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Title	Update of the rules on air operations (Air OPS Regulation — all Annexes & related AMC/GM) — sub-NPA (B) 'Draft AMC/GM'
NPA Number	NPA 2015-18 (B)

UK CAA (European.Affairs@caa.co.uk) has placed **16** unique comments on this NPA:

Cmt#	Segment description	Page	Comment	Attachments
110	3.1.2. AMC/GM to Annex II (Part-ARO) — AMC1 ARO.GEN.200(a)(1)(e) Management system	17 - 18	<p>Page No: 18</p> <p>Paragraph No: (6) - AMC1 ARO.GEN.200(a)(1)(e)</p> <p>Comment: It is not clear whether the 'if so requested' refers to the provision of the copy of procedures to the Agency and the organisations, or just to the organisations. The UK CAA believes disclosure of procedure related to the management system should, in the main, be limited to the Agency but available to organisations on request to the CA. A simple review of the intention of the text by the author would be helpful but suggested text is provided.</p> <p>Justification: Clarification.</p> <p>Proposed Text: "A copy of the procedures related to the management system and their amendments should be made available to the Agency for the purpose of standardisation, and to the other organisations subject to this Regulation, if so requested."</p>	
111	3.1.2. AMC/GM to Annex II (Part-ARO) — GM5 ARO.GEN.200(a)(1)(e) Management system	25	<p>Page No: 25</p> <p>Paragraph No: N/A</p> <p>Comment: Proposed additional guidance material regarding Fatigue Risk Management Training for Inspectors.</p> <p>Justification: This GM was discussed at the EASA FRM TAG meeting and it was strongly supported by NAAs. By using the ICAO GM, a clear and standardised approach would be provided, in order to support the knowledge requirements for the Inspectors. It would also provide support that this was the accepted practice in order to achieve FRM approval</p> <p>Proposed Text:</p> <p>"GM6 ARO.GEN.200(a)(2)</p> <p>In order to ensure that Inspectors are trained in Fatigue Risk Management in sufficient detail to understand the subject, CAs should consider basing their training on the ICAO Fatigue Management for Regulators Guidance Manual."</p>	
112	3.1.2. AMC/GM to Annex II (Part-ARO) — GM1 ARO.OPS.100(b) Issue of the air operator	33 - 34	<p>Page No: 33</p> <p>Paragraph No: (24) - GM1 ARO.OPS.110(b) Issue of the air operator certificate</p> <p>Comment: Paragraph GM1 ARO.OPS.110(b) Issue of the air</p>	

