



**COMMENT RESPONSE DOCUMENT (CRD)
TO NOTICE OF PROPOSED AMENDMENT (NPA) 2009-02E**

**for an Agency Opinion on a Commission Regulation establishing the Implementing
Rules for cabin crew in commercial air transport operations**

and

**draft Decision of the Executive Director of the European Aviation Safety Agency on
Acceptable Means of Compliance and Guidance Material related to the Implementing
Rules for cabin crew in commercial air transport operations**

"Implementing Rules for Cabin Crew in Commercial Air Transport Operations"

CRD c.1 - Comments received on Part-CC

I. Comments received on Part-CC

(General Comments)

comment 24 comment by: *Ulf Skjäl, SAS*

The medical requirements proposed to the cabin crew are far too extensive. The cost for the airlines will be extremely high and it is very doubtful if any lives can be saved. It does not make sense when there are more extensive requirements on a cabin crew than on a pilot authorized for single pilot operations (LPL) and the same requirements that apply to a smaller business jet pilot (single pilot operation).

In case of an accident requiring a fast evacuation it is very unlikely that medical unfitness - discovered by an AME (but not by a common doctor in medicine) will prevent the cabin crew from fulfilling his/her duties...

comment 61 comment by: *Air Southwest*

Attestation: In English the verb 'to attest' is to make a legal declaration; to witness; to swear on oath. Therefore an attestation (noun) is a witnessing; a giving of evidence; a declaration on oath. Throughout Part-CC frequent mention is made of exercising the privileges of the attestation. You cannot exercise the privileges of an attestation' just as you cannot exercise the privileges of a bucket of water! As stated in CC.GEN.025 the privileges are granted to the holder of the attestation not the attestation itself. A licence, on the other hand, grants permission to do something in addition to stating the qualification to hold the licence. You can therefore exercise the privileges of a licence.

EU-OPS 1.995 requires the cabin crew member to have successfully completed initial training in accordance with 1.1005 **and** to hold an attestation of safety training.

EU-OPS 1.1005 covers initial **safety** training.

In this sense, the attestation is a certificate that certifies that the CCM has undergone the initial safety training. However, CC.TRA.120 and 125 extend the training to general theoretical knowledge of aviation, aviation regulations, communication, human factors and crew resource management. These take the scope of training far in excess of initial safety training. Therefore in theory, the 'attestation of initial safety training' certifies that the CCM has only covered part of the required training.

As Part-Cabin Crew takes the requirement for training beyond the requirements of EU OPS 1.1005, the validity of the 'attestation' is questionable as a certificate of full cabin crew training as per CC.TRA.120 and 125.

The opportunity is now presented to call a 'spade a spade' and establish a Cabin Crew Licence that will give the holder status and a legal basis for exercising the privileges of that licence. It will also be simple to attach a medical certificate to the licence. Clearly, a medical standard would need to be established (similar to a Class 2 medical) and in this respect, Part-MED section 4 goes a long way. Indeed, as was stated at the presentation workshops, the idea is to make the 'attestation' transferrable from one operator to another so a legal licence is necessary.

comment 62 comment by: *Air Southwest*

At the EASA presentation/workshop held at Gatwick in January, it was stated that operators would have the power to limit, suspend or revoke a Cabin Crew Member attestation/licence. Regulation 216/2008 article 8 (4) does state that at the discretion of the member state, attestations may be issued by approved operators. Also article 8(5)(e) states that measures adopted shall include conditions for issuing, maintaining, amending, limiting, suspending or revoking the cabin crew attestation. This is not clearly transferred into CC.CCA.110 (a) where it states ".....the attestation may be limited, suspended or revoked by the competent authority."

As this is a potential 'mine field' or a short cut to Court, it is requested that this is clarified and the status of the operator concerning the maintaining, amending, limiting, suspending or revoking the cabin crew attestation, be clearly stated.

comment 265 comment by: *AEA*

Relevant Text:

NPA 2009-02E (General Comment)

Comment:

This whole NPA, which is based on a flawed RIA, goes far beyond the intentions of the EU legislator which was not to make major changes to Subpart O of EU-OPS. The proposals of NPA 2009-2E have no safety justification

Proposal:

Reconsider the entire NPA 2009-2E and realign it with Subpart O of EU-OPS.

comment 280 comment by: *AEA*

Comment:

Part CC is an attempt to replicate FCL. Unneeded and resulting in confusing rulemaking. An attestation, as mend in EU-OPS was only for initial safety training, not to act as an active license including active type's etc.

Part-CC is different from Part-OR, although both state training requirements.

EU-OPS is very clear with only one subpart for cabin crew.

Cabin crew attestation is wrong attempt to sort of implement a cabin crew license placing a administrative burden on companies.

Validity, Recency, Currency are mixed in a wrong way. There's an attempt again to replicate the FCL in this respect. An attestation cannot have such an expiring principle as it is just a statement of completion of a specific (initial flight safety, in this case) training.

Proposal:

Merge NPA 2009-2e Part CC within NPA 2009-2c.

Bring it back in line with Basic regulation which refers to EU-OPS 1.1005 (d).

Leave NPA 2009-2e as Part MED only.

comment 385 comment by: *AUSTRIAN Airlines*

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469

comment by: *KLM*

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Leave NPA 2009-2e as Part MED only.

comment

537

comment by: *Austro Control GmbH*

The cabin crew rules are exceeding EU-OPS and not in line with the mandate of Article 8(4) of the Basic Regulation. The rules should express very clearly, that the cabin crew attestation is only certifying the completion of and that no other privileges are associated for the holder of the attestation. **The attestation is not to be understood as a licence**; it is a confirmation of initial competence.

comment 544

comment by: *Deutsche Lufthansa AG***Relevant Text:**

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Bring it back in line with Basic regulation which refers to EU-OPS 1.1005 (d).

comment 623

comment by: *British Airways Flight Operations***Comment:**

Part CC is confused rulemaking. It appears to replicate information from NPA 2009-02c. Furthermore, the meaning of 'attestation', as derived from EU-OPS was an attestation for initial safety training only, not an active cabin crew licence including active type etc. Part-CC is different from Part-OR, although both state training requirements - this is confusing and poor rulemaking.

EU-OPS, on the other hand is very clear, with only one subpart relating to cabin crew.

The cabin crew attestation, as proposed by EASA, is clearly an attempt to implement a cabin crew licence, thereby placing a wholly-unjustified administrative burden on companies. In that respect, subjects such as validity, recency and currency are introduce, which appear to be an attempt the FCL requirements. An attestation (as intended by EU Ops) cannot in principle expire, because it is just a statement of completion of specific (initial flight safety, in this case) training.

Proposal:

Merge NPA 2009-2e Part CC within NPA 2009-2c.

Bring it back into line with the Basic Regulation which refers to EU-OPS 1.1005 (d).

Leave NPA 2009-2e as Part MED only.

General Comment:

NPA 2009-2 in its entirety is unfit for the purpose for which it is intended and must be withdrawn and reconsidered.

comment

644

comment by: *Swiss International Airlines / Bruno Pfister*

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Leave NPA 2009-2e as Part MED only.

comment

716

comment by: *bmi*

It is the opinion of bmi that EASA should consider the comments submitted by the United Kingdom CAA and the Association of European Airlines (AEA). bmi concur with the opinions submitted by these organisations.

comment

717

comment by: *TAP Portugal*

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comment 718 comment by: TAP Portugal

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comment 800 comment by: ERA

European Regions Airline Association Comment

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Reconsider the entire NPA 2009-2E and realign it with Subpart O of EU-OPS

comment 847 comment by: DGAC

0 General Comments:

We would like to take advantage of this NPA 2009-02, to confirm previous comments concerning NPA 2008-22, that is to say: the new structure is hard to understand, the reading is complex and an overall view is missing. In France, despite many inforamory meetings, stakeholders have had great difficulty in understanding these propositions. This is especially true for the small organizations which experience problems in understanding the measures which are applicable to them. It is indispensable that the simplified measures should be very explicit and that a dedicated consultation should take place.

The new regulatory structure does not seem to be well adapted; at least it appears, in our opinion, to be very far from being mature and we confirm our preference for to an activity-based approach.

We consider this NPA as an advanced NPA

It would have been appropriate to keep the old widespread JAR's structure with JAR OPS 0 (Gen), 1 (Plane), 2 (Corporate), 3 (helicopter) and 4 (aerial work), completed by the modern Safety Management Systems concepts and also to create, as necessary, new ones concerning balloons and other aircrafts (such as UAV, sailplanes...).

A great deal of work needs to be done on the definitions linked to "commercial"

The proposed requirements must not prevent a member State from carrying

out, apart from the SAFA programmes and methods, ground inspections of foreign aircraft on its territory, as specified by the directive 2004/36 item 2 article 1.

The BR 216/2008 5 and 7 recitals allow the member States to deal directly with certain local based operations as local flights, this possibility must be used

The transition measures must be extensive and gradual in scope according to the areas concerned.

1 Structure:

- Here are some examples which show the difficulties in reading those proposals, for the industry as for the Authorities, and which demonstrate the need for a return to a more classical activity-based regulation.
- Equipment: paragraphs are very long, divided by aircraft types, even mixed with activities (airplane & helicopter vs carriage of parachutists), and too complicated to understand which kind of seat belt/harness is required: OPS.GEN.405 "Equipment for all aircraft", items (a) (3) and (a) (4), then OPS.GEN.400 "Seat belts and harnesses" which should contain previous items, but we have to reach the third line to understand that it's only applicable to commercial air transport.
- A lot of time is uselessly spent trying to understand where the relevant information is to be found, and what is applicable to whom.
- The Agency's holistic approach leads for the reader and the future user, to a far less holistic vision of the applicable rules.
- In spite of the Agency's promise (§24 NPA 2009-02a Explanatory Note) to conserve the whole EU-OPS & JAR-OPS 3 dispositions', many differences crop up throughout the proposition, which leads the reader to doubt the rest of the dispositions, and these differences require a careful analysis, which has not been successfully completed yet because of the lack of time.
 - For example: the disappearance of the "commander" (we need to know who is legally responsible on board, during a flight), and the emergence of the "pilot in command" (PIC); moreover, the PIC can delegate only to another PIC, including above the FL 200, which was not the case in the EU-OPS. This new curtailment appears in AMC, which is somewhat out of place/..

All of this leads to, a very partial study of the dispositions, and the necessity to convert this NPA into an A-NPA. The Agency, after studying the comments/ , shall publish a complete NPA which should encompass the 3 NPAs 2008-17, 2008-22, 2009-02.

2 Definitions:

Serious work must be undertaken on the definitions:

(a) The substance:

CAT: a definition is needed consistent with other European rules. On the one hand, the NPA 2009-02 (point 53, pages 34/123) refers for CAT to the ICAO's annex 6 definition of "commercial air transport operation" which is not consistent with the "commercial operation" definition contained in the basic regulation article 3)i). On the other hand, the EC 1008/2008, chapter II, article 3)3) b) excludes local flights from the obligation to hold an operating license. We propose to define the "commercial air transport" concept by using the BR's

(article 3i)) definition of "commercial" and the concept of "air transport" as transportation from A to B, with A different from B, as the EC 1008/2008 suggests.

AMC/CS: Following the Agency's seminar organized on June 23rd, and the large number of explanations asked for, it seems to be necessary to introduce those definitions in the AR.

"Organization": this term shall be defined. Is it an organism or simply the fact of being organized?

(b) The form:

There is a discrepancy with other European Rules (cf previous), which could lead to a legal uncertainty.

Lack of definition: in this case, either we take the ICAO's definitions or we propose one. For example, "flight crew is defined nowhere, whereas "cabin crew" is only defined in Part CC and "*for the purpose of this part*" ; so, we do not know which definition should be taken into account for Part OPS. Finally, we have no definition of the "*technical cabin crew*".

We have found definitions at many different regulation levels, sometimes in IR, AMC, or GM. For example: the list of definitions begins in the IR section, and suddenly ends, to be continued in the GM section.

Sometimes, a definition is given in the AMC section whereas it is used in IRs.

Generally speaking, definitions should be gathered in only one IR "Part Definition" (except, if it were used in a single paragraph). This way, definitions can be used in other parts, allowing for more homogeneity.

3 Security

Some dispositions proposed by the EASA do not seem to be compliant with other Community Regulations already in force about security. The Agency should verify compliance.

4 Part CC (IR personnel annex V) and Medical CC (IR personnel annex II)

We would like to give full support to the Agency's proposition on both CC's certification and medical requirements.

5 Ramp inspections (IR AR section IV)

The exact scope concerning "ramp inspection" should be clarified.

We understand that the dispositions introduced for ramp inspections are taken in application of the article 10.2 of BR 216/2008 which says that a Member State must, on his territory, conduct ramp inspections on aircraft the general supervision of which he doesn't have the responsibility of, and that these inspections must be conducted by following agency-specified methods, and this would therefore replace the scope of directive 2004/36.

We haven't found any basic regulatory specification in BR 216/2008 to justify the application of Community methods to ramp inspections conducted by a Member State on aircrafts used by operators that it oversees. All references to inspections on all but foreign aircraft must be removed from the agency's proposition in terms of Ramp Inspections.

In addition, the proposed dispositions must not prevent a Member State from conducting, without following the SAFA program (and its methods), ramp inspections of foreign aircraft, as described in paragraph 2 of article 1 of

directive 2004/36.

6. Flexibility (use of paragraphs 8.2 and 8.3 of BR216) and subsidiarity

Articles 8.2 and 8.3 make provision for certification of commercial operations and declaration of non commercial operations of complex aircraft "unless otherwise determined in the implementing rules". EASA hasn't made use of this possibility in its propositions whereas we see at least two points where such dispositions could have been made use of.

(a) Fractional ownership and Shared ownership: these two concepts should be better defined. We understand that the agency's propositions do not make provision for a control of air operations conducted under these concepts (except declaration in the case of complex aircraft). We wish that specific dispositions be made.

Regarding fractional ownership, CEAC recommended, a few years ago, that the future European regulation take its inspiration from the American Part 91-K, that imposes conditions on the number of aircraft in the fleet and on the owners, and organises contractual dispositions between the administrator and the co-owners, and between the different co-owners.

(b) Aerial work: as a first step, it seems reasonable to certify only those aerial work activities that are considered as generating the most risk (everything that involves low altitudes: crop-spraying, line surveillance), the rest could be subjected only to a declaration.

(c) Furthermore, certain activities that are restricted to a very small geographical area, should remain in the domain of subsidiarity, taking into account the absence of any competitive aspect and technical requirements linked to a European recognition need.: such as local flights (from A to A, with both time and range limited), and initiation flights. This proposition follows the BR 216/2008's recital n°5, which was initially drawn up to introduce annex 2.

7 FTL

We have found only 4 of the 5 points specified in the article 8.4 of the CR 3922/91 (OPS 1.1105 point 6, OPS 1.1110 points 1.3 and 1.4.1, OPS 1.1115, and OPS 1.1125 point 2.1); the "reduced rest arrangement" is missing.

From our point of view, it seems clear that both the numeric values and the five points specified in article 8.4 should be in the IRs' section. CSs should allow the application of those 5 points. The Agency itself reminds, in the NPA 2009-02-a, that the sub-part Q's substantive provisions shall be included in IR, according to article 22. Moreover, as specified in the NPA 2009-02-a, page 51 paragraph 41, numeric values are considered as "substantive provisions".

Last but not least, we wish, according to the Agency's statements, national provisions, implemented in compliance with article 8.4, to be taken into account and acceptable for further regulation.

8 Transition measures

The propositions contained in the NPA 2009-02 modify requirements significantly concerning certain kinds of stakeholders; which is the case for aerial work (COM non CAT), that are today, in most member states, under a declarative system (which is changing for a certified system).

Those operators are either badly or insufficiently organised and represented and they are faced with numerous problems to read and comment on those

texts (not translated into French). Under those conditions, measures to facilitate an acceptable transition must be scheduled (by giving time and the appropriate means to understanding).

According to the BR 216/2008, the IR must be published before April 2012, but the actual putting into practice may occur later

Taking into account:

- The new rules' structure
- Modifications in existing regulations (EU-OPS/JAR OPS 3)
- A wider scope
- The crisis that airlines are facing

The adopted transition measures should be as long as possible and scheduled depending on the areas. We consider that the requirements for the non commercial air transport activities (areas generally not so strongly regulated), should be delayed.

A two-year period after the 8th April 2012 seems reasonable before applying the requirements concerning commercial air transport, and it is our considered opinion that a schedule should be drawn up on an individual basis for all the other activities.

9. Code share

The IR-OPS toughen the conditions by which European airlines will be able to conclude code share agreements with non-European airlines because the candidate must prove (by initial and regular in situ audits) to its Authority that the airline approached for the code share agreement observes the ER (the foreign airline will furthermore have to be TCO authorized) and certain dispositions of IR OPS. The medical fitness required of cabin crew could for example prevent the agreement.

French airlines are worried about the possible repercussions of these propositions on code share agreements that are already in force.

While we understand the legitimate concern that leads to clarifying the conditions associated with code sharing, we consider it not appropriate to prevent such operations with a major airline that is supervised by a country that is recognized in terms of safety, on the ground that the non-European country does not conform to such and such disposition of IR OPS.

10. Work priority

If the process cannot be finished within the given time, France proposes that the following domains be treated in the following order from highest to lowest priority:

1. CAT airplane and CAT helicopter
2. Corporate aviation: complex aircraft and fractional ownership
3. other types of aerial work (airplane & helicopter)
4. all other domains

comment

871

comment by: *BMVBS (MoT Germany)*

The Federal Republic of Germany cannot accept the text of the entire NPA 02-2009 as proposed. The text does not fulfil the requirements set out by the Regulation No. (EC) No 216/2008 of the European Parliament and of the Council of 20 February 2008.

First Reason: Endangering a high uniform level of civil aviation safety

in Europe

In Article 1 of this Basic Regulation it is stated:

"1. The principal objective of this Regulation is to establish and maintain a high uniform level of civil aviation safety in Europe."

The Agency proposed in its draft an approach of so called "performance-based rulemaking" in order to provide a higher level of flexibility to fulfill the technical requirements of the implementing rules and to incorporate technical innovations more easily. While Germany supports the objective of this approach we have strong concerns that the way it is implemented will have negative consequences on the level-of-safety of European aviation.

The Agency proposes to express safety objectives by means of indefinite terms at the level of binding implementing rules. These indefinite legal terms are substantiated by "Acceptable Means of Compliance" (AMC) which are not legally binding. According to German administrative law, the NAA can only enforce binding law. The Agency or the NAA can publish AMCs and require the applicants to fulfill them as prerequisite e. g. for a certificate. If the applicant does not fulfill the requirements of the AMC the NAA would not issue the certificate. If the applicant does not accept the decision of the NAA he or she might go to court. In this case, the judge of the administrative court will decide whether the requirements set out by the written and binding law are fulfilled by the applicant or not. If the binding law contains indefinite legal terms the judge has a high level of freedom for his or her decision.

The consequence might be that a level-of-safety which is lower than that incorporated within the AMC is acceptable to the court. Moreover, courts of different member states might come to different decisions. The result would be a level-of-safety which might be lower than today and which is certainly not uniformly applied. Therefore, the drafts of the NPA do not conform to the Basic Regulation.

In order to establish and maintain a high uniform level of civil aviation safety across Europe it is necessary to provide clear and unambiguous rules which conform to the standards of legal certainty. If a higher level of flexibility for the means to fulfill the binding law is desired the concept of performance-based rulemaking as proposed by ICAO might be used. In order not to compromise the level-of-safety, it is essential that performance objectives within the rules are clearly determined by either quantitative or qualitative terms. An indefinite legal term is too generic and is certainly not appropriate for this purpose.

The approach of performance-based rulemaking should be applied with care since even ICAO has identified risks for the conversion of prescriptive rules into performance-based ones. Except for the State Safety Program and the Safety Management Systems concept ICAO has not yet incorporated the performance-based approach into the standards. Therefore, Europe would be one of the pioneers when establishing of performance-based rules and must ensure that the States can still fulfill their obligation to comply with ICAO standards.

Second Reason: Unnecessary Deviation from EU-OPS

In Article 8 Paragraph 4 and 6 as well as in Article 22 Paragraph 2 (a) it is clearly stated that at least for the application area of commercial transport in aeroplanes the implementing measures of the Commission shall initially be based on the common technical requirements and administrative procedures specified in Annex III (EU-OPS) to Regulation (EEC) No 3922/91.

The new structure of the proposed rule text does not, by status and content, mirror the current operational rules, i.e. in EU-OPS and JAR-OPS 3. In case of an enforcement of the proposed rule, AMC and guidance material, the industry as well as NAAs would need to change well established checking survey plans, procedures, manuals and records. We do not see any justification for introducing a new rule structure, especially with the view of enhancing safety. In so far, the RIA to the NPA does not really justify the step taken by EASA to entirely change the structure of future European requirements. It is not understandable why EASA did not consider these inputs, as similar objections were raised by other NAA's as well as by industry's representatives. Initially, EASA argued with legal implications a duplication of rules (such as in OPS 1 and 3) would impose. Hence, so EASA, i.e. only one requirement for an AOC can be enforced, leading to a disruption of the well established EU-OPS/JAR-OPS 1 and 3 requirements. The same applies to the proposed licensing requirements. Legal experts throughout Europe very much questioned the legal position expressed by EASA, and meanwhile, it is very clear that similar requirements in different EU – Regulations are acceptable and, in fact, existent. For example, almost identical Authority requirements apply for EU Regulations 1702/2003 and 2042/2003.

Germany, therefore, proposes not to implement the proposed rule structure for OPS, but to develop dedicated requirements for every single air operations application, such as JAR-OPS 1, 3 and draft JAR-OPS 2 and 4. We have to accept duplications in order to provide a separate book for each separate application. So, we also have to accept that in case of the need for changing similar requirements by an NPA, it is the task of EASA to steer the associated rule making work as well as to maintain and update the material as required.

Moreover, there is neither the obligation nor the mandate for EASA within the Basic Regulation to promulgate higher requirements for cabin crew attestations or flight time limitation rules than the ones which are already included in EU-OPS.

The way forward:

The quality of a regulatory amendment is highly dependent on the level of maturity of the draft as published for consultation. Ideally, the consultation process should help the Agency to perform mainly a fine tuning to optimize the final rule. The Notice of Proposed Amendment (NPA) No. 2009-02, however, is far from mature. It contains major conceptual mistakes. In consultation with the German aviation industry it has been assessed that the introduction of the proposed amendment would not only undermine aviation safety due to unclear or incomplete requirements, it would also erode the competitiveness of the European aviation industry at large.

The situation is considered extremely startling and the German government is increasingly concerned about these developments. We do not consider the proposed amendment suitable to support a process that would converge towards a consensus in the Committee phase of the regulatory procedure with scrutiny, and therefore would strongly advice EASA to re-consider the NPA as an "advanced" NPA that would be followed by a second round of consultation once a consensus on the conceptual approach has been reached. It is already clear at this stage, that this NPA will have to undergo substantial modification to an extent that would require a second round of consultation, if the principle of "better regulation" was to be respected.

In our view the proposed amendment not only fails to achieve the objective to base the implementing rules as much as possible on existing JAA material, it also fails to safeguard the highly important regulatory continuity, thereby creating incalculable risks for affected stakeholders potentially jeopardizing their very existence.

Against this background the Agency would be well advised to apply a sound change management strategy keeping the risks induced by the regulatory changes for the European aviation industry in mind.

Due to the extent and complexity of this rulemaking proposal the deadline of 31st July 2009 was still insufficient to coordinate a complete response by the German MOT. The German Ministry of Transport therefore generally endorses and supports the comments brought forward by the Luftfahrt-Bundesamt and German aviation stakeholders whose comments could not be collated and reproduced in due time.

comment

872

comment by: *BMVBS (MoT Germany)*

The Federal Republic of Germany cannot accept the text of the entire NPA 02-2009 as proposed. The text does not fulfil the requirements set out by the Regulation No. (EC) No 216/2008 of the European Parliament and of the Council of 20 February 2008.

First Reason: Endangering a high uniform level of civil aviation safety in Europe

In Article 1 of this Basic Regulation it is stated:

"1. The principal objective of this Regulation is to establish and maintain a high uniform level of civil aviation safety in Europe."

The Agency proposed in its draft an approach of so called "performance-based rulemaking" in order to provide a higher level of flexibility to fulfill the technical requirements of the implementing rules and to incorporate technical innovations more easily. While Germany supports the objective of this approach we have strong concerns that the way it is implemented will have negative consequences on the level-of-safety of European aviation.

The Agency proposes to express safety objectives by means of indefinite terms at the level of binding implementing rules. These indefinite legal terms are substantiated by "Acceptable Means of Compliance" (AMC) which are not legally binding. According to German administrative law, the NAA can only enforce binding law. The Agency or the NAA can publish AMCs and require the applicants to fulfill them as prerequisite e. g. for a certificate. If the applicant does not fulfill the requirements of the AMC the NAA would not issue the certificate. If the applicant does not accept the decision of the NAA he or she might go to court. In this case, the judge of the administrative court will decide whether the requirements set out by the written and binding law are fulfilled by the applicant or not. If the binding law contains indefinite legal terms the judge has a high level of freedom for his or her decision.

The consequence might be that a level-of-safety which is lower than that incorporated within the AMC is acceptable to the court. Moreover, courts of different member states might come to different decisions. The result would be a level-of-safety which might be lower than today and which is certainly not uniformly applied. Therefore, the drafts of the NPA do not conform to the Basic

Regulation.

In order to establish and maintain a high uniform level of civil aviation safety across Europe it is necessary to provide clear and unambiguous rules which conform to the standards of legal certainty. If a higher level of flexibility for the means to fulfill the binding law is desired the concept of performance-based rulemaking as proposed by ICAO might be used. In order not to compromise the level-of-safety, it is essential that performance objectives within the rules are clearly determined by either quantitative or qualitative terms. An indefinite legal term is too generic and is certainly not appropriate for this purpose.

The approach of performance-based rulemaking should be applied with care since even ICAO has identified risks for the conversion of prescriptive rules into performance-based ones. Except for the State Safety Program and the Safety Management Systems concept ICAO has not yet incorporated the performance-based approach into the standards. Therefore, Europe would be one of the pioneers when establishing of performance-based rules and must ensure that the States can still fulfill their obligation to comply with ICAO standards.

Second Reason: Unnecessary Deviation from EU-OPS

In Article 8 Paragraph 4 and 6 as well as in Article 22 Paragraph 2 (a) it is clearly stated that at least for the application area of commercial transport in aeroplanes the implementing measures of the Commission shall initially be based on the common technical requirements and administrative procedures specified in Annex III (EU-OPS) to Regulation (EEC) No 3922/91.

The new structure of the proposed rule text does not, by status and content, mirror the current operational rules, i.e. in EU-OPS and JAR-OPS 3. In case of an enforcement of the proposed rule, AMC and guidance material, the industry as well as NAAs would need to change well established checking survey plans, procedures, manuals and records. We do not see any justification for introducing a new rule structure, especially with the view of enhancing safety. In so far, the RIA to the NPA does not really justify the step taken by EASA to entirely change the structure of future European requirements. It is not understandable why EASA did not consider these inputs, as similar objections were raised by other NAA's as well as by industry's representatives. Initially, EASA argued with legal implications a duplication of rules (such as in OPS 1 and 3) would impose. Hence, so EASA, i.e. only one requirement for an AOC can be enforced, leading to a disruption of the well established EU-OPS/JAR-OPS 1 and 3 requirements. The same applies to the proposed licensing requirements. Legal experts throughout Europe very much questioned the legal position expressed by EASA, and meanwhile, it is very clear that similar requirements in different EU – Regulations are acceptable and, in fact, existent. For example, almost identical Authority requirements apply for EU Regulations 1702/2003 and 2042/2003.

Germany, therefore, proposes not to implement the proposed rule structure for OPS, but to develop dedicated requirements for every single air operations application, such as JAR-OPS 1, 3 and draft JAR-OPS 2 and 4. We have to accept duplications in order to provide a separate book for each separate application. So, we also have to accept that in case of the need for changing similar requirements by an NPA, it is the task of EASA to steer the associated rule making work as well as to maintain and update the material as required.

Moreover, there is neither the obligation nor the mandate for EASA within the

Basic Regulation to promulgate higher requirements for cabin crew attestations or flight time limitation rules than the ones which are already included in EU-OPS.

The way forward:

The quality of a regulatory amendment is highly dependent on the level of maturity of the draft as published for consultation. Ideally, the consultation process should help the Agency to perform mainly a fine tuning to optimize the final rule. The Notice of Proposed Amendment (NPA) No. 2009-02, however, is far from mature. It contains major conceptual mistakes. In consultation with the German aviation industry it has been assessed that the introduction of the proposed amendment would not only undermine aviation safety due to unclear or incomplete requirements, it would also erode the competitiveness of the European aviation industry at large.

The situation is considered extremely startling and the German government is increasingly concerned about these developments. We do not consider the proposed amendment suitable to support a process that would converge towards a consensus in the Committee phase of the regulatory procedure with scrutiny, and therefore would strongly advise EASA to re-consider the NPA as an "advanced" NPA that would be followed by a second round of consultation once a consensus on the conceptual approach has been reached. It is already clear at this stage, that this NPA will have to undergo substantial modification to an extent that would require a second round of consultation, if the principle of "better regulation" was to be respected.

In our view the proposed amendment not only fails to achieve the objective to base the implementing rules as much as possible on existing JAA material, it also fails to safeguard the highly important regulatory continuity, thereby creating incalculable risks for affected stakeholders potentially jeopardizing their very existence.

Against this background the Agency would be well advised to apply a sound change management strategy keeping the risks induced by the regulatory changes for the European aviation industry in mind.

Due to the extent and complexity of this rulemaking proposal the deadline of 31st July 2009 was still insufficient to coordinate a complete response by the German MOT. The German Ministry of Transport therefore generally endorses and supports the comments brought forward by the Luftfahrt-Bundesamt and German aviation stakeholders whose comments could not be collated and reproduced in due time.

comment

873

comment by: IATA

The whole NPA goes far beyond the intention of the EU-legislator. This is not the simple transfer of EU-OPS Subpart O as promised. Even though still called "attestation" it is in fact a new licence for Cabin Crew with all the unnecessary bureaucratic burden and cost to operators.

Most important there has been no evidence so far of a lack of safety in this area and it is definitely not a sufficient reason that some European States require that way.

Proposal:

Transfer EU-OPS without any changes or additions.

comment 880 comment by: *President VNC*
 VNC supports the comments made by ETF.

comment 887 comment by: *British Airways Flight Operations*

British Airways Flight Operations department has been actively involved with the industry working groups which have been assessing NPA 2009-02, both within the United Kingdom and internationally. In general, our opinions about the material presented in NPA 2009-02 agree wholeheartedly with those of the Association of European Airlines (AEA), which, we note, has submitted several hundred comments. We have also worked closely with the UK Civil Aviation Authority, which has also submitted several hundred comments.

We have decided to submit this general comment about NPA 2009-02 so that EASA will be aware, unambiguously, of British Airways' concerns about the material presented in the NPA. It is our opinion that NPA 2009-02 in its entirety is unfit for the purpose for which it is intended and must be withdrawn and reconsidered. The reasons for this conclusion will be discussed below. As well as making this general comment, British Airways has also submitted many individual comments about the NPA, from a number of different sources within the company; however, all should be seen in the light of this opinion: **that NPA 2009-02 in its entirety is unfit for the purpose for which it is intended and must be withdrawn and reconsidered.** In making other comments British Airways does not seek to endorse NPA 2009-02, but rather to limit the damage which would be done to the industry if the material was adopted into implementing rules.

As the Chairman of the EASA Management Board is on record as saying: the Agency has set out to produce idealistic, holistic perfection; regrettably, it has failed in that task. British Airways' first concern is with the structure of the rule material presented. It is undeniably the case that safety proceeds from simplicity, not complexity. Therefore, for EASA to choose to move from a clear and unambiguous set of rules – published in one or two volumes (EU Ops / JAR Ops 1) – to a complicated and diverse set in many volumes causes us great concern. Furthermore, we note it was specifically the Agency's own decision to create a rule set based on the GERT: NPA 2009-02A makes it clear that neither the SSCC nor the AGNA endorsed that decision. We are also aware from conversations with some of the Agency's Rulemaking Officers that they were specifically instructed to use a different rules structure from that which had gone before "because EASA had to be different." We think such a policy decision - essentially to try to destroy the JAA heritage - by senior personnel from the Rulemaking Directorate (both those formerly employed and those still employed by the Agency) constitutes a serious error of judgment. We believe rules for commercial air transport should be published altogether in one volume, and not mixed with rule material for other types of aviation operations.

Another consequence of the Agency's desire to have one set of rules covering all types of operations is the combination of rule material for aeroplane operations and helicopter operations in the published NPA. Having had experience of the JAA rulemaking processes for Sub Parts D and E, we are aware that helicopter operations were never considered in the development of JAR Ops 1 material, and neither should they have been, by definition. Therefore, to propose rule material which is applicable to both types of operation in one document constitutes a serious mistake, which could give rise

to what is called colloquially in English 'the law of unintended consequences'; in this case unintended, adverse, safety consequences. We are aware that one of the arguments the Agency has advanced for putting all rules in one place is the need for legal certainty in rulemaking. We are also aware that the Agency believes the same type of activity should not be regulated in more than one place. However, we believe those arguments are flawed: if rules were to be published separately for 'helicopters' and 'aeroplanes' they would be mutually exclusive and unambiguous, even if they contained similar material.

Many comments will doubtless be received by the Agency expressing disquiet that the material in NPA 2009-02 has departed greatly from EU Ops. We are very concerned that the Agency appears to have forgotten its mission – to promote SAFETY – and strayed into areas of social policy. Much new material has been introduced with no safety justification and with little, if any, meaningful regulatory impact assessment.

Leaving aside the concerns expressed above, much of the material proposed in NPA 2009-02 seems ill thought out and lacking in maturity. We are aware that the Agency has expressed concerns to the European Commission about its resourcing for the rulemaking tasks associated with the extension of scope to Air Operations. Of course, if EASA is really short of resources, it would have made much more sense for the Agency to base its rulemaking on the existing EU Ops material rather than branching off in new directions. We are aware this latter opinion is shared by the European Commission. Furthermore, we would have expected rule material to be presented in a mature form; instead, we see rule proposals which seem like early drafts rather than finished material. It seems ungracious to say "we told you so"; however, the Agency will be aware that the AEA in particular expressed concern about the scope of the work required of the Agency versus the amount of time and resource available to it, and suggested the establishment of stakeholder working groups to help with the rulemaking tasks. Of course, those suggestions were firmly declined.

