



EASA

European Aviation Safety Agency

Part-ORO –

Small organisations

Management system & Management personnel

Julia Egerer

Regulations Officer, Air Operations

12 Jan. 2017

Your safety is our mission.

An agency of the European Union 

TE.GEN.00409-001



Presenter's biography

JULIA EGERER

STUDIES:

Business School (Diplome Grande Ecole de Commerce), Poitiers, France

M.A. European Studies, Osnabrueck, Germany



PROFESSIONAL EXPERIENCE:

Prior to joining EASA in 2010 as a rulemaking officer, Julia worked as an aviation insurance underwriter for insurance company Swiss Re in Munich insuring airlines worldwide and assessing airlines' safety performance and as General Manager for the Association of European Airlines (AEA) in Brussels .

Within the Flight Standards Department, Air Operations Regulations, she is the focal point for authority requirements (Part-ARO), third-country operators (TCO) and the organisation requirements (Part-ORO).



SMS is great, **but** small organisations....

- ‘...do not generate sufficient data’
- ‘...do not have sufficient resources to set it up’



Introduction



SMICG: SMS for Small Organizations

a joint cooperation between regulatory authorities to promote a common understanding of safety management principles and requirements.

Topics addressed

- Safety policy and objectives
- Appointment of key SMS personnel
- Step by step guide for small organisations
- Example of a very small organisation SMS manual
- What is a root cause analysis
- Management of change template



What is a small, non-complex organisation ?

AMC1 ORO.GEN.200(b) Management system

Defines how the operator should assess if they should follow the AMCs for complex or non-complex organisations (= 'small').



- Complex, if workforce + 20 full time equivalents (FTEs).
- Up to 20 FTEs **may** also be considered complex based on assessment of the following factors:
 - (1) **complexity**, the extent and scope of contracted activities subject to the approval;
 - (2) **risk criteria** :
 - (i) specific approvals;
 - (ii) commercial specialised operations requiring an authorisation (=high risk);
 - (iii) different types of aircraft used;
 - (iv) environment (offshore, mountainous area, etc.).

