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Title	Embodiment of safety management system (SMS) requirements into Part-145 and Part 21
NPA Number	NPA 2019-05 (A)

UK CAA (European.Affairs@caa.co.uk) has placed **2** unique comments on this NPA:

Cmt#	Segment description	Page	Comment	Attachments
21	(General Comments)	0	<p>General Comment</p> <p>The descriptions of what is required of the SMS and Safety Manager across each of the regulations (Part 145, Part 21 Subpart M, 21G and 21J) has similar intent but uses different text.</p> <p>Examples of this are: NPA 2019/05 Doc B - Page.138 AMC2 21.A.145(c)(2) Resources, and page.186 AMC2 21.A.245(b) Resources, and NPA 2019/05 Doc C – Page 76 GM5 145.A.30(e) Personnel requirements</p> <p>We suggest as a principle, if the intent is the same then the same text should be used.</p> <p>Justification: Some organisations will hold approvals against all of these (e.g. British Airways) and they should not infer a difference if it is not intended.</p>	
22	4. Impact assessment (IA) 4.1. What is the issue	12 - 14	<p>Page No: 12</p> <p>Paragraph No: 4.1.1</p> <p>Comment: The statement that UK has already mandated SMS in Part 145 is incorrect.</p> <p>Justification: To provide factually correct information</p>	