Throughout the rulemaking processes which lead to the publication of NPA 2009-02 *et al* various bodies have been engaged with EASA to offer help with its task and, latterly, to express concerns about the direction in which the rulemaking was proceeding. In particular, the AEA has been very proactive in discussing its thoughts and concerns with the Agency. Furthermore, we know the Agency's Executive Director has recently visited the CEOs of several major European operators to discuss issues of concern. Therefore, the Agency should be under no illusions that there is major dissatisfaction among the operators with the direction in which the rulemaking task has proceeded (although we are concerned that some people within the Agency still do not seem to have acknowledged or accepted that fact). Overall however, the Agency has resolutely refused to engage with the operators; has refused to acknowledge that its rulemaking proposals might be flawed; and has failed to understand its responsibilities to the organisations for which it is creating regulations. This lack of accountability is a major cause for concern.

Lastly, we are very concerned that we are being expected to comment on a large amount of new material, to tight timescales, but without all the relevant material having been published. Since EASA has produced a large amount of interdependent material, it is unacceptable for us to be expected to assess that material without all of it being available. The quality of the comments which the Agency receives will undoubtedly be adversely affected thereby, because interested parties are not in possession of all the relevant information.

Therefore, to summarise British Airways' position. We are greatly concerned with the material presented in NPA 2009-02 because:

- It is presented in many volumes in a way which makes it difficult to understand.
- It mixes material for helicopters and aeroplanes in the same document.
- It departs greatly from EU Ops and introduces new material with no safety justification.
- It is ill thought-out and not mature.
- It demonstrates a lack of accountability to operators by the Agency.
- It relies on unpublished material.

In isolation, any of these issues would give us significant cause for concern. Taken together, they lead us to conclude, unreservedly, **that NPA 2009-02 in its entirety is unfit for the purpose for which it is intended and must be withdrawn and reconsidered.** All of the comments which will be entered by British Airways Flight Operations will be suffixed to that effect.

comment 940 comment by: *ANE (Air Nostrum) OPS QM*

This whole NPA, which is based on a flawed RIA, goes far beyond the intentions of the EU legislator which was not to make major changes to Subpart O of EU-OPS. The proposals of NPA 2009-2E have no safety justification

Reconsider the entire NPA 2009-2E and realign it with Subpart O of EU-OPS

comment 943 comment by: *Pascal JOUBERT*

part-CC should not be applicable to balloons. The operator should be responsible to nominate its own crew after a specific training developed by the operator.

comment 944 comment by: *Pascal JOUBERT*

a specific subpart for balloons should be developed in part-MED

comment 947 comment by: *European Balloon Corporation*

General comment: part-CC should not be applicable to balloons. The operator should be responsible to nominate its own crew after a specific training developed by the operator.

E. VIII. Draft Opinion Part-CC

p. 4

comment 881 comment by: *KLM Cityhopper*

Comment:

This whole NPA, which is based on a flawed RIA, goes far beyond the intentions of the EU legislator which was not to make major changes to Subpart O of EU-OPS. The proposals of NPA 2009-2E have no safety justification

Proposal:

Reconsider the entire NPA 2009-2E and realign it with Subpart O of EU-OPS

E. VIII. Draft Opinion Part-CC - Subpart GEN

p. 4

comment 104

comment by: *Dr Martin St Laurent*

First comment is a fully agreement with NPA 2009 02E. This NPA maintains the notion that cabin crew has to perform duties in the interest of safety of passengers and aircraft. It is clearly asked cabin crew has the capacity to undergo training and to carry out the duties. That means a physical and mental capacity to do them.

CCGEN010 Definition

It would be important to define the difference between "cabin crew in NON commercial operations" and "in commercial operations".

comment 359

comment by: *Walter Gessky***General comment:**

The cabin crew rules are exceeding EU-OPS and are not in line with the mandate of Article 8/4 of the Basic Regulation. In the rules it should be made very clear that the cabin crew attestation is only certifying that initial safety training was successfully completed and no other privileges are associated with for the holder of the attestation. Additional Conversion and differences training, the familiarization, recurrent training and refresher training is required before any assignment to duty. All the additional requirements shall be under the control of the operator and cannot be linked to the validity of the initial safety training attestation.

The mandatory medical standards, which are very close to the standards for private pilots, could impose significant unnecessary costs on authorities. There is no evidence that flight safety, or the safety of passengers during emergency evacuation, has ever been compromised as a result of cabin crew incapacitation. The new subpart E shall be reviewed if all proposed fitness requirements are adequate. It shall be verified, if cabin crew incapacitation has ever compromised safety of passengers in case of an emergency.

EASA should only propose to regulate the attestation as required by EU OPS and develop, when required, the EASA attestation concept later, because this is not a priority for safety. When EASA intend to continue, changes are proposed to the individual points.

E. VIII. Draft Opinion Part-CC - Subpart GEN - CC.GEN.001 Competent authority

p. 4

comment 266

comment by: *AEA***Relevant Text:**

For the purpose of this Part, the competent Authority shall be the authority designated by the Member State to whom a person applies for the issuance of a cabin crew attestation

Comment:

Article 8.4 of the basic EASA regulation (216/2008) clearly states that cabin crew involved in commercial operations shall hold an attestation as initially set out in Annex III, Subpart O, point (d) of OPS 1.1005 as set out in Regulation (EC) No 1899/2006. This confirms the intentions of the EU legislator that the attestation of cabin crew should be identical to the requirements of EU-OPS.

The attestation of cabin crew should therefore remain limited to a attestation for initial safety training. The AEA urges EASA to stick to its safety role and to stop inventing new requirements which conflict with art 8.4 of the basic EASA regulation.

Proposal:

Realign with EU-OPS. Replace 'attestation' with 'attestation for initial safety training'

comment 369

comment by: *FSC - CCOO*

Supported: The cabin crew attestation should always be issued by NAAs.

comment 387

comment by: *AUSTRIAN Airlines*

Relevant Text:

For the purpose of this Part, the competent Authority shall be the authority designated by the Member State to whom a person applies for the issuance of a cabin crew attestation

Comment:

Article 8.4 of the basic EASA regulation (216/2008) clearly states that cabin crew involved in commercial operations shall hold an attestation as initially set out in Annex III, Subpart O, point (d) of OPS 1.1005 as set out in Regulation (EC) No 1899/2006. This confirms the intentions of the EU legislator that the attestation of cabin crew should be identical to the requirements of EU-OPS. The attestation of cabin crew should therefore remain limited to a attestation for initial safety training. AUSTRIAN urges EASA to stick to its safety role and to stop inventing new requirements which conflict with art 8.4 of the basic EASA regulation.

Proposal:

Realign with EU-OPS. Replace 'attestation' with 'attestation for initial safety training'

comment 471

comment by: *KLM*

Relevant Text:

For the purpose of this Part, the competent Authority shall be the authority designated by the Member State to whom a person applies for the issuance of a cabin crew attestation

Comment:

Article 8.4 of the basic EASA regulation (216/2008) clearly states that cabin crew involved in commercial operations shall hold an attestation as initially set out in Annex III, Subpart O, point (d) of OPS 1.1005 as set out in Regulation (EC) No 1899/2006. This confirms the intentions of the EU legislator that the attestation of cabin crew should be identical to the requirements of EU-OPS. The attestation of cabin crew should therefore remain limited to a attestation for initial safety training. The AEA urges EASA to stick to its safety role and to stop inventing new requirements which conflict with art 8.4 of the basic EASA regulation.

Proposal:

Realign with EU-OPS. Replace 'attestation' with 'attestation for initial safety training'

comment 546

comment by: *Deutsche Lufthansa AG*

Relevant Text:

For the purpose of this Part, the competent Authority shall be the authority designated by the Member State to whom a person applies for the issuance of a cabin crew attestation

Comment:

Article 8.4 of the basic EASA regulation (216/2008) clearly states that cabin crew involved in commercial operations shall hold an attestation as initially set out in Annex III, Subpart O, point (d) of OPS 1.1005 as set out in Regulation (EC) No 1899/2006. This confirms the intentions of the EU legislator that the attestation of cabin crew should be identical to the requirements of EU-OPS. The attestation of cabin crew should therefore remain limited to a attestation for initial safety training. Lufthansa urges EASA to stick to its safety role and to stop inventing new requirements which conflict with art 8.4 of the basic EASA regulation.

Proposal:

Realign with EU-OPS. Replace 'attestation' with 'attestation for initial safety training'

comment

625

comment by: *British Airways Flight Operations***Relevant Text:**

For the purpose of this Part, the competent Authority shall be the authority designated by the Member State to whom a person applies for the issuance of a cabin crew attestation

Comment:

Article 8.4 of the basic EASA regulation (216/2008) clearly states that cabin crew involved in commercial operations shall hold an attestation as initially set out in Annex III, Subpart O, sub-para (d) of OPS 1.1005 as defined in Regulation (EC) No 1899/2006 (ie EU Ops). This confirms the intention of the EU legislator that the attestation of cabin crew should be identical to the requirement from EU-OPS. The attestation of cabin crew should therefore remain limited to an attestation for initial safety training.

Proposal:

Realign with EU-OPS. Replace 'attestation' with 'attestation for initial safety training'

General Comment:

NPA 2009-2 in its entirety is unfit for the purpose for which it is intended and must be withdrawn and reconsidered.

comment

646

comment by: *Swiss International Airlines / Bruno Pfister***Relevant Text:**

For the purpose of this Part, the competent Authority shall be the authority designated by the Member State to whom a person applies for the issuance of a cabin crew attestation

Comment:

Article 8.4 of the basic EASA regulation (216/2008) clearly states that cabin crew involved in commercial operations shall hold an attestation as initially set out in Annex III, Subpart O, point (d) of OPS 1.1005 as set out in Regulation (EC) No 1899/2006. This confirms the intentions of the EU legislator that the attestation of cabin crew should be identical to the requirements of EU-OPS. The attestation of cabin crew should therefore remain limited to a attestation for initial safety training. The AEA urges EASA to stick to its safety role and to stop inventing new requirements which conflict with art 8.4 of the basic EASA regulation.

Proposal:

Realign with EU-OPS. Replace 'attestation' with 'attestation for initial safety training'

comment 719

comment by: *TAP Portugal***Relevant Text:**

For the purpose of this Part, the competent Authority shall be the authority designated by the Member State to whom a person applies for the issuance of a cabin crew attestation

Comment:

Article 8.4 of the basic EASA regulation (216/2008) clearly states that cabin crew involved in commercial operations shall hold an attestation as initially set out in Annex III, Subpart O, point (d) of OPS 1.1005 as set out in Regulation (EC) No 1899/2006. This confirms the intentions of the EU legislator that the attestation of cabin crew should be identical to the requirements of EU-OPS. The attestation of cabin crew should therefore remain limited to a attestation for initial safety training. The AEA urges EASA to stick to its safety role and to stop inventing new requirements which conflict with art 8.4 of the basic EASA regulation.

Proposal:

Realign with EU-OPS. Replace 'attestation' with 'attestation for initial safety training'

comment 793

comment by: *Civil Aviation Authority of Norway*

The definition of competent authority for this part may be insufficient, taking into account that an initial cabin crew attestation may be issued by any operator in any member state, while the cabin crew member may be exercising his/her privileges with an operator from a different member state. For instance, if a Norwegian operator operating in Norway with Norwegian cabin crew contracts an approved cabin crew training organisation in the UK for the training of their cabin crew, it would not be particularly efficient to delegate all enforcement actions to the UK CAA. Therefore, some flexibility regarding the oversight and control of cabin crew attestations should be provided in this paragraph.

comment 828

comment by: *AIR FRANCE***Comment:**

Article 8.4 of the basic EASA regulation (216/2008) states that cabin crew involved in commercial operations shall hold an attestation as initially set out in Annex III, Subpart O, point (d) of OPS 1.1005 as set out in Regulation (EC) No 1899/2006. The attestation of cabin crew should be identical to the requirements of EU-OPS. The attestation of cabin crew should therefore be an attestation for initial safety training.

Proposal:

Realign with EU-OPS by replacing 'attestation' with 'attestation for initial safety training'

comment 855

comment by: *Swedish Transport Agency, Civil Aviation Department (Transportstyrelsen, Luftfartsavdelningen)***Comment:**

Shall a person apply for a cabin crew attestation to the competent authority even if the authority does not issue attestations?

Proposal:

An application for a cabin crew attestation should be made to the delegated organisation

E. VIII. Draft Opinion Part-CC - Subpart GEN - CC.GEN.005 Scope

p. 4

comment

244

comment by: *ETF*

Delete: This Part establishes the requirements for the issue of cabin crew attestations and the conditions of their validity and use by cabin crew members ~~in commercial air transport operations.~~

Reason: All cabin crew should be properly certified and trained, also cabin crew in non-commercial operations.

comment

257

comment by: *The TUI Airlines group represented by Thomson Airways, TUIfly, TUIfly Nordic, CorsairFly, Arkefly, Jet4U, JetairFly*

CC.GEN.005 Scope

Cabin crew attestations

Comment:

It has not been satisfied that Cabin Crew attestations as defined under EASA serve any purpose other than increasing a further bureaucratic level of responsibility. They do not enhance safety in any way and neither would they improve or permit transfer of CC from one Operator to another as each new Operator is required to complete an OCC and to satisfy itself of the level of competence of each CC employee.

Proposal:

The requirement for a CC Attestation as defined under this NPA should be cancelled.

comment

267

comment by: *AEA*

Relevant Text:

This Part establishes the requirements for the issue of cabin crew attestations and the conditions of their validity and use by cabin crew members in commercial air transport operations

Comment:

Article 8.4 of the basic EASA regulation (216/2008) clearly states that cabin crew involved in commercial operations shall hold an attestation as initially set out in Annex III, Subpart O, point (d) of OPS 1.1005 as set out in Regulation (EC) No 1899/2006. This confirms the intentions of the EU legislator that the attestation of cabin crew should be identical to the requirements of EU-OPS. The attestation of cabin crew should therefore remain limited to a attestation for initial safety training. The AEA urges EASA to stick to its safety role and to stop inventing new requirements which conflicts with article 8.4 of the basic EASA regulation.

Proposal:

Realign with EU-OPS. Replace 'attestation' with 'attestation for initial safety training'

comment

349

comment by: *Jill Pelan*

CFDT France & ETF demand

Delete: This Part establishes the requirements for the issue of cabin crew attestations and the conditions of their validity and use by cabin crew members, ~~in commercial air transport operations.~~

Reason: All cabin crew should be properly certified and trained, also cabin crew in non-commercial operations.

comment

360

comment by: *Walter Gessky*

1. CC.GEN.005 Scope

Add the following:

This Part establishes the requirements for the issue of cabin crew attestations **after passing the initial safety training examination** and the conditions of their validity and use by cabin crew members in commercial air transport operations.

Justification:

It shall make clear that the attestation without type and conversion training and familiarization does not grant any privileges.

comment

370

comment by: *kapers Cabin Crew Union*

Delete: This Part establishes the requirements for the issue of cabin crew attestations and the conditions of their validity and use by cabin crew members, ~~in commercial air transport operations.~~

Reason: All cabin crew should be properly certified and trained, also cabin crew in non-commercial operations.

comment

388

comment by: *AUSTRIAN Airlines*

Relevant Text:

This Part establishes the requirements for the issue of cabin crew attestations and the conditions of their validity and use by cabin crew members in commercial air transport operations

Comment:

Article 8.4 of the basic EASA regulation (216/2008) clearly states that cabin crew involved in commercial operations shall hold an attestation as initially set out in Annex III, Subpart O, point (d) of OPS 1.1005 as set out in Regulation (EC) No 1899/2006. This confirms the intentions of the EU legislator that the attestation of cabin crew should be identical to the requirements of EU-OPS. The attestation of cabin crew should therefore remain limited to a attestation for initial safety training. AUSTRIAN EASA to stick to its safety role and to stop inventing new requirements which conflicts with article 8.4 of the basic EASA regulation.

Proposal:

Realign with EU-OPS. Replace 'attestation' with 'attestation for initial safety training'

comment 467

comment by: easyjet safety

Requirement for Cabin Crew Attestation

A CC attestation or licence brings with it no benefit to the individual in terms of movement of labour as training is not transferable between airlines because of the requirement for approval of training organisations.

Under EU-OPS before an airline can use any training provider or accept any training formerly undertaken with another airline, that organisation must be approved by the airline. The introduction of a licence would not change this requirement and so would not allow training to be transferred between airlines; a full approval and ongoing auditing process of other airlines' training would be required before their attestation could be accepted. However, airlines will continue to be accountable for the safety standards of their operation and hence easyJet would not be willing to accept the cabin crew licence as proof that a cabin crew member's training with a different airline met easyJet's stringent safety training standards.

The justification that the CC Attestation process will encourage freedom of labour movement has not been demonstrated under current EU-OPS provisions and therefore the proposed NPA does not meet that requirement as specified in NPA 2009-02a Appendix IV Para. 7 and Para. 8

comment 472

comment by: KLM

Relevant Text:

This Part establishes the requirements for the issue of cabin crew attestations and the conditions of their validity and use by cabin crew members in commercial air transport operations

Comment:

Article 8.4 of the basic EASA regulation (216/2008) clearly states that cabin crew involved in commercial operations shall hold an attestation as initially set out in Annex III, Subpart O, point (d) of OPS 1.1005 as set out in Regulation (EC) No 1899/2006. This confirms the intentions of the EU legislator that the attestation of cabin crew should be identical to the requirements of EU-OPS. The attestation of cabin crew should therefore remain limited to a attestation for initial safety training. KLM urges EASA to stick to its safety role and to stop inventing new requirements which conflicts with article 8.4 of the basic EASA regulation.

Proposal:

Realign with EU-OPS. Replace 'attestation' with 'attestation for initial safety training'

comment 480

comment by: easyjet safety

Cabin Crew Attestation**Justification**

•
easyJet strongly argues that the training proposals, incorporated under NPA 2009-02e, for a comprehensive Cabin Crew attestation are regressive and do not reflect the developments in Flight Crew training adopted thro' ATQP for flight crew, which are based on the ability to match training requirements with demonstrated safety issues, within a risk management framework

•

easyJet also strongly believes that the justification for an Attestation, in its being transferable, is specious since the majority of such training is Operator specific.

As a result the proposals in NPA 23009-02e do not meet the principles outlined in the Implementing Rules (Article 8) in that they should:

- take into account worldwide aircraft experience in service, and scientific and technical progress
- be based on a risk assessment and shall be proportional to the scale and scope of the operation

comment 538

comment by: *Austro Control GmbH*

1.

Add the following:

*This Part establishes the requirements for the issue of cabin crew attestations **when the examination after the initial safety training was passed and the conditions of their validity and use by cabin crew members in commercial air transport operations.***

Justification:

It shall make clear that the attestation without type and conversion training and familiarization does not grant any privileges.

comment 547

comment by: *Deutsche Lufthansa AG*

Relevant Text:

This Part establishes the requirements for the issue of cabin crew attestations and the conditions of their validity and use by cabin crew members in commercial air transport operations

Comment:

Article 8.4 of the basic EASA regulation (216/2008) clearly states that cabin crew involved in commercial operations shall hold an attestation as initially set out in Annex III, Subpart O, point (d) of OPS 1.1005 as set out in Regulation (EC) No 1899/2006. This confirms the intentions of the EU legislator that the attestation of cabin crew should be identical to the requirements of EU-OPS. The attestation of cabin crew should therefore remain limited to a attestation for initial safety training. Lufthansa urges EASA to stick to its safety role and to stop inventing new requirements which conflicts with article 8.4 of the basic EASA regulation.

Proposal:

Realign with EU-OPS. Replace 'attestation' with 'attestation for initial safety training'

comment 612

comment by: *bmi REGIONAL*

It is the Opinion of bmi regional that EASA should seriously consider the recently submitted comments made by the CAA and those of the AEA and we align our opinion with those submitted by these organisations.

comment 613

comment by: *Finnish CAA*

Paragraph No: CC.GEN.005

Comment: The scope is restricting the requirements for cabin crew training and attestation to commercial air transport only. Yet para. MED.A.075(a) affects cabin crew in non-commercial operations, too.

comment 626

comment by: *British Airways Flight Operations***Relevant Text:**

This Part establishes the requirements for the issue of cabin crew attestations and the conditions of their validity and use by cabin crew members in commercial air transport operations

Comment:

Article 8.4 of the basic EASA regulation (216/2008) clearly states that cabin crew involved in commercial operations shall hold an attestation as initially set out in Annex III, Subpart O, sub-para (d) of OPS 1.1005 as defined in Regulation (EC) No 1899/2006 (ie EU Ops). This confirms the intention of the EU legislator that the attestation of cabin crew should be identical to the requirement from EU-OPS. The attestation of cabin crew should therefore remain limited to an attestation for initial safety training.

Proposal:

Realign with EU-OPS. Replace 'attestation' with 'attestation for initial safety training'

General Comment:

NPA 2009-2 in its entirety is unfit for the purpose for which it is intended and must be withdrawn and reconsidered.

comment 647

comment by: *Swiss International Airlines / Bruno Pfister***Relevant Text:**

This Part establishes the requirements for the issue of cabin crew attestations and the conditions of their validity and use by cabin crew members in commercial air transport operations

Comment:

Article 8.4 of the basic EASA regulation (216/2008) clearly states that cabin crew involved in commercial operations shall hold an attestation as initially set out in Annex III, Subpart O, point (d) of OPS 1.1005 as set out in Regulation (EC) No 1899/2006. This confirms the intentions of the EU legislator that the attestation of cabin crew should be identical to the requirements of EU-OPS. The attestation of cabin crew should therefore remain limited to a attestation for initial safety training. The AEA urges EASA to stick to its safety role and to stop inventing new requirements which conflicts with article 8.4 of the basic EASA regulation.

Proposal:

Realign with EU-OPS. Replace 'attestation' with 'attestation for initial safety training'

comment 720

comment by: *TAP Portugal***Relevant Text:**

This Part establishes the requirements for the issue of cabin crew attestations and the conditions of their validity and use by cabin crew members in commercial air transport operations

Comment:

Article 8.4 of the basic EASA regulation (216/2008) clearly states that cabin

crew involved in commercial operations shall hold an attestation as initially set out in Annex III, Subpart O, point (d) of OPS 1.1005 as set out in Regulation (EC) No 1899/2006. This confirms the intentions of the EU legislator that the attestation of cabin crew should be identical to the requirements of EU-OPS. The attestation of cabin crew should therefore remain limited to a attestation for initial safety training. The AEA urges EASA to stick to its safety role and to stop inventing new requirements which conflicts with article 8.4 of the basic EASA regulation.

Proposal:

Realign with EU-OPS. Replace 'attestation' with 'attestation for initial safety training'

comment

783

comment by: UCC SLO

Delete: This Part establishes the requirements for the issue of cabin crew attestations and the conditions of their validity and use by cabin crew members ~~in commercial air transport operations.~~

Reason: All cabin crew should be properly certified and trained, also cabin crew in non-commercial operations.

comment

794

comment by: Civil Aviation Authority of Norway

This scope is restricting the requirements for cabin crew training and attestation to commercial air transport only. Some considerations should also be given to non-commercial operators of complex aircraft, who wants to use cabin crew on board. In particular, since Annex II section 4 in the Personnel Cover Regulation addresses both commercial and non-commercial operations, it seems illogical to limit the scope of this Part only to commercial operations.

comment

805

comment by: DGAC

Contrary to what is stated in CC.GEN.005, the scope of Part CC is not only "*the requirements for the issue of cabin crew attestations and their validity and use by cabin crew members in commercial air transport operations*". It also deals with some training requirements applicable to all cabin crew whether operating in CAT or not - therefore not necessarily holding an attestation. Paragraph OR.OPS.110.CC, which is a common requirement applicable to all cabin crew, makes a reference to the training contained in by Part CC.

comment

829

comment by: AIR FRANCE

Comment:

Article 8.4 of the basic EASA regulation (216/2008) states that cabin crew involved in commercial operations shall hold an attestation as initially set out in Annex III, Subpart O, point (d) of OPS 1.1005 as set out in Regulation (EC) No 1899/2006. The attestation of cabin crew should be identical to the requirements of EU-OPS. The attestation of cabin crew should therefore be an attestation for initial safety training.

Proposal:

Realign with EU-OPS by replacing 'attestation' with 'attestation for initial safety training'

comment 898

comment by: *IACA International Air Carrier Association*

It has not been satisfied that Cabin Crew attestations as defined under EASA serve any purpose other than increasing a further bureaucratic level of responsibility. They do not enhance safety in any way and neither would they improve or permit transfer of CC from one Operator to another as each new Operator is required to complete an OCC and to satisfy itself of the level of competence of each CC employee.

Proposal: The requirement for a CC Attestation as defined under this NPA should be cancelled.

E. VIII. Draft Opinion Part-CC - Subpart GEN - CC.GEN.010 Definition

p. 4

comment 180

comment by: *ETF*

Add: 'Cabin crew member' means a crew member, other than a flight crew member or technical crew member, who performs duties in the interests of safety of passengers and aircraft during operations **and holds a cabin crew attestation, meets the medical requirements in Part MED and has successfully completed appropriate training.**

Reason: The definition is too vague and risk to permit anyone but flight crew and technical crew to be a cabin crew member.

comment 182

comment by: *Jill Pelan*

CC GEN 010 DEFINITION (Page 4)

"Cabin crew member means..... Who performs duties in the interests of safety of passengers and aircraft during operations"

COMMENT : This should include the addition "and meets with the medical requirements in part MED , holds an attestation and has successfully completed the appropriate type training"

SUBPART CCA (Page 5)

CC CCA 100 Cabin Crew Attestation (b) A cabin crew attestation shall be issued by the competent authority , or on its behalf by:

- (1) The operator
- (2) The training organisation

COMMENT : THIS SHOULD REMAIN THE PREROGATIVE OF THE AUTHORITY ALONE in order to ensure fair , objective issuance of attestations. This has been the demand of the 100,000 cabin crew of ETF for many years.

CC.TRA 135 Recurrent training & checking (Page 7)

(b) The programme of a recurrent training course shall cover :

- 1. Every 12 months.....
- 2. In addition to (1) Within intervals not exceeding 3 years , each cabin member shall complete for each aircraft type or variant to be operated :
 - (1) Actual operation & opening
 - (2) Training on the use of equipment

COMMENT & proposed amendment : " The programme of a recurrent

training course shall cover :

(1) (I) (II) AND

2. Each cabin member shall also complete for each aircraft type of variant to be operated the operation of opening doors and exits and the use of equipment and all systems relevant to pilot incapacitation. "

Reason - the type variant training cannot be relegated to every 3 years -this is part of training to aid performance on board the aircraft.

comment 254

comment by: Jill Pelan

CC GEN 010 Definition

The French CFDT Union asks for the following to be added to this definition ; "and who meets with the medical requirements in part MED, holds an attestation and has successfully completed the appropriate training".

comment 268

comment by: AEA

Relevant Text:

Cabin Crew member means a crew member, other than a flight crew member or technical crew member, who performs duties in the interest of safety of passengers and aircraft during operations

Comment:

This definition is not in line with EU-OPS which only refers to safety of passengers but not to safety of aircraft . It is also not line with the ICAO Annex 6 (Chapter 1) definition of cabin crew which only refers to safety of passengers.

Proposal:

Delete 'and aircraft'

comment 350

comment by: Jill Pelan

The CFDT France & ETF Cabin Crew ask for :

Add: 'Cabin crew member' means a crew member, other than a flight crew member or technical crew member, who performs duties in the interests of safety of passengers and aircraft during operations **and holds a cabin crew attestation, meets the medical requirements in Part MED and has successfully completed appropriate training.**

Reason: The definition is too vague and risks permitting anyone but flight crew and technical crew to be a cabin crew member.

comment 371

comment by: kapers Cabin Crew Union

Add: 'Cabin crew member' means a crew member, other than a flight crew member or technical crew member, who performs duties in the interests of safety of passengers and aircraft during operations **and holds a cabin crew attestation, meets the medical requirements in Part MED and has successfully completed appropriate training.**

Reason: The definition is too vague and risk to permit anyone but flight crew and technical crew to be a cabin crew member.

comment 389

comment by: AUSTRIAN Airlines

Relevant Text:

Cabin Crew member means a crew member, other than a flight crew member or technical crew member, who performs duties in the interest of safety of passengers and aircraft during operations

Comment:

This definition is not in line with EU-OPS which only refers to safety of passengers but not to safety of aircraft . It is also not line with the ICAO Annex 6 (Chapter 1) definition of cabin crew which only refers to safety of passengers.

Proposal:

Delete 'and aircraft'

comment 473

comment by: KLM

Relevant Text:

Cabin Crew member means a crew member, other than a flight crew member or technical crew member, who performs duties in the interest of safety of passengers and aircraft during operations

Comment:

This definition is not in line with EU-OPS which only refers to safety of passengers but not to safety of aircraft . It is also not line with the ICAO Annex 6 (Chapter 1) definition of cabin crew which only refers to safety of passengers.

Proposal:

Delete 'and aircraft'

comment 548

comment by: Deutsche Lufthansa AG

Relevant Text:

Cabin Crew member means a crew member, other than a flight crew member or technical crew member, who performs duties in the interest of safety of passengers and aircraft during operations

Comment:

This definition is not in line with EU-OPS which only refers to safety of passengers but not to safety of aircraft . It is also not line with the ICAO Annex 6 (Chapter 1) definition of cabin crew which only refers to safety of passengers.

Proposal:

Delete 'and aircraft'

comment 627

comment by: British Airways Flight Operations

Relevant Text:

Cabin Crew member means a crew member, other than a flight crew member or technical crew member, who performs duties in the interest of safety of passengers and aircraft during operations

Comment:

This definition is different from EU-OPS which only refers to safety of passengers but not to safety of aircraft . It is also different from the definition of cabin crew in ICAO Annex 6 (Chapter 1, page 1-2) which says:

Cabin crew member. A crew member who performs, in the interest of safety of passengers, duties assigned by the operator or the pilot-in-command of the aircraft, but who shall not act as a flight crew member.

Proposal:

Align the definition with ICAO Annex 6

General Comment:

NPA 2009-2 in its entirety is unfit for the purpose for which it is intended and must be withdrawn and reconsidered.

comment 648

comment by: *Swiss International Airlines / Bruno Pfister***Relevant Text:**

Cabin Crew member means a crew member, other than a flight crew member or technical crew member, who performs duties in the interest of safety of passengers and aircraft during operations

Comment:

This definition is not in line with EU-OPS which only refers to safety of passengers but not to safety of aircraft . It is also not line with the ICAO Annex 6 (Chapter 1) definition of cabin crew which only refers to safety of passengers.

Proposal:

Delete 'and aircraft'

comment 721

comment by: *TAP Portugal***Relevant Text:**

Cabin Crew member means a crew member, other than a flight crew member or technical crew member, who performs duties in the interest of safety of passengers and aircraft during operations

Comment:

This definition is not in line with EU-OPS which only refers to safety of passengers but not to safety of aircraft . It is also not line with the ICAO Annex 6 (Chapter 1) definition of cabin crew which only refers to safety of passengers.

Proposal:

Delete 'and aircraft'

comment 784

comment by: *UCC SLO*

Add: 'Cabin crew member' means a crew member, other than a flight crew member or technical crew member, who performs duties in the interests of safety of passengers and aircraft during operations **and holds a cabin crew attestation, meets the medical requirements in Part MED and has successfully completed appropriate training.**

Reason: The definition is too vague and risk to permit anyone but flight crew and technical crew to be a cabin crew member.

comment 806

comment by: *DGAC*

According to paragraph CC.GEN.010 the present definition of a cabin crew member stands only "for the purpose of this Part " [i.e. Part CC]. However there is a need to have such a definition covering also section VI of Part OR and subpart CC of Part AR.

Generally speaking, all definitions (except may be those that are really only used for the purpose of one single paragraph) should be put together in one common document, with IR status.

comment

818

comment by: *cfdt france***CC GEN 010 DEFINITION (Page 4)**

"Cabin crew member means..... Who performs duties in the interests of safety of passengers and aircraft during operations"

COMMENT : This s hould incl ude th e additi on "and meets withth e medical r equirements in part MED , holds an attestati on and h as successfully completed the appropriate type training"

SUBPART CCA (Page 5)

CC CCA 100 Cabin Crew Attestation (b) A cabin crew attestation shall be issued by the competent authority , or on its behalf by:

- (1) The operator
- (2) The training organisation

COMMENT : THIS S HOULD R EMAINT HE PREROGATIVE OF THE AUTHORITY ALONE in or der t o en sure fair , obj ective iss uance o f attestations. This has been t he demand of the 100,000 cabin cr ew of ETF for many years.

CC.TRA 135 Recurrent training & checking (Page 7)

(b) The programme of a recurrent training course shall cover :

1. Every 12 months.....
2. In addition to (1) Within intervals not exceeding 3 years , each cabin member shall complete for each aircraft type or variant to be operated :
 - (1) Actual operation & opening
 - (2) Training on the use fo equipment

COMMENT & prop osed amendment : " The programme of a recurrent training course shall cover :

(1) (I) (II) AND

2. Each cabin member sh all also c omplete for each aircr aft type of variant to be oper ated the operation of opening doors and exits and the use of equipment and all systems relevant to pilot incapacitation. "

Reason - the type variant training cannot be relegated to every 3 years -this is part of training to aid performance on board the aircraft.

E. VIII. Draft Opinion Part-CC - Subpart GEN - CC.GEN.010 Definition

CC GEN 010 Definition

The French CFDT Union asks for the following to be added to this definition ;
"and who meets with the medical requirements in part MED, holds an attestation and has successfully completed the appropriate training".

comment

830

comment by: *AIR FRANCE*

Comment:

This definition must not be limited to this part as the terms "Cabin Crew" are used in other parts of the IRs (such as part OR in NPA 2009-02 C, etc.). The sentence "For the purpose of this part, the following definition shall apply :"
should be deleted

This definition is not in line with EU-OPS which refers to safety of passengers but not to safety of aircraft, nor with the ICAO Annex 6 (Chapter 1) definition of cabin crew which only refers to safety of passengers.

Proposal:

Delete the sentence : "For the purpose of this part, the following definition shall apply :"

Delete 'and aircraft'

comment

851

comment by: FSC - CCOO

'Cabin crew member' means a crew member, other than a flight crew member or technical

Add:

,meets with the medical requirements in part MED, holds an attestation and has successfully completed the appropriate type training.

Reason: The fore mentioned conditions to perform duties in the interest of safety of passengers and aircraft during operations appear in other parts, including them in Part-CC summarizes all conditions and reflects in this very relevant OPS for CC.

E. VIII. Draft Opinion Part-CC - Subpart GEN - CC.GEN.015 Application

p. 4

comment

269

comment by: AEA

Relevant Text:

An application for a cabin crew attestation shall be made in a form and manner established by the Competent Authority

Comment:

Article 8.4 of the basic EASA regulation (216/2008) clearly states that cabin crew involved in commercial operations shall hold an attestation as initially set out in Annex III, Subpart O, point (d) of OPS 1.1005 as set out in Regulation (EC) No 1899/2006. This confirms the intentions of the EU legislator that the attestation of cabin crew should be identical to the requirements of EU-OPS. The attestation of cabin crew should therefore remain limited to a attestation for initial safety training. The AEA urges EASA to stick to its safety role and to stop inventing new requirements which conflicts with article 8.4 of the basic EASA regulation.

