



## PRINCIPLE

# (OPS.25) Air display approval



### Acknowledgement of Country

The Civil Aviation Safety Authority (CASA) respectfully acknowledges the Traditional Custodians of the lands on which our offices are located and their continuing connection to land, water and community, and pays respect to Elders past, present and emerging.

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# Terminology

## Acronyms and abbreviations

**Table 1.** List of acronyms and abbreviations

Acronym/abbreviation	Description
AC	advisory circular
AFM	aircraft flight manual
AIP SUP	Aeronautical Information Publication Supplement
ALARP	as low as reasonably practical
AMC	acceptable means of compliance
CASA	Civil Aviation Safety Authority
CASR	<i>Civil Aviation Safety Regulations 1998</i>
COA	certificate of airworthiness
ERP	emergency response plan
GM	guidance material
IFR	instrument flight rules
IMC	instrument meteorological conditions
MOS	Manual of Standards
NOTAM	notice to airmen
PIC	pilot in command
ReOC	remotely piloted aircraft operator certificate
VMC	visual meteorological conditions

## Definitions

**Table 2.** List of definitions

Term	Definition
aerobatic manoeuvres	<p>For an aircraft, means manoeuvres of the aircraft that involve:</p> <ul style="list-style-type: none"> <li>• bank angles that are greater than 60 degrees</li> <li>• pitch angles that are greater than 45 degrees or are otherwise abnormal to the aircraft type; or</li> <li>• abrupt changes of speed, direction, angle of bank or pitch.</li> </ul>

Term	Definition
air display	<p>Organised flying performed before a public gathering, including the following:</p> <ul style="list-style-type: none"> <li>• a contest</li> <li>• an exhibition of aerobatic manoeuvres</li> <li>• flying in formation</li> <li>• other aircraft operations associated with the air display.</li> </ul>
air transport operation	A passenger transport operation, a cargo transport operation, or a medical transport operation, that is conducted for hire or reward, or is prescribed by an instrument issued under regulation 201.025.
balloon transport operation	<p>An operation is a balloon transport operation if the operation is:</p> <p>(a) a passenger transport operation conducted using a Part 131 aircraft that is a registered aircraft or a foreign registered aircraft; and</p> <p>(b) conducted for hire or reward; and</p> <p>(c) undertaken wholly within Australia; and</p> <p>(d) not undertaken as part of a flight into or out of Australian territory.</p>
flying in formation	<p>Two or more aircraft are:</p> <ol style="list-style-type: none"> <li>1. flying in formation if they: <ul style="list-style-type: none"> <li>a. are operating as a single unit with regard to navigation, position reporting and control; and</li> <li>b. are so close to each other that any change in height, heading or airspeed of any aircraft used for station-keeping results in a need for one or more of the other aircraft to manoeuvre to maintain station or avoid a collision.</li> </ul> </li> <li>2. taken to be flying in formation: <ul style="list-style-type: none"> <li>a. when the aircraft are changing station; and</li> <li>b. during join-up or breakaway.</li> </ul> </li> </ol>
large display	<p>An air display that features 4 or more programmed events or an event over multiple days.</p> <p>For a balloon event, this is an organised event with 4 or more balloons, for the enjoyment of the public that have been invited to attend.</p> <div style="border: 1px solid black; padding: 10px; margin-top: 10px;"> <p><b>Note:</b> If an event consists of only flypasts, it is considered a small event regardless of the number of events.</p> </div>
organiser	An individual or entity, however named, responsible for the application, planning and administration of an air display.
participant	A pilot in command of an aircraft being operated in the air display.

Term	Definition
public gathering	<p>An assembly of people at a place on the basis of a general public invitation to attend at that place, whether or not a charge is made for attendance.</p> <div> <p>Note: CASA considers a general public invitation to be any form of advertising or promotion to the general public via public communication methods. This does not include invitation or promotion within likeminded organisations such as aeroclubs, sport aircraft associations etc.</p> </div>
program of events	The program of air display activities provided with, or during, the application.
small display	<p>An air display that features only flypasts or 3 or less programmed events. A small display is a single day event.</p> <p>For a Balloon event, this is an organised event with less than 4 balloons, for the enjoyment of the public that have been invited to attend.</p> <div> <p>Note: A small display can still be a complex display depending on the nature of these events.</p> </div>
State aircraft	Aircraft of any part of the defence force (including any aircraft that is commanded by a member of that force in the course of duties as such a member); and aircraft used in the military, customs or police services of a foreign country.
STOP DISPLAY	<p>The call made to cease either an individual item in an air display or to cancel the entire program.</p> <div> <p>Note: Other terms to stop a display such as <i>'Knock-It-Off'</i> may be used, provided that all participants understand the meaning.</p> </div>

## Reference to regulations

Unless specified otherwise, all subregulations, regulations, Divisions, Subparts and Parts referenced in this Principle are references to the *Civil Aviation Safety Regulations 1998 (CASR)*.

