EASA

Comment Response Tool

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

UK CAA (European.Affairs@caa.co.uk) has placed **3** unique comments on this NPA:

Cmt	Segment description	Page	Comment	Attachments
594	145.A.60 Occurrence reporting	21 - 22	**Page No:** 22 **Paragraph No:** 145.A.60, subparagraph (f) **Comment:** Some, but not all the required reporting timescales associated with EU 376/2014 are listed. For example, the initial reporting timescale is listed, but not the follow up requirements. **Justification:** For clarity and to avoid confusion. **Proposed Text:** We suggest the text should include the 72hr, 30 Day and 90 Day requirements	
595	GM2 145.A.30(e) Personnel requirements	70 - 73	**Page No:** 71 **Paragraph No:** GM2 145.A.30(e) Personnel requirements **Comment:** Within the competency assessment table, the 'Manager' position is not required to have "knowledge of occurrence reporting…" **Justification:** Knowledge of occurrence reporting is key for managers to promote a just culture within their organisations. **Proposed Text:** We recommend that within the competency assessment table, place an X in the "Knowledge of occurrence reporting.." competency box for all 'Manager' positions.	
596	GM4 145.A.30(e) Personnel requirements	75	**Page No:** 75 **Paragraph No:** GM5 145.A.30(e) Personnel requirements **Comment:** Knowledge of root cause is not included within the personnel requirements for the safety manager. **Justification:** A thorough understanding of root cause methodologies and their application should be considered a minimum requirement for safety managers, without this knowledge they will not be able to determine why an event occurred, resulting in repeat occurrences coupled to the associated safety risk. **Proposed Text:** We recommend "A thorough understanding of root cause methodologies and their application" should be included in the personnel requirements for the safety manager	