Proposal:

Realign with EU-OPS. Replace 'attestation' with '**attestation for initial safety training**'

comment

390

comment by: AUSTRIAN Airlines

Relevant Text:

An application for a cabin crew attestation shall be made in a form and manner established by the Competent Authority

Comment:

Article 8.4 of the basic EASA regulation (216/2008) clearly states that cabin crew involved in commercial operations shall hold an attestation as initially set

out in Annex III, Subpart O, point (d) of OPS 1.1005 as set out in Regulation (EC) No 1899/2006. This confirms the intentions of the EU legislator that the attestation of cabin crew should be identical to the requirements of EU-OPS. The attestation of cabin crew should therefore remain limited to a attestation for initial safety training. AUSTRIAN urges EASA to stick to its safety role and to stop inventing new requirements which conflicts with article 8.4 of the basic EASA regulation.

Proposal:

Realign with EU-OPS. Replace 'attestation' with '**attestation for initial safety training**'

comment 474

comment by: KLM

Relevant Text:

An application for a cabin crew attestation shall be made in a form and manner established by the Competent Authority

Comment:

Article 8.4 of the basic EASA regulation (216/2008) clearly states that cabin crew involved in commercial operations shall hold an attestation as initially set out in Annex III, Subpart O, point (d) of OPS 1.1005 as set out in Regulation (EC) No 1899/2006. This confirms the intentions of the EU legislator that the attestation of cabin crew should be identical to the requirements of EU-OPS. The attestation of cabin crew should therefore remain limited to a attestation for initial safety training. KLM urges EASA to stick to its safety role and to stop inventing new requirements which conflicts with article 8.4 of the basic EASA regulation.

Proposal:

Realign with EU-OPS. Replace 'attestation' with '**attestation for initial safety training**'

comment 549

comment by: Deutsche Lufthansa AG

Relevant Text:

An application for a cabin crew attestation shall be made in a form and manner established by the Competent Authority

Comment:

Article 8.4 of the basic EASA regulation (216/2008) clearly states that cabin crew involved in commercial operations shall hold an attestation as initially set out in Annex III, Subpart O, point (d) of OPS 1.1005 as set out in Regulation (EC) No 1899/2006. This confirms the intentions of the EU legislator that the attestation of cabin crew should be identical to the requirements of EU-OPS. The attestation of cabin crew should therefore remain limited to a attestation for initial safety training. Lufthansa urges EASA to stick to its safety role and to stop inventing new requirements which conflicts with article 8.4 of the basic EASA regulation.

Proposal:

Realign with EU-OPS. Replace 'attestation' with '**attestation for initial safety training**'

comment 628

comment by: British Airways Flight Operations

Relevant Text:

An application for a cabin crew attestation shall be made in a form and manner established by the Competent Authority

Comment:

Article 8.4 of the basic EASA regulation (216/2008) clearly states that cabin crew involved in commercial operations shall hold an attestation as initially set out in Annex III, Subpart O, sub-para (d) of OPS 1.1005 as defined in Regulation (EC) No 1899/2006 (ie EU Ops). This confirms the intention of the EU legislator that the attestation of cabin crew should be identical to the requirement from EU-OPS. The attestation of cabin crew should therefore remain limited to an attestation for initial safety training.

Proposal:

Realign with EU-OPS. Replace 'attestation' with 'attestation for initial safety training'

General Comment:

NPA 2009-2 in its entirety is unfit for the purpose for which it is intended and must be withdrawn and reconsidered.

comment 649

comment by: *Swiss International Airlines / Bruno Pfister***Relevant Text:**

An application for a cabin crew attestation shall be made in a form and manner established by the Competent Authority

Comment:

Article 8.4 of the basic EASA regulation (216/2008) clearly states that cabin crew involved in commercial operations shall hold an attestation as initially set out in Annex III, Subpart O, point (d) of OPS 1.1005 as set out in Regulation (EC) No 1899/2006. This confirms the intentions of the EU legislator that the attestation of cabin crew should be identical to the requirements of EU-OPS. The attestation of cabin crew should therefore remain limited to a attestation for initial safety training. The AEA urges EASA to stick to its safety role and to stop inventing new requirements which conflicts with article 8.4 of the basic EASA regulation.

Proposal:

Realign with EU-OPS. Replace 'attestation' with '**attestation for initial safety training**'

comment 722

comment by: *TAP Portugal***Relevant Text:**

An application for a cabin crew attestation shall be made in a form and manner established by the Competent Authority

Comment:

Article 8.4 of the basic EASA regulation (216/2008) clearly states that cabin crew involved in commercial operations shall hold an attestation as initially set out in Annex III, Subpart O, point (d) of OPS 1.1005 as set out in Regulation (EC) No 1899/2006. This confirms the intentions of the EU legislator that the attestation of cabin crew should be identical to the requirements of EU-OPS. The attestation of cabin crew should therefore remain limited to a attestation for initial safety training. The AEA urges EASA to stick to its safety role and to stop inventing new requirements which conflicts with article 8.4 of the basic EASA regulation.

Proposal:

Realign with EU-OPS. Replace 'attestation' with '**attestation for initial safety training**'

comment 831

comment by: *AIR FRANCE*

Comment:

Article 8.4 of the basic EASA regulation (216/2008) states that cabin crew involved in commercial operations shall hold an attestation as initially set out in Annex III, Subpart O, point (d) of OPS 1.1005 as set out in Regulation (EC) No 1899/2006. The attestation of cabin crew should be identical to the requirements of EU-OPS. The attestation of cabin crew should therefore be an attestation for initial safety training.

Proposal:

Realign with EU-OPS by replacing 'attestation' with 'attestation for initial safety training'

E. VIII. Draft Opinion Part-CC - Subpart GEN - CC.GEN.020 Minimum age

p. 4

comment

270

comment by: AEA

Relevant Text:

An applicant for a cabin crew attestation shall be at least 18 years of age

Comment:

Article 8.4 of the basic EASA regulation (216/2008) clearly states that cabin crew involved in commercial operations shall hold an attestation as initially set out in Annex III, Subpart O, point (d) of OPS 1.1005 as set out in Regulation (EC) No 1899/2006. This confirms the intentions of the EU legislator that the attestation of cabin crew should be identical to the requirements of EU-OPS. The attestation of cabin crew should therefore remain limited to a attestation for initial safety training. The AEA urges EASA to stick to its safety role and to stop inventing new requirements which conflicts with article 8.4 of the basic EASA regulation.

Proposal:

Realign with EU-OPS. Replace 'attestation' with '**attestation for initial safety training**'

comment

391

comment by: AUSTRIAN Airlines

Relevant Text:

An applicant for a cabin crew attestation shall be at least 18 years of age

Comment:

Article 8.4 of the basic EASA regulation (216/2008) clearly states that cabin crew involved in commercial operations shall hold an attestation as initially set out in Annex III, Subpart O, point (d) of OPS 1.1005 as set out in Regulation (EC) No 1899/2006. This confirms the intentions of the EU legislator that the attestation of cabin crew should be identical to the requirements of EU-OPS. The attestation of cabin crew should therefore remain limited to a attestation for initial safety training. AUSTRIAN urges EASA to stick to its safety role and to stop inventing new requirements which conflicts with article 8.4 of the basic EASA regulation.

Proposal:

Realign with EU-OPS. Replace 'attestation' with '**attestation for initial safety training**'

comment

475

comment by: KLM

Relevant Text:

An applicant for a cabin crew attestation shall be at least 18 years of age

Comment:

Article 8.4 of the basic EASA regulation (216/2008) clearly states that cabin crew involved in commercial operations shall hold an attestation as initially set out in Annex III, Subpart O, point (d) of OPS 1.1005 as set out in Regulation (EC) No 1899/2006. This confirms the intentions of the EU legislator that the attestation of cabin crew should be identical to the requirements of EU-OPS. The attestation of cabin crew should therefore remain limited to a attestation for initial safety training. KLM urges EASA to stick to its safety role and to stop inventing new requirements which conflicts with article 8.4 of the basic EASA regulation.

Proposal:

Realign with EU-OPS. Replace 'attestation' with '**attestation for initial safety training**'

comment 550

comment by: Deutsche Lufthansa AG

Relevant Text:

An applicant for a cabin crew attestation shall be at least 18 years of age

Comment:

Article 8.4 of the basic EASA regulation (216/2008) clearly states that cabin crew involved in commercial operations shall hold an attestation as initially set out in Annex III, Subpart O, point (d) of OPS 1.1005 as set out in Regulation (EC) No 1899/2006. This confirms the intentions of the EU legislator that the attestation of cabin crew should be identical to the requirements of EU-OPS. The attestation of cabin crew should therefore remain limited to a attestation for initial safety training. Lufthansa urges EASA to stick to its safety role and to stop inventing new requirements which conflicts with article 8.4 of the basic EASA regulation.

Proposal:

Realign with EU-OPS. Replace 'attestation' with '**attestation for initial safety training**'

comment 629

comment by: British Airways Flight Operations

Relevant Text:

An applicant for a cabin crew attestation shall be at least 18 years of age

Comment:

Article 8.4 of the basic EASA regulation (216/2008) clearly states that cabin crew involved in commercial operations shall hold an attestation as initially set out in Annex III, Subpart O, sub-para (d) of OPS 1.1005 as defined in Regulation (EC) No 1899/2006 (ie EU Ops). This confirms the intention of the EU legislator that the attestation of cabin crew should be identical to the requirement from EU-OPS. The attestation of cabin crew should therefore remain limited to an attestation for initial safety training.

Proposal:

Realign with EU-OPS. Replace 'attestation' with 'attestation for initial safety training'

General Comment:

NPA 2009-2 in its entirety is unfit for the purpose for which it is intended and must be withdrawn and reconsidered.

comment 650

comment by: Swiss International Airlines / Bruno Pfister

Relevant Text:

An applicant for a cabin crew attestation shall be at least 18 years of age

Comment:

Article 8.4 of the basic EASA regulation (216/2008) clearly states that cabin crew involved in commercial operations shall hold an attestation as initially set out in Annex III, Subpart O, point (d) of OPS 1.1005 as set out in Regulation (EC) No 1899/2006. This confirms the intentions of the EU legislator that the attestation of cabin crew should be identical to the requirements of EU-OPS. The attestation of cabin crew should therefore remain limited to a attestation for initial safety training. The AEA urges EASA to stick to its safety role and to stop inventing new requirements which conflicts with article 8.4 of the basic EASA regulation.

Proposal:

Realign with EU-OPS. Replace 'attestation' with '**attestation for initial safety training**'

comment

723

comment by: TAP Portugal

Relevant Text:

An applicant for a cabin crew attestation shall be at least 18 years of age

Comment:

Article 8.4 of the basic EASA regulation (216/2008) clearly states that cabin crew involved in commercial operations shall hold an attestation as initially set out in Annex III, Subpart O, point (d) of OPS 1.1005 as set out in Regulation (EC) No 1899/2006. This confirms the intentions of the EU legislator that the attestation of cabin crew should be identical to the requirements of EU-OPS. The attestation of cabin crew should therefore remain limited to a attestation for initial safety training. The AEA urges EASA to stick to its safety role and to stop inventing new requirements which conflicts with article 8.4 of the basic EASA regulation.

Proposal:

Realign with EU-OPS. Replace 'attestation' with '**attestation for initial safety training**'

comment

807

comment by: DGAC

Comment :

Amend the text as follows :

"An applicant for **the issuance of** a cabin crew attestation shall be at least 18 years of age."

Justification :

Minimum age should be for the issuance of the attestation, not for the commencement of the training. The purpose is to be 18 years of age or more when starting to act as a cabin crew.

comment

832

comment by: AIR FRANCE

Comment:

Article 8.4 of the basic EASA regulation (216/2008) states that cabin crew involved in commercial operations shall hold an attestation as initially set out in Annex III, Subpart O, point (d) of OPS 1.1005 as set out in Regulation (EC) No 1899/2006. The attestation of cabin crew should be identical to the requirements of EU-OPS. The attestation of cabin crew should therefore be an attestation for initial safety training.

Proposal:

Realign with EU-OPS by replacing 'attestation' with 'attestation for initial safety training'

E. VIII. Draft Opinion Part-CC - Subpart GEN - CC.GEN.025 Privileges and conditions

p. 4

comment

245

comment by: *ETF*

Delete: (a) The privileges of holders of a cabin crew attestation are to act as cabin crew member ~~in commercial air transport operations.~~

Reason: All cabin crew members should comply with the same standards and enjoy the same privileges.

comment

271

comment by: *AEA*

Relevant Text:

(a) *The privileges of holders of a cabin crew attestation are to act as cabin crew member in commercial air transport operations*

(b) *The holder s of a cabin crew a ttestation shall only exercise thei r privileges if they comply with this Part and the applicable requirements of Part-OR for the aircraft to be operated.*

Comment:

This goes far beyond the intentions of the EU legislator and EU-OPS; Article 8.4 of the basic EASA regulation (216/2008) clearly states that cabin crew involved in commercial operations shall hold an attestation as initially set out in Annex III, Subpart O, point (d) of OPS 1.1005 as set out in Regulation (EC) No 1899/2006. This confirms the intentions of the EU legislator that the attestation of cabin crew should be identical to the requirements of EU-OPS. The attestation of cabin crew should therefore remain limited to a attestation for initial safety training. The AEA urges EASA to stick to its safety role and to stop inventing new requirements which conflicts with article 8.4 of the basic EASA regulation.

Proposal:

Delete (b) and replace in (a) 'attestation' by 'attestation for initial safety training'

comment

361

comment by: *Walter Gessky*

CC.GEN.025 Privileges and conditions

Add the following:

(a) The privileges of holders of a cabin crew attestation are to act as cabin crew member in commercial air transport operations, **after completi on the required type and conversion training and familiarization and the initial medical examin ation and assessment in accor dance wit h PartMED is valid; .**

Justification:

The proposal is not in line with EU-OPS which shall be according Art 8/4 the basis for IR. The attestation does not grant any privileges when the type ad conversion training and familiarization is not completed. In addition it is required that the medical certificate is valid. There shall be no link between the attestations issued after the initial safety training and the medical certificate. It shall be the responsibility of the cabin crew and the operator to verify this

because the attestation does only certifies that the initial training is passed. Since the attestation only verifies that the initial training is completed it shall remain the responsibility of the operator and the cabin crew that the conditions for privileges are met. Any process to control the validity by the NAA or the organization issuing the attestation is only an administrative bureaucratic burden without any value and does not have an impact on safety because the operator has to verify that all additional training (type and conversion training, familiarization, recurrent training, refresher training is completed) is met. When this training is not provided, the medical certificate is not valid and when the attestation was issued using wrong data, than the operator shall not assign the person for official duties.

comment

372

comment by: *kapers Cabin Crew Union*

Delete: (a) The privileges of holders of a cabin crew attestation are to act as cabin crew member ~~in commercial air transport operations.~~

Reason: All cabin crew members should comply with the same standards and enjoy the same privileges.

comment

392

comment by: *AUSTRIAN Airlines***relevant Text:**

(a) *The privileges of holders of a cabin crew attestation are to act as cabin crew member in commercial air transport operations*

(b) *The holder s of a cabin crew a ttestation shall only exercise thei r privileges if they comply with this Part and the applicable requirements of Part-OR for the aircraft to be operated.*

Comment:

This goes far beyond the intentions of the EU legislator and EU-OPS; Article 8.4 of the basic EASA regulation (216/2008) clearly states that cabin crew involved in commercial operations shall hold an attestation as initially set out in Annex III, Subpart O, point (d) of OPS 1.1005 as set out in Regulation (EC) No 1899/2006. This confirms the intentions of the EU legislator that the attestation of cabin crew should be identical to the requirements of EU-OPS. The attestation of cabin crew should therefore remain limited to a attestation for initial safety training. AUSTRIAN urges EASA to stick to its safety role and to stop inventing new requirements which conflicts with article 8.4 of the basic EASA regulation.

Proposal:

Delete (b) and replace in (a) 'attestation' by 'attestation for initial safety training'

comment

476

comment by: *KLM***Relevant Text:**

(a) *The privileges of holders of a cabin crew attestation are to act as cabin crew member in commercial air transport operations*

(b) *The holder s of a cabin crew a ttestation shall only exercise thei r privileges if they comply with this Part and the applicable requirements of Part-OR for the aircraft to be operated.*

Comment:

This goes far beyond the intentions of the EU legislator and EU-OPS; Article 8.4 of the basic EASA regulation (216/2008) clearly states that cabin crew involved

in commercial operations shall hold an attestation as initially set out in Annex III, Subpart O, point (d) of OPS 1.1005 as set out in Regulation (EC) No 1899/2006. This confirms the intentions of the EU legislator that the attestation of cabin crew should be identical to the requirements of EU-OPS. The attestation of cabin crew should therefore remain limited to a attestation for initial safety training. KLM urges EASA to stick to its safety role and to stop inventing new requirements which conflicts with article 8.4 of the basic EASA regulation.

Proposal:

Delete (b) and replace in (a) 'attestation' by 'attestation for initial safety training'

comment 539

comment by: *Austro Control GmbH*

Add the following:

*(a) The privileges of holders of a cabin crew attestation are to act as cabin crew member in commercial air transport operations, **when the required type or conversion training and familiarization is completed and the initial medical examination and assessment in accordance with Part MED is valid;***

Justification:

The proposal is not in line with EU-OPS which shall be according Art 8 (4) the basis for IR. The attestation does not grant any privileges when the type ad conversion training and familiarization is not completed. In addition it is required that the medical certificate is valid. There shall be no link between the attestations issued after the initial safety training and the medical certificate. It shall be responsibility of the cabin crew and the operator to verify this because the attestation does only certifys that the initial safety training is passed.

Since the attestation only verifies that the initial safety training is completed it shall remain the responsibility of the operator and the cabin crew that the conditions for privileges are met. Any process to control the validity by the NAA or organisation issuing the attestation is only an administrative bureaucratic burden without any value and does not have an impact on safety because the operator has to verify that all additional training (type and conversion training, familiarization, recurrent training, refresher training is completed) is met. When this training is not provided, the medical certificate is not valid and when the attestation was issued using wrong data, than the operator shall not assign the person for official duties.

comment 551

comment by: *Deutsche Lufthansa AG***Relevant Text:**

(a) The privileges of holders of a cabin crew attestation are to act as cabin crew member in commercial air transport operations

(b) The holder s of a cabin crew a ttestation shall only exercise thei r privileges if they comply with this Part and the applicable requirements of Part-OR for the aircraft to be operated.

Comment:

This goes far beyond the intentions of the EU legislator and EU-OPS; Article 8.4 of the basic EASA regulation (216/2008) clearly states that cabin crew involved in commercial operations shall hold an attestation as initially set out in Annex III, Subpart O, point (d) of OPS 1.1005 as set out in Regulation (EC) No 1899/2006. This confirms the intentions of the EU legislator that the attestation of cabin crew should be identical to the requirements of EU-OPS. The attestation of cabin crew should therefore remain limited to a attestation

for initial safety training. Lufthansa urges EASA to stick to its safety role and to stop inventing new requirements which conflicts with article 8.4 of the basic EASA regulation.

Proposal:

Delete (b) and replace in (a) 'attestation' by 'attestation for initial safety training'

comment

614

comment by: *Finnish CAA*

Paragraph No: CC.GEN.025

Comment: Should the attestation concern also cabin crew performing duties in the interest of safety of passengers in non-commercial operations and in aircraft with a maximum passenger seating configuration of 19 or less, when cabin crew is present?

comment

630

comment by: *British Airways Flight Operations*

Relevant Text:

(a) *The privileges of holders of a cabin crew attestation are to act as cabin crew member in commercial air transport operations*

(b) *The holder s of a cabin crew a ttestation shall only exercise thei r privileges if they comply with this Part and the applicable requirements of Part-OR for the aircraft to be operated.*

Comment:

Article 8.4 of the basic EASA regulation (216/2008) clearly states that cabin crew involved in commercial operations shall hold an attestation as initially set out in Annex III, Subpart O, sub-para (d) of OPS 1.1005 as defined in Regulation (EC) No 1899/2006 (ie EU Ops). This confirms the intention of the EU legislator that the attestation of cabin crew should be identical to the requirement from EU-OPS. The attestation of cabin crew should therefore remain limited to an attestation for initial safety training. If that is the case, how can a cabin crew member exercise the privileges of an attestation? What EASA is proposing is a licence for cabin crew, which is unjustified and unnecessary. It is interesting in this regard that ICAO clearly regards flight crew and cabin crew as different entities; whereas, EASA appears to be attempting to blur merge those definitions.

Proposal:

Realign with EU-OPS. Replace 'attestation' with 'attestation for initial safety training'

General Comment:

NPA 2009-2 in its entirety is unfit for the purpose for which it is intended and must be withdrawn and reconsidered.

comment

652

comment by: *Swiss International Airlines / Bruno Pfister*

Relevant Text:

(a) *The privileges of holders of a cabin crew attestation are to act as cabin crew member in commercial air transport operations*

(b) *The holder s of a cabin crew a ttestation shall only exercise thei r privileges if they comply with this Part and the applicable requirements of Part-OR for the aircraft to be operated.*

Comment:

This goes far beyond the intentions of the EU legislator and EU-OPS; Article 8.4

of the basic EASA regulation (216/2008) clearly states that cabin crew involved in commercial operations shall hold an attestation as initially set out in Annex III, Subpart O, point (d) of OPS 1.1005 as set out in Regulation (EC) No 1899/2006. This confirms the intentions of the EU legislator that the attestation of cabin crew should be identical to the requirements of EU-OPS. The attestation of cabin crew should therefore remain limited to a attestation for initial safety training. The AEA urges EASA to stick to its safety role and to stop inventing new requirements which conflicts with article 8.4 of the basic EASA regulation.

Proposal:

Delete (b) and replace in (a) 'attestation' by 'attestation for initial safety training'

comment

724

comment by: TAP Portugal

Relevant Text:

(a) *The privileges of holders of a cabin crew attestation are to act as cabin crew member in commercial air transport operations*

(b) *The holder s of a cabin crew a ttestation shall only exercise thei r privileges if they comply with this Part and the applicable requirements of Part-OR for the aircraft to be operated.*

Comment:

This goes far beyond the intentions of the EU legislator and EU-OPS; Article 8.4 of the basic EASA regulation (216/2008) clearly states that cabin crew involved in commercial operations shall hold an attestation as initially set out in Annex III, Subpart O, point (d) of OPS 1.1005 as set out in Regulation (EC) No 1899/2006. This confirms the intentions of the EU legislator that the attestation of cabin crew should be identical to the requirements of EU-OPS. The attestation of cabin crew should therefore remain limited to a attestation for initial safety training. The AEA urges EASA to stick to its safety role and to stop inventing new requirements which conflicts with article 8.4 of the basic EASA regulation.

Proposal:

Delete (b) and replace in (a) 'attestation' by 'attestation for initial safety training'

comment

785

comment by: UCC SLO

Delete: (a) The privileges of holders of a cabin crew attestation are to act as cabin crew member, ~~in commercial air transport operations.~~

Reason: All cabin crew members should comply with the same standards and enjoy the same priviledges.

comment

795

comment by: Civil Aviation Authority of Norway

Comment to (a)

The privileges of holders of a cabin crew attestation should not be limited to act as cabin crew member in commercial air transport operations only, as this attestation should also be recognized for non-commercial operations.

comment

833

comment by: AIR FRANCE

Comment:

Article 8.4 of the basic EASA regulation (216/2008) states that cabin crew involved in commercial operations shall hold an attestation as initially set out in Annex III, Subpart O, point (d) of OPS 1.1005 as set out in Regulation (EC) No 1899/2006. The attestation of cabin crew should be identical to the requirements of EU-OPS. The attestation of cabin crew should therefore be an attestation for initial safety training.

Proposal:

Realign with EU-OPS by replacing 'attestation' with 'attestation for initial safety training'

E. VIII. Draft Opinion Part-CC - Subpart CCA

p. 5

comment

352

comment by: *Jill Pelan*

CC.CCA. General comment:

In COM(2005) 578 of 2005 the Commission expressed that it is time to end the inconsistency that "while aircraft now enjoy complete freedom within a unified market, safety standards continue to vary between Member States." In this respect the legislator in Regulation 216/2008 acknowledge that cabin crews standards were not harmonised, taking into account that half of Europe certifies or license their cabin crews. In its explanation and recommendation leading to the above regulation the EP stated on cabin crew "The EP accepted to reintroduce the Commission proposals text with am 8, in combination with Article 11(1)- recognition of certificates- and Article 8(4) in the Common Position." This shows that the EP clearly asked for and voted on a full certification process of cabin crew and that Article 8 (e) of Regulation 216/2008 must be seen in combination with Article 11.

There is no doubt that the increasing activities of leasing aircrafts, mixed crews, alliances and the deregulation and liberalisation of European airlines emphasize the need for common standards and regulations. At present half of the EU countries enjoy certification or licensing of their cabin crews. The additional non harmonised requirements on training and medical fitness for cabin crew typically amount to between 50 and 100 pages. For the CFDT &ETF the NPA proposed texts on cabin crew has the potential to enhance the integrity of cabin crew on issues related to safety, security and survivability through the official recognition of well trained safety professionals with common standards.

ETF refer to the aim of harmonised safety standards of a high level and harmonising Member State (MS) legislation for cabin crew in Regulation 1899/2006 Whereas (7) and ask that EASA assess if the new standards are high enough compared to MS CC certification/licensing. To substantiate this, in Article 1 paragraph 2, the Legislator state that the course towards further harmonisation of cabin crew training requirements and any other safety requirement as described in OPS 1.988 should be maintained.

A cabin crew attestation has the potential to harmonise MS rules on cabin crew certification or licensing and ensure their uniform application. ETF furthermore shows to Regulation 216/2008 Article 8 point 5 and 5(e) and point 6 and finally ER 7.b. of the same regulation.

comment

355

comment by: *fédération des transports CGT, membre de ETF*

CGT member of ETF ask for the modifications of the following parts : CC.CCA 100 , CC CCA 105, CC CCA 110, and CC.TRA.115, CC TRA 125

in order to take account of the following demands:

- **initial training and the attestation should only include GENERAL training and not type-training**
- the initial safety training course and the associated examination **are acquired definitively**
- The initial safety training attestation is extended by additional trainings and checkings (general , aircraft type type -specific , recurrent) , this part of attestation can only be subject to suspension or limitation (no revocation)
- a number of hours must be fixed for the initial training , minimum 135h

CGT comment :

the parts CC CCA 100, 105, 110, and CC TRA 125 does not present clearly the relation between the initial certificate and the aircraft type specific training : for CGT it seems that the attestation comprises both initial training and aircraft-type specific

In France, we have an initial CERTIFICATE which has been adapted to EU-OPS annexe III subpart O (Arrêté du 25 septembre 2007) . This **certificate is definitive** , qualifies cabin crew to work and **only holds the GENERAL training** . Afterwards , after being qualify as trained crew , cabin crew go through the TYPE/VARIANT training .

If the type and recurrent trainings and checkings are completely linked (indissociable) to the attestation , in case of failing type training or recurrent training , cabin crew may lose everything despite having succeeded the general trainings.

Also, how can a Cabin crew with an attestation showing its qualifications on Tupolev , Ilouchine etc.. can apply to a company where there are only Airbus or boeing ?

further garanties on organisation or operators approval :

- All the training organisations or operators who are in charge of all trainings **must be approved** by the Authority on procedures that has to be determined through this regulation in part AR
- all the instructors and examiners must **be qualified and approved by the Authority** on procedures that has to be determined through this regulation in part AR
- The conduct of the examination after completion of the initial safety training course by personnel **that is independent from the personnel that conducted the training course;**

limitations , suspension , revocation

- **No revocation on cabin crew attestation for non compliance with part CC or the applicable par OR reasons (see our comments on**

part AR 215)

- all attestations must be **delivered , suspended or li mited by the Authority only**
- for cases of limitation and suspension of attestation National Authorities should establish a committee of defense of workers with equal representation of all sides (workers, employers and Authorities would have a seat and decide)

CGT commentaire :

How could the holder not comply with the requirements" if he had all trainings and examinations, all done by approved training centres? If the holder does not comply it is probably because the trainings have not been of not good quality, suspension or limitation would allow rectifying the situation and force organisations to provide proper trainings/controls as well as holder to adjust its acknowledgment, human factors have to be developed to keep the level of safety and security competencies for each cabin crew member all along its carrier. This will add real value to the safety of aviation.
See also our comment on 2009-2d partAR CC 215

comment 383

comment by: *Flybe*

The attestation seems to be nothing more than a Licence to operate as cabin crew. This is not required as crew have been policed for years in an efficient manner without the need for additional and unnecessary red tape.

comment 620

comment by: *Ryanair*

Comment

The development of the Attestation from its existing staus and function is an attempt to escalate this document to the status of a Licence. In all these matters where agendas are being pursued by interests the question must be asked is: what will this do to improve safety?

This requirement will impose another layer of costly administration to an Operator. Small changes have beens suggested to the training syllabi (which would/could have been introduced anyway) but the development of attestation as proposed the will not change the day to day function of a cabin crew member one bit.

Proposal

Existing Cabin Crew Attestation status and function is not changed.

E. VIII. Draft Opinion Part-CC - Subpart CCA - CC.CCA.100 Cabin crew attestation

p. 5

comment 100

comment by: *CAA-NL**Comment CAA-NL:*

CAA-NL is not in favor of the issuing of a cabin crew attestation. The value of this attestation is not clear. The CAA-NL requests EASA to remove this

requirement.

comment

109

comment by: *Thomas Cook Airlines UK*

Paragraph CC.CCA100 Cabin crew attestation

Comment:

The meaning of a cabin crew attestation needs to be clarified. There is no evidence that a medical examination will in anyway enhance flight safety even for single cabin crew operations. Almost all cabin crew incapacity is of acute onset and would never be detected or anticipated by a routine medical examination. The arrangements under EU OPS 1 are sufficient for the medical assessment of cabin crew. Medical assessments should be based on best Occupational Health practice as detailed by the UK Faculty of Occupational Medicine. Regular safety training for Cabin Crew is sufficient to demonstrate that they can safely perform their duties.

In a cost-benefit analysis if safety can be improved by increasing costs then these extra costs can be justified, but if increasing costs does not enhance flight safety then this may prove to lower standards of flight safety with potential serious consequences. With the system proposed in this NPA there is a significant risk that a mandatory, bureaucratic and expensive system of regular cabin crew medical examinations will transfer scarce resources away from flight safety. Such a system, rather than enhancing flight safety may increase risk and jeopardise the already high standards of flight safety operated by European Airlines.

Justification:

There is no documented evidence in any accident safety report or scientific study that has shown any evidence that flight safety has ever been compromised as a result of cabin crew incapacity. The introduction of a system of regular cabin crew medical examinations cannot be justified as there is NO evidence that such a system will enhance flight safety standards.

Proposed text:

(a) A cabin crew attestation shall only be issued to an applicant after the successful completion of:

(1) either an initial medical examination or by means of a medical assessment using an approved health questionnaire. This assessment shall be conducted in accordance with a risk assessment based on best Occupational Health practice.
an initial safety training course and the associated examination in accordance with this Part.

comment

133

comment by: *bmi*

Para. CC.CCA100 Cabin Crew Attestation.

Comment: Attestation needs to be defined.

Justification: clarity

Proposed text: add definition of 'attestation' to CC.GEN.010 Definition.

Comment: Almost all cabin crew incapacitation is acute onset conditions not

able to predicted by previous medical. The is no evidence to support medical examination of cabin crew will improve safety.

Justification: no evidence in search of medical literature that medical examination is necessary for cabin crew.

Proposed text: (a) (1) either an initial medical examination or by means of an approved health questionnaire, in accordance with best occupational health practice.

comment 147

comment by: *ETF*

Attachment [#1](#)

CC.CCA. General comment:

In COM(2005) 578 of 2005 the Commission expressed that it is time to end the inconsistency that "while aircraft now enjoy complete freedom within a unified market, safety standards continue to vary between Member States." In this respect the legislator in Regulation 216/2008 acknowledge that cabin crews standards were not harmonised, taking into account that half of Europe certifies or license their cabin crews. In its explanation and recommendation leading to the above regulation the EP stated on cabin crew "The EP accepted to reintroduce the Commission proposals text with am 8, in combination with Article 11(1)- recognition of certificates- and Article 8(4) in the Common Position." This shows that the EP clearly asked for and voted on a full certification process of cabin crew and that Article 8 (e) of Regulation 216/2008 must be seen in combination with Article 11.

There is no doubt that the increasing activities of leasing aircrafts, mixed crews, alliances and the deregulation and liberalisation of European airlines emphasize the need for common standards and regulations. At present half of the EU countries enjoy certification or licensing of their cabin crews. The additional non harmonised requirements on training and medical fitness for cabin crew typically amount to between 50 and 100 pages. For ETF the NPA proposed texts on cabin crew has the potential to enhance the integrity of cabin crew on issues related to safety, security and survivability through the official recognition of well trained safety professionals with common standards.

ETF refer to the aim of harmonised safety standards of a high level and harmonising Member State (MS) legislation for cabin crew in Regulation 1899/2006 Whereas (7) and ask that EASA assess if the new standards are high enough compared to MS CC certification/licensing. To substantiate this, in Article 1 paragraph 2, the Legislator state that the course towards further harmonisation of cabin crew training requirements and any other safety requirement as described in OPS 1.988 should be maintained.

A cabin crew attestation has the potential to harmonise MS rules on cabin crew certification or licensing and ensure their uniform application. ETF furthermore shows to Regulation 216/2008 Article 8 point 5 and 5(e) and point 6 and finally ER 7.b. of the same regulation.

See also the attached ETF position paper.

CC.CCA.100 (a)

Comment: The text connects certification to medical fitness of cabin crew. The ETF is satisfied that this will define a minimum standard for first time applicants that will be helpful in refocusing on the safety role of cabin crew during recruitment. It will also address the physical and mental potential

compatible with emergency actions and safety duties of cabin crew. Furthermore it will be a first step to harmonise the additional training and fitness requirements tied to current licensing and certification of cabin crew in half of the EU countries. The new standards will outline how and why the CC(s) need to be fit.

Delete last part: **(b)** A cabin crew attestation shall be issued by the competent authority, or on its behalf, by:

~~(1) the operator specifically approved to do so in accordance with PartOR, or~~

~~(2) the training organisation specifically approved to do so in accordance with the applicable national requirements,~~

Reason: ETF is not satisfied that the attestation may be issued by the operator; it should be issued directly by the national authorities.

(c)

Comment: A list of aircraft types that cabin crew are proficient on is not enough and will not give a certification status to the attestation as type training still is under the operator. EASA should evaluate different alternatives. A personal attestation will ease the work and check of the training centres, operators, authorities and inspectors.

comment

160

comment by: *claire.amos*

cc.cca.100 (c)

Clarification required: What is the value of crew carrying their attestation? Full details of their qualifications are held on AIMS and can be accessed 365 days.