# 1. Assessment scope

## 1.1 Application

Division 91.C.9—Special flight operations prescribes the requirement for an approval under regulation 91.045 for the conduct of an air display in the Australian territory. The Division also prescribes the requirement to hold an approval under regulation 91.045 for certain other aircraft activities.

Depending on the planned events, other regulations may require individual approvals.

An air display assessment may be as simple as one aircraft doing a flypast, or it may be a major air show over several days, with multiple events. The assessment scope includes the inherent risks associated with air display activities, and the mitigation of those risks through proper planning and oversight.

Each display will likely have some unique facets or activities that the inspector will need to be able to assess as safe, following the as low as reasonably practical (ALARP) principle.

## 1.2 Assessment worksheet user instructions

An air display application will require a flying operations inspector to complete the worksheet.

This principle provides guidance to the inspector when using the associated *Worksheet (OPS.25) Air display approval*. The worksheet provides inspectors with a regulation-based tool for recording the outcomes of the assessment. It is set out as follows:

- user instructions
- assessment worksheets
- assessment summary
- approval data sheet.

## 1.3 Approvals

An organiser who wishes to conduct an air display under regulation 91.180 is required to hold an approval under regulation 91.045. The approval may be given to an entity or individual.

**Note:** A person can be a legal entity or individual and, therefore, an organisation can apply to conduct the display.

There are two broad types of applicants for an air display:

1. An **entity** (e.g. a Pty Ltd company): the organiser listed in the display application, with an individual also listed who will carry out the responsibilities of the display organiser in accordance with the CASA approved program of events. In this case, the entity will be listed as the organiser on the Instrument of Approval and include the name of the individual who will carry out the display organiser responsibilities on behalf of the entity (the responsible person).
2. An **individual**: the organiser listed in the application who will carry out the display organiser activities in accordance with the application.

The CASA application form must be completed with 1 of the two options above.

An approval for an air display also provides relief from the minimum height requirements prescribed by regulations 91.265 and 91.267.

Additional approvals, under regulation 91.045, may be required to support the program of events for participants not already authorised to conduct the activity. The inspector will need to complete the relevant sections of the approval data sheet to ensure the approval includes all activities listed in the program of events.

An approval for an individual event is via a non-legislative instrument, while on-going approvals (up to 5 years) are made via a legislative instrument.



## 2. Assessment

### 2.1 Application

The application form provides CASA with the information required to support an approval of an air display. The application can be made by an individual or legal entity. If the application is made by a legal entity, the display organiser must specify the individual who will carry out the display organiser responsibilities.

The inspector must confirm the display includes the following:

- detailed display instructions or an exposition
- a detailed program of events, which must include (but is not limited to):
  - traffic management procedures
  - parking and ground movement procedures
  - the control of air traffic management (if necessary), including radio frequencies for air and ground control, arrival and departure procedures (these should be promulgated via NOTAM or AIP SUP), and any priorities for departures (such as slow aircraft with a long distance to travel or weather considerations).
- a copy of permission from the aerodrome operator, owner or landowner
- a risk assessment scaled to the size of the display (large or small)
- an emergency response plan (ERP)
- an area/aerodrome diagram with display lines and display area clearly marked.

The inspector must confirm that the application for an air display has been completed in full. Incomplete applications will be returned to the organiser prior to the commencement of any assessment activities.

The inspector should refer to advisory circular (AC) 91-21 as a guide to the assessment.

#### 2.1.1 Conducting aerobatic manoeuvres

If the program of events includes the conduct of aerobatic manoeuvres, each participant listed in the program of events will require an approval under subparagraph 91.185(2)(b)(ii).

