined by the helicopter operator but is not normally a limiting factor for the suits specified in the AMC, except that a greater rescue time is assumed for operations at night in respect of the application of Category 1 suits. Note that basing suit insulation on operational criteria is not new. The change to the IR text serves only to allow greater flexibility and, hence, a better match of suit insulation to the operating environment.
2(a)	AMC1 SPA.HOFO.110(b)(3)	Re-wording to improve clarity	We are supportive of the overall change, and in particular of better optimising flight crew thermal exposure while flying vs survival time in the water. However, Table 1, when included in AMC, has the potential to cause confusion. We understand the chart's original intent is to show the optimum category of suit for the water temperature and assumes certain standard under-suit clothing (not mentioned in the proposed text). Our concern is that too great an emphasis will be given to this table if it is presented in AMC in comparison to consideration of rescue time.	Move Table 2 to GM and emphasise this is guidance on suit selection and specify what the assumed under-suit clothing is and how to account for lower or higher under-suit clothing insulation levels.	The maximum recommended exposure times associated with the immersion suit categories for the range of sea temperatures given in Table 1 are specified in the standard (see Table A.1 in BS EN 4862:2023). They are: o Category 1 = unlimited o Category 2 = 4 hours o Category 3 = 4 hours o Category 4 = 6 hours The under-suit clothing corresponding to the certification of the suit is specified in the standard (see para. 6.10.3 in BS EN 4862:2023), and this information should be provided by the suit manufacturer to the user and applied. NB: Since the suit insulation can be varied, it may no longer be necessary to vary the under-suit clothing from season to season. Rescue time is not normally a limiting factor for the suits specified in the AMC, except that a greater rescue time is assumed for operations at night in respect of the application of Category 1 suits.

2(b)	AMC1 SPA.HOFO.110(b)(3)	Comment on the principle or policy associated with the proposed change	There are uncertainties regarding decision of the selection of suits according to sea temperatures and day/night flights and the mandate regarding these decisions. 1. According to which source shall sea temperatures be decided? 2. It's stated that "the insulation shall be sufficient for the prevailing conditions and not excessive". In Table 1 it is used a Key that is not corresponding to this wording. The Key is: o Optional o Minimum required for nigh flight, optional for day flights o Minimum required o Not recommended 3. What is classed as day and night flights? During winter and summer months the length of the day in e.g. Aberdeen by the Dec 21st is only 6:40 hrs, in comparison to 21st of June when its 17:55 hrs. 4. The PPE provider must always have equipment available for the operators. With variations in sea temperatures several options must be available. Having liners for different thermal classes available is an investment in extra liners and space to store them. It also implicates that more staff must be available to change liners depending on sea temperatures. Will the PPE provider get access to the operators' source of temperature forecasts, and how long in advance will the PPE provider get this information to prepare PPE for flights? The questions raised above must have common understanding across the whole sector, and who should decide? • Helicopter operators • Operators on installations • UK- CAA • Others, e.g. HR • Cooperation between several partners Before a final cut-off date of Grandfathered PPE is set, a collaboration between operations, authorities and manufacturers/PPE providers should be in place. This to ensure clear understanding regarding operational complexity, implications to existing fleet, additional capex, and operational costs and logistics. Due to above uncertainties, there should be allowed for a longer transition period, not a cut-off date 01. Jan 2026.	Before a final cut-off date of Grandfathered PPE is set, a collaboration between operations, authorities and manufacturers/PPE providers should be in place. This to ensure clear understanding regarding operational complexity, implications to existing fleet, additional capex, and operational costs and logistics. Due to above uncertainties, there should be allowed for a longer transition period, not a cut-off date 01. Jan 2026.	See response to Item 1(a). The text of sub para. (c) has been modified to clarify that the insulation categories only apply to BS EN 4863 suits, and a new GM2 has been added as follows: ***"ADDITIONAL PROCEDURES AND EQUIPMENT FOR OPERATIONS IN A HOSTILE ENVIRONMENT — FLIGHT CREW SURVIVAL SUITS*** *Flight crew survival suits approved to ETSO-2C502 or ETSO-2C503 manufactured prior to 01 January 2027 and any associated operational procedures may continue to be used until retired from service."*