Operational impact: crew forget to bring their attestation to work has no impact on the safe operation of the flt but will cause a delay.

comment

172

comment by: *UKAMAC*

Comment:

There is no evidence that incapacitation of cabin crew from causes that could be anticipated by medical examination have lead to adverse outcomes in commercial airline incidents or accidents. We know of no internationally-accredited flight safety database or peer-reviewed publication that provides such evidence. A medical history is much more valuable than an examination in predicting risk.

Justification:

ICAO does not mandate this level of surveillance of cabin crew. The FAA does not mandate it. This regulatory burden would fall uniquely on European operators.

A requirement for medical examination could not satisfy regulatory impact assessment. No unmet safety need has been identified to justify this additional regulatory burden. It would be a costly exercise with no prospect of adding safety margin.

Proposed text:

CC.CCA.100 Cabin crew attestation

(a) A cab in crew attes tation shall only be is sued to a n applica nt after the successful completion of:

(1) an initial medical assessment in accordance with PartMED; and

(2) an in itial safety training co urse and the associa ted exami nation i n accordance with this Part.

comment 220 comment by: *SCCA/ head of health and safety*

100 (a) Supported.

Reason: The text connects certification to medical fitness of cabin crew. This will give a minimum standard that will be helpful in refocusing on the safety role of cabin crew during recruitment.

(b) Delete last part: A cabin crew attestation shall be issued by the competent authority, ~~or on its behalf, by:~~

~~(1) the operator specifically approved to do so in accordance with Part OR, or
(2) the training organisation specifically approved to do so in accordance with the applicable national requirements,~~

Reason: The attestation should be issued directly by the national authorities a demand.

c) Supported.

A personal attestation will ease the work and check of the training centers, operators, authorities and inspectors.

comment 223 comment by: *UK CAA*

Paragraph No: CC.CCA.100 (a) (1) Cabin crew attestation

Comment:

The phrase "examination and" should be deleted, as the word assessment covers any evaluation that may be necessary. Medical history may be sufficient for a medical assessment of fitness to be made.

Justification: The word "assessment" is used in ICAO Annex 1 for other types of medical requirement (though it is notable that ICAO Annex 1 does not contain medical requirements for cabin crew).

Proposed Text (if applicable):

Amend to: "the initial medical assessment in accordance".

comment 224 comment by: *UK CAA*

Paragraph No: CC.CCA.100 - (c)

Comment: New requirement for attestation and list of aircraft types to be carried by the cabin crew member.

Justification: This is a new requirement and there does not appear to be any justification for this in the Explanatory Note. It is also not clear as to what action would be taken if the crew member was not in possession of these documents. Would it be checked on SAFA's? Would it ground the crew member if they were not in possession of the documents? If the carriage of such non-ICAO documents has any safety benefit, will Third Country Operators flying into the Community have to carry them?

Proposed Text (if applicable): Clarification required as to purpose and intent of this new requirement which goes beyond ICAO SARPs and the EASA Basic Regulation.

comment 240 comment by: *Unionen/Sweden*

CC.CCA.100 (a) Supported.
Reason: The text connects certification to medical fitness of cabin crew. This will give a minimum standard that will be helpful in refocusing on the safety role of cabin crew during recruitment.

(b) Delete last part: A cabin crew attestation shall be issued by the competent authority, ~~or on its behalf, by:~~
~~(1) the operator specifically approved to do so in accordance with Part OR, or~~
~~(2) the training organisation specifically approved to do so in accordance with the applicable national requirements;~~
Reason: ETF is not satisfied that the attestation may be issued by the operator; it should be issued directly by the national authorities.

(c) Supported.
A personal attestation will ease the work and check of the training centers, operators, authorities and inspectors.

comment 246 comment by: *Jill Pelan*

CC.CCA.100

(a) The CFDT France asks for this to be in agreement with an initial safety training course and the associated examination in accordance with..... and CC TRA 120

The text connects certification to medical fitness of cabin crew. This will give a minimum standard that will be helpful in refocusing on the safety role of cabin crew during recruitment.

(b) Delete last part: A cabin crew attestation shall be issued by the competent authority, ~~or on its behalf, by:~~
~~(1) the operator specifically approved to do so in accordance with Part OR~~
~~(2) the training organisation specifically approved to do so in accordance with the applicable national requirements;~~
The CFDT France & ETF is not satisfied that the attestation may be issued by the operator; it should be issued directly by the national authorities.

comment 258 comment by: *The TUI Airlines group represented by Thomson Airways, TUIfly, TUIfly Nordic, CorsairFly, Arkefly, Jet4U, JetairFly*

CC.CCA 100 Cabin Crew Attestations

General Comment:

- The NPA proposals are not evidence based.
- There are no ICAO SARPS relating to Cabin Crew (CC) medical requirements.
- The FAA has no medical requirements for CC.
- There are no UK CAA MOR reports that have shown that CC health affected flight safety.
- There are no reported cases of CC incapacitation affecting flight safety. (Refer to the IATA CC Safety Conference, Geneva, 2008).
- Diversions rarely occur because of CC incapacitation, but these are operational concerns not flight safety ones.
- The pragmatic approach of EU Ops should be incorporated into EASA Ops whereby the Implementing Rules (which effectively cannot be changed) should

state general guidance and the Acceptable Means of Compliance (AMC) should have the detail which can be changed as medical knowledge progresses.

- Most CC incapacitation is unpredictable e.g. Gastroenteritis, fainting or accident and would not be picked up at a routine medical examination.
- Even in an evacuation situation there is built in redundancy of CC numbers.
- In single CC flights following a sudden CC incapacity, the flight crew would take over direction of the passengers.

• Risk analysis does not seem to have been fully appreciated:

1. The effect of two small risks e.g. Sudden CC incapacity (say 1%) and emergency evacuation (say 1%) is not additive and to equal 2%.
2. The resultant risk is a multiple and is incredibly small e.g. $=1\% \times 1\% = 0.01\%$.

• Best Aeromedical Practice:

1. Should be directed to medical assessments or examinations that have a yield i.e. how good is the sensitivity of the tool to pick up disease or to prove that there is no disease in an individual.
2. Medicals should be cost effective, otherwise by committing huge resources to CC medicals might drain resources from elsewhere which really could affect flight safety.
3. There is no evidence that the proposed medical examinations will improve flight safety by picking up more information than could be got from a self declaration questionnaire or by a General Medical Practitioner's report.
4. Fearful CC may not divulge significant medical histories which might compromise good occupational health.
5. Some CC might be tempted to get unreasonable treatments to get round the rules, which is not good occupational health practice.

Proposal:

Cabin crew attestation shall only be issued to an applicant after the successful completion of:

- (1) An initial medical examination or by an approved medical questionnaire which maybe either completed by the applicant or by the applicants General Medical Practitioner.
- (2) An initial safety training course and the associated examination in accordance with this part.

CC.CCA 100 Cabin Crew Attestations

(c)

Comment:

- Would the regulations ground a crew member if their bag was stolen containing their attestation?
- Would the aircraft be grounded if the crew went below the minimum requirement?
- Would a non EU operator whose NAA did not require a CC Attestation be grounded -would this and other Operators be considered unsafe?

All crew currency details are contained within a computer rostering system.

Safety would not be enhanced by carrying an attestation.

Proposal: Remove the need to carry.

comment

272

comment by: AEA

Relevant text:

(a) A Cabin Crew attestation shall only be issued to an applicant after

successful completion of:

- (1) The initial medical examination and assessment in accordance with Part-MED; and*
- (2) An initial safety training course and the associated examination in accordance with this Part*

Comment:

This goes far beyond the intentions of the EU legislator and EU-OPS; There should be no requirement for a medical examination since the basic EASA regulation refers to an assessment (not examination) which is in line with the medical fitness requirements of EU-OPS. A detailed medical examination would lead to unjustified cost, which have no safety justification (see AEA comments to Part-MED). Article 8.4 of the basic EASA regulation (216/2008) clearly states that cabin crew involved in commercial operations shall hold an attestation as initially set out in Annex III, Subpart O, point (d) of OPS 1.1005 as set out in Regulation (EC) No 1899/2006. This confirms the intentions of the EU legislator that the attestation of cabin crew should be identical to the requirements of EU-OPS. The attestation of cabin crew should therefore remain limited to a attestation for initial safety training. The AEA urges EASA to stick to its safety role and to stop inventing new requirements which conflicts with article 8.4 of the basic EASA regulation

Proposal:

Realign with Subpart O of EU-OPS (EU-OPS 1.1005). Replace (a) with 'A cabin crew attestation for initial safety training shall only be issued to an applicant after successful completion of an initial safety training course

comment

273

comment by: AEA

Relevant Text:

c) Holders of a cabin crew attestation shall carry it when exercising their privileges together with the list of aircraft type(s) they are proficient to operate on

Comment:

This goes beyond the requirements of Subpart O of EU-OPS.

A list as mentioned in the article is unfeasible and an administrative burden.

It could lead to cancelled flights (and associated cost) if the cabin crew has lost or forgotten his/her attestation.

Paperwork does not provide safety. What is important is the quality of the training. Checking the quality of the training is the responsibility of the NAA that has issued the AOC of the operator. If the NAA is not capable of doing proper safety oversight than the attestation will not say anything about the quality of cabin crew training provided. Relevant information on individual cabin crew is available in the training records which can be accessed by the competent authority in case of doubts.

Proposal:

Delete c) (requirements for cabin crew to carry their attestation)

comment

281

comment by: AEA

Relevant Text:

(a) A cabin crew attestation shall only be issued to an applicant after the successful completion of:

- (1) the initial medical examination and assessment in accordance with PartMED;*

Comment:

Where are the medical requirements for CC in Part MED? See NPA 2009-02e

Proposal:

Refer to exact location in Part Med

comment

290

comment by: *Thomas Cook Airlines***Justification:**

What addition to safety standards would be achieved by a crew member carrying their attestation and list of aircraft types - this information is monitored by other processes

Proposal:

Remove the requirement that the attestation and list of aircraft types are to be carried

comment

362

comment by: *Walter Gessky***CC.CCA.100 Cabin crew attestation****Delete (a)(1):**

(a) A cabin crew attestation shall only be issued to an applicant after the successful

completion of:

(1) ~~the initial medical examination and assessment in accordance with PartMED; and~~

Justification:

This reference shall be deleted because the medical shall not be link with the attestation that initial safety training was successfully completed. This is not in line with EU-OPS and will not be supported.

Change the following in (c):

(c) ~~Holders of a cabin crew attestation shall carry it when exercising their privileges together with the list of aircraft type(s) they are proficient to operate on.~~

Justification:

This point shall be deleted, because not required by EU-OPS and without any value. The attestation is only an attest for initial training and does not grant any privileges itself. (EU-OPS)

comment

373

comment by: *kapers Cabin Crew Union***Attachment [#2](#)****CC.CCA. General comment:**

In COM(2005) 578 of 2005 the Commission expressed that it is time to end the inconsistency that "while aircraft now enjoy complete freedom within a unified market, safety standards continue to vary between Member States." In this respect the legislator in Regulation 216/2008 acknowledge that cabin crews standards were not harmonised, taking into account that half of Europe certifies or license their cabin crews. In its explanation and recommendation leading to the above regulation the EP stated on cabin crew "The EP accepted to reintroduce the Commission proposals text with am 8, in combination with Article 11(1)- recognition of certificates- and Article 8(4) in the Common Position." This shows that the EP clearly asked for and voted on a full certification process of cabin crew and that Article 8 (e) of Regulation 216/2008 must be seen in combination with Article 11.

There is no doubt that the increasing activities of leasing aircrafts, mixed

crews, alliances and the deregulation and liberalisation of European airlines emphasize the need for common standards and regulations. At present half of the EU countries enjoy certification or licensing of their cabin crews. The additional non harmonised requirements on training and medical fitness for cabin crew typically amount to between 50 and 100 pages. For kapers the NPA proposed texts on cabin crew has the potential to enhance the integrity of cabin crew on issues related to safety, security and survivability through the official recognition of well trained safety professionals with common standards.

kapers refers to the aim of harmonised safety standards of a high level and harmonising Member State (MS) legislation for cabin crew in Regulation 1899/2006 Whereas (7) and ask that EASA assess if the new standards are high enough compared to MS CC certification/licensing. To substantiate this, in Article 1 paragraph 2, the Legislator state that the course towards further harmonisation of cabin crew training requirements and any other safety requirement as described in OPS 1.988 should be maintained.

A cabin crew attestation has the potential to harmonise MS rules on cabin crew certification or licensing and ensure their uniform application. kapers furthermore shows to Regulation 216/2008 Article 8 point 5 and 5(e) and point 6 and finally ER 7.b. of the same regulation.

See also the attached ETF position paper.

CC.CCA.100 (a)

Comment: The text connects certification to medical fitness of cabin crew. The ETF is satisfied that this will define a minimum standard for first time applicants that will be helpful in refocusing on the safety role of cabin crew during recruitment. It will also address the physical and mental potential compatible with emergency actions and safety duties of cabin crew. Furthermore it will be a first step to harmonise the additional training and fitness requirements tied to current licensing and certification of cabin crew in half of the EU countries. The new standards will outline how and why the CC(s) need to be fit.

Delete last part: **(b)** A cabin crew attestation shall be issued by the competent authority, ~~or on its behalf, by:~~

~~(1) the operator specifically approved to do so in accordance with PartOR,~~

~~or~~

~~(2) the training organisation specifically approved to do so in accordance with the applicable national requirements,~~

Reason: kapers is not satisfied that the attestation may be issued by the operator; it should be issued directly by the national authorities.

(c)

Comment: It would be more logic that the aircraft types are listed on the cabin crew attestation. A personal attestation will ease the work and check of the training centres, operators, authorities and inspectors.

comment

393

comment by: *AUSTRIAN Airlines*

Relevant text:

(a) A Cabin Crew attestation shall only be issued to an applicant after successful completion of:

- (1) *The initial medical examination and assessment in accordance with Part-MED; and*
 (2) *An initial safety training course and the associated examination in accordance with this Part*

Comment:

This goes far beyond the intentions of the EU legislator and EU-OPS; There should be no requirement for a medical examination since the basic EASA regulation refers to an assessment (not examination) which is in line with the medical fitness requirements of EU-OPS. A detailed medical examination would lead to unjustified cost, which have no safety justification (see AUSTRIAN comments to Part-MED). Article 8.4 of the basic EASA regulation (216/2008) clearly states that cabin crew involved in commercial operations shall hold an attestation as initially set out in Annex III, Subpart O, point (d) of OPS 1.1005 as set out in Regulation (EC) No 1899/2006. This confirms the intentions of the EU legislator that the attestation of cabin crew should be identical to the requirements of EU-OPS. The attestation of cabin crew should therefore remain limited to a attestation for initial safety training. AUSTRIAN urges EASA to stick to its safety role and to stop inventing new requirements which conflicts with article 8.4 of the basic EASA regulation

Proposal:

Realign with Subpart O of EU-OPS (EU-OPS 1.1005). Replace (a) with 'A cabin crew attestation for initial safety training shall only be issued to an applicant after successful completion of an initial safety training course

comment

394

comment by: AUSTRIAN Airlines

Relevant Text:

c) Holders of a cabin crew attestation shall carry it when exercising their privileges together with the list of aircraft type(s) they are proficient to operate on

Comment:

This goes beyond the requirements of Subpart O of EU-OPS.

A list as mentioned in the article is unfeasible and an administrative burden.

It could lead to cancelled flights (and associated cost) if the cabin crew has lost or forgotten his/her attestation.

Paperwork does not provide safety. What is important is the quality of the training. Checking the quality of the training is the responsibility of the NAA that has issued the AOC of the operator. If the NAA is not capable of doing proper safety oversight than the attestation will not say anything about the quality of cabin crew training provided. Relevant information on individual cabin crew is available in the training records which can be accessed by the competent authority in case of doubts.

Proposal:

Delete c) (requirements for cabin crew to carry their attestation)

comment

395

comment by: AUSTRIAN Airlines

Relevant Text:

(a) A cabin crew attestation shall only be issued to an applicant after the successful completion of:

(1) the initial medical examination and assessment in accordance with PartMED;

Comment:

Where are the medical requirements for CC in Part MED? See NPA 2009-02e

Proposal:

Refer to exact location in Part Med

comment

450

comment by: *Elaine Allan Monarch*

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Ref No. NPA 2009 - 2e CC.CCA.100 (c)

Summary of EASA Proposed Requirement:

Holders of the Cabin Crew attestation shall carry it when exercising their privileges **together** with the list of aircraft type(s) they are proficient on

Comment:

If cabin crewmembers do not have their attestation with them will they not be able to operate. Is the list of aircraft types a separate document. If so is the cabin crewmember required to carry both.

Justification:

What benefit is there from a safety standpoint for a crewmember carrying an attestation. As operators hold copies of attestations on cabin crew files it seems an unnecessary exercise.

Proposed Text (if applicable)

Remove the requirement for the attestation and list of aircraft types to be carried

comment

477

comment by: *KLM*

Relevant text:

(a) A Cabin Crew attestation shall only be issued to an applicant after successful completion of:

(1) The initial medical examination and assessment in accordance with Part-MED; and

(2) An initial safety training course and the associated examination in accordance with this Part

Comment:

This goes far beyond the intentions of the EU legislator and EU-OPS; There should be no requirement for a medical examination since the basic EASA regulation refers to an assessment (not examination) which is in line with the medical fitness requirements of EU-OPS. A detailed medical examination would lead to unjustified cost, which have no safety justification (see AEA comments to Part-MED). Article 8.4 of the basic EASA regulation (216/2008) clearly states that cabin crew involved in commercial operations shall hold an attestation as initially set out in Annex III, Subpart O, point (d) of OPS 1.1005 as set out in Regulation (EC) No 1899/2006. This confirms the intentions of the EU legislator that the attestation of cabin crew should be identical to the requirements of EU-OPS. The attestation of cabin crew should therefore remain limited to a attestation for initial safety training. KLM urges EASA to stick to its safety role and to stop inventing new requirements which conflicts with article 8.4 of the basic EASA regulation

Proposal:

Realign with Subpart O of EU-OPS (EU-OPS 1.1005). Replace (a) with 'A cabin crew attestation for initial safety training shall only be issued to an applicant after successful completion of an initial safety training course

comment 478

comment by: KLM

Relevant Text:

c) Holders of a cabin crew attestation shall carry it when exercising their privileges together with the list of aircraft type(s) they are proficient to operate on

Comment:

This goes beyond the requirements of Subpart O of EU-OPS.

A list as mentioned in the article is unfeasible and an administrative burden.

It could lead to cancelled flights (and associated cost) if the cabin crew has lost or forgotten his/her attestation.

Paperwork does not provide safety. What is important is the quality of the training. Checking the quality of the training is the responsibility of the NAA that has issued the AOC of the operator. If the NAA is not capable of doing proper safety oversight than the attestation will not say anything about the quality of cabin crew training provided. Relevant information on individual cabin crew is available in the training records which can be accessed by the competent authority in case of doubts.

Proposal:

Delete c) (requirements for cabin crew to carry their attestation)

comment 479

comment by: KLM

Relevant Text:

(a) A cabin crew attestation shall only be issued to an applicant after the successful completion of:

(1) the initial medical examination and assessment in accordance with PartMED;

Comment:

Where are the medical requirements for CC in Part MED? See NPA 2009-02e

Proposal:

Refer to exact location in Part Med

comment 552

comment by: Deutsche Lufthansa AG

Relevant text:

(a) A Cabin Crew attestation shall only be issued to an applicant after successful completion of:

(1) The initial medical examination and assessment in accordance with Part-MED; and

(2) An initial safety training course and the associated examination in accordance with this Part

Comment:

This goes far beyond the intentions of the EU legislator and EU-OPS; There should be no requirement for a medical examination since the basic EASA regulation refers to an assessment (not examination) which is in line with the medical fitness requirements of EU-OPS. A detailed medical examination would lead to unjustified cost, which have no safety justification (see Lufthansa comments to Part-MED). Article 8.4 of the basic EASA regulation (216/2008) clearly states that cabin crew involved in commercial operations shall hold an attestation as initially set out in Annex III, Subpart O, point (d) of OPS 1.1005 as set out in Regulation (EC) No 1899/2006. This confirms the intentions of the EU legislator that the attestation of cabin crew should be identical to the requirements of EU-OPS. The attestation of cabin crew should therefore remain limited to a attestation for initial safety training. Lufthansa urges EASA to stick

to its safety role and to stop inventing new requirements which conflicts with article 8.4 of the basic EASA regulation

Proposal:

Realign with Subpart O of EU-OPS (EU-OPS 1.1005). Replace (a) with 'A cabin crew attestation for initial safety training shall only be issued to an applicant after successful completion of an initial safety training course

comment 553

comment by: *Deutsche Lufthansa AG*

Relevant Text:

c) Holders of a cabin crew attestation shall carry it when exercising their privileges together with the list of aircraft type(s) they are proficient to operate on

Comment:

This goes beyond the requirements of Subpart O of EU-OPS.

A list as mentioned in the article is unfeasible and an administrative burden.

It could lead to cancelled flights (and associated cost) if the cabin crew has lost or forgotten his/her attestation.

Paperwork does not provide safety. What is important is the quality of the training. Checking the quality of the training is the responsibility of the NAA that has issued the AOC of the operator. If the NAA is not capable of doing proper safety oversight than the attestation will not say anything about the quality of cabin crew training provided. Relevant information on individual cabin crew is available in the training records which can be accessed by the competent authority in case of doubts.

Proposal:

Delete c) (requirements for cabin crew to carry their attestation)

comment 554

comment by: *Deutsche Lufthansa AG*

Relevant Text:

(a) A cabin crew attestation shall only be issued to an applicant after the successful completion of:

(1) the initial medical examination and assessment in accordance with PartMED;

Comment:

Where are the medical requirements for CC in Part MED? See NPA 2009-02e

Proposal:

Refer to exact location in Part Med

comment 615

comment by: *Finnish CAA*

Paragraph No: CC.CCA.100 (c)

Comment:

It has not been determined who are authorized to provide the type and company specific training and to issue a list of aircraft type(s) the cabin crew are proficient to operate on. The format of the attestation of initial training has been determined. Should the format of the list of aircraft type validation(s) also be standardized? Alternatively, should the type ratings be included in the attestation?

comment 632

comment by: *British Airways Flight Operations*

Relevant text:

(a) A Cabin Crew attestation shall only be issued to an applicant after successful completion of:

(1) The initial medical examination and assessment in accordance with Part-MED; and

(2) An initial safety training course and the associated examination in accordance with this Part

Comment:

This proposal far beyond the intentions of the EU legislator and EU-OPS; There should be no requirement for a medical examination since the basic EASA regulation refers to an assessment (not examination) which is in line with the medical fitness requirements of EU-OPS. A detailed medical examination would lead to unjustified cost, and would have no safety justification. Article 8.4 of the basic EASA regulation (216/2008) clearly states that cabin crew involved in commercial operations shall hold an attestation as initially set out in Annex III, Subpart O, sub-para (d) of OPS 1.1005 as defined in Regulation (EC) No 1899/2006 (ie EU Ops). This confirms the intention of the EU legislator that the attestation of cabin crew should be identical to the requirement from EU-OPS. The attestation of cabin crew should therefore remain limited to an attestation for initial safety training.

Proposal:

Realign with Subpart O of EU-OPS (EU-OPS 1.1005). Replace (a) with 'A cabin crew attestation for initial safety training shall only be issued to an applicant after successful completion of an initial safety training course.'

comment

633

comment by: *British Airways Flight Operations***Relevant Text:**

c) Holders of a cabin crew attestation shall carry it when exercising their privileges together with the list of aircraft type(s) they are proficient to operate on

Comment:

EASA appears to be inventing a cabin crew licence, which is unnecessary and unjustified.

Proposal:

Delete c) (requirements for cabin crew to carry their attestation)

General Comment:

NPA 2009-2 in its entirety is unfit for the purpose for which it is intended and must be withdrawn and reconsidered.

comment

653

comment by: *Swiss International Airlines / Bruno Pfister***Relevant text:**

(a) A Cabin Crew attestation shall only be issued to an applicant after successful completion of:

(1) The initial medical examination and assessment in accordance with Part-MED; and

(2) An initial safety training course and the associated examination in accordance with this Part

Comment:

This goes far beyond the intentions of the EU legislator and EU-OPS; There should be no requirement for a medical examination since the basic EASA regulation refers to an assessment (not examination) which is in line with the medical fitness requirements of EU-OPS. A detailed medical examination would lead to unjustified cost, which have no safety justification (see AEA comments

to Part-MED). Article 8.4 of the basic EASA regulation (216/2008) clearly states that cabin crew involved in commercial operations shall hold an attestation as initially set out in Annex III, Subpart O, point (d) of OPS 1.1005 as set out in Regulation (EC) No 1899/2006. This confirms the intentions of the EU legislator that the attestation of cabin crew should be identical to the requirements of EU-OPS. The attestation of cabin crew should therefore remain limited to a attestation for initial safety training. The AEA urges EASA to stick to its safety role and to stop inventing new requirements which conflicts with article 8.4 of the basic EASA regulation

Proposal:

Realign with Subpart O of EU-OPS (EU-OPS 1.1005). Replace (a) with 'A cabin crew attestation for initial safety training shall only be issued to an applicant after successful completion of an initial safety training course

comment 654

comment by: *Swiss International Airlines / Bruno Pfister*

Relevant Text:

c) Holders of a cabin crew attestation shall carry it when exercising their privileges together with the list of aircraft type(s) they are proficient to operate on

Comment:

This goes beyond the requirements of Subpart O of EU-OPS.

A list as mentioned in the article is unfeasible and an administrative burden.

It could lead to cancelled flights (and associated cost) if the cabin crew has lost or forgotten his/her attestation.

Paperwork does not provide safety. What is important is the quality of the training. Checking the quality of the training is the responsibility of the NAA that has issued the AOC of the operator. If the NAA is not capable of doing proper safety oversight than the attestation will not say anything about the quality of cabin crew training provided. Relevant information on individual cabin crew is available in the training records which can be accessed by the competent authority in case of doubts.

Proposal:

Delete c) (requirements for cabin crew to carry their attestation)

comment 655

comment by: *Swiss International Airlines / Bruno Pfister*

Relevant Text:

(a) A cabin crew attestation shall only be issued to an applicant after the successful completion of:

(1) the initial medical examination and assessment in accordance with PartMED;

Comment:

Where are the medical requirements for CC in Part MED? See NPA 2009-02e

Proposal:

Refer to exact location in Part Med

comment 725

comment by: *TAP Portugal*

Relevant text:

(a) A Cabin Crew attestation shall only be issued to an applicant after successful completion of:

(1) The initial medical examination and assessment in accordance with Part-MED; and

(2) *An initial safety training course and the associated examination in accordance with this Part*

Comment:

This goes far beyond the intentions of the EU legislator and EU-OPS; There should be no requirement for a medical examination since the basic EASA regulation refers to an assessment (not examination) which is in line with the medical fitness requirements of EU-OPS. A detailed medical examination would lead to unjustified cost, which have no safety justification (see AEA comments to Part-MED). Article 8.4 of the basic EASA regulation (216/2008) clearly states that cabin crew involved in commercial operations shall hold an attestation as initially set out in Annex III, Subpart O, point (d) of OPS 1.1005 as set out in Regulation (EC) No 1899/2006. This confirms the intentions of the EU legislator that the attestation of cabin crew should be identical to the requirements of EU-OPS. The attestation of cabin crew should therefore remain limited to a attestation for initial safety training. The AEA urges EASA to stick to its safety role and to stop inventing new requirements which conflicts with article 8.4 of the basic EASA regulation

Proposal:

Realign with Subpart O of EU-OPS (EU-OPS 1.1005). Replace (a) with 'A cabin crew attestation for initial safety training shall only be issued to an applicant after successful completion of an initial safety training course

comment

726

comment by: TAP Portugal

Relevant Text:

c) Holders of a cabin crew attestation shall carry it when exercising their privileges together with the list of aircraft type(s) they are proficient to operate on

Comment:

This goes beyond the requirements of Subpart O of EU-OPS.

A list as mentioned in the article is unfeasible and an administrative burden.

It could lead to cancelled flights (and associated cost) if the cabin crew has lost or forgotten his/her attestation.

Paperwork does not provide safety. What is important is the quality of the training. Checking the quality of the training is the responsibility of the NAA that has issued the AOC of the operator. If the NAA is not capable of doing proper safety oversight than the attestation will not say anything about the quality of cabin crew training provided. Relevant information on individual cabin crew is available in the training records which can be accessed by the competent authority in case of doubts.

Proposal:

Delete c) (requirements for cabin crew to carry their attestation)

comment

727

comment by: TAP Portugal

Relevant Text:

(a) A cabin crew attestation shall only be issued to an applicant after the successful completion of:

(1) the initial medical examination and assessment in accordance with PartMED;

Comment:

Where are the medical requirements for CC in Part MED? See NPA 2009-02e

Proposal:

Refer to exact location in Part Med

comment 786

comment by: UCC SLO

CC.CCA. General comment:

In COM(2005) 578 of 2005 the Commission expressed that it is time to end the inconsistency that "while aircraft now enjoy complete freedom within a unified market, safety standards continue to vary between Member States." In this respect the legislator in Regulation 216/2008 acknowledge that cabin crews standards were not harmonised, taking into account that half of Europe certifies or license their cabin crews. In its explanation and recommendation leading to the above regulation the EP stated on cabin crew "The EP accepted to reintroduce the Commission proposals text with am 8, in combination with Article 11(1)- recognition of certificates- and Article 8(4) in the Common Position." This shows that the EP clearly asked for and voted on a full certification process of cabin crew and that Article 8 (e) of Regulation 216/2008 must be seen in combination with Article 11.

There is no doubt that the increasing activities of leasing aircrafts, mixed crews, alliances and the deregulation and liberalisation of European airlines emphasize the need for common standards and regulations. At present half of the EU countries enjoy certification or licensing of their cabin crews. The additional non harmonised requirements on training and medical fitness for cabin crew typically amount to between 50 and 100 pages. For UCC SLO the NPA proposed texts on cabin crew has the potential to enhance the integrity of cabin crew on issues related to safety, security and survivability through the official recognition of well trained safety professionals with common standards.

UCC Slo refer to the aim of harmonised safety standards of a high level and harmonising Member State (MS) legislation for cabin crew in Regulation 1899/2006 Whereas (7) and ask that EASA assess if the new standards are high enough compared to MS CC certification/licensing. To substantiate this, in Article 1 paragraph 2, the Legislator state that the course towards further harmonisation of cabin crew training requirements and any other safety requirement as described in OPS 1.988 should be maintained.

A cabin crew attestation has the potential to harmonise MS rules on cabin crew certification or licensing and ensure their uniform application. UCC Slo furthermore shows to Regulation 216/2008 Article 8 point 5 and 5(e) and point 6 and finally ER 7.b. of the same regulation.

CC.CCA.100 (a)

Comment: The text connects certification to medical fitness of cabin crew. The UCC Slo is satisfied that this will define a minimum standard for first time applicants that will be helpful in refocusing on the safety role of cabin crew during recruitment. It will also address the physical and mental potential compatible with emergency actions and safety duties of cabin crew. Furthermore it will be a first step to harmonise the additional training and fitness requirements tied to current licensing and certification of cabin crew in half of the EU countries. The new standards will outline how and why the CC(s) need to be fit.

Delete last part: **(b)** A cabin crew attestation shall be issued by the competent authority, ~~or on its behalf, by:~~

~~(1) the operator specifically approved to do so in accordance with Part OR,~~
or

~~(2) the training organisation specifically approved to do so in accordance with the applicable national requirements,~~

Reason: UCC Slo is not satisfied that the attestation may be issued by the operator; it should be issued directly by the national authorities.

(c)

Comment: It would be more logic that the aircraft types are listed on the cabin crew attestation. A personal attestation will ease the work and check of the training centres, operators, authorities and inspectors.

comment 796

comment by: *Civil Aviation Authority of Norway*

Comment to (b)

The sentence "*that conducted the examination following the initial safety training course*" should be deleted, as it seems to be superfluous.

comment 797

comment by: *Civil Aviation Authority of Norway*

Comment to (c);

To require an holder of a cabin crew attestation to carry a list of aircraft type(s) they are proficient to operate on, will require the format of such a list to be standardised, in order to ensure mutual recognition of such "authorisations" between the operators and within the member states. As a part of such standardisation, it must be stated who are authorised to issue such a list, and the validity of the privileges related to the different aircraft types must be described.

In our opinion, a list of aircraft should be replaced by a "*Cabin Crew Member Licence*", issued by the operator on the basis of a cabin crew attestation, a valid medical assessment and a successfully performed operator's conversion course. The CCML would only be valid for performing duties at that particular operator, and in the event of changing operator; a new CCML would have to be issued by that operator. This system would enable the operators to remain fully responsible for the training, checking and medical assessment of the cabin crew member. The cabin crew attestation would then serve as a basic document with no privileges attached to it, and therefore there should be no need for limitation, suspension or revocation of this document. As the CCM licence would be the "living" evidence of competency, this licence would also be subject to a limitation, suspension or revocation process.

In order to issue a CCM Licence, the operator must be authorized by the competent Authority, in accordance with the requirements in Part OR and Part AR.

See also our comments on AR.CC.215 regarding this issue.

comment 801

comment by: *ERA*

[*European Regions Airline Association Comment*](#)

Reference:

Para (c) Holders of a cabin crew attestation shall carry it when exercising their privileges together with the list of aircraft type(s) they are proficient to operate on.

[EASA need to clarify whether it is talking about two documents or one \[Attestation with privileges and a separate with aircraft list\]. Examples of attestations do not show a section where aircraft types can be noted.](#)

comment

819

comment by: *cfdt france***CC.CCA.100**

(a) The CFDT France asks for this to be in agreement with an initial safety training course and the associated examination in accordance with..... and CC TRA 120

The text connects certification to medical fitness of cabin crew. This will give a minimum standard that will be helpful in refocusing on the safety role of cabin crew during recruitment.

(b) Delete last part: A cabin crew attestation shall be issued by the competent authority, ~~or on its behalf, by:~~

~~(1) the operator specifically approved to do so in accordance with Part OR(2) the training organisation specifically approved to do so in accordance with the applicable national requirements;~~

The CFDT France & ETF is not satisfied that the attestation may be issued by the operator; it should be issued directly by the national authorities.

(c)

A personal attestation will ease the work and checks by the training centers, operators, authorities and inspectors.

comment

834

comment by: *Lufthansa CityLine GmbH*

EASA need to clarify whether it is talking about two documents or one [Attestation with privileges and a separate with aircraft list]. Examples of attestations do not show a section where aircraft types can be noted.

comment

835

comment by: *AIR FRANCE*

Comment:

This is different from the EU-OPS. The delivery of the attestation of initial safety training is not conditioned by a medical examination which is a condition for exercising the cabin crew privileges dealt with by another paragraph of the IR (CC.CCA.105).