If aerobatic manoeuvres will be conducted at night, participants will also require approval under subparagraph 91.185(2)(b)(iii).

The display organiser must supply the following supporting documentation:

- details of previous approvals from CASA to conduct this activity
- evidence of training or assessment undertaken by an ICAO contracting state or in the military
- well-defined processes and procedures that demonstrate how the display will be conducted safely
- a risk assessment covering the human factors surrounding night flight and risk mitigations.

#### 2.1.2 Carriage on, or in, a part of the aircraft not designed to carry a person

If the program of events includes the carriage of a person on, or in, a part of the aircraft not designed for that purpose (e.g. a wing walker), each participant listed in the program of events must hold an approval under paragraph 91.200(1)(b).

The display organiser must supply the following supporting documentation:

- details of previous approvals from CASA to conduct this activity
- evidence of training or assessment undertaken by an ICAO contracting state or in the military
- well-defined processes and procedures that demonstrate how the display will be conducted safely

- a risk assessment covering the human factors surrounding night flight and risk mitigations.

### Notes

- An approval will not be required for a Part 138 certificate holder authorised to conduct the activity.
- An additional approval will not be required for a pilot in command (PIC) authorised to conduct the activity by regulation 91.045.

## 2.1.3 Flying in formation

If the program of events includes aircraft flying in formation at night, or in instrument meteorological conditions (IMC), each participant listed in the program of events must hold an approval under paragraph 91.205(2)(b) and/or paragraph 91.205(3)(b).

The display organiser must supply the following supporting documentation:

- details of previous approvals from CASA to conduct this activity
- evidence of training or assessment undertaken by an ICAO contracting state or in the military
- well-defined processes and procedures that demonstrate how the display will be conducted safely
- a risk assessment covering the human factors surrounding night flight and risk mitigations.

**Note:** An additional approval will not be required for a PIC authorised to conduct the activity by regulation 91.045.

## 2.1.4 Towing of things by aircraft

If the program of events includes towing a banner from an aircraft, each participant listed in the program of events must hold an approval under paragraph 91.210(2)(a); and if the activity involves picking up and setting down the banner, an approval under paragraph 91.195(2)(a).

If the program of events includes towing a thing at night, such as a light or pyrotechnics, each participant listed in the program of events must hold an approval under paragraph 91.210(2)(a). If the aircraft is to operate without navigation lights, an exemption against regulation 91.810 will also be required.

The risk assessment will need to address such activities, including the human factors .

### Notes

- An approval will not be required for a Part 138 certificate holder authorised to conduct the activity.
- An additional approval will not be required for a PIC authorised to conduct the activity by regulation 91.045.

## 2.1.5 Dropping things from aircraft

If the program of events includes dropping a thing from an aircraft, the display organiser must list each participant and the aircraft, and whether they will be operating under the exemption *CASA EX81/21 Part 91 of CASR – Supplementary Exemptions and Directions Instrument 2021*, or the activity will be conducted by the holder of a Part 137 air operator's certificate or Part 138 certificate.

### 2.1.6 Participation by a State aircraft

The rules governing air displays are not applicable to aircraft operated by the Australian Defence Force, which are State aircraft, or aircraft used in the military, customs or police services of a foreign country. Such aircraft, when operating at an air display, will coordinate participation with the display organiser.

State aircraft of a foreign country also have multiple other approval and clearance requirements to meet before operations of any kind are permitted within Australian territory.

### 2.1.7 Applications for ongoing approval

On-going approvals are generally more complex and will require the display organiser to submit additional information on how the air display will be managed each year. An on-going approval should be supported by an exposition that details the planning and notification required for each event. The exposition should detail the organisational structure that plans and co-ordinate's each event, including who will be the person responsible, and include the following:

- the processes and procedures to be followed during air displays
- the responsibilities of key personnel
- a change management process, including procedures for significant and non-significant changes
- a list of display locations
- a list of display activities (aerobatics, flypast formation etc.)
- a list of the display pilots to be used
- a list of aircraft to be used.

To grant an ongoing approval, CASA must be satisfied with the matters required by subregulation 11.055(1B). Refer to section 1.3 of this principle.

### 2.1.8 Events that organisers are planning for the first time

The inspector should review section 3.4 of AC 91-21—Air Displays in relation to this topic – especially when the risks involved in some planned events may require approvals other than air display approvals from CASA, and be subject to general or particular operational conditions or limitations. Examples of such events could be night pyrotechnics, night aerobatics, car to plane transfers, flying under a thing, ribbon cutting etc. that are being conducted for the first time by the particular organiser.