2(c)	AMC1 SPA.HOFO.110(b)(3)	Question/clarification	(a) Refer to Item 1. (b) There are significant commercial & operational implications. No 'Grandfather' rights: this has commercial implications to existing equipment rental fleets, with regards to return on investment. Survival equipment is not purchased: it is leased. Capex costs are borne by the OEMs. S1 has invested and maintains a significant equipment rental fleet of immersion suits, lifejackets, EBS and PLBs for passengers and aircrew, used predominantly over UKCS. Significant qualification costs may be amortised by passenger use, but not by helicopter operators, who invariably demand bespoke solutions, and a variety of accessory equipment, and constitute a significantly smaller market size. (c) 'The operator should ensure...' should this not be 'shall', for mandatory use?	No comment.	(a) See response to Item 1(b). (b) It is anticipated that the new equipment will be phased in over a period of time such that existing equipment can remain in service until needing to be retired. The proposed cut-off date for newly manufactured equipment is under review as the date for submission to UK Parliament has been deferred to May 2026. The text of sub para. (c) has been modified to clarify that the insulation categories only apply to BS EN 4863 suits, and a new GM2 has been added as follows: ***"ADDITIONAL PROCEDURES AND EQUIPMENT FOR OPERATIONS IN A HOSTILE ENVIRONMENT — FLIGHT CREW SURVIVAL SUITS*** *Flight crew survival suits approved to ETSO-2C502 or ETSO-2C503 manufactured prior to 01 January 2027 and any associated operational procedures may continue to be used until retired from service."* (c) "Shall" and "must" may only be used in rule (IR) text, not in AMC or GM. This text is AMC.
3(a)	GM1 SPA.HOFO.110(b)(3)	Comment on the principle or policy associated with the proposed change	We suggest that (b) may be too simplistic and that the GM as a whole is 'light' on assessment of the likely rescue time. It is reasonable to assume the on-scene portion of a rescue at night may take longer than in the day (though now offset for SAR helicopters by the use of FLIR, NVIS and enhanced lighting), though within the PFEER 500 m zone (where applicable) the same performance standard applied day and night. We assume another factor behind this paragraph is potentially an assumption of different SAR helicopter readiness times day & night, though this may be less significant than the proximity of a SAR helicopter base. A further consideration is that daytime SAR helicopter taskings are higher, and with finite coverage, means an ongoing daytime tasking may mean a delay in response or result in the tasking of a more distant asset.	We suggest the GM is expanded to give better guidance on a methodology to calculate a likely rescue time, with a realistic & proportionate degree of pessimism.	Helicopter operators already have to establish and take account of rescue time, and the proposed update does not alter this responsibility. Expanding the guidance to cover rescue time would incur significant additional work and is considered to be beyond the scope of the current update.