Article 8.4 of the basic EASA regulation (216/2008) states that cabin crew involved in commercial operations shall hold an attestation as initially set out in Annex III, Subpart O, point (d) of OPS 1.1005 as set out in Regulation (EC) No 1899/2006.

Proposal:

Realign with Subpart O of EU-OPS (EU-OPS 1.1005). Replace (a) with 'A cabin crew attestation for initial safety training shall only be issued to an applicant after successful completion of an initial safety training course

comment

836

comment by: *AIR FRANCE*

Comment:

This is not in line with the requirements of Subpart O of EU-OPS.

The mandatory carriage of the attestation by the cabin crew may lead to cancelled flights if the cabin crew has lost or forgotten his/her attestation. What is important is the quality of the training which is checked by the competent authority.

Relevant information on individual cabin crew is available in the training records which are accessible to the competent authority in case of doubt.

Proposal:

Delete c) (requirements for cabin crew to carry their attestation)

comment 852

comment by: FSC - CCOO

(b) A cabin crew attestation shall be issued by the competent authority, ~~or on its behalf, by:~~

~~(1) the operator specifically approved to do so in accordance with Part OR, or
(2) the training organisation specifically approved to do so in accordance with the applicable national requirements, that conducted the examination following the initial safety training course.~~

Reason:

In order to ensure fairness and objectivity in the process, only the competent authority should issue the cabin crew attestation.

ETF, on behalf of 100.000 cabin crew has demanded this for many years. Unfortunately there are some airlines and training organizations that will hand out a cabin crew attestation to who ever is willing to pay for it.

comment

856

comment by: Swedish Transport Agency, Civil Aviation Department
(Transportstyrelsen, Luftfartsavdelningen)

Paragraph text:

(b) A cabin crew attestation shall be issued by the competent authority, or on its behalf, by:

(1) the operator specifically approved to do so in accordance with Part OR, or
(2) the training organisation specifically approved to do so in accordance with the applicable national requirements

Comment:

The reference to Part OR seems to be wrong or a paragraph in Part OR with relevant requirements is missing. Relevant text can be found in Subpart CC.TRA.115 but is not exhaustive in this context.

Proposal:

Add a text in Part OR or Part CC regarding what requirements an organisation needs to comply with in order to obtain a special approval for issuing cabin crew attestations.

comment

878

comment by: IATA

(c) Holders of a cabin crew attestation shall carry it when exercising their privileges together with the list of aircraft type(s) they are proficient to operate on.

It is an addition to EU-OPS and administrative burden.

Proposal: Delete (c)

comment

888

comment by: Frank Ciupka

Too much bureaucracy, doesn't increase safety!

Proposal:

No carrying of CCA or list of aircraft type(s). The operator guarantees that only authorised qualified Cabin Crews are on duty and the appropriate documentations stored at the operator. For each flight the operator creates a crew list which is carried on board and identifies crew members. Each crew member has a company ID card with a photograph.

comment 899

comment by: *IACA International Air Carrier Association*

General Comment:

The NPA proposals are not evidence based.

There are no ICAO SARPS relating to Cabin Crew (CC) medical requirements.

The FAA has no medical requirements for CC.

There are no UK CAA MOR reports that have shown that CC health affected flight safety.

There are no reported cases of CC incapacitation affecting flight safety. (Refer to the IATA CC Safety Conference, Geneva, 2008).

Diversions rarely occur because of CC incapacitation, but these are operational concerns not flight safety ones.

The pragmatic approach of EU-OPS should be incorporated into EASA OPS whereby the Implementing Rules (which effectively cannot be changed) should state general guidance. The Acceptable Means of Compliance (AMC) should have the detail which can be changed as medical knowledge progresses.

Most CC incapacitation is unpredictable e.g. Gastroenteritis, fainting or accident and would not be picked up at a routine medical examination.

Even in an evacuation situation there is built in redundancy of CC numbers.

In single CC flights following a sudden CC incapacity, the flight crew would take over direction of the passengers.

comment 901

comment by: *IACA International Air Carrier Association*

Risk analysis does not seem to have been fully appreciated:

(1) The effect of two small risks e.g. Sudden CC incapacity (say 1%) and emergency evacuation (say 1%) is not additive and to equal 2%.

The resultant risk is a multiple and is incredibly small e.g. $=1\% \times 1\% = 0.01\%$.

comment 902

comment by: *IACA International Air Carrier Association*

Best Aeromedical Practice:

(1) Should be directed to medical assessments or examinations that have a yield i.e. how good is the sensitivity of the tool to pick up disease or to prove that there is no disease in an individual.

(2) Medicals should be cost effective, otherwise by committing huge resources to CC medicals might drain resources from elsewhere which really could affect flight safety.

(3) There is no evidence that the proposed medical examinations will improve flight safety by picking up more information than could be got from a self declaration questionnaire or by a General Medical Practitioner's report.

(4) Fearful CC may not divulge significant medical histories which might compromise good occupational health.

(5) Some CC might be tempted to get unreasonable treatments to get round the rules, which is not good occupational health practice.

Proposal:

Cabin crew attestation shall only be issued to an applicant after the successful completion of:

(1) An initial medical examination or by an approved medical questionnaire which maybe either completed by the applicant or by the applicants General Medical Practitioner.

An initial safety training course and the associated examination in accordance with this part.

comment 903

comment by: *IACA International Air Carrier Association*

Would the regulations ground a crew member if their bag was stolen containing their attestation ?

Would the aircraft be grounded if the crew went below the minimum requirement ?

Would a non EU operator whose NAA did not require a CC Attestation be grounded -would this and other Operators be considered unsafe ?

All crew currency details are contained within a computer rostering system. Safety would not be enhanced by carrying an attestation.

Proposal: remove the need to carry.

comment 939

comment by: *ANE (Air Nostrum) OPS QM*

Para (c) Holders of a cabin crew attestation shall carry it when exercising their privileges together with the list of aircraft type(s) they are proficient to operate on.

EASA need to clarify whether it is talking about two documents or one [Attestation with privileges and a separate with aircraft list]. Examples of attestations do not show a section where aircraft types can be noted.

E. VIII. Draft Opinion Part-CC - Subpart CCA - CC.CCA.105 Validity of the cabin crew attestation

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comment 148

comment by: *ETF*

CC.CCA.105 (a)

Comment: ETF supports the principle that medical fitness is part of the cabin crew proficiency. This principle should not be abused for dismissing cabin crew. The position of the Aeromedical Examiner is in fact to keep the crew member at work and to assist in facilitation when needed.

(b)

Comment: Just like in any other safety profession, cabin crew must meet training standards.

(c)

Comment: This rule has worked well over the years. Should cabin crew be absent from flying for more than 6 months they should pass a refresher training.

comment 183

comment by: *Airbus S.A.S.*

Typo error.
In the first line of CC.CCA.105 (c), replace "their privileges" with "his/her privileges".

comment 184 comment by: *Airbus S.A.S.*

CC.CCA.105 (c) states:
"has exercised their privileges within the preceding 6 months on at least one aircrafttype [...]"

A 6 months period, is considered to be too short.
Considering i.e. pregnancy, according to MED.E.040 a cabin crew will not exercise her privileges for at least 5 months, and the cabin crew attestation shall be suspended until full recovery following the end of the pregnancy.
A considerable percentage of pregnancies would result in expiration of validity for the cabin crew attestation.

comment 221 comment by: *SCCA/ head of health and safety*

CC.CCA.105 (a) Supported.

Reason: I supports the principle that medical fitness is part of the cabin crew proficiency. This principle should not be abused for dismissing cabin crew. The position of the Aeromedical Examiner is in fact to keep the crew member at work and to assist in facilitation when needed.

(b) Supported.

Reason: Just like in any other safety profession, cabin crew must meet training standards.

(c) Supported.

Reason: This is in accordance with current regulation. Should cabin crew be absent from flying for more than 6 months they should pass a refresher training.

comment 241 comment by: *Unionen/Sweden*

CC.CCA.105 (a) Supported.

Reason: ETF supports the principle that medical fitness is part of the cabin crew proficiency. This principle should not be abused for dismissing cabin crew. The position of the Aeromedical Examiner is in fact to keep the crew member at work and to assist in facilitation when needed.

(b) Supported.

Reason: Just like in any other safety profession, cabin crew must meet training standards.

(c) Supported.

Reason: This is in accordance with current regulation. Should cabin crew be absent from flying for more than 6 months they should pass a refresher training.

comment 274 comment by: *AEA*

Relevant Text:

The Cabin crew attestation shall remain valid as long as the holder

a) Complies with the requirements for medical fitness of cabin crew specified in Part-MED

b) Complies with the training requirements specified in this Part; and

c) *Has exercised their privileges in the preceding 6 months on at least one aircraft type or has undergone the appropriate training course on the type in accordance with this Part and with Part-OR as relevant*

Comment:

This goes far beyond the intentions of the EU legislator and EU-OPS; There should be no requirement for a medical examination since the basic EASA regulation refers to an assessment (not examination) which is in line with the medical fitness requirements of EU-OPS. A detailed medical examination would lead to unjustified cost, which have no safety justification (see AEA comments to Part-MED). Article 8.4 of the basic EASA regulation (216/2008) clearly states that cabin crew involved in commercial operations shall hold an attestation as initially set out in Annex III, Subpart O, point (d) of OPS 1.1005 as set out in Regulation (EC) No 1899/2006. This confirms the intentions of the EU legislator that the attestation of cabin crew should be identical to the requirements of EU-OPS. The attestation of cabin crew should therefore remain limited to a attestation for initial safety training with unlimited validity. The AEA urges EASA to stick to its safety role and to stop inventing new requirements which conflicts with article 8.4 of the basic EASA regulation

Proposal:

Delete the entire paragraph and replace it with

CC.CCA.105 Conditions to exercise as Cabin Crew Member

'To exercise as cabin crew member in a transport aircraft the cabin crew member must:

- *Hold an attestation for initial safety training*
- *Has passed a medical examination or assessment at regular intervals*
- *Comply with the training requirements of this part*
- *Have exercised their privileges within the preceding 6 months on at least one aircraft type or has undergone the appropriate training course on the type in accordance with this Part and Part-OR*

'The cabin crew attestation for initial safety training shall remain valid as long as the attestation is not revoked

comment

291

comment by: *Thomas Cook Airlines*

Justification:

The information on the validity of an attestation will not be obvious from the form as the crew members last operation flight is not recorded. There appears to be no safety benefit to the including recency in the validity of an attestation, the attestation is issued as proof of initial training only.

Proposal:

Remove all reference to recency from attestation information.

comment

353

comment by: *Jill Pelan*

CC.CCA.105 (a) The CFDT France & ETF supports the principle that medical fitness is part of the cabin crew proficiency. This principle should not be abused for dismissing cabin crew. The position of the Aero medical Examiner is in fact to keep the crew member at work and to assist in facilitation when needed.

comment

363

comment by: *Walter Gessky*

CC.CCA.105 Validity of the cabin crew attestation

Add the following:

The cabin crew attestation shall remain valid as **basis to be assigned by the operator to duties as** long as the holder:

- (a) complies with the requirements for medical fitness of cabin crew specified in PartMED;
- (b) complies with the training requirements specified in this Part; and
- (c) has exercised their privileges within the preceding 6 months on at least one aircraft type or has undergone the appropriate training **or refresher** course on the type in accordance with this Part and with PartOR as relevant.

Justification:

It shall be made clear that the attestation is only the basis for assignment when the additional conditions are met. The attestation itself does not grant any privileges.

Refresher shall be added for clarification.

Comment to (a):

The requirement for medical fitness seems to be too restrictive and shall be reviewed.

comment

374

comment by: *kapers Cabin Crew Union*

CC.CCA.105 (a)

Comment: kapers supports the principle that medical fitness is part of the cabin crew proficiency. This principle should not be abused for dismissing cabin crew. The position of the Aeromedical Examiner is in fact to keep the crew member at work and to assist in facilitation when needed.

(b)

Comment: Just like in any other safety profession, cabin crew must meet training standards.

(c)

Comment: This rule has worked well over the years. Should cabin crew be absent from flying for more than 6 months they should pass a refresher training.

comment

396

comment by: *AUSTRIAN Airlines*

Relevant Text:

The Cabin crew attestation shall remain valid as long as the holder

- a) Complies with the requirements for medical fitness of cabin crew specified in Part-MED*
- b) Complies with the training requirements specified in this Part; and*
- c) Has exercised their privileges in the preceding 6 months on at least one aircraft type or has undergone the appropriate training course on the type in accordance with this Part and with Part-OR as relevant*

Comment:

This goes far beyond the intentions of the EU legislator and EU-OPS; There should be no requirement for a medical examination since the basic EASA regulation refers to an assessment (not examination) which is in line with the medical fitness requirements of EU-OPS. A detailed medical examination would lead to unjustified cost, which have no safety justification (see AUSTRIAN comments to Part-MED). Article 8.4 of the basic EASA regulation (216/2008) clearly states that cabin crew involved in commercial operations shall hold an

attestation as initially set out in Annex III, Subpart O, point (d) of OPS 1.1005 as set out in Regulation (EC) No 1899/2006. This confirms the intentions of the EU legislator that the attestation of cabin crew should be identical to the requirements of EU-OPS. The attestation of cabin crew should therefore remain limited to a attestation for initial safety training with unlimited validity. AUSTRIAN urges EASA to stick to its safety role and to stop inventing new requirements which conflicts with article 8.4 of the basic EASA regulation

Proposal:

Delete the entire paragraph and replace it with
CC.CCA.105 Conditions to exercise as Cabin Crew Member

'To exercise as cabin crew member in a transport aircraft the cabin crew member must:

- ***Hold an attestation for initial safety training***
- ***Has passed a medical examination or assessment at regular intervals***
- ***Comply with the training requirements of this part***
- ***Have exercised their privileges within the preceeding 6 months on at least one aircraft type or has undergone the appropriate training course on the type in accordance with this Part and Part-OR***

'The cabin crew attestation for initial safety training shall remain valid as long as the attestation is not revoked

comment

451

comment by: *Elaine Allan Monarch*

Page No.
5

Ref No.
NPA 2009 - 2e CC.CCA.105 (c)

Summary of EASA Proposed Requirement:

The Cabin Crew attestation shall remain valid as long as the holder: (c) has exercised their privileges within the preceding 6 months one at least on aircraft type or has undergone the appropriate training course on the type in accordance with this Part and with Part-OR as relevant

Comment:

Does this not contradict the requirement for the crewmember to carry a list of aircraft types they are proficient on. I.e. if a crewmember goes over the 6 months requirement to operate on an aircraft type then the list of aircraft is no longer valid

Justification:

The information on the validity of an attestation will not be identifiable from the attestation as the crewmembers last operation flight is not recorded. The inclusion of recency in the validity of an attestation will cause additional admin for little safety benefit.

Proposed Text (if applicable)

Remove all reference to recency from attestation information.

comment

481

comment by: *KLM*

Relevant Text:

The Cabin crew attestation shall remain valid as long as the holder

a) Complies with the requirements for medical fitness of cabin crew specified in Part-MED

b) Complies with the training requirements specified in this Part; and

c) Has exercised their privileges in the preceding 6 months on at least one aircraft type or has undergone the appropriate training course on the type in accordance with this Part and with Part-OR as relevant

Comment:

This goes far beyond the intentions of the EU legislator and EU-OPS; There should be no requirement for a medical examination since the basic EASA regulation refers to an assessment (not examination) which is in line with the medical fitness requirements of EU-OPS. A detailed medical examination would lead to unjustified cost, which have no safety justification (see AEA comments to Part-MED). Article 8.4 of the basic EASA regulation (216/2008) clearly states that cabin crew involved in commercial operations shall hold an attestation as initially set out in Annex III, Subpart O, point (d) of OPS 1.1005 as set out in Regulation (EC) No 1899/2006. This confirms the intentions of the EU legislator that the attestation of cabin crew should be identical to the requirements of EU-OPS. The attestation of cabin crew should therefore remain limited to a attestation for initial safety training with unlimited validity. KLM urges EASA to stick to its safety role and to stop inventing new requirements which conflicts with article 8.4 of the basic EASA regulation

Proposal:

Delete the entire paragraph and replace it with

CC.CCA.105 Conditions to exercise as Cabin Crew Member

'To exercise as cabin crew member in a transport aircraft the cabin crew member must:

- ***Hold an attestation for initial safety training***
 - ***Has passed a medical examination or assessment at regular intervals***
 - ***Comply with the training requirements of this part***
 - ***Have exercised their privileges within the preceding 6 months on at least one aircraft type or has undergone the appropriate training course on the type in accordance with this Part and Part-OR***
- 'The cabin crew attestation for initial safety training shall remain valid as long as the attestation is not revoked***

comment

555

comment by: Deutsche Lufthansa AG

Relevant Text:

The Cabin crew attestation shall remain valid as long as the holder

a) Complies with the requirements for medical fitness of cabin crew specified in Part-MED

b) Complies with the training requirements specified in this Part; and

c) Has exercised their privileges in the preceding 6 months on at least one aircraft type or has undergone the appropriate training course on the type in accordance with this Part and with Part-OR as relevant

Comment:

This goes far beyond the intentions of the EU legislator and EU-OPS; There should be no requirement for a medical examination since the basic EASA regulation refers to an assessment (not examination) which is in line with the medical fitness requirements of EU-OPS. A detailed medical examination would lead to unjustified cost, which have no safety justification (see Lufthansa comments to Part-MED). Article 8.4 of the basic EASA regulation (216/2008) clearly states that cabin crew involved in commercial operations shall hold an

attestation as initially set out in Annex III, Subpart O, point (d) of OPS 1.1005 as set out in Regulation (EC) No 1899/2006. This confirms the intentions of the EU legislator that the attestation of cabin crew should be identical to the requirements of EU-OPS. The attestation of cabin crew should therefore remain limited to a attestation for initial safety training with unlimited validity. Lufthansa urges EASA to stick to its safety role and to stop inventing new requirements which conflicts with article 8.4 of the basic EASA regulation

Proposal:

Delete the entire paragraph and replace it with
CC.CCA.105 Conditions to exercise as Cabin Crew Member

'To exercise as cabin crew member in a transport aircraft the cabin crew member must:

- ***Hold an attestation for initial safety training***
- ***Has passed a medical examination or assessment at regular intervals***
- ***Comply with the training requirements of this part***
- ***Have exercised their privileges within the preceeding 6 months on at least one aircraft type or has undergone the appropriate training course on the type in accordance with this Part and Part-OR***

'The cabin crew attestation for initial safety training shall remain valid as long as the attestation is not revoked

comment

616

comment by: *Finnish CAA*

Paragraph No: CC.CCA.105

Comments:

- CC.CCA.105 (a): Medical fitness standard shall be set below that of a Leisure Pilot Licence. Medical fitness shall be assessed by employer's company doctor or alike.

- CC.CCA.105 (b) and (c):

To comply easily with this paragraph, the cabin crew attestation shall be issued by the operator. In any case the operator shall have records of the training(s), medical assessments and absences from duty (need for refresher training). The validation of the attestation shall end when the cabin crew member ends service with the operator (new employer, new attestation).

comment

634

comment by: *British Airways Flight Operations*

British Airways concurs with the AEA comment (#274) on this paragraph.

General Comment:

NPA 2009-2 in its entirety is unfit for the purpose for which it is intended and must be withdrawn and reconsidered.

comment

656

comment by: *Swiss International Airlines / Bruno Pfister*

Relevant Text:

The Cabin crew attestation shall remain valid as long as the holder

a) Complies with the requirements for medical fitness of cabin crew specified in Part-MED

b) Complies with the training requirements specified in this Part; and

c) *Has exercised their privileges in the preceding 6 months on at least one aircraft type or has undergone the appropriate training course on the type in accordance with this Part and with Part-OR as relevant*

Comment:

This goes far beyond the intentions of the EU legislator and EU-OPS; There should be no requirement for a medical examination since the basic EASA regulation refers to an assessment (not examination) which is in line with the medical fitness requirements of EU-OPS. A detailed medical examination would lead to unjustified cost, which have no safety justification (see AEA comments to Part-MED). Article 8.4 of the basic EASA regulation (216/2008) clearly states that cabin crew involved in commercial operations shall hold an attestation as initially set out in Annex III, Subpart O, point (d) of OPS 1.1005 as set out in Regulation (EC) No 1899/2006. This confirms the intentions of the EU legislator that the attestation of cabin crew should be identical to the requirements of EU-OPS. The attestation of cabin crew should therefore remain limited to a attestation for initial safety training with unlimited validity. The AEA urges EASA to stick to its safety role and to stop inventing new requirements which conflicts with article 8.4 of the basic EASA regulation

Proposal:

Delete the entire paragraph and replace it with

CC.CCA.105 Conditions to exercise as Cabin Crew Member

'To exercise as cabin crew member in a transport aircraft the cabin crew member must:

- ***Hold an attestation for initial safety training***
 - ***Has passed a medical examination or assessment at regular intervals***
 - ***Comply with the training requirements of this part***
 - ***Have exercised their privileges within the preceding 6 months on at least one aircraft type or has undergone the appropriate training course on the type in accordance with this Part and Part-OR***
- 'The cabin crew attestation for initial safety training shall remain valid as long as the attestation is not revoked***

comment

728

comment by: TAP Portugal

Relevant Text:

The Cabin crew attestation shall remain valid as long as the holder

a) *Complies with the requirements for medical fitness of cabin crew specified in Part-MED*

b) *Complies with the training requirements specified in this Part; and*

c) *Has exercised their privileges in the preceding 6 months on at least one aircraft type or has undergone the appropriate training course on the type in accordance with this Part and with Part-OR as relevant*

Comment:

This goes far beyond the intentions of the EU legislator and EU-OPS; There should be no requirement for a medical examination since the basic EASA regulation refers to an assessment (not examination) which is in line with the medical fitness requirements of EU-OPS. A detailed medical examination would lead to unjustified cost, which have no safety justification (see AEA comments to Part-MED). Article 8.4 of the basic EASA regulation (216/2008) clearly states that cabin crew involved in commercial operations shall hold an attestation as initially set out in Annex III, Subpart O, point (d) of OPS 1.1005 as set out in Regulation (EC) No 1899/2006. This confirms the intentions of the EU legislator that the attestation of cabin crew should be identical to the requirements of EU-OPS. The attestation of cabin crew should therefore remain

limited to a attestation for initial safety training with unlimited validity. The AEA urges EASA to stick to its safety role and to stop inventing new requirements which conflicts with article 8.4 of the basic EASA regulation

Proposal:

Delete the entire paragraph and replace it with
CC.CCA.105 Conditions to exercise as Cabin Crew Member

'To exercise as cabin crew member in a transport aircraft the cabin crew member must:

- ***Hold an attestation for initial safety training***
 - ***Has passed a medical examination or assessment at regular intervals***
 - ***Comply with the training requirements of this part***
 - ***Have exercised their privileges within the preceeding 6 months on at least one aircraft type or has undergone the appropriate training course on the type in accordance with this Part and Part-OR***
- 'The cabin crew attestation for initial safety training shall remain valid as long as the attestation is not revoked***

comment 798

comment by: *Civil Aviation Authority of Norway*

In our opinion, a cabin crew attestation is an evidence of a successful completion of some basic training and an initial medical assessment, and should therefore not be provided with an expiry date. It is obvious that medical fitness and recurrent training is criteria for the continued validity of the privileges to act as a cabin crew member, as already stated in paragraph CC.GEN.025(b). This is the sole responsibility of the operator, and therefore this paragraph may be replaced by a paragraph addressing the renewal procedures of a cabin crew member licence, issued by the operator. However, our general opinion regarding the cabin crew attestation is addressed by our comments to CC.CCA.100

comment 837

comment by: *AIR FRANCE*

Comment:

Once the cabin crew has an attestation of initial safety training, he/she needs to fulfill some additional conditions to exercise the privileges of cabin crew as set out in block 12 of the cabin crew attestation template.

Proposal:

Delete the title and the entire sentence "The cabin crew attestation shall remain valid as long as the holder:" and replace it with CC.CCA.105 Conditions to exercise as Cabin Crew Member

'To exercise as cabin crew member in a transport aircraft the cabin crew member must:

- ***Hold an attestation for initial safety training***
- ***Have passed a medical examination or assessment at regular intervals***
- ***Comply with the training requirements of this part***
- ***Have exercised his/her privileges within the preceding 6 months on at least one aircraft type or have undergone the appropriate training course on the type in accordance with this Part and with Part-OR as relevant.***

comment 874

comment by: *IATA*

The cabin crew attestation shall remain valid as long as the holder:

- (a) complies with the requirements for medical fitness of cabin crew specified in PartMED;
- (b) complies with the training requirements specified in this Part; and
- (c) has exercised their privileges within the preceding 6 months on at least one aircraft type or has undergone the appropriate training course on the type in accordance with this Part and with PartOR as relevant.

There is no reason that a CC attestation is more stringent regulated as a pilot licence.

Proposal:

The attestation shall remain lifelong, and only allows to exercise the privileges when:

- (a)
- (b)
- (c)

comment

889

comment by: *Frank Ciupka*

Too much bureaucracy, doesn't increase safety!

Proposal:

No carrying of CCA or list of aircraft type(s). The operator guarantees that only authorised qualified Cabin Crews are on duty and the appropriate documentations stored at the operator. For each flight the operator creates a crew list which is carried on board and identifies crew members. Each crew member has a company ID card with a photograph.

comment

890

comment by: *Frank Ciupka*

Too much bureaucracy, doesn't increase safety!

Medical fitness should be documented separately.

Proposal:

The „cabin crew attestation“ (CCA) is valid lifetime.

The flight attendant may be on duty If:

1. Is holding a CCA
2. Is recurrent on the aircraft type
3. Is holding valid „medical fitness“ approval

All documentations are stored at the operator.

The operator checks all documents and guarantees that only personnel fulfilling the requirements are on duty. The flight attendant on board only carries his company ID.

E. VIII. Draft Opinion Part-CC - Subpart CCA - CC.CCA.110 Limitation, suspension and revocation of the cabin crew attestation

p. 5

comment

149

comment by: *ETF*

CC.CCA.110

General comment: The text implements Article 8 (e) of Regulation 216/2008.

(a) Comment: Non compliance on the part of the holder should just like for other certification have consequences until the situation is rectified.

(b) Comment: See reply to (a).

(c) Comment: See reply to (a).

New: **CC.CCA.111 Complaints**

Complaints of the decision taken by the competent authority may be presented to a Board of Appeal or the Ombudsman.

Reason: The principle of obtaining a second opinion is important for cabin crew.

comment

161

comment by: *claire.amos*

CC.CCA.110 (a)

confirmation required: Will the attestations be issued and managed by each country's regulatory body or is this the responsibility of the operator?

Cost implication: additional one/two heads to manage the issue, limitation, revoking or suspension of the attestations of all cabin crew.

comment

173

comment by: *UKAMAC*

Comment:

To include temporary medical unfitness within the scope of this paragraph would place an intolerable bureaucratic burden on NAAs. They would have to manage temporary medical unfitness in the way that they do for pilots but for a much larger population. Temporary grounding for medical reasons is perfectly adequately managed by operators in accordance with occupational health principles. Regulatory action is not required or desirable. Some grammatical errors.

Justification:

A requirement for regulatory action in respect of temporary medical unfitness could not satisfy regulatory impact assessment. No unmet safety need has been identified to justify this additional regulatory burden. The process would be costly and result in large numbers of days lost to the administrative processes of revocation and revalidation.

Proposed text:

CC.CCA.110 Limitation, suspension and revocation of the cabin crew attestation

(a) When the holder does not comply with the requirements of this Part except in respect of temporary medical unfitness, the cabin crew attestation may be limited, suspended or revoked by the competent authority.

(b) Upon limitation, the holder shall exercise the privileges of his or her cabin crew attestation in accordance with the applicable limitation.

(c) Upon suspension or revocation, the holder shall not exercise the privileges of his or her cabin crew attestation and shall return the cabin crew attestation in accordance with the applicable procedure established by the competent authority.

comment 222 comment by: *SCCA/ head of health and safety*

CC.CCA.110

(a) Supported.

Reason: Non compliance on the part of the holder should just like for other certification have consequences until the situation is rectified.

(b) Supported.

Reason: See reply to (a).

(c) Supported.

Reason: See reply to (a).

comment 242 comment by: *Unionen/Sweden*

CC.CCA.110

(a) Supported.

Reason: Non compliance on the part of the holder should just like for other certification have consequences until the situation is rectified.

(b) Supported.

Reason: See reply to (a).

(c) Supported.

Reason: See reply to (a).

CC.CCA.111 New: Complaints

Complaints of the decision(s) taken by the competent authority may be presented to the Commission.

Reason: The principle of obtaining a second opinion is important for cabin crew.

comment 247 comment by: *Jill Pelan*

CC CCA 110

The CFDT France asks How can "the holder do not comply with the requirements" if he has gone through training and examinations, all done by approved training centres? If the holder "does not comply" the training centres or training programme must be investigated and the cabin crew must have access to full reasons for the revocation of the Attestation & the possibility of going to an arbitration committee.

comment 248 comment by: *Jill Pelan*

CC.CCA.111 New: Complaints

The CFDT France and ETF asks for a provision for Complaints of the decision(s) taken by the competent authority which should include an arbitration committee including worker representatives, operator and authority & and also presentation of the complaint to the Commission .

All provisions for training and issuance of Attestation should be hard rules - I.R. and not CS material. **This is a general demand of French and European Cabin crew as SAFETY PROFESSIONALS**

CC.CCA.110

General comment: The text implements Article 8 (e) of Regulation 216/2008.

(a) Comment: Non compliance on the part of the holder should just like for other certification have consequences until the situation is rectified.

(b) Comment: See reply to (a).

(c) Comment: See reply to (a).

New: **CC.CCA.111 Complaints**

Complaints of the decision taken by the competent authority may be reviewed by a special appeals board & presented to the Commission.

Reason: The principle of obtaining a second opinion is important for cabin crew.

comment

259

comment by: *The TUI Airlines group represented by Thomson Airways, TUIfly, TUIfly Nordic, CorsairFly, Arkefly, Jet4U, JetairFly*

CC.CCA.110

Comment:

This would create a costly bureaucratic nightmare. It is hard to see what an attestation subject to limitation might include other than simple things like wearing spectacles if the vision is poor etc. Disqualification for medical reasons would fall foul of many Disability Discrimination Acts.

Proposal:

Delete this section.

comment

275

comment by: *AEA*

Relevant Text:

a) When the holder does not comply with the requirements of this Part, the cabin crew attestation may be limited, suspended or revoked by the Competent Authority

b) Upon limitation, the holder shall exercise the privileges of their cabin crew attestation in accordance with the applicable limitation

c) Upon suspension or revocation, the holder shall not exercise the privileges of their cabin crew attestation and shall return their cabin crew attestation in accordance with the applicable procedure established by the Competent Authority

Comment:

This goes far beyond the intentions of the EU legislator and EU-OPS. Article 8.4 of the basic EASA regulation (216/2008) clearly states that cabin crew involved in commercial operations shall hold an attestation as initially set out in Annex III, Subpart O, point (d) of OPS 1.1005 as set out in Regulation (EC) No 1899/2006. This confirms the intentions of the EU legislator that the attestation of cabin crew should be identical to the requirements of EU-OPS. The attestation of cabin crew should therefore remain limited to a attestation for initial safety training. The AEA urges EASA to stick to its safety role and to stop inventing new requirements which conflicts with article 8.4 of the basic EASA regulation

The conditions for limitation, suspension and revocation of the cabin crew attestation should therefore only cover an attestation for initial safety training.. Such an approach would be in line with the intentions of the EU legislator which was not to make changes to Subpart O of EU-OPS in particular since there is no safety justification for completely overhauling Subpart O of EU-OPS. Once again, the AEA urges EASA to stick to its safety role and not get involved in social legislation..

Proposal:

Replace the text of CC.CCA.110 with

'CC.CCA.110 ***Privileges of holder of an Attestation for Initial Safety Training***

The attestation for initial safety training may be limited, suspended or revoked by the competent Authority or operator when the holder does not comply with the requirements of this part.:

comment

364

comment by: *Walter Gessky*

CC.CCA.110 Limit ation, su spension and revoc ation of t he cabin crew attestation

Delete the following:

~~(a) When the holder does not comply with the requirements of this Part, the cabin crew attestation may be limited, suspended or revoked by the competent authority.~~

~~(b) Upon limitation, the holder shall exercise the privileges of their cabin crew attestation in accordance with the applicable limitation.~~

~~(c) Upon suspension or revocation, the holder shall not exercise the privileges of their cabin crew attestation and shall return their cabin crew attestation in accordance with the applicable procedure established by the competent authority.~~

Comment:

This point shall be deleted, because no real privileges for the cabin crew arise from the attestation. We should avoid giving the impression that any real privileges to work as cabin crew is associated with the attestation. The attestation is only the basis and has no value without type and conversion training and familiarization.

An alternative would be:

Reword as follows:

The cabin crew attestation **is not valid until** the holder

(a) Has not completed the additional training required;

(b) Is in noncompliance with the requirements of PartCC or the applicable requirements of PartOR, where a safety issue has been identified;

(c) does not comply with the requirements of this Part,

(d) has obtained the cabin crew attestation by falsification of submitted documentary evidence;

(e) exercising the privileges of the cabin crew attestation when adversely affected by alcohol or drugs;

(f) has fraudulent used the cabin crew attestation;

Justification:

The attestation does not grant any privileges and additional training is required by the operator. Therefore it makes no sense to suspend or revoke the attestation. This would only be an administrative burden for the issuing body and would have no safety impact and would only be an expensive bureaucratic

action without any value, because the operator has to verify that all conditions are met. These are the conditions which shall be controlled by the operator before assignment on duty of a cabin crew member. Anything else is not in line with EU-OPS and not supported.

comment

375

comment by: *kapers Cabin Crew Union***CC.CCA.110**

General comment: The text implements Article 8 (e) of Regulation 216/2008.

(a) Comment: Non compliance on the part of the holder should just like for other certification have consequences until the situation is rectified.

(b) Comment: See reply to (a).

(c) Comment: See reply to (a).

New: **CC.CCA.111 Complaints**

Complaints of the decision taken by the competent authority may be presented to the Commission.