	certificate		<p>operator certificate is an incorrect reference. The UK CAA suggests it should state GM1 ARO.OPS.100(b).</p> <p>Justification: ARO.OPS.100 refers to AOC issues and ARO.OPS.110 refers to Leasing</p> <p>Proposed Text: Amend this reference to “GM1 ARO.OPS.100(b)...”</p>	
113	3.1.2. AMC/GM to Annex II (Part-ARO) — GM2 ARO.OPS.110 Lease agreements	34	<p>Page No: 34</p> <p>Paragraph No: (25) - GM2 ARO.OPS.110</p> <p>Comment: Refers to long-term lease agreements of more than 7 months between EU operators, the UK CAA suggests this should clarify that it is 7 months cumulative within any 12 consecutive months.</p> <p>Justification: Clarification is required, otherwise consecutive 6 month lease agreements could run indefinitely without having to comply with the new GM2.</p> <p>Proposed Text: “In <i>the</i> case of a long-term lease agreement of more than 7 months cumulative within 12 consecutive months between operators having their principal place of business in an EU Member States...”</p>	
114	3.1.2. AMC/GM to Annex II (Part-ARO) — GM2 ARO.RAMP.115(b) Qualification of ramp inspectors	35 - 36	<p>Page No: 35</p> <p>Paragraph No: 28</p> <p>Comment: The UK CAA suggests this should allow for SANA inspections to be included as part of senior inspector qualification number.</p> <p>Justification: SANA follows the same procedure and checklist.</p> <p>Proposed Text: Amend the text to make it clear that the 72 inspections could include SANA inspections.</p>	
115	3.1.3. AMC/GM to Annex III (Part-ORO) — AMC1 ORO.GEN.200(b) Management system	59 - 60	<p>Page No: 60</p> <p>Paragraph No: (48) - AMC1 ORO.GEN.200(b),(c)</p> <p>Comment: The proposed text makes the statement that operation of 2 aircraft of the same type makes the organisation non-complex by default. This is questionable and should be reviewed as for an example of an operation of 2 B747s on a world-wide basis with a FTE of 40 or more would hardly seem to imply a non-complex organisation. The details contained in sub-paragraphs (a) and (b), which are ignored under (c), would seem to provide adequate, clear and safe provisions. It is recommended that (c) be deleted.</p> <p>Justification: Potential for unintended consequences due to unsubstantiated change.</p> <p>Proposed Text: n/a</p>	
116	3.1.3. AMC/GM to Annex III (Part-ORO) — AMC1 ORO.GEN.200(b) Management system	59 - 60	<p>Page No: 60</p> <p>Paragraph No: 48 - AMC1 ORO.GEN.200(b)(c)</p> <p>Comment: It is not clear from this amendment whether an operator can operate several other-than complex aircraft in addition to two</p>	

			<p>complex aircraft of the same type and still be considered to be a non-complex organisation.</p> <p>Justification: The UK CAA suggests it should be made clear whether or not it can be a mixed fleet, with a maximum of two complex aircraft of the same type, plus additional other-than complex aircraft and still be considered a non-complex organisation by default.</p> <p>Proposed Text: Text will depend upon intention of the rulemaker.</p>	
117	3.1.3. AMC/GM to Annex III (Part-ORO) — AMC2 ORO.GEN.210(a) Application for an air operator certificate	61 - 62	<p>Page No: 61</p> <p>Paragraph No: (50) - AMC1 ORO.AOC.100(b)</p> <p>Comment: The introductory heading describes a change “without suggesting that an EASA Form 4 should be provided, but in the proposal it states ‘regarding the accountable manager in accordance with EASA Form 4’? The UK suggests clarification of the text and intent would be helpful.</p> <p>Justification: Clarification and explanation of intent.</p>	
118	3.1.3. AMC/GM to Annex III (Part-ORO) — AMC1 ORO.AOC.110 Leasing agreement	63	<p>Page No: 63</p> <p>Paragraph No: (53) - AMC1 ORO.AOC.110 (a) (1)</p> <p>Comment: “once available” has been added to the request for information on aircraft type, registration and serial number. The UK CAA suggests this should also include when this information must be provided by and would suggest at least 30 minutes prior to the specific aircraft being used.</p> <p>Justification: This will ensure that NAAs have current and accurate information of the leased aircraft and the lessor and lessee must know which aircraft will be used by this time.</p> <p>Proposed Text: “... The aircraft type, registration markings and serial number, once available but at least 30 minutes prior to the lease commencing;...”</p>	
119	3.1.3. AMC/GM to Annex III (Part-ORO) — AMC3 ORO.AOC.110(g) Leasing agreement	64	<p>Page No: 64</p> <p>Paragraph No: (55) - AMC3 ORO.AOC.110(g)</p> <p>Comment: The UK CAA believes wet lease-in agreements between 1 day and up to 7 months should also require the lessee to provide the signed statement.</p> <p>Justification: Wet leasing-in is considered a contracted activity and therefore falls under the requirements of ORO.GEN.205, regardless of who the operators are and the length of the wet lease.</p> <p>Proposed Text: “In the case of a long-term wet lease-in agreement of more than 7 months between operators having their principal place of business in an EU Member State, the lessee should provide the competent authority with a statement explaining how it intends to comply with ORO.GEN.205 on contracted activities during the long-term wet lease-in agreement”.</p>	
120	3.1.4. AMC/GM to Annex IV (Part-CAT) — AMC2 CAT.IDE.A.225	94 - 95	<p>Page No: 95</p> <p>Paragraph No: (68) AMC2 CAT.IDE.A.225</p>	