3(b)	GM1 SPA.HOFO.110(b)(3)		There are uncertainties regarding decision of the selection of suits according to sea temperatures and day/night flights and the mandate regarding these decisions. 1. According to which source shall sea temperatures be decided? 2. It's stated that "the insulation shall be sufficient for the prevailing conditions and not excessive". In Table 1 it is used a Key that is not corresponding to this wording. The Key is: o Optional o Minimum required for nigh flight, optional for day flights o Minimum required o Not recommended 3. What is classed as day and night flights? During winter and summer months the length of the day in e.g. Aberdeen by the Dec 21st is only 6:40 hrs, in comparison to 21st of June when its 17:55 hrs. 4. The PPE provider must always have equipment available for the operators. With variations in sea temperatures several options must be available. Having liners for different thermal classes available is an investment in extra liners and space to store them. It also implicates that more staff must be available to change liners depending on sea temperatures. Will the PPE provider get access to the operators' source of temperature forecasts, and how long in advance will the PPE provider get this information to prepare PPE for flights? The questions raised above must have common understanding across the whole sector, and who should decide? • Helicopter operators • Operators on installations • UK- CAA • Others, e.g. HR • Cooperation between several partners Before a final cut-off date of Grandfathered PPE is set, a collaboration between operations, authorities and manufacturers/PPE providers should be in place. This to ensure clear understanding regarding operational complexity, implications to existing fleet, additional capex, and operational costs and logistics. Due to above uncertainties, there should be allowed for a longer transition period, not a cut-off date 01. Jan 2026.	Before a final cut-off date of Grandfathered PPE is set, a collaboration between operations, authorities and manufacturers/PPE providers should be in place. This to ensure clear understanding regarding operational complexity, implications to existing fleet, additional capex, and operational costs and logistics. Due to above uncertainties, there should be allowed for a longer transition period, not a cut off date 01. Jan 2026.	See response to Item 1(a).

3(c)	GM1 SPA.HOFO.110(b)(3)	Comment on the principle or policy associated with the proposed change	The defined use of different levels of thermal protection are unenforceable and are not policed. Aircrew routinely wear little underclothing underneath immersion suits, using the flight safety caveat, on the basis of in-flight comfort rather than immersed thermal protection. Aircrew may wear their own unqualified underclothing, or unqualified third party / diving thermal liners. This renders the development and qualification of aircrew thermal liners uneconomic. Significant qualification costs may be amortised by passenger use, but not by helicopter operators, who invariably demand bespoke solutions, and a variety of accessory equipment, and constitute a significantly smaller market size.	No comment.	The wearing of the correct immersion suit is the responsibility of the helicopter operators who are regulated and inspected by the CAA in the UK. The AMC has to followed unless an acceptable alternative means of compliance (AltMoC) has been submitted and approved. With regard to clothing worn under the suit, it is expected that the suit manufacturers guidance will be followed such that the maximum recommended exposure times (see Table A.1 in BS EN 4862:2023) are realised. It is expected that the greater flexibility in suit insulation will enable a better match to the operating environment, reducing the motivation for 'variation' in the underclothing worn.
4	GM1 SPA.HOFO.110(b)(10)	Re-wording to improve clarity	This is a partial quote.	Either a) refer to the AIP and do not quote the text or b) quote in full	Although the wording is identical, the GM text is not presented as a quote and the reader is expected to refer to the AIP. However, the following prompt has been added: *"Refer to UK AIP GEN 1.6 Para. 3.6 for the full and current requirements."* NB: A full quote is not considered advisable in case the wording of the AIP were to change.

7	SPA.HOFO.165(a)	Comment on the principle or policy associated with the proposed change	There are significant commercial & operational implications of this policy. The scope and complexity of the new Standards impose a dramatically higher cost of compliance, requiring significant investment. Such investment costs act as a barrier to entry which is uncompetitive. Given the nature of the mature market, which is forecast to diminish in size, such implementation will stifle product development and innovation. No 'Grandfather' rights: this has commercial implications to existing equipment rental fleets, with regards to return on investment. Survival equipment is mostly not purchased: it is leased. Capex costs are borne by the OEMs. S1 has invested and maintains a significant equipment rental fleet of immersion suits, lifejackets, EBS and PLBs for passengers and aircrew, used predominantly over UKCS.	No comment.	It is anticipated that the new equipment will be phased in over a period of time such that existing equipment can remain in service until needing to be retired. The proposed cut-off date for newly manufactured equipment is under review as the date for submission to UK Parliament has been deferred to May 2026. A new GM2 has been added to clarify as follows: ***"LIFEJACKETS*** *Lifejackets approved to ETSO-2C504 manufactured prior to 01 January 2027 and any associated operational procedures may continue to be used until retired from service. All passenger lifejackets worn on any individual flight should meet the same standard."*
8(a)	SPA.HOFO.165(b)	Re-wording to improve clarity	The wording is identical to flight crew. However, flight crews need to perform effectively during a flight and will wear a suit for a longer consecutive period.	Delete "and not excessive" or otherwise make clear that passenger comfort in flight should not affect protection in a sea survival scenario (and this is different to the concern for effective flight crew performance in flight)	The differing considerations for flight crew are recognised and are reflected in GM1 SPA.HOFO.110(b)(3).