Reason: The principle of obtaining a second opinion is important for cabin crew.

comment

397

comment by: *AUSTRIAN Airlines***Relevant Text:**

a) When the holder does not comply with the requirements of this Part, the cabin crew attestation may be limited, suspended or revoked by the Competent Authority

b) Upon limitation, the holder shall exercise the privileges of their cabin crew attestation in accordance with the applicable limitation

c) Upon suspension or revocation, the holder shall not exercise the privileges of their cabin crew attestation and shall return their cabin crew attestation in accordance with the applicable procedure established by the Competent Authority

Comment:

This goes far beyond the intentions of the EU legislator and EU-OPS. Article 8.4 of the basic EASA regulation (216/2008) clearly states that cabin crew involved in commercial operations shall hold an attestation as initially set out in Annex III, Subpart O, point (d) of OPS 1.1005 as set out in Regulation (EC) No 1899/2006. This confirms the intentions of the EU legislator that the attestation of cabin crew should be identical to the requirements of EU-OPS. The attestation of cabin crew should therefore remain limited to an attestation for initial safety training. AUSTRIAN urges EASA to stick to its safety role and to stop inventing new requirements which conflicts with article 8.4 of the basic EASA regulation

The conditions for limitation, suspension and revocation of the cabin crew attestation should therefore only cover an attestation for initial safety training.. Such an approach would be in line with the intentions of the EU legislator which was not to make changes to Subpart O of EU-OPS in particular since there is no safety justification for completely overhauling Subpart O of EU-OPS. Once again, AUSTRIAN urges EASA to stick to its safety role and not get

involved in social legislation..

Proposal:

Replace the text of CC.CCA.110 with

'CC.CCA.110 '***Privileges of holder of an Attestation for Initial Safety Training***

The attestation for initial safety training may be limited, suspended or revoked by the competent Authority or operator when the holder does not comply with the requirements of this part.

comment 482

comment by: KLM

Relevant Text:

a) *When the holder does not comply with the requirements of this Part, the cabin crew attestation may be limited, suspended or revoked by the Competent Authority*

b) *Upon limitation, the holder shall exercise the privileges of their cabin crew attestation in accordance with the applicable limitation*

c) *Upon suspension or revocation, the holder shall not exercise the privileges of their cabin crew attestation and shall return their cabin crew attestation in accordance with the applicable procedure established by the Competent Authority*

Comment:

This goes far beyond the intentions of the EU legislator and EU-OPS. Article 8.4 of the basic EASA regulation (216/2008) clearly states that cabin crew involved in commercial operations shall hold an attestation as initially set out in Annex III, Subpart O, point (d) of OPS 1.1005 as set out in Regulation (EC) No 1899/2006. This confirms the intentions of the EU legislator that the attestation of cabin crew should be identical to the requirements of EU-OPS. The attestation of cabin crew should therefore remain limited to a attestation for initial safety training. The AEA urges EASA to stick to its safety role and to stop inventing new requirements which conflicts with article 8.4 of the basic EASA regulation

The conditions for limitation, suspension and revocation of the cabin crew attestation should therefore only cover an attestation for initial safety training.. Such an approach would be in line with the intentions of the EU legislator which was not to make changes to Subpart O of EU-OPS in particular since there is no safety justification for completely overhauling Subpart O of EU-OPS. Once again, KLM urges EASA to stick to its safety role and not get involved in social legislation..

Proposal:

Replace the text of CC.CCA.110 with

'CC.CCA.110 '***Privileges of holder of an Attestation for Initial Safety Training***

The attestation for initial safety training may be limited, suspended or revoked by the competent Authority or operator when the holder does not comply with the requirements of this part.:

comment 556

comment by: Deutsche Lufthansa AG

Relevant Text:

a) *When the holder does not comply with the requirements of this Part, the cabin crew attestation may be limited, suspended or revoked by the Competent Authority*

b) *Upon limitation, the holder shall exercise the privileges of their cabin crew attestation in accordance with the applicable limitation*

c) Upon suspension or revocation, the holder shall not exercise the privileges of their cabin crew attestation and shall return their cabin crew attestation in accordance with the applicable procedure established by the Competent Authority

Comment:

This goes far beyond the intentions of the EU legislator and EU-OPS. Article 8.4 of the basic EASA regulation (216/2008) clearly states that cabin crew involved in commercial operations shall hold an attestation as initially set out in Annex III, Subpart O, point (d) of OPS 1.1005 as set out in Regulation (EC) No 1899/2006. This confirms the intentions of the EU legislator that the attestation of cabin crew should be identical to the requirements of EU-OPS. The attestation of cabin crew should therefore remain limited to a attestation for initial safety training. Lufthansa urges EASA to stick to its safety role and to stop inventing new requirements which conflicts with article 8.4 of the basic EASA regulation

The conditions for limitation, suspension and revocation of the cabin crew attestation should therefore only cover an attestation for initial safety training.. Such an approach would be in line with the intentions of the EU legislator which was not to make changes to Subpart O of EU-OPS in particular since there is no safety justification for completely overhauling Subpart O of EU-OPS. Once again, Lufthansa urges EASA to stick to its safety role and not get involved in social legislation..

Proposal:

Replace the text of CC.CCA.110 with

'CC.CCA.110 ***Privileges of holder of an Attestation for Initial Safety Training***

The attestation for initial safety training may be limited, suspended or revoked by the competent Authority or operator when the holder does not comply with the requirements of this part.:

comment

617

comment by: Finnish CAA

Paragraph: CC.CCA.110

Comment: The operator should also have the right to limit, suspend and revoke the cabin crew attestation.

Justification: The operator is responsible for ensuring that all crew members are qualified to exercise their privileges. The operator can be approved to issue the attestation. Logically, the operator should be approved to limit, suspend or revoke the attestation.

comment

635

comment by: British Airways Flight Operations

Relevant Text:

a) When the holder does not comply with the requirements of this Part, the cabin crew attestation may be limited, suspended or revoked by the Competent Authority

b) Upon limitation, the holder shall exercise the privileges of their cabin crew attestation in accordance with the applicable limitation

c) Upon suspension or revocation, the holder shall not exercise the privileges of their cabin crew attestation and shall return their cabin crew attestation in accordance with the applicable procedure established by the Competent Authority

Comment:

This proposal goes far beyond the intentions of the EU legislator and EU-OPS. Article 8.4 of the basic EASA regulation (216/2008) clearly states that cabin crew involved in commercial operations shall hold an attestation as initially set out in Annex III, Subpart O, sub-para (d) of OPS 1.1005 as defined in Regulation (EC) No 1899/2006 (ie EU Ops). This confirms the intention of the EU legislator that the attestation of cabin crew should be identical to the requirement from EU-OPS. The attestation of cabin crew should therefore remain limited to an attestation for initial safety training.

The conditions for limitation, suspension and revocation of the cabin crew attestation should therefore only cover an attestation for initial safety training.. Such an approach would be in line with the intentions of the EU legislator which was not to make changes to Subpart O of EU-OPS in particular since there is no safety justification for completely overhauling Subpart O of EU-OPS. It is clear EASA is trying to introduce a cabin crew licence, which is unnecessary and unjustified.

Proposal:

Replace the text of CC.CCA.110 with

'CC.CCA.110 *'Privileges of holder of an Attestation for Initial Safety Training*

The attestation for initial safety training may be limited, suspended or revoked by the competent Authority or operator when the holder does not comply with the requirements of this part.

General Comment:

NPA 2009-2 in its entirety is unfit for the purpose for which it is intended and must be withdrawn and reconsidered.

comment

657

comment by: *Swiss International Airlines / Bruno Pfister*

Relevant Text:

a) When the holder does not comply with the requirements of this Part, the cabin crew attestation may be limited, suspended or revoked by the Competent Authority

b) Upon limitation, the holder shall exercise the privileges of their cabin crew attestation in accordance with the applicable limitation

c) Upon suspension or revocation, the holder shall not exercise the privileges of their cabin crew attestation and shall return their cabin crew attestation in accordance with the applicable procedure established by the Competent Authority

Comment:

This goes far beyond the intentions of the EU legislator and EU-OPS. Article 8.4 of the basic EASA regulation (216/2008) clearly states that cabin crew involved in commercial operations shall hold an attestation as initially set out in Annex III, Subpart O, point (d) of OPS 1.1005 as set out in Regulation (EC) No 1899/2006. This confirms the intentions of the EU legislator that the attestation of cabin crew should be identical to the requirements of EU-OPS. The attestation of cabin crew should therefore remain limited to a attestation for initial safety training. The AEA urges EASA to stick to its safety role and to stop inventing new requirements which conflicts with article 8.4 of the basic EASA regulation

The conditions for limitation, suspension and revocation of the cabin crew attestation should therefore only cover an attestation for initial safety training.. Such an approach would be in line with the intentions of the EU legislator which was not to make changes to Subpart O of EU-OPS in particular since there is no safety justification for completely overhauling Subpart O of EU-OPS. Once again, the AEA urges EASA to stick to its safety role and not get involved in social legislation..

Proposal:

Replace the text of CC.CCA.110 with

'CC.CCA.110 *'Privileges of holder of an Attestation for Initial Safety Training*

The attestation for initial safety training may be limited, suspended or revoked by the competent Authority or operator when the holder does not comply with the requirements of this part.:

comment 729

comment by: TAP Portugal

Relevant Text:

a) *When the holder does not comply with the requirements of this Part, the cabin crew attestation may be limited, suspended or revoked by the Competent Authority*

b) *Upon limitation, the holder shall exercise the privileges of their cabin crew attestation in accordance with the applicable limitation*

c) *Upon suspension or revocation, the holder shall not exercise the privileges of their cabin crew attestation and shall return their cabin crew attestation in accordance with the applicable procedure established by the Competent Authority*

Comment:

This goes far beyond the intentions of the EU legislator and EU-OPS. Article 8.4 of the basic EASA regulation (216/2008) clearly states that cabin crew involved in commercial operations shall hold an attestation as initially set out in Annex III, Subpart O, point (d) of OPS 1.1005 as set out in Regulation (EC) No 1899/2006. This confirms the intentions of the EU legislator that the attestation of cabin crew should be identical to the requirements of EU-OPS. The attestation of cabin crew should therefore remain limited to a attestation for initial safety training. The AEA urges EASA to stick to its safety role and to stop inventing new requirements which conflicts with article 8.4 of the basic EASA regulation

The conditions for limitation, suspension and revocation of the cabin crew attestation should therefore only cover an attestation for initial safety training.. Such an approach would be in line with the intentions of the EU legislator which was not to make changes to Subpart O of EU-OPS in particular since there is no safety justification for completely overhauling Subpart O of EU-OPS. Once again, the AEA urges EASA to stick to its safety role and not get involved in social legislation..

Proposal:

Replace the text of CC.CCA.110 with

'CC.CCA.110 *'Privileges of holder of an Attestation for Initial Safety Training*

The attestation for initial safety training may be limited, suspended or revoked by the competent Authority or operator when the holder does not comply with the requirements of this part.:

comment 787

comment by: UCC SLO

CC.CCA.105 (a)

Comment: ETF supports the principle that medical fitness is part of the cabin crew proficiency. This principle should not be abused for dismissing cabin crew. The position of the Aeromedical Examiner is in fact to keep the crew member at work and to assist in facilitation when needed.

(b) Comment: Just like in any other safety profession, cabin crew must meet training standards.

(c) Comment: This rule has worked well over the years. Should cabin crew be absent from flying for more than 6 months they should pass a refresher training.

comment

788

comment by: *UCC SLO***CC.CCA.110**

General comment: The text implements Article 8 (e) of Regulation 216/2008.

(a) Comment: Non compliance on the part of the holder should just like for other certification have consequences until the situation is rectified.

(b) Comment: See reply to (a).

(c) Comment: See reply to (a).

New: **CC.CCA.111 Complaints**

Complaints of the decision taken by the competent authority may be presented to the Commission.

Reason: The principle of obtaining a second opinion is important for cabin crew.

comment

799

comment by: *Civil Aviation Authority of Norway*

The operator remains ultimately responsible for ensuring that no crew member operate on an aircraft without being qualified to do so. A the cabin crew attestation itself does not give the holder any privileges to act as a cabin crew member, there should be no need for the competent authority to collect cabin crew attestations whenever they are "deactivated." Avoiding the possibility of a cabin crew who have had his/her cabin crew attestation revoked or suspended by a member state, from seeking a cabin crew attestation from another member state, would require a pan-European database of all issued CCA's. This would be inappropriate, and therefore we suggest that a CCA shall not be subject to a suspension or revocation process, as the CCA would only be regarded as an evidence of basic training, without any operating privileges attached.

comment

820

comment by: *cfdt france***CC CCA 110**

The CFDT France asks How can "the holder do not comply with the requirements" if he has gone through training and examinations, all done by approved training centres? If the holder "does not comply" the training centres or training programme must be investigated and the cabin crew must have access to full reasons for the revocation of the Attestation & the possibility of going to an abritration committee

comment 821 comment by: *cdt france*

CC.CCA.111 New: Complaints

The CFDT France and ETF asks for a provision for Complaints of the decision(s) taken by the competent authority which should include an arbitration committee including worker representatives, operator and authority & also presentation of the complaint to the Commission .

All provisions for training and issuance of Attestation should be hard rules - I.R. and not CS material. **This is a general demand of French and European Cabin crew as SAFETY PROFESSIONALS**

comment 838 comment by: *AIR FRANCE*

Comment:

Article 8.4 of the basic EASA regulation (216/2008) states that cabin crew involved in commercial operations shall hold an attestation as initially set out in Annex III, Subpart O, point (d) of OPS 1.1005 as set out in Regulation (EC) No 1899/2006. The attestation of cabin crew should be identical to the requirements of EU-OPS. The attestation of cabin crew should therefore be an attestation for initial safety training.

It is proposed to reword the text in order to clarify these important points

Proposal:

Realign with EU-OPS by replacing 'attestation' with 'attestation for initial safety training'

comment 853 comment by: *FSC - CCOO*

Comment:

How can "the holder not comply with the requirements" if he has gone through training and examinations, all done by approved training centres? If the holder "does not comply" the training centres or training programme must be investigated and the cabin crew must have access to full reasons for the revocation of the Attestation & the possibility of going to an arbitration committee.

An appeal procedure should be established.

comment 857 comment by: *Swedish Transport Agency, Civil Aviation Department (Transportstyrelsen, Luftfartsavdelningen)*

Paragraph text:

(a) When the holder does not comply with the requirements of this Part, the cabin crew attestation may be limited, suspended or revoked by the competent authority.

Comment:

Can the attestation be limited, suspended or revoked by the competent authority even if the attestation has been issued by an operator or a training organisation specifically approved to do so on behalf of the competent authority?

Proposal (including new text):

(a) When the holder does not comply with the requirements of this Part, the

cabin crew attestation may be limited, suspended or revoked ~~by the competent authority~~ **according to National regulations**

comment

891

comment by: *Frank Ciupka*

The „cabin crew attestation“ confirms a successful participation on a initial safety training.

The „cabin crew attestation“ alone (without any aircraft type training attestation) should not qualify to act as a cabin attendant on board.

Therefore the content of CC.CCA110. should affect aircraft type training.

Proposal:

Limitation, suspension and revocation applies to the “aircraft type training” attestation and not to the cabin crew attestation

comment

905

comment by: *IACA International Air Carrier Association*

This would create a costly bureaucratic nightmare. It is hard to see what an attestation subject to limitation might include other than simple things like wearing spectacles if the vision is poor etc. Disqualification for medical reasons would fall foul of many Disability Discrimination Acts.

Proposal: Delete this section.

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comment

278

comment by: *AEA***Relevant Text:**

Subpart TRA (entire part)

Comment:

This goes far beyond the intentions of the EU legislator and EU-OPS; Article 8.4 of the basic EASA regulation (216/2008) clearly states that cabin crew involved in commercial operations shall hold an attestation as initially set out in Annex III, Subpart O, point (d) of OPS 1.1005 as set out in Regulation (EC) No 1899/2006. This confirms the intentions of the EU legislator that the attestation of cabin crew should be identical to the requirements of EU-OPS. The attestation of cabin crew should therefore remain limited to a attestation for initial safety training. The AEA urges EASA to stick to its safety role and to stop inventing new requirements which conflicts with article 8.4 of the basic EASA regulation.

Proposal:

Only initial safety training requirements should refer to the cabin crew attestation.

Other training requirements (aircraft type specific and recurrent training) should not refer to the attestation.

Replace ‘attestation’ with **‘attestation for initial safety training’**

comment

398

comment by: *AUSTRIAN Airlines***Relevant Text:**

Subpart TRA (entire part)

Comment:

This goes far beyond the intentions of the EU legislator and EU-OPS; Article 8.4 of the basic EASA regulation (216/2008) clearly states that cabin crew involved in commercial operations shall hold an attestation as initially set out in Annex III, Subpart O, point (d) of OPS 1.1005 as set out in Regulation (EC) No 1899/2006. This confirms the intentions of the EU legislator that the attestation of cabin crew should be identical to the requirements of EU-OPS. The attestation of cabin crew should therefore remain limited to a attestation for initial safety training. AUSTRIAN urges EASA to stick to its safety role and to stop inventing new requirements which conflicts with article 8.4 of the basic EASA regulation.

Proposal:

Only initial safety training requirements should refer to the cabin crew attestation.

Other training requirements (aircraft type specific and recurrent training) should not refer to the attestation.

Replace 'attestation' with '**attestation for initial safety training**'

comment

483

comment by: *KLM*

Relevant Text:

Subpart TRA (entire part)

Comment:

This goes far beyond the intentions of the EU legislator and EU-OPS; Article 8.4 of the basic EASA regulation (216/2008) clearly states that cabin crew involved in commercial operations shall hold an attestation as initially set out in Annex III, Subpart O, point (d) of OPS 1.1005 as set out in Regulation (EC) No 1899/2006. This confirms the intentions of the EU legislator that the attestation of cabin crew should be identical to the requirements of EU-OPS. The attestation of cabin crew should therefore remain limited to a attestation for initial safety training. KLM urges EASA to stick to its safety role and to stop inventing new requirements which conflicts with article 8.4 of the basic EASA regulation.

Proposal:

Only initial safety training requirements should refer to the cabin crew attestation.

Other training requirements (aircraft type specific and recurrent training) should not refer to the attestation.

Replace 'attestation' with '**attestation for initial safety training**'

comment

557

comment by: *Deutsche Lufthansa AG*

Relevant Text:

Subpart TRA (entire part)

Comment:

This goes far beyond the intentions of the EU legislator and EU-OPS; Article 8.4 of the basic EASA regulation (216/2008) clearly states that cabin crew involved in commercial operations shall hold an attestation as initially set out in Annex III, Subpart O, point (d) of OPS 1.1005 as set out in Regulation (EC) No 1899/2006. This confirms the intentions of the EU legislator that the attestation of cabin crew should be identical to the requirements of EU-OPS. The attestation of cabin crew should therefore remain limited to a attestation for initial safety training. Lufthansa urges EASA to stick to its safety role and to stop inventing new requirements which conflicts with article 8.4 of the basic

EASA regulation.

Proposal:

Only initial safety training requirements should refer to the cabin crew attestation.

Other training requirements (aircraft type specific and recurrent training) should not refer to the attestation.

Replace 'attestation' with '**attestation for initial safety training**'

comment 636

comment by: *British Airways Flight Operations*

Relevant Text:

Subpart TRA (entire part)

Comment:

This proposal goes far beyond the intentions of the EU legislator and EU-OPS. Article 8.4 of the basic EASA regulation (216/2008) clearly states that cabin crew involved in commercial operations shall hold an attestation as initially set out in Annex III, Subpart O, sub-para (d) of OPS 1.1005 as defined in Regulation (EC) No 1899/2006 (ie EU Ops). This confirms the intention of the EU legislator that the attestation of cabin crew should be identical to the requirement from EU-OPS. The attestation of cabin crew should therefore remain limited to an attestation for initial safety training.

Proposal:

Only initial safety training requirements should refer to the cabin crew attestation.

Other training requirements (aircraft type specific and recurrent training) should not refer to the attestation.

Replace 'attestation' with '**attestation for initial safety training**'

General Comment:

NPA 2009-2 in its entirety is unfit for the purpose for which it is intended and must be withdrawn and reconsidered.

comment 659

comment by: *Swiss International Airlines / Bruno Pfister*

Relevant Text:

Subpart TRA (entire part)

Comment:

This goes far beyond the intentions of the EU legislator and EU-OPS; Article 8.4 of the basic EASA regulation (216/2008) clearly states that cabin crew involved in commercial operations shall hold an attestation as initially set out in Annex III, Subpart O, point (d) of OPS 1.1005 as set out in Regulation (EC) No 1899/2006. This confirms the intentions of the EU legislator that the attestation of cabin crew should be identical to the requirements of EU-OPS. The attestation of cabin crew should therefore remain limited to a attestation for initial safety training. The AEA urges EASA to stick to its safety role and to stop inventing new requirements which conflicts with article 8.4 of the basic EASA regulation.

Proposal:

Only initial safety training requirements should refer to the cabin crew attestation.

Other training requirements (aircraft type specific and recurrent training) should not refer to the attestation.

Replace 'attestation' with '**attestation for initial safety training**'

comment 730

comment by: *TAP Portugal*

Relevant Text:

Subpart TRA (entire part)

Comment:

This goes far beyond the intentions of the EU legislator and EU-OPS; Article 8.4 of the basic EASA regulation (216/2008) clearly states that cabin crew involved in commercial operations shall hold an attestation as initially set out in Annex III, Subpart O, point (d) of OPS 1.1005 as set out in Regulation (EC) No 1899/2006. This confirms the intentions of the EU legislator that the attestation of cabin crew should be identical to the requirements of EU-OPS. The attestation of cabin crew should therefore remain limited to a attestation for initial safety training. The AEA urges EASA to stick to its safety role and to stop inventing new requirements which conflicts with article 8.4 of the basic EASA regulation.

Proposal:

Only initial safety training requirements should refer to the cabin crew attestation.

Other training requirements (aircraft type specific and recurrent training) should not refer to the attestation.

Replace 'attestation' with '**attestation for initial safety training**'

comment 839

comment by: AIR FRANCE

Comment:

Article 8.4 of the basic EASA regulation (216/2008) states that cabin crew involved in commercial operations shall hold an attestation as initially set out in Annex III, Subpart O, point (d) of OPS 1.1005 as set out in Regulation (EC) No 1899/2006. The attestation of cabin crew should be identical to the requirements of EU-OPS. The attestation of cabin crew should therefore be an attestation for initial safety training.

Proposal:

Realign this sub part with EU-OPS by replacing 'attestation' with 'attestation for initial safety training'

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comment 101

comment by: CAA-NL

Comment regarding:

(b) be provided only by an operator or a training organisation that are specifically approved ...

Comment CAA-NL:

The requirements of an approved training organisation should be set by EASA.

comment 181

comment by: ETF

Replace: (c) be performed by **authorised i nstructors**. ~~personnel suitably qualified and experienced.~~

Comment: ETF ask that missing qualifications standards for cabin crew instructors be developed.

comment 189 comment by: *Austro Control GmbH*

(c):
As already commended in OR.OPS.115.CC (c) and AR.CC.100 (c), a clear definition of "suitably qualified and experienced" is required to avoid legal uncertainty.

comment 225 comment by: *UK CAA*

Paragraph No: CC.TRA.115

Comment: Text indicates only an operator or an approved training organisation can conduct training. However some training, such as fire training, is often carried out by third party organisations that are acceptable to the operator.

Justification: Operators should be permitted to use certain organisations to carry out their approved training without further requirements. It would create unnecessary workload for this to be conducted by NAA's. There would also be a cost implication for the operator.

Proposed Text (i f applicable): (b) be provided by an operator, an organisation acceptable to the operator, or a training organisation.....approved by the competent authority.

comment 276 comment by: *AEA*

Relevant Text:
(b) Be provided only by an operator or a training organization that are specifically approved to do so by the competent Authority

Comment:
This goes beyond EU-OPS and the EASA basic regulation 216/2008. There is no need for a specific approval of AOC holder to conduct cabin crew training because the authorization to conduct training could be generic as part of the AOC (without a need for a separate approval). This EASA proposal would lead to additional bureaucracy and associated costs for no safety benefit

Proposal:
Amend (b) '*Be provided by an AOC holder or an approved training organization*'

comment 292 comment by: *Thomas Cook Airlines*

Comment:
b) Clarification required of the approval process and does this requirement extend to include any company employed to provide third party training to the operator

comment 297 comment by: *The TUI Airlines group represented by Thomson Airways, TUIfly, TUIfly Nordic, CorsairFly, Arkefly, Jet4U, JetairFly*

CC.TRA.115 Conduct of training courses, examination and checking (c) be performed by personnel suitably qualified and experienced.

Comment: – Appendix 1 to OPS 1.1010 & Appendix 1 to OPS 1.1015 require that training is carried out by suitably qualified persons. All trainers have to be

trained themselves hence may be qualified be not experienced.

Proposal: Remove the need for trainers to be experienced only qualified.

comment 299

comment by: *Thomas Cook Airlines*

Justification:

Clarification required on the definition of experience, does this mean that they have operated as Cabin Crew, Nursing for First Aid Training etc?

Proposal: Suggest removal of the word experienced

comment

376

comment by: *kapers Cabin Crew Union*

Replace: (c) be performed by **authorised i nstructors**. ~~personnel suitably qualified and experienced.~~

Comment: kapers ask that missing qualifications standards for cabin crew instructors be developed.

comment

399

comment by: *AUSTRIAN Airlines*

Relevant Text:

(b) Be provided only by an operator or a training organization that are specifically approved to do so by the competent Authority

Comment:

This goes beyond EU-OPS and the EASA basic regulation 216/2008. There is no need for a specific approval of AOC holder to conduct cabin crew training because the authorization to conduct training could be generic as part of the AOC (without a need for a separate approval). This EASA proposal would lead to additional bureaucracy and associated costs for no safety benefit

Proposal:

Amend (b) *'Be provided by an AOC holder or an approved training organization'*

comment

452

comment by: *Elaine Allan Monarch*

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Ref No. NPA 2009 - 2e CC.TRA.115 (b)

Summary of EASA Proposed Requirement:

Be provided only by an operator or a training organisation that are specifically approved to do so by the competent authority

Comment:

Does this mean that all operators and third party organisations have to be approved by the UK CAA

Justification: What is the approval criteria .

Proposed Text (if applicable)

comment 453 comment by: *Elaine Allan Monarch*

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Ref No. NPA 2009 - 2e CC.TRA.115 (c)

Summary of EASA Proposed Requirement:
be performed by personnel suitably qualified and **experienced**

Comment: What is the definition of experience.

Justification:
Clarification required on the definition of experience, does this mean that they have operated as Cabin Crew or completed relevant training courses.

Proposed Text (if applicable)
Suggest removal of the word ***experienced***

comment 484 comment by: *KLM*

Relevant Text:
(b) *Be provided only by an operator or a training organization that are specifically approved to do so by the competent Authority*

Comment:
This goes beyond EU-OPS and the EASA basic regulation 216/2008. There is no need for a specific approval of AOC holder to conduct cabin crew training because the authorization to conduct training could be generic as part of the AOC (without a need for a separate approval). This EASA proposal would lead to additional bureaucracy and associated costs for no safety benefit

Proposal:
Amend (b) '*Be provided by an AOC holder or an approved training organization*'

comment 558 comment by: *Deutsche Lufthansa AG*

Relevant Text:
(b) *Be provided only by an operator or a training organization that are specifically approved to do so by the competent Authority*

Comment:
This goes beyond EU-OPS and the EASA basic regulation 216/2008. There is no need for a specific approval of AOC holder to conduct cabin crew training because the authorization to conduct training could be generic as part of the AOC (without a need for a separate approval). This EASA proposal would lead to additional bureaucracy and associated costs for no safety benefit

Proposal:
Amend (b) '*Be provided by an AOC holder or an approved training organization*'

comment 660 comment by: *Swiss International Airlines / Bruno Pfister*

Relevant Text:
(b) *Be provided only by an operator or a training organization that are specifically approved to do so by the competent Authority*

Comment:

This goes beyond EU-OPS and the EASA basic regulation 216/2008. There is no need for a specific approval of AOC holder to conduct cabin crew training because the authorization to conduct training could be generic as part of the AOC (without a need for a separate approval). This EASA proposal would lead to additional bureaucracy and associated costs for no safety benefit

Proposal:

Amend (b) 'Be provided by ***an AOC holder or an approved training organization*** '

comment 715 comment by: *Irish Aviation Authority*

Paragraph (b)

Comment: Text reads awkwardly.

Justification: Text error (grammar - plural used in place of singular)

Proposed text:

Be provided only by an operator or a training organisation, which is specifically approved to do so....

comment 731 comment by: *TAP Portugal*

Relevant Text:

(b) *Be provided only by an operator or a training organization that are specifically approved to do so by the competent Authority*

Comment:

This goes beyond EU-OPS and the EASA basic regulation 216/2008. There is no need for a specific approval of AOC holder to conduct cabin crew training because the authorization to conduct training could be generic as part of the AOC (without a need for a separate approval). This EASA proposal would lead to additional bureaucracy and associated costs for no safety benefit

Proposal:

Amend (b) 'Be provided by ***an AOC holder or an approved training organization*** '

comment 789 comment by: *UCC SLO*

Replace: (c) be performed by **authorised instructors**. ~~personnel suitably qualified and experienced.~~

Comment: UCCSlo ask that missing qualifications standards for cabin crew instructors be developed

comment 840 comment by: *AIR FRANCE*

Comment:

This goes beyond EU-OPS and the EASA basic regulation 216/2008. There is no need for a specific approval of AOC holder to conduct cabin crew training

Proposal:

Amend (b) 'Be provided by an AOC holder or an approved training organization'

comment 854 comment by: *FSC - CCOO*

Attachment [#3](#)

Comment:

In order to improve harmonization EASA should propose a minimum syllabus and duration for training in IR and CS for operators and training organizations. See Spanish 'circular dgac curso basico tcp 961104'

comment

858

comment by: *FSC - CCOO*

(c) be performed by ~~personnel suitably qualified and experienced.~~

Replace: by authorized cabin crew instructors.

Reason:

In order to achieve harmonization training courses, examination and checking should be conducted authorized cabin crew instructors, these should have undergone a harmonized training course to obtain their qualification as authorized instructors. The relevant training elements for the instructor training should be part of this NPA.

comment

906

comment by: *IACA International Air Carrier Association*

(b)

Appendix 1 to EU-OPS 1.1010 & Appendix 1 to EU-OPS 1.1015 require that training is carried out by suitably qualified persons. All trainers have to be trained themselves hence may be qualified be not experienced.

Proposal: remove the need for trainers to be experienced only qualified.

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comment

102

comment by: *CAA-NL*

Comment regarding:
9. Survival training

Comment CAA-NL:
Survival training should be given for the specific area of the operation only

comment

156

comment by: *Luftfahrt-Bundesamt*

Since „dangerous goods“ alone is not concrete enough, under no. 6 the following should be added:

„(6) dangerous goods, as established in the current version of the ICAO Technical Instructions;“

comment

188

comment by: *Welcome Air*

- Security training programmes are already mandated in Chapter 11 of EU300/2008 – EASA section CC.TRA.120 should be amended to reflect this.
- Safety and security are two different disciplines – the title should reference both subjects or be amended to just 'Training'

comment

190

comment by: *Austro Control GmbH***General Comment:**

It should be considered that the term *initial safety training* could be misleading, as the initial training includes more than only safety aspects. Therefore the question is raised if the training should be an "initial training" (see chapter ramp inspections) throughout the whole Part CC.

(b)(1):

there is a recommendation to be considered:
the extent of "general knowledge of aviation" should be clarified.

comment

277

comment by: *AEA***Relevant Text:**

(c) *The programme of initial safety training course shall include theoretical and practical training and shall cover at least the following subjects:*

...

(7) *Security***Comment:**

Security training programmes are already mandated in Chapter 11 of EU300/2008 – EASA section CC.TRA.120 should be amended to reflect this. EASA has no legal competence for security matters. Security matters are a responsibility of national and EU security programmes at the level of the European Commission.

Safety and security are two different disciplines – the title should be amended to just 'Training'

The initial training for security matters should therefore not be mixed with safety requirements

Proposal:

Delete the reference to security

Comment:

comment

282

comment by: *AEA***Relevant Text:**

(b) *The programme of the initial safety training course shall include theoretical and practical training and shall cover at least the following:*

(1) *general theoretical knowledge on aviation, **aviation regulations** relevant to cabin crew and the safety functions and responsibilities of cabin crew;*

Comment:

"(b)(1)" re-phrased from EU-OPS. Appendix 1 to OPS 1.1002 was "an awareness of aviation regulations".

Proposal:

Re-phrase "(b)(1)" to;

(1) *general theoretical knowledge on aviation, **an awareness of aviation regulations** relevant to cabin crew and the safety functions and responsibilities of cabin crew;*

comment

293

comment by: *The TUI Airlines group represented by Thomson Airways, TUIfly, TUIfly Nordic, CorsairFly, Arkefly, Jet4U, JetairFly*

**CC.TRA.120 Initial safety training and examination
(b) and (c)**

Comment:

It could be interpreted that it is the intention to have only one examination rather than be individual exams for each part of the syllabus.

One examination is very restrictive and would not highlight the areas of retraining required before the end of the course.

Proposal:

Initial Safety Training examination is intended to mean a series of Examinations covering each part of the syllabus.

comment 400

comment by: AUSTRIAN Airlines

Relevant Text:

(c) The programme of initial safety training course shall include theoretical and practical training and shall cover at least the following subjects:

...

(7) Security

Comment:

EASA has no legal competence for security matters. Security matters are a responsibility of national and EU security programmes at the level of the European Commission. The initial training for security matters should therefore not be mixed with safety requirements

Proposal:

Delete the reference to security

Relevant Text:

(b) The programme of the initial safety training course shall include theoretical and practical training and shall cover at least the following:

*(1) general theoretical knowledge on aviation, **aviation regulations** relevant to cabin crew and the safety functions and responsibilities of cabin crew;*

Comment:

"(b)(1)" re-phrased from EU-OPS. Appendix 1 to OPS 1.1002 was "an awareness of aviation regulations".

Proposal:

Re-phrase "(b)(1)" to;

*(1) general theoretical knowledge on aviation, **an awareness of aviation regulations** relevant to cabin crew and the safety functions and responsibilities of cabin crew;*

comment 485

comment by: KLM

Relevant Text:

(c) The programme of initial safety training course shall include theoretical and practical training and shall cover at least the following subjects:

...

(7) Security

Comment:

EASA has no legal competence for security matters. Security matters are a responsibility of national and EU security programmes at the level of the European Commission. The initial training for security matters should therefore not be mixed with safety requirements

Proposal:

Delete the reference to security

comment 486

comment by: KLM

Relevant Text:

(b) The programme of the initial safety training course shall include theoretical and practical training and shall cover at least the following:

***(1)** general theoretical knowledge on aviation, **aviation regulations** relevant to cabin crew and the safety functions and responsibilities of cabin crew;*

Comment:

"(b)(1)" re-phrased from EU-OPS. Appendix 1 to OPS 1.1002 was "an awareness of aviation regulations".

Proposal:

Re-phrase "(b)(1)" to;

***(1)** general theoretical knowledge on aviation, **an awareness of aviation regulations** relevant to cabin crew and the safety functions and responsibilities of cabin crew;*

comment 559

comment by: Deutsche Lufthansa AG

Relevant Text:

(c) The programme of initial safety training course shall include theoretical and practical training and shall cover at least the following subjects:

...