## 2.2 Supporting documentation

The inspector must confirm the documentation includes the following:

- detailed display instructions or an exposition for the air display, including:
  - the air display name
  - location (aerodrome or geographic latitude/longitude)
  - site details, including maps
  - start and finish dates and times of the air display
  - start and finish dates and times of practice/rehearsal days
  - the date, time and location of the air display briefing
  - any exemptions being relied on for the air display.
- a detailed program of events, which must include (but is not limited to):
  - traffic management procedures
  - parking and ground movement procedures
  - the control of air traffic management (if necessary), including radio frequencies for air and ground control, arrival and departure procedures (these should be promulgated via NOTAM or AIP SUP),

and any priorities for departures (such as slow aircraft with a long distance to travel or weather considerations).

- a copy of permission from the aerodrome operator, owner or landowner
- a risk assessment scaled to the size of the display (large or small)
- an ERP
- an area/aerodrome diagram with display lines and display area clearly marked.

### 2.2.1 Air display briefing

The content of the air display briefing, whether written or verbal, will depend on the size and scope of the event. The briefing should be conducted taking into consideration the matters mentioned in Appendix E to AC 91-21.

If the event is classified as a large display, the briefing may be delivered to all participants prior to the day of the event, and followed by a short briefing on the day of the air display to update specific operational requirements.

### 2.2.2 Maps or display diagrams

The inspector must review the applicants maps or display diagrams to ensure the display location and display lines are clearly delineated. Depending on the program of events, the following matters should be considered:

- display axis/lines
- aircraft holding points
- manoeuvring areas
- display aircraft parking
- static display areas
- joy flight embarkation points
- spectator viewing areas, including ensuring:
  - the public are not permitted to enter any area where aircraft engines are operating
  - spectator areas are not situated in the approach or take-off areas of an aerodrome.
- secondary spectator areas identified
- model aircraft areas
- parachute drop zone
- helipads
- banner pick-up/drop area
- refuelling area
- location of emergency services
- location of display coordinator
- spectator aircraft arrival and departure plan.

### 2.2.3 Emergency response plan

An emergency response plan (ERP) is a mandatory document required to be provided by an organiser. In some cases, the air display ERP will be in operation concurrently with another ERP (e.g. an airport ERP). In this case, the organiser should describe how the air display ERP will work in conjunction with the location ERP, to avoid confusion if the ERP is activated. The air display ERP can refer to the location ERP for procedures relating to particular emergency events. The inspector will need to confirm that the air display ERP works harmoniously with the location ERP.

The ERP will depend on the size and scope of the air display activities. A suitable ERP will include the following:

- the emergency services on site and their location
- details of who is responsible for, and how they will ensure, the details and locations of incidents or accidents are conveyed to emergency services
- the types of occurrences that may require cancellation of the event
- the emergency services ingress and egress points to the display site
- details of any medical services on site
- who has responsibility and control of any accident or incident
- the details of any emergency control (command) centre on site
- any consultation with, or link to, an existing ERP that is already in place (e.g. at an aerodrome).

The inspector should consider the following matters when assessing the ERP:

- crowd control and evacuation
- emergency contact – Fire
- emergency contact – Ambulance
- emergency contact – Police
- aircraft accident (before, during and after display)
- stop program events or conditions
- restart program considerations
- emergency services briefing
- media contact
- recording and reporting
- information to participants and spectators
- post traumatic event information/counselling.

## **2.2.4 Risk assessment**

The risk assessment will depend on the size and scope of the air display activities. Depending on the risks identified, the risk assessment will include mitigations that reduce the risk to ALARP. A suitable risk assessment should consider the following matters:

- crowd lines
- display lines/area
- secondary spectators
- arrivals and departure (non-display aircraft)
- marshalling, directing and parking of aircraft
- starting of engines
- weather:
  - the air display must be conducted in visual meteorological conditions (VMC), except for a cross-country event which may be conducted under instrument flight rules (IFR).
- unauthorised activities
- display pilot rest facilities
- communication (ground and air)

- display briefing
- last minute changes.