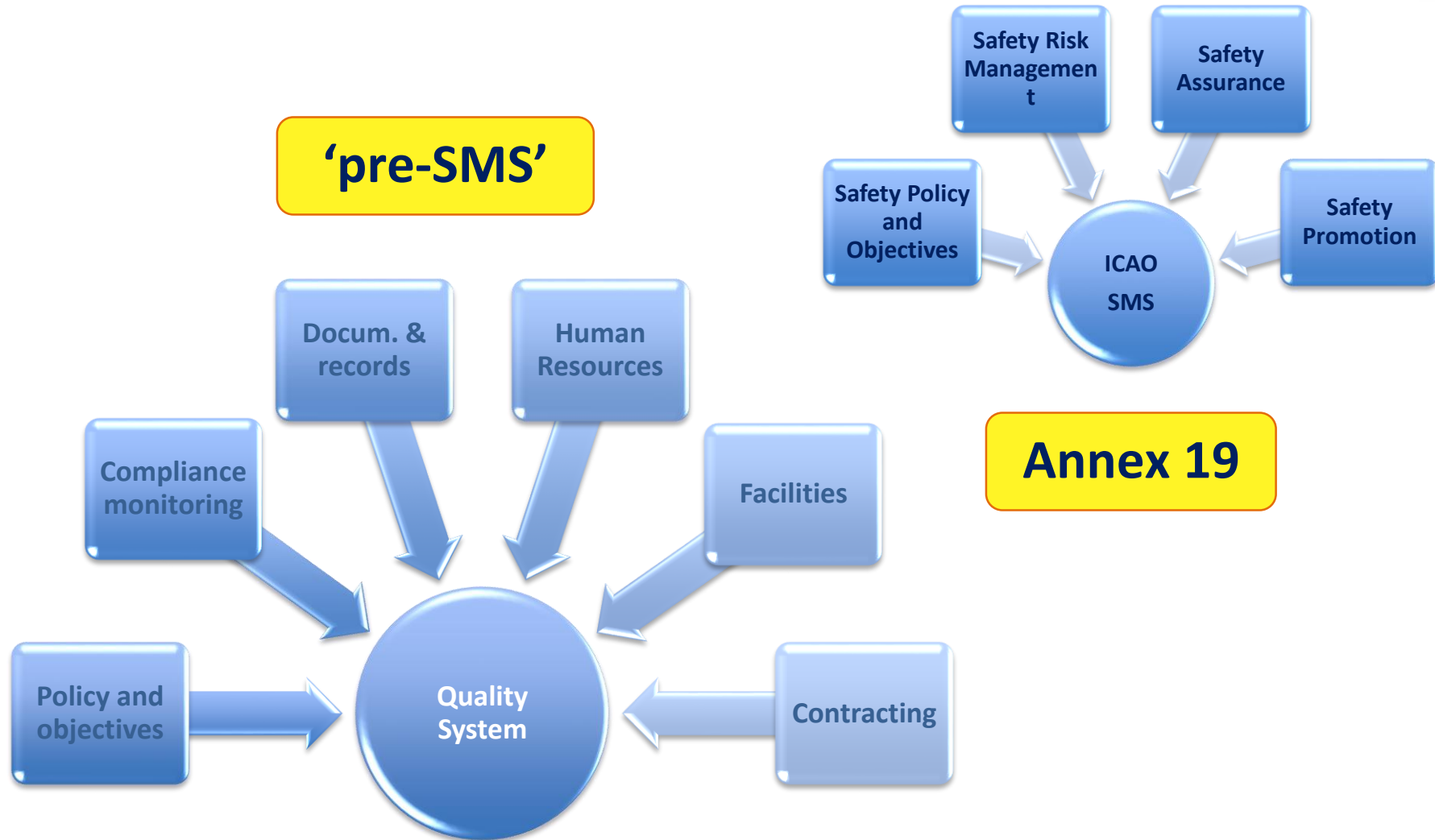


Documentation submitted to the CA

- commercial and non-commercial specialised operators operating with CMPA need to submit a declaration.
 - Appendix 1 of Part-ORO confirms management system i.a.w. Part-ORO
- High Risk commercial specialised operators need to submit a description of the management system, incl. organisational structure to the CA.
 - (b)(2) of ORO.SPO.110



Integrated approach to safety management





Benefits of integration

Management system integration

- ✓ reduction of duplication and therefore of costs;
- ✓ better information flow for better hazard identification;
- ✓ reduction of overall organisational risks;
- ✓ an increase in profitability;
- ✓ balance of potentially conflicting objectives; and
- ✓ elimination of potentially conflicting responsibilities and relationships.