(7) Security

Comment:

EASA has no legal competence for security matters. Security matters are a responsibility of national and EU security programmes at the level of the European Commission. The initial training for security matters should therefore not be mixed with safety requirements

Proposal:

Delete the reference to security

comment 560

comment by: Deutsche Lufthansa AG

Relevant Text:

(b) The programme of the initial safety training course shall include theoretical and practical training and shall cover at least the following:

***(1)** general theoretical knowledge on aviation, **aviation regulations** relevant to cabin crew and the safety functions and responsibilities of cabin crew;*

Comment:

"(b)(1)" re-phrased from EU-OPS. Appendix 1 to OPS 1.1002 was "an awareness of aviation regulations".

Proposal:

Re-phrase "(b)(1)" to;

***(1)** general theoretical knowledge on aviation, **an awareness of aviation regulations** relevant to cabin crew and the safety functions and responsibilities of cabin crew;*

comment 609

comment by: AUSTRIAN Airlines

P6 CC.TRA.120 Initial safety training and examination

Para (b) (7) security training:

Security training programmes are already mandated in Chapter 11 of EU300/2008 – EASA section CC.TRA.120 should be amended to reflect this. Safety and security are two different disciplines – the title should reference both subjects or be amended to just 'Training'

comment

621

comment by: TAP Portugal

2009-02E Draft Opinion Part-CC, Draft Decision AMC/GM Part-CC and Supplement to Draft Opinion Part-MED

P6 CC.TRA.120 Initial safety training and examination

Para (b) (7) security training

Association comment

1. Security training programmes are already mandated in Chapter 11 of EU300/2008 – EASA section CC.TRA.120 should be amended to reflect this.
2. Safety and security are two different disciplines – the title should reference both subjects or be amended to just 'Training'

comment

637

comment by: British Airways Flight Operations

Relevant Text:

(c) The programme of initial safety training course shall include theoretical and practical training and shall cover at least the following subjects:

...

(7) Security

Comment:

EASA has no legal competence for security matters. Security matters are a responsibility of national and EU security programmes at the level of the European Commission. The initial training for security matters should therefore not be mixed with safety requirements

Proposal:

Delete the reference to security

General Comment:

NPA 2009-2 in its entirety is unfit for the purpose for which it is intended and must be withdrawn and reconsidered.

comment

638

comment by: British Airways Flight Operations

Relevant Text:

(b) The programme of the initial safety training course shall include theoretical and practical training and shall cover at least the following:

*(1) general theoretical knowledge on aviation, **aviation regulations** relevant to cabin crew and the safety functions and responsibilities of cabin crew;*

Comment:

"(b)(1)" re-phrased from EU-OPS. Appendix 1 to OPS 1.1002 was "an awareness of aviation regulations".

Proposal:

Re-phrase "(b)(1)" to;

*(1) general theoretical knowledge on aviation, **an awareness of aviation regulations** relevant to cabin crew and the safety functions and responsibilities of cabin crew;*

General Comment:

NPA 2009-2 in its entirety is unfit for the purpose for which it is intended and must be withdrawn and reconsidered.

comment 661 comment by: *Swiss International Airlines / Bruno Pfister*

Relevant Text:

(c) The programme of initial safety training course shall include theoretical and practical training and shall cover at least the following subjects:

...

(7) Security

Comment:

EASA has no legal competence for security matters. Security matters are a responsibility of national and EU security programmes at the level of the European Commission. The initial training for security matters should therefore not be mixed with safety requirements

Proposal:

Delete the reference to security

comment 662 comment by: *Swiss International Airlines / Bruno Pfister*

Relevant Text:

(b) The programme of the initial safety training course shall include theoretical and practical training and shall cover at least the following:

(1) general theoretical knowledge on aviation, aviation regulations relevant to cabin crew and the safety functions and responsibilities of cabin crew;

Comment:

"(b)(1)" re-phrased from EU-OPS. Appendix 1 to OPS 1.1002 was "an awareness of aviation regulations".

Proposal:

Re-phrase "(b)(1)" to;

(1) general theoretical knowledge on aviation, an awareness of aviation regulations relevant to cabin crew and the safety functions and responsibilities of cabin crew;

comment 732 comment by: *TAP Portugal*

Relevant Text:

(c) The programme of initial safety training course shall include theoretical and practical training and shall cover at least the following subjects:

...

(7) Security

Comment:

EASA has no legal competence for security matters. Security matters are a responsibility of national and EU security programmes at the level of the European Commission. The initial training for security matters should therefore not be mixed with safety requirements

Proposal:

Delete the reference to security

comment 733 comment by: *TAP Portugal*

Relevant Text:

(b) The programme of the initial safety training course shall include theoretical and practical training and shall cover at least the following:

(1) general theoretical knowledge on aviation, aviation regulations relevant to cabin crew and the safety functions and responsibilities of cabin crew;

Comment:

"(b)(1)" re-phrased from EU-OPS. Appendix 1 to OPS 1.1002 was "an awareness of aviation regulations".

Proposal:

Re-phrase "(b)(1)" to;

(1) general theoretical knowledge on aviation, an awareness of aviation regulations relevant to cabin crew and the safety functions and responsibilities of cabin crew;

comment 802

comment by: ERA

European Regions Airline Association Comment

- Security training programmes are already mandated in Chapter 11 of EU300/2008 – EASA section CC.TRA.120 should be amended to reflect this.
- Safety and security are two different disciplines – the title should reference both subjects or be amended to just 'Training'

comment 808

comment by: DGAC

In its report on the incident involving the Lockheed 1011-385-3 registered A6-BSM operated by Star Jet and leased by Olympic Airlines (flight number OA202) that occurred on 4 July 2005 at Paris Charles de Gaulle airport (France) the BEA made a recommendation to the EASA in order to enhance the requirements of EU OPS in terms of "common language". DGAC position is that it does not appear realistic to require the cabin crew to be able to communicate in the language of the countries of departure and arrival, due to the current organisation of air transport based on the "hub" model. However, should the EASA decide to take into account the part of the recommendation dealing with a minimum level of proficiency in English language, it should be part of the initial safety training.

The initial training of the cabin crew should also emphasise the difficulty to handle passengers whose language is not the one of the cabin crew and the benefit of using clear, simple and non ambiguous orders that can be understandable by all passengers to control the crowd.

This could be mentioned in § 4.6 of AMC.CC.TRA.120 Initial safety training and examination dealing with the methods used to motivate passengers and the crowd control necessary to expedite an aeroplane evacuation.

comment 827

comment by: Swiss International Airlines / Bruno Pfister

Security training programmes are already mandated in Chapter 11 of EU300/2008 – EASA section CC.TRA.120 should be amended to reflect this. Safety and security are two different disciplines – the title should reference both subjects or be amended to just 'Training'

comment 841

comment by: AIR FRANCE

Comment:

Security matters are not generic knowledge and are based on national and airline security programs That is why it is proposed to delete the security aspects of the initial safety training as security will be part of the following trainings.

Proposal:
Delete the reference to security

comment 842 comment by: AIR FRANCE

Comment:
"(b)(1)" re-phrased from EU-OPS. Appendix 1 to OPS 1.1002 was "an awareness of aviation regulations".
Proposal:
Re-phrase "(b)(1)" to;
(1) general theoretical knowledge on aviation, an awareness of aviation regulations relevant to cabin crew and the safety functions and responsibilities of cabin crew;

comment 867 comment by: FSC - CCOO

Comment to (c)
In order to achieve harmonization, legal certainty and equivalent levels of proficiency the examination process should be standardized.

comment 908 comment by: IACA International Air Carrier Association

(b) and (c)
It could be interpreted that it is the intention to have only one examination rather than be individual exams for each part of the syllabus. One examination is very restrictive and would not highlight the areas of retraining required before the end of the course.
Proposal: Initial Safety Training examination is intended to mean a series of Examinations covering each part of the syllabus.

comment 937 comment by: IATA

Security training programmes are already mandated in Chapter 11 of EU300/2008 – EASA section CC.TRA.120 should be amended to reflect this.
Safety and security are two different disciplines – the title should reference both subjects or be amended to just 'Training'

comment 941 comment by: ANE (Air Nostrum) OPS QM

Safety and security are two different disciplines – the title should reference both subjects or be amended to just 'Training'

E. VIII. Draft Opinion Part-CC - Subpart TRA - CC.TRA.125 Aircraft type-specific training and checking

p. 6-7

comment 103 comment by: CAA-NL

Comment CAA-NL:
Use of common terminology lavatories or toilets

comment 105 comment by: Dr Martin St Laurent

CC TRA 155

A physical aptitude is needed to perform "evacuate procedures" as detailed in paragraph 6-1 and 6-2 and para 3 about "normal and emergency procedures". It is the reason why we have to keep medical regulations and survey by AME or AeMC under the competency of the authority in each country.

Many objections are written against this kind of medical regulations. For instance I have read that the risk of sudden inflight incapacitation of a cabin crew member is not a concern for the safety. Maybe it is true but it is not the problem. The problem is to keep the ability to manage procedures for emergency or for evacuation.

I have also read that use of psychotropic medication is not a concern among cabin crew. No, it's false because of the reason of the treatment and the side effects on personality, attitude, behavior, stress, vigilance etc..... and summarizing on mental block before an emergency situation.

We keep in mind that the cabin crew efficient condition needs a fine quality of training and a guaranteed physical and mental state. Physical on locomotor system, hearing condition, vision, they have to be correct. Mental without history of psychiatric disorder or fragility or addiction to psychotropic substance or medication.

comment

249

comment by: Jill Pelan

CC TRA 125

The CFDT FRANCE asks for this to be simply deleted.

Aircraft type specific training and checking should not be in initial training and the Attestation as this may be **discriminatory** and go **against a level playing field for all with harmonised training.**

A cabin crew member who has an attestation including general knowledge and proficiency + type training on aircraft A, B & C may not find employment with an operator who has aircraft X, Y & Z...

Type training should be added to the Attestation as an annex by the operator employing the cabin crew. As each operator has different emergency material and locations, they MUST provide training for the cabin crew on their particular aircraft before allowing them to work as crew - this makes initial type training in an attestation superfluous and unnecessary.

comment

283

comment by: AEA

Relevant Text:

(a) For extending the privileges of their cabin crew attestation on an aircraft type determined in accordance with the applicable requirements of Part-21, cabin crew members shall undergo:

(1) a training course to acquire the adequate proficiency to perform all cabin crew duties as relevant to the type; and

(2) the associated checking covering all training subjects to demonstrate they have attained the required level of proficiency.

(b) The programme of the training course shall:

(1) be based on the specific data provided for the relevant aircraft type in accordance with the applicable requirements of Part-21;

Comment:

"(a)" and "(b)(1)" not in EU-OPS. Operator has no influence on Part-21, especially variants of 1 type.

Proposal:

re-phrase "(a)" and "(b)(1)" as similar article in EU-OPS. 1.1010

comment

294

comment by: *The TUI Airlines group represented by Thomson Airways, TUIfly, TUIfly Nordic, CorsairFly, Arkefly, Jet4U, JetairFly*

CC.TRA.135 (a) (2)

Comment:

It is unclear whether this is this a requirement for a Line Check or an examination .

comment

300

comment by: *Thomas Cook Airlines*

Justification:

This rule includes a number of areas that operator specific and not generic to the aircraft type. To include these in the attestation process would compromise safety standards.

Proposal:

Suggest removal of all Aircraft type training and checking from the CC.TRA section of Implementing Rules and place it all within CC.OR. OPS

comment

365

comment by: *Walter Gessky*

CC.TRA.125 Aircraft type specific training and checking

(a) ~~For extending the~~ **To grant** ~~privileges of their~~ **to the holder of a** cabin crew attestation **for assignment to duties** on an aircraft type ~~determined in accordance with the applicable requirements of Part 21,~~ the cabin crew members shall undergo:

Justification:

Delete the reference to part 21 because no power is given to the Commission to regulate the trainings syllabus for cabin crew members in part 21. This can only be regulated under CC.TRA.

It shall made clear that the attestation itself does not give another privilege than this training must be passed before the required specific type training can be started. When an attestation once issued, the initial safety training is valid and not required to be repeated by another operator.

comment

401

comment by: *AUSTRIAN Airlines*

Relevant Text:

(a) For extending the privileges of their cabin crew attestation on an aircraft type determined in accordance with the applicable requirements of Part-21, cabin crew members shall undergo:

(1) a training course to acquire the adequate proficiency to perform all cabin crew duties as relevant to the type; and

(2) the associated checking covering all training subjects to demonstrate they have attained the required level of proficiency.

(b) The programme of the training course shall:

(1) be based on the specific data provided for the relevant aircraft type in accordance with the applicable requirements of Part-21;

Comment:

"(a)" and "(b)(1)" not in EU-OPS. Operator has no influence on Part-21, especially variants of 1 type.

Proposal:

re-phrase "(a)" and "(b)(1)" as similar article in EU-OPS. 1.1010

comment

454

comment by: Elaine Allan Monarch

Page No. 6

Ref No. NPA 2009 - 2e CC.TRA.125

Summary of EASA Proposed Requirement:

Gives a list of subjects that are considered to be generic to aircraft type. Reference to Part 21 for requirements

Comment:

Part 21 doesn't exist for all aircraft types. This rule appears to duplicate the training requirements for aircraft type training, as the majority of these subjects are Operator Specific.

Justification:

This rule includes a number of areas that are operator specific. To include these in the attestation process would compromise safety standards.

Proposed Text (if applicable)

Suggest removal of all Aircraft type training and checking from the CC.TRA section of Implementing Rules

comment

487

comment by: KLM

Relevant Text:

(a) For extending the privileges of their cabin crew attestation on an aircraft type determined in accordance with the applicable requirements of Part-21, cabin crew members shall undergo:

(1) a training course to acquire the adequate proficiency to perform all cabin crew duties as relevant to the type; and

(2) the associated checking covering all training subjects to demonstrate they have attained the required level of proficiency.

(b) The programme of the training course shall:

(1) be based on the specific data provided for the relevant aircraft type in accordance with the applicable requirements of Part-21;

Comment:

"(a)" and "(b)(1)" not in EU-OPS. Operator has no influence on Part-21, especially variants of 1 type.

Proposal:

re-phrase "(a)" and "(b)(1)" as similar article in EU-OPS. 1.1010

comment

541

comment by: Austro Control GmbH

~~a) For extending the~~ **To grant a privilege of their to the holder of a cabin crew attestation for assignment to duties on an aircraft type determined in accordance with the applicable requirements of Part-21, the cabin crew members shall undergo:**

Justification:

Delete the reference to Part 21 because no power is given to the Commission to regulate the trainings syllabus for cabin crew members in Part 21. This can

only be regulated under CC.TRA.

It shall be made clear that the attestation itself does not give another privilege than the initial safety training and it must be passed before the required specific type training can be started. When an attestation once is issued, the initial safety training is valid and not required to be repeated by another operator.

comment 561

comment by: Deutsche Lufthansa AG

Relevant Text:

(a) For extending the privileges of their cabin crew attestation on an aircraft type determined in accordance with the applicable requirements of Part-21, cabin crew members shall undergo:

(1) a training course to acquire the adequate proficiency to perform all cabin crew duties as relevant to the type; and

(2) the associated checking covering all training subjects to demonstrate they have attained the required level of proficiency.

(b) The programme of the training course shall:

(1) be based on the specific data provided for the relevant aircraft type in accordance with the applicable requirements of Part-21;

Comment:

"(a)" and "(b)(1)" not in EU-OPS. Operator has no influence on Part-21, especially variants of 1 type.

Proposal:

re-phrase "(a)" and "(b)(1)" as similar article in EU-OPS. 1.1010

comment 663

comment by: Swiss International Airlines / Bruno Pfister

Relevant Text:

(a) For extending the privileges of their cabin crew attestation on an aircraft type determined in accordance with the applicable requirements of Part-21, cabin crew members shall undergo:

(1) a training course to acquire the adequate proficiency to perform all cabin crew duties as relevant to the type; and

(2) the associated checking covering all training subjects to demonstrate they have attained the required level of proficiency.

(b) The programme of the training course shall:

(1) be based on the specific data provided for the relevant aircraft type in accordance with the applicable requirements of Part-21;

Comment:

"(a)" and "(b)(1)" not in EU-OPS. Operator has no influence on Part-21, especially variants of 1 type.

Proposal:

re-phrase "(a)" and "(b)(1)" as similar article in EU-OPS. 1.1010

comment 734

comment by: TAP Portugal

Relevant Text:

(a) For extending the privileges of their cabin crew attestation on an aircraft type determined in accordance with the applicable requirements of Part-21, cabin crew members shall undergo:

(1) a training course to acquire the adequate proficiency to perform all cabin crew duties as relevant to the type; and

(2) the associated checking covering all training subjects to demonstrate they

have attained the required level of proficiency.
 (b) The programme of the training course shall:
(1) be based on the specific data provided for the relevant aircraft type in accordance with the applicable requirements of Part-21;

Comment:

"(a)" and "(b)(1)" not in EU-OPS. Operator has no influence on Part-21, especially variants of 1 type.

Proposal:

re-phrase "(a)" and "(b)(1)" as similar article in EU-OPS. 1.1010

comment 809

comment by: DGAC

The smoke training required by CC.TRA.125 (b) (3) (v) is to be performed using a generic "smoke protection equipment used in aviation" iaw AMC.CC.TRA.125. In addition of this training, the cabin crew member will have to perform a smoke training using the operator's equipment as per OR.OPS.125.CC (operator's aircraft type training and difference training). This might not be efficient in terms of teaching and even confusing.

Suggestion: mandatory exercises involving the use of a safety equipment should only be performed using the operator's equipment during the operator's aircraft type training and difference training. What is the benefit to include this kind of exercise in addition in the Part CC ?

comment 822

comment by: cfdt france

CC.CCA.111 New: Complaints

The CFDT France and ETF asks for a provision for Complaints of the decision(s) taken by the competent authority which should include an arbitration committee including worker representatives, operator and authority & also presentation

of the complaint to the Commission .

All provisions for training and issuance of Attestation should be hard rules - I.R. and not CS material. **This is a general demand of French and European Cabin crew as SAFETY PROFESSIONALS**

comment 869

comment by: FSC - CCOO

Comment to (a)

The type specific training course syllabus should be defined in the aircraft's OSC.

comment 875

comment by: IATA

(a) For extending the privileges of their cabin crew attestation on an aircraft type

determined in accordance with the applicable requirements of Part21, cabin crew members shall undergo:

(1) a training course to acquire the adequate proficiency to perform all cabin crew duties as relevant to the type; and

(2) the associated checking covering all training subjects to demonstrate they have attained the required level of proficiency.

(b) The programme of the training course shall:

(1) be based on the specific data provided for the relevant aircraft type in accordance with the applicable requirements of Part21;

(2) include training and practice on either a representative training device or on the actual aircraft; and
 (3) cover those elements that are aircraft typespecific for at least the following training subjects:
 (i) aircraft general description; (ii) all safety equipment and systems installed;
 (iii) normal and emergency procedures;
 (iv) actual operation and opening by each cabin crew member of each type or variant of normal and emergency doors and exits in the normal and emergency modes, and demonstration of the operation of the other exits;
 (v) fire and smoke training;
 (vi) evacuation procedures including slide training where fitted;
 (vii) pilot incapacitation; and
 (viii) crew resource management (CRM).
 (c) To exercise their privileges on an aircraft type, cabin crew members shall in addition to the training required in (b) undergo the related operator's aircraft type training in accordance with the applicable requirements specified in PartOR.

The distinction between "type specific" and "operator specific" is irrelevant as the training under CC.TRA.125 is mostly "operator specific".

Proposal:

Delete this distinction. In case the cabin crew members change the operator for safety reasons they should perform the whole trainings course.

E. VIII. Draft Opinion Part-CC - Subpart TRA - CC.TRA.135 Recurrent training and checking

p. 7

comment

150

comment by: *International Air Transport Association*

CC.TRA.135

There is no mention that cabin crew members are required to successfully complete recurrent dangerous goods training at intervals not exceed 24 months as set out in Part 1;4 of the ICAO Technical Instructions.

Proposed revision.

Insert and a new subparagraph (2) to (b) as follows:

"(2) in addition to (1), within intervals not exceeding 24 months, each cabin crew member shall undergo dangerous goods training."

Renumber the existing (2) to become (3) and also revise initial text to read:

"(3) in addition to (1) and (2), within intervals..."

comment

162

comment by: *claire.amos*

CC.TRA.135 (2) (i)

clarification required: This contradicts AMC OR.OPS.135.CC 1.4 & 1.5 which states that these fall into the annual requirements.

comment 165 comment by: *claire.amos*

Fire and smoke training is not mentioned here in either annual or triannual requirements? It is not consistent with AMC OR.OPS.135.CC.
Safety equipment (including donning) is also missing from this list.

comment 171 comment by: *ETF*

~~Delete last part: (b)(1)(ii) for each aircraft type or variant to be operated, the typespecific emergency and evacuation procedures and individual touch-drills by each cabin crew member for opening each type or variant of normal and emergency doors and exits for passenger evacuation.~~

Reason: Emergency evacuation of passengers is a key safety job for cabin crew. It is insufficient that hands on operation of doors is only every three years. The NTSB states that survivability for Part 121 carriers involved in accidents between 1983 and 2000 was 95.7%. (See NTSB/SR-01/01.) This proves that opening of cabin doors is a crucial task for passenger survival. The DGAC "Regulatory study on emergency evacuations" of 1999 pointed to the fact that a yearly training of fairly short duration for cabin crew, often carried out in low realism conditions, with a relative motivation of the staff, and often limited physical strength regarding the professional acts to be carried out, do not prepare the cabin crew members to emergency evacuations well enough. Also taking into consideration that approximately half of the doors and slides may be unserviceable during an evacuation, door training should be annual hands on training.

Delete: (2) in addition to (1), ~~within intervals not exceeding 3 years~~, each cabin crew member shall complete for each aircraft type or variant to be operated:

Reason: See above

comment 250 comment by: *Jill Pelan*

CC.TRA 135 (
~~(2) in addition to (1), within intervals not exceeding 3 years, each cabin crew member shall complete for each aircraft type or variant to be operated:~~
~~(i) actual operation and opening in a representative training device or in the actual aircraft of each type or variant of normal and emergency exits in the normal and emergency modes; and~~
~~(ii) training on the use of equipment and systems relevant to pilot incapacitation.~~
~~The CFDT FRANCE and ETF cabin crew demand the deletion of this paragraph 2..... the procedures mentioned should be part of the aircraft type/variant training every 12 Months.~~

Delete last part: (b)(1)(ii) for each aircraft type or variant to be operated, the typespecific emergency and evacuation procedures ~~and individual touch-drills by each cabin crew member for opening each type or variant of normal and emergency doors and exits for passenger evacuation.~~

Reason: Emergency evacuation of passengers is a key safety job for cabin crew. It is insufficient that hands on operation of doors is only every three years. The NTSB states that survivability for Part 121 carriers involved in

accidents between 1983 and 2000 was 95.7%. (See NTSB/SR-01/01.) This proves that opening of cabin doors is a crucial task for passenger survival. The DGAC "Regulatory study on emergency evacuations" of 1999 pointed to the fact that a yearly training of fairly short duration for cabin crew, often carried out in low realism conditions, with a relative motivation of the staff, and often limited physical strength regarding the professional acts to be carried out, do not prepare the cabin crew members to emergency evacuations well enough. Also taking into consideration that approximately half of the doors and slides may be unserviceable during an evacuation, door training should be annual hands on training.

Delete: (2) in addition to (1), ~~within intervals not exceeding 3 years~~, each cabin crew member shall complete for each aircraft type or variant to be operated:

Reason: See above

comment

284

comment by: AEA

Relevant Text:

(b) The programme of a recurrent training course shall cover:

(1) every 12 calendar months,

(i) review and update as relevant of aviation regulations, crew resource management, incident and accident review, effects of surface contamination

Comment:

"(b)(1)(i)" not in EU-OPS. The basis of operator training programmes is aviation regulations, therefore no need to worry cabin crew.

Proposal:

Keep text in "(a)" and "(b)(1)". Delete (I)

comment

295

comment by: *The TUI Airlines group represented by Thomson Airways, TUIfly, TUIfly Nordic, CorsairFly, Arkefly, Jet4U, JetairFly*

CC.TRA.135 Recurrent training and checking

(a)

Comment - The NPA is more restrictive than EU-OPS 1.1015 Recurrent Training

(c) The period of validity of recurrent training and the associated checking required by OPS 1.1025 shall be 12 calendar months **in addition to the remainder of the month of issue**. If issued within the final three calendar months of validity of a previous check, **the period of validity shall extend from the date of issue until 12 calendar months from the expiry date of that previous check**.

Proposal:

Reinstate the period of validity from EU-OPS 1.1025

comment

301

comment by: *Thomas Cook Airlines*

Justification:

Information contained is contradictory to the rule material and needs to correctly reflect the requirement

Proposal:

Suggest rewriting to: (2) in addition to (1) within intervals not exceeding 3 years, each cabin crew member 3) Each Cabin Crew given realistic and practical training in the use of all fire fighting equipment, including protective clothing, representative of that carried in the aircraft. This training must include: (a) each cabin crew member extinguishing an actual fire characteristic of an aircraft interior fire except that, in the case of Halon extinguishers, an alternative extinguishing agent may be used. (ii) the donning of PBE and its use by each cabin crew member in an enclosed simulated smoke filled environment.

comment

351

comment by: *Jill Pelan*

CC.TRA 135 Recurrent training & checking (Page 7)

(b) The programme of a recurrent training course shall cover :

1. Every 12 months.....

2. In addition to (1) Within intervals not exceeding 3 years , each cabin member shall complete for each aircraft type or variant to be operated :

(1) Actual operation & opening

(2) Training on the use fo equipment

CFDT France COMMENT & proposed amendment : " The programme of a recurrent training course shall cover :

(1) AND

(2.) Each cabin member shall also complete for each aircraft type of variant to be operated the operation of opening doors and exits and the use of equipment and all systems relevant to pilot incapacitation. "

Reason - the type variant training cannot be relegated to every 3 years -this is part of training to aid performance on board the aircraft.

comment

377

comment by: *kapers Cabin Crew Union*

Delete last part: (b)(1)(ii) for each aircraft type or variant to be operated, the typespecific emergency and evacuation procedures ~~and individual touchdrills by each cabin crew member for opening each type or variant of normal and emergency doors and exits for passenger evacuation.~~

Reason: Emergency evacuation of passengers is a key safety job for cabin crew. It is insufficient that hands on operation of doors is only every three years. The NTSB states that survivability for Part 121 carriers involved in accidents between 1983 and 2000 was 95.7%. (See NTSB/SR-01/01.) This proves that opening of cabin doors is a crucial task for passenger survival. The DGAC "Regulatory study on emergency evacuations" of 1999 pointed to the fact that a yearly training of fairly short duration for cabin crew, often carried out in low realism conditions, with a relative motivation of the staff, and often limited physical strength regarding the professional acts to be carried out, do not prepare the cabin crew members to emergency evacuations well enough. Also taking into consideration that approximately half of the doors and slides may be unserviceable during an evacuation, door training should be annual hands on training.

Delete: (2) in addition to (1), ~~within intervals not exceeding 3 years~~, each cabin crew member shall complete for each aircraft type or variant to be

operated:

Reason: See above

comment 402

comment by: *AUSTRIAN Airlines*

Relevant Text:

(b) The programme of a recurrent training course shall cover:

(1) every 12 calendar months,

(i) review and update as relevant of aviation regulations, crew resource management, incident and accident review, effects of surface contamination

Comment:

"(b)(1)(i)" not in EU-OPS. The basis of operator training programmes is aviation regulations, therefore no need to worry cabin crew.

Proposal:

Keep text in "(a)" and "(b)(1)". Delete (I)

comment

455

comment by: *Elaine Allan Monarch*

Page No. 7

Ref No. NPA 2009 - 2e CC.TRA.135(b) (2)

Summary of EASA Proposed Requirement:

No reference to 3 yearly requirement for Fire & Smoke training

Comment:

Is Fire and Smoke training still required three yearly.

Justification:

Information needs to reflect the requirement.

Proposed Text (if applicable)

Suggest rewriting to: **(2) in addition to (1) within intervals not exceeding 3 years, each cabin crew member 3) Each Cabin Crew given realistic and practical training in the use of all fire fighting equipment, including protective clothing, representative of that carried in the aircraft. This training must include: (a) each cabin crew member extinguishing an actual fire characteristic of an aircraft interior fire except that, in the case of Halon extinguishers, an alternative extinguishing agent may be used. (ii) the donning of PBE and its use by each cabin crew member in an enclosed simulated smoke filled environment.**

comment

488

comment by: *KLM*

Relevant Text:

(b) The programme of a recurrent training course shall cover:

(1) every 12 calendar months,

(i) review and update as relevant of aviation regulations, crew resource management, incident and accident review, effects of surface contamination

Comment:

"(b)(1)(i)" not in EU-OPS. The basis of operator training programmes is aviation regulations, therefore no need to worry cabin crew.

Proposal:

Keep text in "(a)" and "(b)(1)". Delete (I)

comment 562

comment by: *Deutsche Lufthansa AG***Relevant Text:**

(b) The programme of a recurrent training course shall cover:

(1) every 12 calendar months,

(i) review and update as relevant of aviation regulations, crew resource management, incident and accident review, effects of surface contamination

Comment:

"(b)(1)(i)" not in EU-OPS. The basis of operator training programmes is aviation regulations, therefore no need to worry cabin crew.

Proposal:

Keep text in "(a)" and "(b)(1)". Delete (I)

comment 639

comment by: *British Airways Flight Operations***Relevant Text:**

(b) The programme of a recurrent training course shall cover:

(1) every 12 calendar months,

(i) review and update as relevant of aviation regulations, crew resource management, incident and accident review, effects of surface contamination

Comment:

"(b)(1)(i)" not in EU-OPS. The basis of operator training programmes is aviation regulations; therefore there is no need to train the cabin crew in their content per se.

Proposal:

Keep text in "(a)" and "(b)(1)". Delete (i).

General Comment:

NPA 2009-2 in its entirety is unfit for the purpose for which it is intended and must be withdrawn and reconsidered.

comment 664

comment by: *Swiss International Airlines / Bruno Pfister***Relevant Text:**

(b) The programme of a recurrent training course shall cover:

(1) every 12 calendar months,

(i) review and update as relevant of aviation regulations, crew resource management, incident and accident review, effects of surface contamination

Comment:

"(b)(1)(i)" not in EU-OPS. The basis of operator training programmes is aviation regulations, therefore no need to worry cabin crew.

Proposal:

Keep text in "(a)" and "(b)(1)". Delete (I)

comment 735

comment by: *TAP Portugal***Relevant Text:**

(b) The programme of a recurrent training course shall cover:

(1) every 12 calendar months,

(i) review and update as relevant of aviation regulations, crew resource management, incident and accident review, effects of surface contamination

Comment:

"(b)(1)(i)" not in EU-OPS. The basis of operator training programmes is aviation regulations, therefore no need to worry cabin crew.

Proposal:

Keep text in "(a)" and "(b)(1)". Delete (I)

comment

790

comment by: *UCC SLO*

Delete last part: (b)(1)(ii) for each aircraft type or variant to be operated, the typespecific emergency and evacuation procedures ~~and individual touch drills by each cabin crew member for opening each type or variant of normal and emergency doors and exits for passenger evacuation.~~

Reason: Emergency evacuation of passengers is a key safety job for cabin crew. It is insufficient that hands on operation of doors is only every three years. The NTSB states that survivability for Part 121 carriers involved in accidents between 1983 and 2000 was 95.7%. (See NTSB/SR-01/01.) This proves that opening of cabin doors is a crucial task for passenger survival. The DGAC "Regulatory study on emergency evacuations" of 1999 pointed to the fact that a yearly training of fairly short duration for cabin crew, often carried out in low realism conditions, with a relative motivation of the staff, and often limited physical strength regarding the professional acts to be carried out, do not prepare the cabin crew members to emergency evacuations well enough. Also taking into consideration that approximately half of the doors and slides may be unserviceable during an evacuation, door training should be annual hands on training.

Delete: (2) in addition to (1), ~~within intervals not exceeding 3 years~~, each cabin crew member shall complete for each aircraft type or variant to be operated:

Reason: See above

comment

843

comment by: *AIR FRANCE*

Comment:

"(b)(1)(i)" not in EU-OPS. The basis of operator training programmes is aviation regulations is taken into account in the operations Manual, therefore there is no added value to train the cabin crew on a recurrent basis.

Proposal:

Keep text in "(a)" and "(b)(1)". Delete (I)

comment

876

comment by: *IATA*

It should be made clear that this training is only appropriate if it is performed in relation to a specific operator

comment

893

comment by: *Frank Ciupka*

Comment:

If all operator related aspect are remove from a regular (JAR OPS) recurrent training and checking there are more or less no left over.

Therefore the recurrent training and checking makes only sense in relation to an operator training.

Proposal:

Delete CC.TRA.135 completely and place all items into OR.OPS.135.CC

comment

895

comment by: *Swedish Transport Agency, Civil Aviation Department (Transportstyrelsen, Luftfartsavdelningen)*

Relevant Text:

(a) Cabin crew members shall undergo every 12 calendar months:
 (1) a recurrent training course to maintain the adequate proficiency to perform all cabin crew duties and responsibilities; and
 (2) the associated checking covering all subjects of the training programme to demonstrate they maintain the required level of proficiency .

Comment:

This requirement is being referred to when preparing the medical requirements for CC. However, the medical requirements for CC should only refer to flight safety and the ability of CC to exercise their privileges safely.

Proposal:

Medical requirements for CC should not refer to CC.TRA.135.

comment

913

comment by: *IACA International Air Carrier Association*

(a)(2)

It is unclear whether this is this a requirement for a Line Check or an examination.

E. IX. Draft Decision Part-CC - Subpart TRA - AMC CC.TRA.115 Conduct of training courses, examination and checking

p. 8

comment

285

comment by: *AEA*

Relevant Text:

2. Examination and checking required for each training course should be accomplished by the method appropriate to the type of training including:
 2.1 practical demonstration;
 2.2 computer based assessment;
 2.3 inflight checks; and
 2.4 oral or written tests.

Comment:

Not in EU-OPS. In JAR-OPS AMC 1.1025 different items 2.1 to 2.4 were listed as "and/or". In this article "and", which is more restrictive.

Proposal:

Add "or" between different items 2.1 to 2.4
 2.1 practical demonstration; **or**
 2.2 computer based assessment; **or**
 2.3 inflight checks; and
 2.4 oral or written tests.

comment

403

comment by: *AUSTRIAN Airlines*

Relevant Text:

2. Examination and checking required for each training course should be accomplished by the method appropriate to the type of training including:

- 2.1 practical demonstration;
- 2.2 computer based assessment;
- 2.3 inflight checks; and
- 2.4 oral or written tests.

Comment:

Not in EU-OPS. In JAR-OPS AMC 1.1025 different items 2.1 to 2.4 were listed as "and/or". In this article "and", which is more restrictive.