	Emergency medical kit		<p>Comment: The UK CAA suggests deleting the word 'secure' in the proposed text.</p> <p>Justification: The purpose of the amendment is to ensure that the emergency medical kit is readily available for use when required, but that access to the kit is adequately controlled such that unauthorised access is prevented. The term 'secure' in this context is likely to be interpreted as a location that is firmly fastened, i.e. locked, and would defeat the purpose of the amendment. 'Prevents authorised access' is the wording used in the CAT.IDE.A.225(c)(2) and is adequate on its own to specify what is required and would allow the flexibility needed to achieve the aim of the amendment.</p> <p>Proposed Text: <i>"The emergency medical kit should be kept either in the flight crew compartment or in another secure location in the cabin that prevents unauthorised access to it."</i></p>	
121	3.1.6. AMC/GM to Annex VI (Part-NCC) — GM1 NCC.IDE.A.100(b) Instruments and equipment — general	105	<p>Page No: 105</p> <p>Paragraph No: (81) - GM1 NCC.IDE.A.100(b)</p> <p>Comment: An incorrect reference has been copied into the text. Delete "SPO.IDE.A.100(b)" and replace with NCC.IDE.A.100(b).</p> <p>Justification: Correction.</p> <p>Proposed Text: Delete "SPO.IDE.A.100(b)" and replace with "NCC.IDE.A.100(b)."</p>	
122	3.1.6. AMC/GM to Annex VI (Part-NCC) — GM1 NCC.IDE.H.100(b) Instruments and equipment — general	107	<p>Page No: 107</p> <p>Paragraph No: (84) - GM1 NCC.IDE.H.100(b)</p> <p>Comment: An incorrect reference has been copied into the text. Delete "SPO.IDE.A.100(b)" and replace with NCC.IDE.H.100(b).</p> <p>Justification: Correction.</p> <p>Proposed Text: Delete "SPO.IDE.A.100(b)" and replace with "NCC.IDE.H.100(b)."</p>	
123	3.1.6. AMC/GM to Annex VI (Part-NCC) — AMC1 NCC.IDE.H.115 Operating lights	108	<p>Page No: 108</p> <p>Paragraph No: (86) - AMC1 NCC.IDE.H.115</p> <p>Comment: The 'optional' landing light text is not altogether clear and the UK CAA suggests that the text is amended as shown.</p> <p>Justification: Clarity of purpose and safety intent.</p> <p>Proposed Text:</p> <p>"LANDING LIGHT The landing light should be trainable, at least in the vertical plane or optionally be supplemented by an additional fixed light or lights positioned to give a wide spread of illumination."</p>	
124	3.1.7. AMC/GM to Annex VIII (Part-NCO) — GM1	110	<p>Page No: 110</p> <p>Paragraph No: (90) - new GM1 NCO.OP.180</p>	

	NCO.OP.200 Simulated situations in flight		<p>Comment: The UK CAA suggests that this definition would be better placed in the GM to Annex I Definitions as it provides a useful explanation for definition (new) 30 – Crew member.</p> <p>Justification: Simplification and clarity.</p>	
125	3.1.8. AMC/GM to Annex VII (Part-SPO) — GM1 SPO.OP.185 Simulated situations in flight	113	<p>Page No: 113</p> <p>Paragraph No: (93) - new GM1 SPO.OP.185</p> <p>Comment: The UK CAA suggests that this definition would be better placed in the GM to Annex I Definitions as it provides a useful explanation for definition (new) 30 – Crew member.</p> <p>Justification: Simplification and clarity.</p>	