8(b)	SPA.HOFO.165(b)	Comment on the principle or policy associated with the proposed change	There are uncertainties regarding decision of the selection of suits according to sea temperatures and day/night flights and the mandate regarding these decisions. 1. According to which source shall sea temperatures be decided? 2. It's stated that "the insulation shall be sufficient for the prevailing conditions and not excessive". In Table 1 it is used a Key that is not corresponding to this wording. The Key is: o Optional o Minimum required for nigh flight, optional for day flights o Minimum required o Not recommended 3. What is classed as day and night flights? During winter and summer months the length of the day in e.g. Aberdeen by the Dec 21st is only 6:40 hrs, in comparison to 21st of June when its 17:55 hrs. 4. The PPE provider must always have equipment available for the operators. With variations in sea temperatures several options must be available. Having liners for different thermal classes available is an investment in extra liners and space to store them. It also implicates that more staff must be available to change liners depending on sea temperatures. Will the PPE provider get access to the operators' source of temperature forecasts, and how long in advance will the PPE provider get this information to prepare PPE for flights? The questions raised above must have common understanding across the whole sector, and who should decide? • Helicopter operators • Operators on installations • UK- CAA • Others, e.g. HR • Cooperation between several partners Before a final cut-off date of Grandfathered PPE is set, a collaboration between operations, authorities and manufacturers/PPE providers should be in place. This to ensure clear understanding regarding operational complexity, implications to existing fleet, additional capex, and operational costs and logistics. Due to above uncertainties, there should be allowed for a longer transition period, not a cut-off date 01. Jan 2026.	Before a final cut-off date of Grandfathered PPE is set, a collaboration between operations, authorities and manufacturers/PPE providers should be in place. This to ensure clear understanding regarding operational complexity, implications to existing fleet, additional capex, and operational costs and logistics. Due to above uncertainties, there should be allowed for a longer transition period, not a cut-off date 01. Jan 2026.	See response to Item 1(a).

8(c)	SPA.HOFO.165(b)	Comment on the principle or policy associated with the proposed change	There are significant commercial & operational implications of this policy. The scope and complexity of the new Standards impose a dramatically higher cost of compliance, requiring significant investment. Such investment costs act as a barrier to entry which is uncompetitive. Given the nature of the mature market, which is forecast to diminish in size, such implementation will stifle product development and innovation. No 'Grandfather' rights: this has commercial implications to existing equipment rental fleets, with regards to return on investment. Survival equipment is mostly not purchased: it is leased. Capex costs are borne by the OEMs. S1 has invested and maintains a significant equipment rental fleet of immersion suits, lifejackets, EBS and PLBs for passengers and aircrew, used predominantly over UKCS. The implementation of different levels of thermal protection throughout the year across different regions of UKCS, will add significant operational and logistical complexity, and therefore cost to the customers.	No comment.	See response to Item (7). For UK operations, it is anticipated that occupants will normally require either a Category 2 or Category 3 suit. Given the overlap in sea temperatures it is expected that suit category changes will be seasonal rather than day to day.

