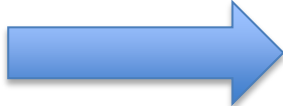




FTL SEMINAR
Management
System
ORO.GEN.200
JAN/FEB 2014

Capt Alex Rattray FO(T)I

In general terms what has changed from EU-OPS?

- The EASA **Air Operations** Regulation will replace EU-OPS in the UK from 28 October 2014 REGULATION (EU) No. 965/2012
- **Much of EU-OPS is transposed**
- **HOWEVER:**
- There is **significant NEW and AMENDED material**. Some EU-OPS Material has not been transposed. (Cosmic Radiation)
- **What is at the heart of the Change?**
- ‘The Management System’ (**ORO.GEN.200**)
- Examples of Change – *inter alia*:
- Key Management **Processes** must be **documented**
- Former QS and SMS are absorbed under the MS Heading
- QM  CMM

Operations Manuals

- Among the most significant areas of change to the Operations Manuals for transition to EASA Air Operations are OM Part A Sections:
 - 1 - Organisation and Responsibilities
 - 2 - Operational Control and Supervision
 - 3 - **Management System** (Note: 3 - was Quality System TGL/44)

ORO.GEN.200

- (a) The operator shall **establish, implement and maintain** a management system that includes:
 - (1) clearly defined **lines of responsibility and accountability throughout the operator**, including a direct safety accountability of the accountable manager;
 - (2) a description of the overall philosophies and principles of the operator with regard to safety, referred to as the **safety policy**;
 - (3) the **identification of aviation safety hazards** entailed by the **activities** of the operator, their **evaluation** and the **management of associated risks**, including taking **actions to mitigate** the risk and **verify** their effectiveness;

ORO.GEN.200 cont/d

- (4) maintaining personnel **trained** and **competent** to perform their tasks;
- (5) **documentation of all management system key processes**, including a process for making personnel aware of their responsibilities and the procedure for amending this documentation;
- (6) **a function to monitor compliance of the operator** with the relevant requirements. Compliance monitoring shall include a **feedback** system of findings to the **accountable manager** to ensure effective implementation of corrective actions as necessary; and
- (7) any additional requirements that are prescribed in the relevant Subparts of this Annex or other applicable Annexes. (Next 2 Slides)
- (b) The management system shall correspond to the **size** of the operator **and** the **nature and complexity** of its activities, taking into account the **hazards** and **associated risks inherent** in these activities.

ORO.GEN.200 (a) 7

- *(7) any additional requirements that are prescribed in the relevant Subparts of this Annex or other applicable Annexes.*
- A fairly sweeping statement.
- Given that there is no AMC or GM for (a)(7), what does this mean??
- Needs to be reflected in simple terms at least in the documented description of the operator's Management System
- Possible Operations Manual Text:
 - *'The Management System is designed to ensure that procedures, processes and systems are in place and documented to ensure that all EASA Implementing Rules and associated AMC and GM relevant to our operation are complied with.'*

ORO.GEN.200 (a) 7 cont/d

- The requirements of ORO.AOC.130 in respect of Flight Data Monitoring (FDM) will be mandatory from 28 October 2014
- The requirements of ORO.FTL.120 in respect of Fatigue Risk Management (FRM) will be mandatory from 18 February 2016. However, this will only be applicable if an operator wishes to take advantage of the less restrictive numerical FTL requirements available only to those operators having a FRM System.
- FDM and FRM (where required) should both form an integral part of the Management System under ORO.GEN.200 (a)7.

ORO.GEN.210 (a) Personnel requirements

- The Accountable Manager shall be responsible for establishing and maintaining an effective management system.