If the display organiser has provided details for carriage of persons, other than flight crew, for reasons of mentoring etc., the risk assessment will need to address the carriage of those persons.

## 2.2.5 Program of events

The program of events for air displays can vary significantly, the important thing to consider is how the program will operate to ensure a safe air display. The program of events must list all participants, including aircraft, and the activities they will perform as part of the air display. The program of events must consider the air display activities in relation to the facilities, location and air space requirements. In addition, the inspector will need to ensure the program of events makes allowance for other aviation activities at the location, such as flight training or air transport operations.

The program of events should include:

- program timing
- sequencing of aircraft
- cancelation of specific events
- order of timing, and changes to that order
- each participant and aircraft, and the type of activities being conducting.

### Notes

- The program of events must not include flying events likely to cause diversion of pilot attention from the aircraft control or that feature disorganised flight by aircraft in close proximity.
- The air display must be conducted in VMC, except for a cross-country event which may be conducted under the IFR.

At the time of application, the program of events may not be finalised. It is the display organisers responsibility to ensure that when finalised, and the air display has been approved, the program of events is not changed without CASA approval.

## 2.3 Air display personnel

### 2.3.1 Display organiser

When the air display is organised by an individual, they will be the display organiser. When the display is organised by an entity, there must be an individual nominated as the person responsible for the conduct of the air display (the responsible person).

The display organiser is responsible for spectator and public safety, in relation to the conduct of the air display. The responsibility extends to the safety of persons not associated with the air display who could be affected by the aviation activities conducted during the display.

CASA must be satisfied that the display organiser, or alternate person, is a fit and proper person.

In assessing fitness and propriety, CASA may take into account a number of matters, including the following:

- the nominee's record of compliance with regulatory requirements (in Australia or elsewhere) relating to aviation safety and other transport safety
- the applicant's demonstrated attitude towards compliance with regulatory requirements (in Australia or elsewhere) relating to aviation safety and other transport safety
- the applicant's experience (if any) in aviation
- the applicant's knowledge of the regulatory requirements applicable to civil aviation in Australia

- the applicant's history (if any) of serious behavioural problems
- any conviction (other than a spent conviction, within the meaning of Part VIIC of the Crimes Act 1914) of the applicant (in Australia or elsewhere) for a transport safety offence
- any evidence held by CASA that the applicant has contravened:
  - the Act or these Regulations
  - a law of another country relating to aviation safety
  - another law (of Australia or of another country) relating to transport safety.
- any other matter relating to the fitness of the applicant to hold the authorisation.

If any matter is identified that raises concerns as to whether the nominee is a fit and proper person, the inspector must request a peer review by their manager and the Legal, International and Regulatory Affairs (LIRA) branch before proceeding with any action that would cancel or refuse the application.

### 2.3.2 Other air display personnel

Depending on the size of the air display, effective supervision of the activities will require additional support personnel. These persons may be delegated duties by the display organiser, but not the responsibilities. The inspector needs to be satisfied that a suitable chain of command exists to ensure safe operations.

Examples of other personnel include:

- display coordinator
- display committee
- ground control coordinator – example duties may include:
  - crowd control barriers and public safety
  - aircraft parking and participant safety
  - emergency services access
  - disabled aircraft recovery
  - aircraft marshalling
  - refuelling arrangements and safety
  - ground marshaller and official's safety briefing
  - emergency services briefing
  - enacting ground component of ERP (if required).
- officials – example duties may include:
  - supervise the marshalling and parking of aircraft or cars
  - operate any public address system, under normal or emergency situations
  - control messengers and any other staff deemed necessary by the display organiser
  - provide crowd control and aircraft safety-related duties.

### 2.3.3 Air display participants

The display organiser is responsible for ensuring that pilots hold the relevant licencing, medical and approvals, and that the aircraft has a relevant certificate of airworthiness to conduct the planned activities. The inspector is not required to confirm these qualifications.

The air display participants may include persons who are not flight crew (such as wing walkers, sky divers, etc.). The display organiser will need to confirm the qualifications and experience of these persons to perform the air display activities.



Passengers must not be carried in an air display aircraft. However, persons other than flight crew may be carried in the interests of safety or for the purpose of training and mentoring. Examples of when this is acceptable may include:

- an aircraft flight manual or certificate of airworthiness requirement for that person to be there
- the safety of the proposed operation would be enhanced with an observer
- training and mentoring.