13(a)	AMC1 SPA.HOFO.165	Comment on the principle or policy associated with the proposed change	a. The offshore industry business model for survival equipment is not purchased: it is leased, meaning capex costs are borne by the OEMs, who maintain significant lease hire fleets of equipment. Such capex ROI need to be recovered over time, as a business proposition. With no obvious Grandfather rights – this timeline has commercial implications to existing rental fleets.	Before a final cut-off date of Grandfathered PPE is set, a collaboration between operations, authorities and manufacturers/PPE providers should be in place. This to ensure clear understanding regarding operational complexity, implications to existing fleet, additional capex, and operational costs and logistics. Due to above uncertainties, there should be allowed for a longer transition period, not a cut-off date 01. Jan 2026.	The cut-off date is under review as the date for submission to UK Parliament has been deferred to May 2026. Note that the cut-off date applies only to newly manufactured equipment and not to existing equipment which may continue to be used until retired. The text of sub para. (c) has been modified to clarify that the insulation categories only apply to BS EN 4863 suits, and a new GM2 has been added as follows: ***"ADDITIONAL PROCEDURES AND EQUIPMENT FOR OPERATIONS IN A HOSTILE ENVIRONMENT — PASSENGER SURVIVAL SUITS*** *Passenger survival suits approved to ETSO-2C502 or ETSO-2C503 manufactured prior to 01 January 2027 and any associated operational procedures may continue to be used until retired from service. All passenger survival suits worn on any individual flight should meet the same standard."*
13(b)	AMC1 SPA.HOFO.165	Comment on the principle or policy associated with the proposed change	The regulatory divergence in Standards, with the UK CAA requiring different lifejacket performance requirements as a foreword to the BS EN Standards will further segment an already niche market. The scope and complexity of the new Standards impose a dramatically higher cost of compliance, requiring significant investment. Such investment costs act as a barrier to entry which is uncompetitive. Given the nature of the mature market, which is forecast to diminish in size, such implementation will stifle product development and innovation. No 'Grandfather' rights: this has commercial implications to existing equipment rental fleets, with regards to return on investment. Survival equipment is mostly not purchased: it is leased. Capex costs are borne by the OEMs. S1 has invested and maintains a significant equipment rental fleet of immersion suits, lifejackets, EBS and PLBs for passengers and aircrew, used predominantly over UKCS.		A number of current survival equipment ensembles, comprising immersion suits with insulation equivalent to Category 3, were tested during the development of the EN standards and all were demonstrated to be capable of self-righting. No integrated suits were provided for testing and it is possible that these may not meet the UK's slightly enhanced self-righting requirement. However, integrated suits are not worn for any current UK operations subject to the UK CAA's requirements. See response to Item (7).

14	GM1 SPA.HOFO.165(a)	Comment on the principle or policy associated with the proposed change	Refer to Item 7.	No comment.	See response to Item (7).
15(a)	AMC1 SPA.HOFO.165(b)	Re-wording to improve clarity	Table 1, when included in AMC, has the potential to cause confusion. We understand the chart's original intent is to show the optimum category of suit for the water temperature and assumes certain standard under-suit clothing (not mentioned in the proposed text). Our concern is that too great an emphasis will be given to this table if it is presented in AMC in comparison to consideration of rescue time. Furthermore this does not take into account the current SCinS winter/summer clothing policy. We also note that the wording in Table 1 could lead to a view that a slight increase in sea temperature while a passenger was offshore to one where their suit became 'not recommended' would mean they could not return ashore without a suit being shipped to the as cargo. We suggest this needs to be addressed in GM.	Move Table 2 to GM and emphasise this is guidance on suit selection and specify what the assumed under-suit clothing is and how to account for lower or higher under-suit clothing insulation levels (e.g. the current SCinS winter/summer clothing policy).	See response to Item 2(a). For UK operations, it is anticipated that passengers will normally require either a Category 2 or Category 3 suit. Given the overlap in sea temperatures it is expected that suit category changes will be seasonal rather than day to day.