Compliance vs. SMS

ML 5: Continuous Improvement

ML 4: Performance measurement

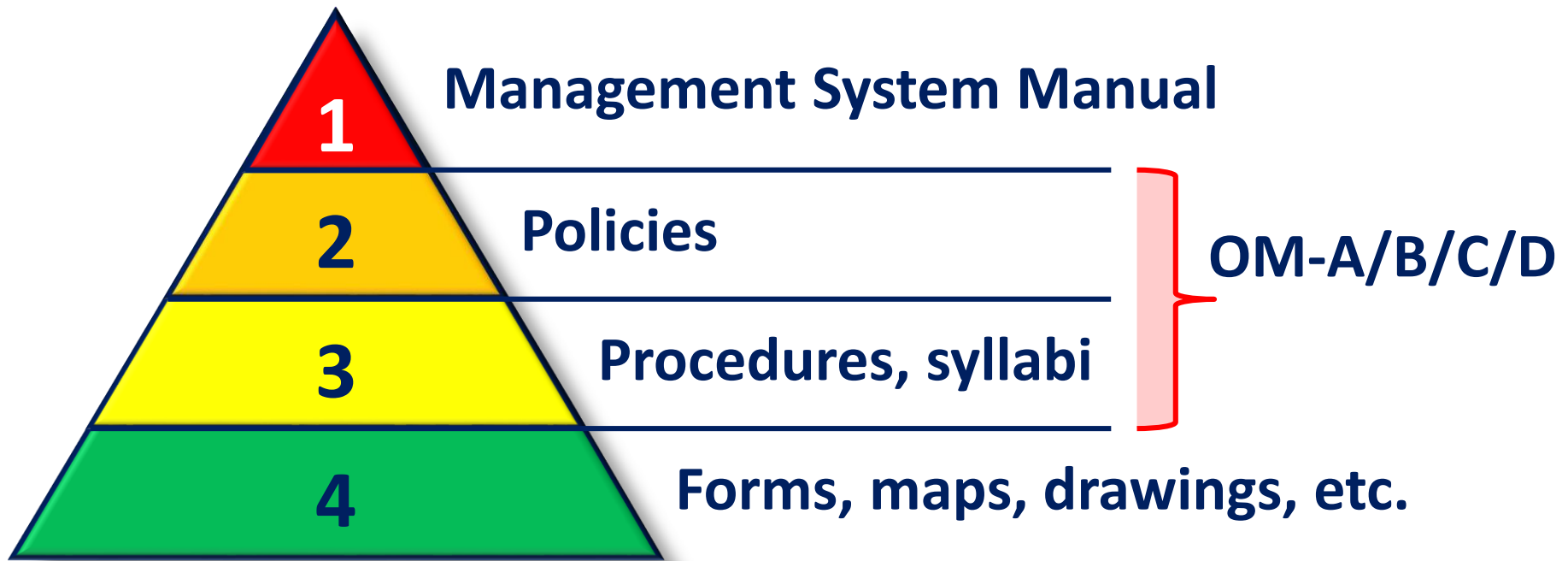
ML 3: Compliance

ML 2: Implementation

ML 1: Awareness & gap-analysis



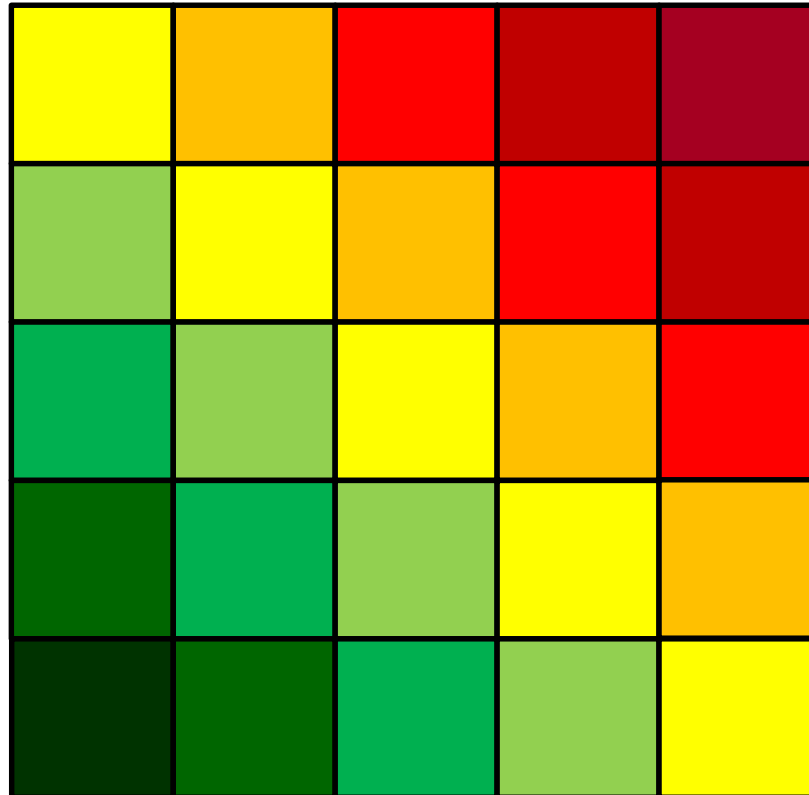
Documentation





Risk matrix for small organisations

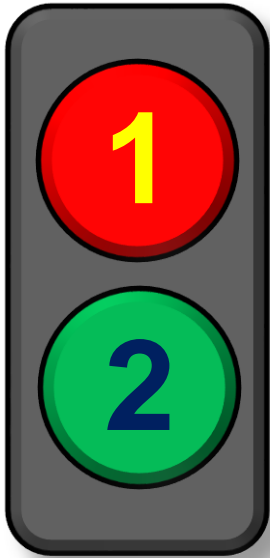
Severity



Probability



Simple traffic light example



WARNING (STOP)

PROCEED



Advanced traffic light example



WARNING (STOP)

