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<b>Title</b>	Embodiment of safety management system (SMS) requirements into Part-145 and Part 21
<b>NPA Number</b>	NPA 2019-05 (B)

**UK CAA** (European.Affairs@caa.co.uk) has placed **6** unique comments on this NPA:

Cmt	Segment description	Page	Comment	Attachments
691	21.A.125B Findings	21 - 22	<b>Page No:</b> 22; 42; 61; 67/68; 77	
	21.A.258 Findings	41 - 42	<p><b>Paragraph No:</b> 21.A.125B Findings (2); 21.A.258 Findings (2); 21.B.125 Findings and corrective actions (3); 21.B.225 Findings and corrective actions (d) and (f)(3); 21.B.433 Findings and corrective actions (d) and (f)(currently incorrectly numbered (d))(3).</p> <p><b>Comment:</b> Level 3 finding still remains in Part 21 although it is only an observation. It does not feature in Part 145.</p> <p><b>Justification:</b> Raising or not raising a level 3 finding should be made uniform across Part 21 and Part 145.</p> <p><b>Proposed Text:</b> We recommend that the corresponding text to level 3 finding should be deleted.</p> <p>In addition, please note the paragraph numbered (d) beginning "The competent authority shall ..." should be renumbered to paragraph (f)</p>	
	21.B.225 Findings and corrective actions	67 - 68		
	21.B.433 Findings and corrective actions	76 - 77		
692	21.A.245 Resources Approval requirements	40 - 41		<p><b>Page No:</b> 40</p> <p><b>Paragraph No:</b> 21.A.245 Resources</p> <p><b>Comment:</b> There is no reference to accountable manager in 21.A.245 Resources.</p> <p><b>Justification:</b> The reference to the accountable manager would help understanding the organisation structure and relationship with the Head of Design. Additionally, its omission makes it inconsistent with the rest of the regulation.</p>
693	21.B.125 Findings and corrective actions	60 - 61	<p><b>Page No:</b> 60 and 67</p> <p><b>Paragraph No:</b> 21.B.125 Findings and corrective actions (b) and (c); 21.B.225 Findings and corrective actions (b) and (c)</p> <p><b>Comment:</b> We believe there needs to be more consistency and alignment in the definition of a level 1 and 2 finding in Part 21 and Part 145. The new definition in Part 21 requirements does not include "with the organisation's procedures and manuals".</p> <p><b>Justification:</b> It could lead to a reduction in the compliance baseline and a potential reduction in safety.</p> <p><b>Proposed Text:</b> We suggest the definition wording "with the organisation's procedures and manuals" should be included.</p>	
	21.B.225 Findings and corrective actions	67 - 68		

Cmt	Segment description	Page	Comment	Attachments
694	Draft AMC & GM to Annex I(Part21) to Regulation (EU) No748/2012 (Draft EASA Decision)	88 - 90	<p><b>Page No:</b> 89</p> <p><b>Paragraph No:</b> Human factors</p> <p><b>Comment:</b> The definition of human factors does not refer to production.</p> <p><b>Justification:</b> Human factors also apply to production.</p> <p><b>Proposed Text:</b> We recommend the definition should have a reference to 'production' incorporated.</p>	
695	GM1 21.A.3A(a)(1) and (b)(1) Occurrence reporting	94 - 98	<p><b>Page No:</b> 94</p> <p><b>Paragraph No:</b> GM1 21.A.3A(a)(1) and (b)(1) Occurrence reporting</p> <p><b>Comment:</b> We suggest the text shown here to implement the requirements of the occurrence reporting regulation (EU 376/2014) should be copied across into NPA 2019-05 Part C to ensure the Part 145 requirements are aligned.</p> <p><b>Justification:</b> This would promote a more standardised implementation of the occurrence reporting regulation within production, design and maintenance approvals.</p> <p><b>Proposed Text:</b> We recommend that current Part B text is copied across to NPA 2019-05 Part C text (minor adjustments required).</p>	
696	AMC1 21.A.239(c) Design management system	149 - 151	<p><b>Page No:</b> 149</p> <p><b>Paragraph No:</b> AMC1 21.A.239(c) Design management system</p> <p><b>Comment:</b> We recommend the document "International Industry Standard in Design, Manufacturing and Maint Org." should not be considered compliant with the EU framework for aviation safety management.</p> <p><b>Justification:</b> It is unclear how this document will be maintained to keep up with changes to the ICAO Doc 9859 Safety Management Manual or future editions of Annex 19.</p> <p>Many airworthiness organisations hold both a Part 145 and Part 21G/Part 21J approval in combination. It would be impractical for such an organisation to integrate the management system across multiple approvals where the "International Industry Standard in Design, Manufacturing and Maint Org" is only applicable to Part 21J. (It is not considered an AMC in NPA 2019-05 Part C to update Part 145)</p> <p>The document is proposed as an acceptable means of compliance; however, the document has limited regulatory input and is primarily developed by industry. Regulators were only observers on the groups that are cited as authors.</p> <p>It is unclear how a competent authority would conduct oversight of a management system where the approval holder has used the document as a means of compliance.</p> <p><b>Proposed Text:</b> We suggest this document should be not considered an acceptable means of compliance, instead it should be referenced as guidance material.</p>	