15(b)	AMC1 SPA.HOFO.165(b)	Comment on the principle or policy associated with the proposed change	There are uncertainties regarding decision of the selection of suits according to sea temperatures and day/night flights and the mandate regarding these decisions. 1. According to which source shall sea temperatures be decided? 2. It's stated that "the insulation shall be sufficient for the prevailing conditions and not excessive". In Table 1 it is used a Key that is not corresponding to this wording. The Key is: o Optional o Minimum required for nigh flight, optional for day flights o Minimum required o Not recommended 3. What is classed as day and night flights? During winter and summer months the length of the day in e.g. Aberdeen by the Dec 21st is only 6:40 hrs, in comparison to 21st of June when its 17:55 hrs. 4. The PPE provider must always have equipment available for the operators. With variations in sea temperatures several options must be available. Having liners for different thermal classes available is an investment in extra liners and space to store them. It also implicates that more staff must be available to change liners depending on sea temperatures. Will the PPE provider get access to the operators' source of temperature forecasts, and how long in advance will the PPE provider get this information to prepare PPE for flights? The questions raised above must have common understanding across the whole sector, and who should decide? • Helicopter operators • Operators on installations • UK- CAA • Others, e.g. HR • Cooperation between several partners Before a final cut-off date of Grandfathered PPE is set, a collaboration between operations, authorities and manufacturers/PPE providers should be in place. This to ensure clear understanding regarding operational complexity, implications to existing fleet, additional capex, and operational costs and logistics. Due to above uncertainties, there should be allowed for a longer transition period, not a cut-off date 01. Jan 2026.	Before a final cut-off date of Grandfathered PPE is set, a collaboration between operations, authorities and manufacturers/PPE providers should be in place. This to ensure clear understanding regarding operational complexity, implications to existing fleet, additional capex, and operational costs and logistics. Due to above uncertainties, there should be allowed for a longer transition period, not a cut off date 01. Jan 2026.	See response to Item 1(a).

15(c)	AMC1 SPA.HOFO.165(b)	Comment on the principle or policy associated with the proposed change	There are significant commercial & operational implications of this policy. The scope and complexity of the new Standards impose a dramatically higher cost of compliance, requiring significant investment. Such investment costs act as a barrier to entry which is uncompetitive. Given the nature of the mature market, which is forecast to diminish in size, such implementation will stifle product development and innovation. No 'Grandfather' rights: this has commercial implications to existing equipment rental fleets, with regards to return on investment. Survival equipment is mostly not purchased: it is leased. Capex costs are borne by the OEMs. S1 has invested and maintains a significant equipment rental fleet of immersion suits, lifejackets, EBS and PLBs for passengers and aircrew, used predominantly over UKCS. The implementation of different levels of thermal protection throughout the year across different regions of UKCS, will add significant operational and logistical complexity, and therefore cost to the customers. Legal definition of 'should' , not 'shall'? Does this imply this is optional equipment?	No comment.	See responses to Items 2(c), 7 and 8(c).
16(a)	GM1 SPA.HOFO.165(b)	Re-wording to improve clarity	See our comments on GM1 SPA.HOFO.110(b)(3).	See our comments on GM1 SPA.HOFO.110(b)(3). We also note that the wording in Table 1 could lead to a view that a slight increase in sea temperature while a passenger was offshore to one where their suit became 'not recommended' would mean they could not return ashore without a suit being shipped to the as cargo. We suggest this needs to be addressed in GM.	See responses to Items 3(b) and 15(a).