Management Systems – Complex/Non Complex

- COMPLEX - workforce of more than 20 full time equivalents (FTEs)
- Operators with up to 20 FTEs may be COMPLEX in the following cases:
 - the **extent** and **scope** of contracted activities
 - operations requiring the following specific approvals: performance-based navigation (**PBN**), low visibility operation (**LVO**), extended range operations with two-engined aeroplanes (**ETOPS**), helicopter hoist operation (**HHO**), helicopter emergency medical service (**HEMS**), night vision imaging system (**NVIS**) and dangerous goods (**DG**)
 - different types of aircraft
 - Operational **environment** - (offshore, mountainous area etc.)

ORO.GEN.130 Changes

- *Any of the elements of the operator's management system as required in ORO.GEN.200(a)(1) and (a)(2) shall require **prior approval** by the competent authority.*
- (1) clearly defined **lines of responsibility and accountability throughout the operator**, including a direct safety accountability of the accountable manager;
- (2) a description of the overall philosophies and principles of the operator with regard to safety, referred to as the **safety policy**;

Implementing Rules – IR

Acceptable Means of Compliance – AMC

Alternative Means of Compliance - AltMoC

- **IR** -The high level rule – Law
- **CS** – Applicable under Subpart FTL – “the operator shall comply”
- **AMC** – ‘Using the AMC is deemed compliant’. (*My words*)
- **AltMoC** – ‘Those means that propose an **alternative to an existing acceptable means of compliance** or those that propose **new means to establish compliance** with Regulation (EC) No. 216/2008 and its Implementing Rules for which no associated AMC have been adopted by the Agency
- *CAA Decision - ORO.GEN.210 refers*

AltMoc Application Form

Safety & Airspace Regulation Group

Application to Propose an Alternative Means of Compliance (AltMOC)

(In accordance with Regulation (EU) 965/2012, Annex III, ORO.GEN.120 Means of compliance)



This template is to be used by operators for the submission of a proposal for an Alternative Means of Compliance to the CAA.

Once completed by the operator, this form, and all supporting documentation, should be sent to the assigned CAA Flight Operations Inspector.



NOTIFYING OPERATOR

1. Operator Name	
2. Focal Point Contact Details	

ALTERNATIVE MEANS OF COMPLIANCE (AltMOC)

3. Regulatory reference		
4. Subject		
5. Rule paragraph(s)		
6. EASA AMC(s)	Yes <input type="checkbox"/>	Ref.: _____
	No <input type="checkbox"/>	_____
7. Summary of AltMOC		
8. Additional information (if any)		
9. Number and description of attachments		

OPERATOR: DATE AND SIGNATURE	
10. Date: _____	Signature: _____
CAA USE ONLY – DATE AND SIGNATURES – ACCEPTANCE RECOMMENDED / NOT RECOMMENDED	
11. Section / Department	
12. Date: _____	Signature: _____ FO Staff Member
13. Date: _____	Signature: _____ Flight Operations Inspector
14. Date: _____	Signature: _____ Line Manager

Instructions for completion

1. State the name of the operator/AOC holder.
2. State the name and position of the person in the operator to whom questions on this AltMOC should be addressed. Include at least the e-mail address and phone number of the Focal Point.
3. State the Regulation that the AltMOC refers to (e.g. Regulation (EU) 965/2012, Annex IV).
4. Briefly outline the issue that the AltMOC intends to address.
5. State the paragraph(s) of the Implementing rules to which the AltMOC refers to (e.g. CAT.IDEA.325).
6. State whether or not there is already an EASA AMC on the same issue. If yes, include the reference(s) (e.g. AMC 1 CAT.IDEA.325).
7. Summarise the AltMOC, describing how it proposes to achieve compliance with the Implementing rule.
8. Give any additional relevant information.
9. Indicate the number of documents attached and include a brief description of each of them (e.g. organisation's internal procedures, studies/safety assessments).
10. The form should be signed by the person who has been indicated as the Focal Point in 2.
11. § 14.

CAA to complete the details of the submitting Section / Department, and signatures of the FO Staff Member, FOI where different, and Line Manager. CAA signatures should be electronic and/or via email.

END