EASA **Comment Response Tool**

Title	Implementing Rules for Cabin Crew in Commercial Air Transport Operations
NPA Number	NPA 2009-02e (Part-CC)

UK CAA (UK CAA, European.Affairs@caa.co.uk) has placed **1** reactions on this NPA:

NPA Page(s)	Reaction to	Reaction	Attachments
0	(general reactions)	**COVER REGULATION - CRD b.1** **Page 4 - Paragraph No: Article [ ] Cabin Crew – various subparagraphs** **Comment:** All transitional periods should be calculated from date of applicability of Regulation, not the date of entry into force. **Justification:** Consistency with latest draft of Commission Regulation (Part FCL). **Proposed Text:** See above **Page 4 - Paragraph No: Article [ ] Cabin Crew – subparagraph 2 (and CRD a.1 – Explanatory Note – Part-CC)** **Comment:** This requires all cabin crew attestations issued under EU-OPS to be re-issued in a new format. **Justification:** There is no safety justification for this requirement. In addition, this will be a costly exercise for industry. For example, in the UK there are currently over 30,000 cabin crew holding attestations issued under EU-OPS which will be rendered invalid and will need to be re-issued for no safety benefit whatsoever. These current attestations all conform to the proforma provided by EASA during the introduction of EU-OPS. This new requirement appears to have been developed partly to accommodate the carriage and production of attestations by cabin crew members. See separate comment suggesting that carriage of the attestation be removed from the rules. **Proposed Text:** Remove the requirement for the attestation to be re-issued in a new format. **RESULTING TEXT - CRD b.2** **Page 3 - Paragraph No: CC.GEN.025**	

(b) (2)

Comment: The new requirement for the attestation, and list of aircraft types, to be carried by the cabin crew member is not justified on safety grounds.

Justification:

This is a new requirement and there does not appear to be any justification for this in the original Explanatory Note. The subsequent CRD a.1 Explanatory Note (dated Oct 2010) states that significant concerns were expressed on this new requirement but the only mitigation has been to introduce flexibility on the production of the document, not change the requirement to carry it. Comments made by the UK CAA during the NPA process have not been addressed by the CRD. Competent authorities are not entitled to demand to inspect cabin crew attestations.

There is no requirement for these documents to be carried or produced as part of a SAFA inspection therefore this rule imposes requirements on Community operators to carry a non-ICAO document which will not be applicable to non-Community operators.

If there are proportionate safety reasons for the carriage and production of an attestation, they should also be applied to third country operators. If there are no proportionate safety reasons then the requirement should not be applied to Community operators.

Proposed Text: The requirement for the attestation and associated list of aircraft types to be carried should be deleted.

Page 4 - Paragraph No: CC.CCA.100 (a)

Comment: The new requirement for aircraft type specific training and checking for at least one aircraft type, to be conducted before the issuance of an attestation, should be removed.

Justification: This new requirement now goes beyond the requirements of EU-OPS 1.1005. It should be possible for a training organisation (which is not an AOC holder / operator) to issue an attestation following the completion of initial training. Aircraft type-specific training and operator conversion training should then be completed before the cabin crew member can exercise the privileges of the attestation.

However, as written, this rule would prevent the issuing of an attestation by an approved training organisation as they would be unable to complete the training required by OR.OPS.CC.125. Training organisations are currently issuing attestations under the requirements of EU-OPS and it is envisaged under AR.CC.100(b)(2) that they should

be able to do so.
Proposed Text: Remove the new requirement for aircraft type training to be conducted before the issuance of an attestation and revert to the original intention and text of EU-OPS 1.1005.

Page 4 - Paragraph No: CC.CCA.105 (c)
Comment: Holders of attestations should not be required to record their own training records.
Justification: The responsibility for recording training must be retained by the organisation that actually conducted the training. The responsibility for ensuring cabin crew are adequately trained is that of the operator. Permitting holders of an attestation to record their own training has the potential for abuse and could directly affect safety.
Proposed Text: All training completed shall be recorded by the organisation or operator who conducted the training. Records shall be made available to the holder on request.

Page 5 - Paragraph No: CC.TRA.220 (b) (7)
Comment: Many aspects of Security training cannot be conducted during Initial training as they are subject to the specific National Aviation Security Programme (NASP) of each Member State.
Justification: Security training cannot be considered as completely generic as it is not only particular to the specific NASP of each Member State but can also be operator and route network specific. Whilst the least risk bomb location and flight crew compartment door, security components and use, form part of Aircraft Type Specific training in AMC1 to OR.OPS.CC.125 (b), Operator Conversion training in (c) only includes flight crew compartment security door, components/use.
Proposed Text: Include in OR.OPS. CC.125 (c) – Aircraft type specific training and operator conversions training, operator specific security training items relevant to the NASP of the State of the operator.

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