CAUTION

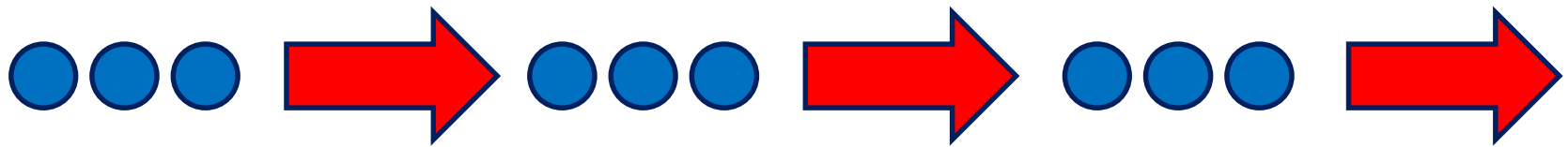
PROCEED



How to get there

TRAINING

PERFORMANCE



IMPLEMENTATION



SMS is great, **but** small organisations....

- ‘...do not generate sufficient data’
 - Simple hazard log on notice board.
 - SMS is proactive, not only reactive, look beyond event-based, historic data.
 - Helps you understand your system, processes, operating environment.
 - Enables you to work together with other operators.
- ‘...do not have sufficient resources to set it up’
 - Communication channels in small organisations are usually much simpler.
 - Functions can be combined, as long as the internal audit function is independent.



Point (b) of ORO.GEN.200 Management system

The operator shall establish a management system corresponding to the size of the operator and the nature and complexity of its activities, taking into account the hazards and associated risks inherent in these activities

ORO.GEN.210 Personnel requirement

The accountable manager is responsible for establishing an effective management system.



AMC1 ORO.GEN.200(a)(2) the safety policy should include a commitment based on the principle of just culture



Rule reference

ORO.GEN.205 Contracted activities

The operator shall ensure that the contracted activities conform to the applicable requirements.



GM2 ORO.GEN.205 the operator is responsible to ensure that the contracted activities are subject to hazard identification and risk management.

AMC1 ARO.GEN.305(d1) Oversight programme

For commercial high risk specialised operators, audits and inspections should take into account the results of the hazard identification and risk assessment conducted and maintained by the organisation as part of the organisation's management system.

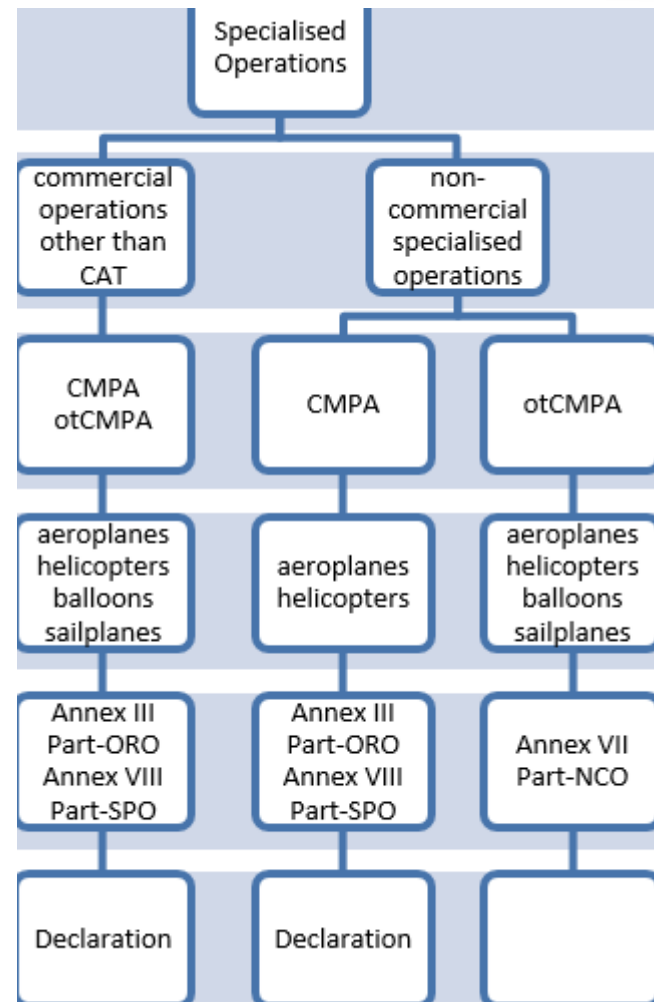


Air Operation rules overview

Regulation on Air Operations - Classification of applicability

➤ [LINK](#)

➤ [LINK](#)





EASA
European Aviation Safety Agency

Thank you!

Your safety is our mission.

An agency of the European Union