The carriage of persons, other than flight crew, must be included in the risk assessment (see section 2.2.4 of this principle).

### 2.3.4 Balloon display and the carriage of passengers

For a balloon display, due to the differences in the risk profile, passengers may be carried provided the display organiser has approved the carriage. If the display organiser approves passengers to be carried, the display documentation must include procedures for mitigating any risks associated with the carriage of these passengers. If this option is to be included in an air display, it should be specifically mentioned in the Instrument of Approval.

For carriage of passengers on Part 131 aircraft as part of the air display, an air display approval should not be granted unless the display organiser has a process in place to:

- assess the safety of such operations and approve them
- ensure that passengers are not carried on any Part 131 aircraft for hire or reward, unless the operator holds a balloon transport AOC.

## 2.4 Site assessment and local authority consultation

The inspector should confirm the following:

- permission has been obtained from either the landowner or aerodrome operator to conduct the display over or on the property
- where applicable, local police and authorities are included in the display planning arrangements
- emergency and first aid services will be available for both spectators and participants in the event of an aviation safety incident or accident.

### 2.4.1 Site management

The inspector must be satisfied with the following matters:

- public enclosures and safety
- aircraft parking
- if conducted at an aerodrome:
  - collision avoidance
  - NOTAM requirements
  - ground special effects, such as explosive/pyrotechnic devices.

## 2.5 Other air display activities

If the display organiser intends to conduct the following activities as part of the air display, the program of events will need to include the activities, including the departure and arrival of the flights:

- air transport operations, such as scenic/joy flights:
  - passengers must not be carried for hire or reward during any part of the air display, except where specifically approved as part of the program of events



- for balloon transport operations to be included as part of the air display, they must be permitted by the display organiser.
- flight training activities, such as trial instructional flights
- operations in the following aircraft (must meet the requirements in section 2.3.3 of this principle):
  - limited category aircraft
  - experimental aircraft
  - sport and recreational aircraft.
- operations by balloons
- operations by model aircraft
- kite flying.

### 2.5.1 Filming by drones

The risks to this operation must be mitigated, and the organiser must ensure that the operation of a drone commercially at a display is done so by someone who holds a remotely piloted aircraft operator certificate (ReOC) and is mentioned in the application.

### 2.5.2 Reduced fuel loads

*CASA EX81/21 Part 91 of CASR – Supplementary Exemptions and Directions Instrument 2021* exempts the PIC of an aircraft participating in an air display from the requirements of section 19.04 of the Part 91 Manual of Standards (MOS). The air display organiser must list, in the program of events, the participants that will be operating under the exemption. The inspector should confirm that the requirement is both operationally necessary and that safety is not compromised.

### 2.5.3 High speed operations

*CASA EX81/21 Part 91 of CASR – Supplementary Exemptions and Directions Instrument 2021* exempts the PIC of an aircraft participating in an air display from the requirements of Chapter 4 of the Part 91 MOS. The air display organiser must list, in the program of events, the participants that will be operating under the exemption. The inspector must confirm that the risk assessment addresses high speed operations and ensure that safety is not compromised.

## 2.6 Post display report

As a requirement of the air display approval process, CASA requires the display organiser to provide a post display report to CASA. The post display report identifies any safety-related occurrences and details relating to the oversight and running of the event.

This report is required to be provided to CASA within 14 days after the event and must include the following details:

- any safety related occurrences at the display, including the pre and post display arrivals and departure of both display and non-display aircraft
- any actions or operations that were not compliant with the air display approval
- any STOP DISPLAY calls required in the interests of safety, and the reason for those calls
- organisational or administrative issues that may impact the safety of future displays
- a copy of the completed and signed participant signature sheet.

### 3. Revision history

Amendments/revisions for this principle are recorded below in order of the most recent first.

**Table 3. Revision history table**

Version No.	Date	Parts / Sections	Details
1.2	July 2024	All	Reformat to latest template and minor updates
1.1	May 2023	Chapter 1 Sections 2.1.8, 2.3.4 and 2.5	Revised chapter 1 to align with current principle template. Inclusion of fit and proper person assessment criteria. Inclusion of balloon passenger carrying information. Further explanation of entity vs individual for display applicants and events that organisers want to conduct for the first time that carry elevated risk.
1.0	November 2022	All	First issue