16(b)	GM1 SPA.HOFO.165(b)	Comment on the principle or policy associated with the proposed change	There are uncertainties regarding decision of the selection of suits according to sea temperatures and day/night flights and the mandate regarding these decisions. 1. According to which source shall sea temperatures be decided? 2. It's stated that "the insulation shall be sufficient for the prevailing conditions and not excessive". In Table 1 it is used a Key that is not corresponding to this wording. The Key is: o Optional o Minimum required for nigh flight, optional for day flights o Minimum required o Not recommended 3. What is classed as day and night flights? During winter and summer months the length of the day in e.g. Aberdeen by the Dec 21st is only 6:40 hrs, in comparison to 21st of June when its 17:55 hrs. 4. The PPE provider must always have equipment available for the operators. With variations in sea temperatures several options must be available. Having liners for different thermal classes available is an investment in extra liners and space to store them. It also implicates that more staff must be available to change liners depending on sea temperatures. Will the PPE provider get access to the operators' source of temperature forecasts, and how long in advance will the PPE provider get this information to prepare PPE for flights? The questions raised above must have common understanding across the whole sector, and who should decide? • Helicopter operators • Operators on installations • UK- CAA • Others, e.g. HR • Cooperation between several partners Before a final cut-off date of Grandfathered PPE is set, a collaboration between operations, authorities and manufacturers/PPE providers should be in place. This to ensure clear understanding regarding operational complexity, implications to existing fleet, additional capex, and operational costs and logistics. Due to above uncertainties, there should be allowed for a longer transition period, not a cut-off date 01. Jan 2026.	Before a final cut-off date of Grandfathered PPE is set, a collaboration between operations, authorities and manufacturers/PPE providers should be in place. This to ensure clear understanding regarding operational complexity, implications to existing fleet, additional capex, and operational costs and logistics. Due to above uncertainties, there should be allowed for a longer transition period, not a cut-off date 01. Jan 2026.	See response to Item 1(a).

16(c)	GM1 SPA.HOFO.165(b)	Comment on the principle or policy associated with the proposed change	There are significant commercial & operational implications of this policy. The scope and complexity of the new Standards impose a dramatically higher cost of compliance, requiring significant investment. Such investment costs act as a barrier to entry which is uncompetitive. Given the nature of the mature market, which is forecast to diminish in size, such implementation will stifle product development and innovation. No 'Grandfather' rights: this has commercial implications to existing equipment rental fleets, with regards to return on investment. Survival equipment is mostly not purchased: it is leased. Capex costs are borne by the OEMs. S1 has invested and maintains a significant equipment rental fleet of immersion suits, lifejackets, EBS and PLBs for passengers and aircrew, used predominantly over UKCS. The implementation of different levels of thermal protection throughout the year across different regions of UKCS, will add significant operational and logistical complexity, and therefore cost to the customers.	No comment	See response to Item 15(c).

17	AMC1 SPA.HOFO.165(c)	Comment on the principle or policy associated with the proposed change	c. The offshore industry business model for survival equipment is not purchased: it is leased, meaning capex costs are borne by the OEMs, who maintain significant lease hire fleets of equipment. Such capex ROI need to be recovered over time, as a business proposition. With no obvious Grandfather rights – this timeline has commercial implications to existing rental fleets.	Before a final cut-off date of Grandfathered PPE is set, a collaboration between operations, authorities and manufacturers/PPE providers should be in place. This to ensure clear understanding regarding operational complexity, implications to existing fleet, additional capex, and operational costs and logistics. Due to above uncertainties, there should be allowed for a longer transition period, not a cut-off date 01. Jan 2026.	See response to Item 1(a).
19	AMC1 SPA.HOFO.165(h)(b)	Comment on the principle or policy associated with the proposed change	In light of the current issues implementing CS-26 in EASA MS it would be helpful if there was GM on what evidence would demonstrate this requirement and who could/should generate it.	Add GM on what evidence would demonstrate this requirement and who could/should generate it.	This is an airworthiness issue and is covered in CS 27.807(b)(2) and CS 29.809(c) and related AMC material. It would not be appropriate to include airworthiness requirements in Air Operating Regulations. It is the responsibility of helicopter operators to comply with Air Operating Regulations, although evidence provided by OEMs may be used in demonstrating compliance.
20	AMC1 SPA.HOFO.165(j)	Re-wording to improve clarity	Examples give are "red" and "yellow with reflective material". This implies yellow chevrons have to be reflective but red do not. FYI: one UK operator does not have any chevrons currently and another does not have chevrons on one type.	Reconsider examples. Possible consider as GM if required.	Wording modified to read: *"…in the colour range yellow to red, with reflective material…".*