Proposal:

Add "or" between different items 2.1 to 2.4

- 2.1 practical demonstration; **or**
- 2.2 computer based assessment; **or**
- 2.3 inflight checks; and
- 2.4 oral or written tests.

comment

456

comment by: Elaine Allan Monarch

Page No. 8

Ref No. NPA 2009 - 2e AMC.CC.TRA.115 2

Summary of EASA Proposed Requirement:

Examination and checking required for each training course should be accomplished by the method appropriate to the type of training including: 2.1 practical demonstration 2.2. Computer based assessment 2.3 in-flight checks; and 2.4 oral or written tests.

Comment:

Can any of these be used and it is the operator who decides which is the most appropriate for their operation.

Justification:

Proposed Text (if applicable)

comment

489

comment by: KLM

Relevant Text:

2. Examination and checking required for each training course should be accomplished by the method appropriate to the type of training including:

- 2.1 practical demonstration;
- 2.2 computer based assessment;
- 2.3 inflight checks; and
- 2.4 oral or written tests.

Comment:

Not in EU-OPS. In JAR-OPS AMC 1.1025 different items 2.1 to 2.4 were listed as "and/or". In this article "and", which is more restrictive.

Proposal:

Add "or" between different items 2.1 to 2.4

- 2.1 practical demonstration; **or**
- 2.2 computer based assessment; **or**

2.3 inflight checks; and
2.4 oral or written tests.

comment 563

comment by: *Deutsche Lufthansa AG***Relevant Text:**

2. Examination and checking required for each training course should be accomplished by the method appropriate to the type of training including:

- 2.1 practical demonstration;
- 2.2 computer based assessment;
- 2.3 inflight checks; and
- 2.4 oral or written tests.

Comment:

Not in EU-OPS. In JAR-OPS AMC 1.1025 different items 2.1 to 2.4 were listed as "and/or". In this article "and", which is more restrictive.

Proposal:

Add "or" between different items 2.1 to 2.4

- 2.1 practical demonstration; **or**
- 2.2 computer based assessment; **or**
- 2.3 inflight checks; and
- 2.4 oral or written tests.

comment 665

comment by: *Swiss International Airlines / Bruno Pfister***Relevant Text:**

2. Examination and checking required for each training course should be accomplished by the method appropriate to the type of training including:

- 2.1 practical demonstration;
- 2.2 computer based assessment;
- 2.3 inflight checks; and
- 2.4 oral or written tests.

Comment:

Not in EU-OPS. In JAR-OPS AMC 1.1025 different items 2.1 to 2.4 were listed as "and/or". In this article "and", which is more restrictive.

Proposal:

Add "or" between different items 2.1 to 2.4

- 2.1 practical demonstration; **or**
- 2.2 computer based assessment; **or**
- 2.3 inflight checks; and
- 2.4 oral or written tests.

comment 736

comment by: *TAP Portugal***Relevant Text:**

2. Examination and checking required for each training course should be accomplished by the method appropriate to the type of training including:

- 2.1 practical demonstration;
- 2.2 computer based assessment;
- 2.3 inflight checks; and
- 2.4 oral or written tests.

Comment:

Not in EU-OPS. In JAR-OPS AMC 1.1025 different items 2.1 to 2.4 were listed

as "and/or". In this article "and", which is more restrictive.

Proposal:

Add "or" between different items 2.1 to 2.4

- 2.1 practical demonstration; **or**
- 2.2 computer based assessment; **or**
- 2.3 inflight checks; and
- 2.4 oral or written tests.

comment 844

comment by: AIR FRANCE

Comment:

Not in EU-OPS. In JAR-OPS AMC 1.1025 different items 2.1 to 2.4 were listed as "and/or". In this article "and", which is more restrictive.

Proposal:

Add "and/or" between different items 2.1 to 2.4

- 2.1 practical demonstration; and/or
- 2.2 computer based assessment; and/or
- 2.3 inflight checks; and
- 2.4 oral or written tests.

comment 879

comment by: IATA

EXAMINATION AND CHECKING

1.

2. Examination and checking required for each training course should be accomplished by the method appropriate to the type of training including:

- 2.1 practical demonstration;
- 2.2 computer based assessment;
- 2.3 inflight checks; and
- 2.4 oral or written tests.

This is more restrictive than in EU-OPS

Proposal:

..... including:

- 2.1 practical demonstration and/or
- 2.2 computer based assessment and/or
- 2.3 inflight checks; and
- 2.4 oral or written tests.

E. IX. Draft Decision Part-CC - Subpart TRA - AAMC CC.TRA.120 Initial safety training and examination

p. 8-10

comment 144

comment by: CAA-NL

Comment regarding:

Paragraph No: AMC CC.TRA.120 6.

Comment: The training aspects are inappropriate for cabin crew.

Justification: With the possible exception of 6.1, the aspects do not align with those specified in the ICAO Technical Instructions; reporting is not a required element – cabin crew will not ordinarily report to the Authority – and

packaging is irrelevant to cabin crew. The elements required by the Technical Instructions are:

- General philosophy
- Limitations
- Labelling and marking
- Recognition of undeclared dangerous goods
- Provisions for passengers and crew
- Emergency procedures

It is suggested that the above aspects are not specified in the IRs because if the Technical Instructions change the IRs will not align. A more "future proof" solution would be to simply refer to the training required by the Technical Instructions.

Proposed Text (if applicable):

6. Dangerous goods:

6.1 Aspects of transport of dangerous goods by air with which the ICAO Technical Instructions state they should be familiar.

comment

151

comment by: *International Air Transport Association*

AMC CC.TRA.120 6.

The elements of dangerous goods training shown are not in compliance with those shown in the current edition of the ICAO Technical Instructions, Table 1-4 and Table 1-5.

Proposed Amendment

Revise the text of 6. to read as follows:

"6. Dangerous Goods. Training for cabin crew should address the aspects with they should be familiar as set out in the current edition of the ICAO Technical Instructions."

comment

157

comment by: *Luftfahrt-Bundesamt*

The training programme should at least comprise the syllabus of the ICAO Technical Instructions as the general basis and can be adjusted by the operators according to the requirements of the respective personnel.

Therefore No. 6 should be changed to:

6. Dangerous goods:

6.1 ~~general principles~~ General philosophy;

6.2 ~~importance of procedures and reporting; and~~ Limitations

6.3 ~~applicable packaging and limitations~~ Labelling and marking

6.4 Recognition of undeclared dangerous goods

6.5 Provisions for passenger and crew

6.6 Emergency procedures.

comment

167

comment by: *ETF*

AMC.CC.120 point 4.5

4.5 duties to be undertaken in the event of turbulence, including securing the

cabin; and

Recommendation: IATA states that turbulence related injuries to cabin crew cost the airline industry over 60 million USD per year. Despite the fact that IATA as well as the CAST in the USA has had this on the agenda, it is still up to the individual airlines in Europe to address the situation. ETF asks that EASA concentrate on this problem through a rulemaking task or study. The reasons for cabin crew ignorance could be lack of knowledge of the nature of turbulence and its effects, insufficient procedures for securing cabin crew, insufficient knowledge on the part of the pilots on how turbulence is experienced in the cabin and perhaps even insufficient communication between the pilot and cabin crews. For reference see ICAO turbulence safety enhancements.

Point 5.2

Add: 5.2 the physiological effects of flying **including gas tro-intestinal disturbances and** with particular emphasis on hypoxia and oxygen requirements;

Reason: The item was included in EU-OPS. It is well established that gases in the bodies closed or semi-closed cavities will expand with high cabin altitude. In the event of depressurisation the effects could become paralyzing. Point 5.2 should also cover decompression sickness, well known to divers.

comment

174

comment by: UKAMAC

AMC CC.TRA.120 para 5.2 Initial safety training and examination

Comment:

The commonest adverse manifestations of aviation physiology arise from lack of understanding of the effects of pressure changes on the middle ear and sinuses.

Justification:

This lack of understanding leads to avoidable barotrauma and potential incapacitation of crew in the event of pressurization failure.

Proposed text:

5.2 the physiological effects of flying with particular emphasis on hypoxia, oxygen requirements, eustachian tubal function and barotrauma;

comment

186

comment by: Federal Office of Civil Aviation (FOCA), Switzerland

Concern detail:

AMC CC.TRA.120 6, page 10

Comment:

The training aspects are inappropriate for cabin crew.

With the possible exception of 6.1, the aspects do not align with those specified in the ICAO Technical Instructions; reporting is not a required element – cabin crew will not ordinarily report to the Authority – and packaging is irrelevant to cabin crew. The elements required by the Technical Instructions are:

- General philosophy
- Limitations
- Labelling and marking
- Recognition of undeclared dangerous goods
- Provisions for passengers and crew

Emergency procedures

It is suggested that the above aspects are not specified in the IRs because if the Technical Instructions change the IRs will not align. A more "future proof" solution would be to simply refer to the training required by the Technical Instructions.

Proposal:

6. Dangerous Goods:

~~6.1 General principles;~~ Aspects of transport of dangerous goods by air with which the ICAO Technical Instructions state they should be familiar.

~~6.2 importance of procedures and reporting; and~~

~~6.3 applicable packaging and limitations~~

comment

226

comment by: UK CAA

Pages 9-10, Paragraph No: AMC CC.TRA.120 - 5.7 d.

Comment: Refers to aircraft disinfection.

Justification: This is insecticide and not disinfectant.

Proposed Text (if applicable): Replace disinfection with disinsection.

comment

227

comment by: UK CAA

Page 10, Paragraph No: AMC CC.TRA.120 6.

Comment: The training aspects are inappropriate for cabin crew.

Justification: With the possible exception of 6.1, the aspects do not align with those specified in the ICAO Technical Instructions; reporting is not a required element – cabin crew will not ordinarily report to the Authority – and packaging is irrelevant to cabin crew. The elements required by the Technical Instructions are:

General philosophy

Limitations

Labelling and marking

Recognition of undeclared dangerous goods

Provisions for passengers and crew

Emergency procedures

It is suggested that the above aspects are not specified in the IRs because if the Technical Instructions change the IRs will not align. A more "future proof" solution would be to simply refer to the training required by the Technical Instructions.

Proposed Text (if applicable):

6. Dangerous goods:

~~6.1 general principles;~~ Aspects of transport of dangerous goods by air with which the ICAO Technical Instructions state they should be familiar.

~~6.2 importance of procedures and reporting; and~~

~~6.3 applicable packaging and limitations.~~

comment

286

comment by: AEA

Relevant Text:

TRAINING PROGRAMME

1. General theoretical knowledge, duties and responsibilities:

1.1. general knowledge of relevant aviation terminology, theory of flight, passenger distribution, areas of operation; meteorology and effects of surface contamination;

1.2 aviation regulations relevant to cabin crew and the role of the competent authority;

1.3 duties and responsibilities.....etc

..

..

9. Survival training

9.1 Survival training on the ground should include hostile environment (e.g. polar, desert or jungle).

9.2 Water survival training should include the actual donning and use of personal flotation equipment in water and use of liferafts or similar equipment, as well as actual practice in water.

Comment:

"1.2" re-phrased from EU-OPS. Appendix 1 to OPS 1.1002 was "an awareness of aviation regulations".

"9.1" re-phrased from EU-OPS "...be appropriate to the areas of operation".

Proposal:

Re-phrase "1.2" to "**1.2 an awareness of aviation regulations**".

Re-phrase "9.1" to "**9.1 Survival training on the ground should include hostile environment if appropriate to the areas of operation (e.g. polar, desert, jungle or sea)**".

comment

289

comment by: AEA

Relevant Text:

(b) The programme of the initial safety training course shall include theoretical and practical training and shall cover at least the following:

(1) general theoretical knowledge on aviation, aviation regulations relevant to cabin crew and the safety functions and responsibilities of cabin crew;

(2) communication;

(3) introductory course to human factors (HF) in aviation and to crew resource management (CRM) conducted by at least one cabin crew CRM instructor;

Comment:

The qualification for a cabin crew CRM instructor is not specified: It could be interpreted as being an active cabin crew member

Proposal:

(3) introductory course to human factors (HF) in aviation and to crew resource management (CRM) conducted by at least one cabin crew suitably qualified CRM instructor

comment

304

comment by: Thomas Cook Airlines

5.7 (d)

Justification

Is this referring to aircraft disinsection?

Proposal:
Suggest disinfection is changed to disinsection

comment

354

comment by: *Jill Pelan***AMC.CC.120 point 4.5****The CFDT and ETF comment**

4.5 duties to be undertaken in the event of turbulence, including securing the cabin; and

Recommendation: IATA states that turbulence related injuries to cabin crew cost the airline industry over 60 million USD per year. Despite the fact that IATA as well as the CAST in the USA has had this on the agenda, it is still up to the individual airlines in Europe to address the situation. ETF asks that EASA concentrate on this problem through a rulemaking task or study. The reasons for cabin crew ignorance could be lack of knowledge of the nature of turbulence and its effects, insufficient procedures for securing cabin crew, insufficient knowledge on the part of the pilots on how turbulence is experienced in the cabin and perhaps even insufficient communication between the pilot and cabin crews. For reference see ICAO turbulence safety enhancements.

ETF and the CFDT France would like to add Point 5.2

Add: 5.2 the physiological effects of flying **including gastro -intestinal disturbances and** with particular emphasis on hypoxia and oxygen requirements;

Reason: The item was included in EU-OPS. It is well established that gases in the bodies closed or semi-closed cavities will expand with high cabin altitude. In the event of depressurisation the effects could become paralyzing. Point 5.2 should also cover decompression sickness, well known to divers.

comment

378

comment by: *kapers Cabin Crew Union***AMC.CC.120 point 4.5**

4.5 duties to be undertaken in the event of turbulence, including securing the cabin; and

Recommendation: IATA states that turbulence related injuries to cabin crew cost the airline industry over 60 million USD per year. Despite the fact that IATA as well as the CAST in the USA has had this on the agenda, it is still up to the individual airlines in Europe to address the situation. ETF asks that EASA concentrate on this problem through a rulemaking task or study. The reasons for cabin crew ignorance could be lack of knowledge of the nature of turbulence and its effects, insufficient procedures for securing cabin crew, insufficient knowledge on the part of the pilots on how turbulence is experienced in the cabin and perhaps even insufficient communication between the pilot and cabin crews. For reference see ICAO turbulence safety enhancements.

Point 5.2

Add: 5.2 the physiological effects of flying **including gastr o-intestinal**

disturbances and with particular emphasis on hypoxia and oxygen requirements;

Reason: The item was included in EU-OPS. It is well established that gases in the bodies closed or semi-closed cavities will expand with high cabin altitude. In the event of depressurisation the effects could become paralyzing. Point 5.2 should also cover decompression sickness, well known to divers.

comment 404

comment by: AUSTRIAN Airlines

Relevant Text:

TRAINING PROGRAMME

1. General theoretical knowledge, duties and responsibilities:

1.1. general knowledge of relevant aviation terminology, theory of flight, passenger distribution, areas of operation; meteorology and effects of surface contamination;

1.2 aviation regulations relevant to cabin crew and the role of the competent authority;

1.3 duties and responsibilities.....etc

..

..

9. Survival training

9.1 Survival training on the ground should include hostile environment (e.g. polar, desert or jungle).

9.2 Water survival training should include the actual donning and use of personal flotation equipment in water and use of liferafts or similar equipment, as well as actual practice in water.

Comment:

"1.2" re-phrased from EU-OPS. Appendix 1 to OPS 1.1002 was "an awareness of aviation regulations".

"9.1" re-phrased from EU-OPS "..be appropriate to the areas of operation".

Proposal:

Re-phrase "1.2" to "**1.2 an awareness of aviation regulations**".

Re-phrase "9.1" to "**9.1 Survival training on the ground should include hostile environment if appropriate to the areas of operation (e.g. polar, desert, jungle or sea)**".

comment 405

comment by: AUSTRIAN Airlines

Relevant Text:

(b) The programme of the initial safety training course shall include theoretical and practical training and shall cover at least the following:

(1) general theoretical knowledge on aviation, aviation regulations relevant to cabin crew and the safety functions and responsibilities of cabin crew;

(2) communication;

(3) introductory course to human factors (HF) in aviation and to crew resource management (CRM) conducted by at least one cabin crew CRM instructor;

Comment:

The qualification for a cabin crew CRM instructor is not specified: It could be interpreted as being an active cabin crew member

Proposal:

(3) introductory course to human factors (HF) in aviation and to crew resource management (CRM) conducted by at least one cabin crew suitably qualified CRM instructor

comment

457

comment by: Elaine Allan Monarch

Page No. 10

Ref No. NPA 2009 - 2e AMC.CC.TRA.120

Summary of EASA Proposed Requirement:
Reference made to aircraft disinfection

Comment:

Should this read as disinsection?

Justification:

Is this referring to disinsection

Proposed Text (if applicable)

comment

490

comment by: KLM

Relevant Text:

TRAINING PROGRAMME

1. General theoretical knowledge, duties and responsibilities:

1.1. general knowledge of relevant aviation terminology, theory of flight, passenger distribution, areas of operation; meteorology and effects of surface contamination;

1.2 aviation regulations relevant to cabin crew and the role of the competent authority;

1.3 duties and responsibilities.....etc

..

..

9. Survival training

9.1 Survival training on the ground should include hostile environment (e.g. polar, desert or jungle).

9.2 Water survival training should include the actual donning and use of personal flotation equipment in water and use of liferafts or similar equipment, as well as actual practice in water.

Comment:

"1.2" re-phrased from EU-OPS. Appendix 1 to OPS 1.1002 was "an awareness of aviation regulations".

"9.1" re-phrased from EU-OPS "...be appropriate to the areas of operation".

Proposal:

Re-phrase "1.2" to "**1.2 an awareness of aviation regulations**".

Re-phrase "9.1" to "**9.1 Survival training on the ground should include hostile environment if appropriate to the areas of operation (e.g. polar, desert, jungle or sea)**"

comment

491

comment by: KLM

Relevant Text:

(b) The programme of the initial safety training course shall include theoretical and practical training and shall cover at least the following:

- (1) general theoretical knowledge on aviation, aviation regulations relevant to cabin crew and the safety functions and responsibilities of cabin crew;*
- (2) communication;*
- (3) introductory course to human factors (HF) in aviation and to crew resource management (CRM) conducted by at least one cabin crew CRM instructor;*

Comment:

The qualification for a cabin crew CRM instructor is not specified: It could be interpreted as being an active cabin crew member

Proposal:

*(3) introductory course to human factors (HF) in aviation and to crew resource management (CRM) conducted by at least one cabin crew **suitably qualified** CRM instructor*

comment

564

comment by: Deutsche Lufthansa AG

Relevant Text:

TRAINING PROGRAMME

1. General theoretical knowledge, duties and responsibilities:

1.1. general knowledge of relevant aviation terminology, theory of flight, passenger distribution, areas of operation; meteorology and effects of surface contamination;

***1.2 aviation regulations** relevant to cabin crew and the role of the competent authority;*

1.3 duties and responsibilities.....etc

..

..

9. Survival training

9.1 Survival training on the ground should include hostile environment (e.g. polar, desert or jungle).

9.2 Water survival training should include the actual donning and use of personal flotation equipment in water and use of liferafts or similar equipment, as well as actual practice in water.

Comment:

"1.2" re-phrased from EU-OPS. Appendix 1 to OPS 1.1002 was "an awareness of aviation regulations".

"9.1" re-phrased from EU-OPS "...be appropriate to the areas of operation".

Proposal:

Re-phrase "1.2" to "**1.2 an awareness of aviation regulations**".

Re-phrase "9.1" to "**9.1 Survival training on the ground should include hostile environment if appropriate to the areas of operation (e.g. polar, desert, jungle or sea)**".

comment

565

comment by: Deutsche Lufthansa AG

Relevant Text:

(b) The programme of the initial safety training course shall include theoretical and practical training and shall cover at least the following:

- (1) general theoretical knowledge on aviation, aviation regulations relevant to cabin crew and the safety functions and responsibilities of cabin crew;*

(2) communication;
 (3) introductory course to human factors (HF) in aviation and to crew resource management (CRM) conducted by at least one cabin crew CRM instructor;

Comment:

The qualification for a cabin crew CRM instructor is not specified: It could be interpreted as being an active cabin crew member

Proposal:

(3) introductory course to human factors (HF) in aviation and to crew resource management (CRM) conducted by at least one cabin crew suitably qualified CRM instructor

comment

631

comment by: Irish Aviation Authority

5.3 /4

Comment:

'Gastro-intestinal disturbances' has been omitted from the list of either 'basic first aid items' (5.3) or 'in-flight medical emergency and associated first aid' (5.4)

Justification:

'Gastro intestinal disturbances' are common first aid occurrences among passengers.

Cabin crew should be trained how to recognize gastro-intestinal disturbances and respond with appropriate first aid treatment.

Proposed text:

Add 'gastro-intestinal disturbances' to list of items either in 5.3 or in 5.4, whichever location is deemed more appropriate.

comment

640

comment by: British Airways Flight Operations

Relevant Text:

TRAINING PROGRAMME

1. General theoretical knowledge, duties and responsibilities:

1.1. general knowledge of relevant aviation terminology, theory of flight, passenger distribution, areas of operation; meteorology and effects of surface contamination;

1.2 aviation regulations relevant to cabin crew and the role of the competent authority;

1.3 duties and responsibilities.....etc

..

..

9. Survival training

9.1 Survival training on the ground should include hostile environment (e.g. polar, desert or jungle).

9.2 Water survival trainings should include the actual donning and use of personal flotation equipment in water and use of liferafts or similar equipment, as well as actual practice in water.

Comment:

"1.2" re-phrased from EU-OPS. Appendix 1 to OPS 1.1002 was "an awareness of aviation regulations".

"9.1" re-phrased from EU-OPS "..be appropriate to the areas of operation".

Proposal:

Re-phrase "1.2" to "**1.2 an awareness of aviation regulations**".

Re-phrase "9.1" to "**9.1 Survival training on the ground should include hostile environment if appropriate to the areas of operation (e.g. polar, desert, jungle or sea)**".

General Comment:

NPA 2009-2 in its entirety is unfit for the purpose for which it is intended and must be withdrawn and reconsidered.

comment 666

comment by: Swiss International Airlines / Bruno Pfister

Relevant Text:

TRAINING PROGRAMME

1. General theoretical knowledge, duties and responsibilities:

1.1. general knowledge of relevant aviation terminology, theory of flight, passenger distribution, areas of operation; meteorology and effects of surface contamination;

1.2 aviation regulations relevant to cabin crew and the role of the competent authority;

1.3 duties and responsibilities.....etc

..

..

9. Survival training

9.1 Survival training on the ground should include hostile environment (e.g. polar, desert or jungle).

9.2 Water survival training should include the actual donning and use of personal flotation equipment in water and use of liferafts or similar equipment, as well as actual practice in water.

Comment:

"1.2" re-phrased from EU-OPS. Appendix 1 to OPS 1.1002 was "an awareness of aviation regulations".

"9.1" re-phrased from EU-OPS "...be appropriate to the areas of operation".

Proposal:

Re-phrase "1.2" to "**1.2 an awareness of aviation regulations**".

Re-phrase "9.1" to "**9.1 Survival training on the ground should include hostile environment if appropriate to the areas of operation (e.g. polar, desert, jungle or sea)**".

comment 667

comment by: Swiss International Airlines / Bruno Pfister

Relevant Text:

(b) The programme of the initial safety training course shall include theoretical and practical training and shall cover at least the following:

(1) general theoretical knowledge on aviation, aviation regulations relevant to cabin crew and the safety functions and responsibilities of cabin crew;

(2) communication;

(3) introductory course to human factors (HF) in aviation and to crew resource management (CRM) conducted by at least one cabin crew CRM instructor;

Comment:

The qualification for a cabin crew CRM instructor is not specified: It could be

interpreted as being an active cabin crew member

Proposal:

(3) introductory course to human factors (HF) in aviation and to crew resource management (CRM) conducted by at least one cabin crew suitably qualified CRM instructor

comment 711 comment by: *Irish Aviation Authority*

Paragraph 7

Comment:

No information re what should be covered in Security training

comment 712 comment by: *Irish Aviation Authority*

Paragraph 9.2

Comment:

The wording seems to suggest that life rafts or similar equipment should be used in the water survival exercise, irrespective of whether the operator's aircraft is equipped with them.

Perhaps this is intentional in order to satisfy generic requirements for the award of the Attestation of Initial safety training and so that a further wet drill does not become necessary?

comment 714 comment by: *Irish Aviation Authority*

Paragraph 1.4

Comment:

This Training module should make cabin crew aware that there is a link between competence / fitness to operate and exercising the privileges of holding an Attestation. (i.e. if a cabin crewmember doesn't maintain competence or fitness, this will have an affect on the validity of the Attestation)

Justification:

Cabin crew should be made aware of their responsibilities re competence and fitness to operate and the affect that these criteria have on the validity of their Attestation

Proposed text:

Continuing fitness and co mpetence to operate as a cabin crew m ember including as reg ards flight time limitations and rest requirements, in order to continue to exercise the privileges of the [b1]Cabin crew Attestation

comment 737 comment by: *TAP Portugal*

Relevant Text:

TRAINING PROGRAMME

1. General theoretical knowledge, duties and responsibilities:

1.1. general kno wledge of relevant a viation ter minology, theor y of flight, passenger distribution, areas of operatio n; meteorology and effects of surface contamination;

1.2 aviation regulations relevant to cabin crew and the role of the

competent authority;

1.3 duties and responsibilities.....etc

..

..

9. Survival training

9.1 Survival training on the ground should include hostile environment (e.g. polar, desert or jungle).

9.2 Water survival training should include the actual donning and use of personal flotation equipment in water and use of liferafts or similar equipment, as well as actual practice in water.

Comment:

"1.2" re-phrased from EU-OPS. Appendix 1 to OPS 1.1002 was "an awareness of aviation regulations".

"9.1" re-phrased from EU-OPS "...be appropriate to the areas of operation".

Proposal:

Re-phrase "1.2" to "**1.2 an awareness of aviation regulations**".

Re-phrase "9.1" to "**9.1 Survival training on the ground should include hostile environment if appropriate to the areas of operation (e.g. polar, desert, jungle or sea)**".

comment

738

comment by: TAP Portugal

Relevant Text:

(b) The programme of the initial safety training course shall include theoretical and practical training and shall cover at least the following:

(1) general theoretical knowledge on aviation, aviation regulations relevant to cabin crew and the safety functions and responsibilities of cabin crew;

(2) communication;

(3) introductory course to human factors (HF) in aviation and to crew resource management (CRM) conducted by at least one cabin crew CRM instructor;

Comment:

The qualification for a cabin crew CRM instructor is not specified: It could be interpreted as being an active cabin crew member

Proposal:

*(3) introductory course to human factors (HF) in aviation and to crew resource management (CRM) conducted by at least one cabin crew **suitably qualified** CRM instructor*

comment

808 ❖

comment by: DGAC

In its report on the incident involving the Lockheed 1011-385-3 registered A6-BSM operated by Star Jet and leased by Olympic Airlines (flight number OA202) that occurred on 4 July 2005 at Paris Charles de Gaulle airport (France) the BEA made a recommendation to the EASA in order to enhance the requirements of EU OPS in terms of "common language". DGAC position is that it does not appear realistic to require the cabin crew to be able to communicate in the language of the countries of departure and arrival, due to the current organisation of air transport based on the "hub" model. However, should the EASA decide to take into account the part of the recommendation dealing with a minimum level of proficiency in English language, it should be part of the initial safety training.

The initial training of the cabin crew should also emphasise the difficulty to

handle passengers whose language is not the one of the cabin crew and the benefit of using clear, simple and non ambiguous orders that can be understandable by all passengers to control the crowd.

This could be mentioned in § 4.6 of AMC.CC.TRA.120 Initial safety training and examination dealing with the methods used to motivate passengers and the crowd control necessary to expedite an aeroplane evacuation.

comment 845

comment by: AIR FRANCE

Comment: "1.2" re-phrased from EU-OPS. Appendix 1 to OPS 1.1002 was "an awareness of aviation regulations".

"9.1" re-phrased from EU-OPS "...be appropriate to the areas of operation".

Proposal:

Re-phrase "1.2" to "1.2 an awareness of aviation regulations".

Re-phrase "9.1" to " 9.1 Survival training on the ground should include hostile environment if appropriate to the areas of operation (e.g. polar, desert, jungle or sea)".

comment 846

comment by: AIR FRANCE

Comment:

The qualification for a cabin crew CRM instructor is not specified: It could be interpreted as being an active cabin crew member

Proposal:

(3) introductory course to human factors (HF) in aviation and to crew resource management (CRM) conducted by at least one cabin crew suitably qualified CRM instructor

comment 885

comment by: Finnish CAA

Paragraph No: AMC CC.TRA.120 6.

Comment: The training aspects are inappropriate for cabin crew.

Justification: With the possible exception of 6.1, the aspects do not align with those specified in the ICAO Technical Instructions; reporting is not a required element – cabin crew will not ordinarily report to the Authority – and packaging is irrelevant to cabin crew. The elements required by the Technical Instructions are:

- General philosophy
- Limitations
- Labelling and marking
- Recognition of undeclared dangerous goods
- Provisions for passengers and crew
- Emergency procedures

It is suggested that the above aspects are not specified in the IRs because if the Technical Instructions change the IRs will not align. A more "future proof" solution would be to simply refer to the training required by the Technical Instructions.

Proposed Text (if applicable):

6. Dangerous goods:
~~6.1 general principles;~~ Aspects of transport of dangerous goods by air with which the ICAO Technical Instructions state they should be familiar.
~~6.2 importance of procedures and reporting;~~ and
~~6.3 applicable packaging and limitations.~~

E. IX. Draft Decision Part-CC - Subpart TRA - AMC CC.TRA.120, CC.TRA.125 and CC.TRA.135 Initial, Aircraft type-specific and recurrent training and checking

p. 10-11

comment

243

comment by: *Pietro Barbagallo ENAC*

AMC CC.TRA.120 6.

Comment: The training aspects are inappropriate for cabin crew.

Justification: With the possible exception of 6.1, the aspects do not align with those specified in the ICAO Technical Instructions; reporting is not a required element - cabin crew will not ordinarily report to the Authority - and packaging is irrelevant to cabin crew. The elements required by the Technical Instructions are: General philosophy; Limitations; Labelling and marking; Recognition of undeclared dangerous goods; Provisions for passengers and crew; Emergency procedures. It is suggested that the above aspects are not specified in the IRs because if the Technical Instructions change the IRs will not align. A more "future proof" solution would be to simply refer to the training required by the Technical Instructions.

Proposal: Amend AMC CC.TRA120 6. as follows: Dangerous goods: 6.1 general principles; Aspects of transport of dangerous goods by air with which the ICAO Technical Instructions state they should be familiar. ~~6.2 importance of procedures and reporting;~~ and ~~6.3 applicable packaging and limitations.~~

comment

287

comment by: *AEA***Relevant Text:**

CRM TRAINING PROGRAMMES

Comment:

Appendix 2 to EU-OPS 1.1005/1.1010/1.1015 Table 1 CRM Training "Note: In Column (d), if relevant aeroplane type specific case based studies are not available, then case based studies relevant to the scale and scope of the operation shall be considered" has been deleted.

This may cause difficulties with (e.g.) introduction new aircraft type.

Proposal:

Restore "Note" from Appendix 2 to EU-OPS 1.1005/1.1010/1.1015 Table 1 CRM Training.

comment

406

comment by: *AUSTRIAN Airlines***Relevant Text:**

CRM TRAINING PROGRAMMES

Comment:

Appendix 2 to EU-OPS 1.1005/1.1010/1.1015 Table 1 CRM Training "Note: In Column (d), if relevant aeroplane type specific case based studies are not available, then case based studies relevant to the scale and scope of the

operation shall be considered" has been deleted.
This may cause difficulties with (e.g.) introduction new aircraft type.

Proposal:

Restore "Note" from Appendix 2 to EU-OPS 1.1005/1.1010/1.1015 Table 1 CRM Training.

comment 492

comment by: *KLM***Relevant Text:**

CRM TRAINING PROGRAMMES

Comment:

Appendix 2 to EU-OPS 1.1005/1.1010/1.1015 Table 1 CRM Training "Note: In Column (d), if relevant aeroplane type specific case based studies are not available, then case based studies relevant to the scale and scope of the operation shall be considered" has been deleted.

This may cause difficulties with (e.g.) introduction new aircraft type.

Proposal:

Restore "Note" from Appendix 2 to EU-OPS 1.1005/1.1010/1.1015 Table 1 CRM Training.

comment 566

comment by: *Deutsche Lufthansa AG***Relevant Text:**

CRM TRAINING PROGRAMMES

Comment:

Appendix 2 to EU-OPS 1.1005/1.1010/1.1015 Table 1 CRM Training "Note: In Column (d), if relevant aeroplane type specific case based studies are not available, then case based studies relevant to the scale and scope of the operation shall be considered" has been deleted.

This may cause difficulties with (e.g.) introduction new aircraft type.

Proposal:

Restore "Note" from Appendix 2 to EU-OPS 1.1005/1.1010/1.1015 Table 1 CRM Training.

comment 641

comment by: *British Airways Flight Operations***Relevant Text:**

CRM TRAINING PROGRAMMES

Comment:

Appendix 2 to EU-OPS 1.1005/1.1010/1.1015 Table 1 CRM Training "Note: In Column (d), if relevant aeroplane type specific case based studies are not available, then case based studies relevant to the scale and scope of the operation shall be considered" has been deleted.

This may cause difficulties with (e.g.) introduction new aircraft type.

Proposal:

Restore "Note" from Appendix 2 to EU-OPS 1.1005/1.1010/1.1015 Table 1 CRM Training.

General Comment:

NPA 2009-2 in its entirety is unfit for the purpose for which it is intended and must be withdrawn and reconsidered.

comment 668

comment by: *Swiss International Airlines / Bruno Pfister*

Relevant Text:

CRM TRAINING PROGRAMMES

Comment:

Appendix 2 to EU-OPS 1.1005/1.1010/1.1015 Table 1 CRM Training "Note: In Column (d), if relevant aeroplane type specific case based studies are not available, then case based studies relevant to the scale and scope of the operation shall be considered" has been deleted.

This may cause difficulties with (e.g.) introduction new aircraft type.

Proposal:

Restore "Note" from Appendix 2 to EU-OPS 1.1005/1.1010/1.1015 Table 1 CRM Training.

comment

739

comment by: *TAP Portugal***Relevant Text:**

CRM TRAINING PROGRAMMES

Comment:

Appendix 2 to EU-OPS 1.1005/1.1010/1.1015 Table 1 CRM Training "Note: In Column (d), if relevant aeroplane type specific case based studies are not available, then case based studies relevant to the scale and scope of the operation shall be considered" has been deleted.

This may cause difficulties with (e.g.) introduction new aircraft type.

Proposal:

Restore "Note" from Appendix 2 to EU-OPS 1.1005/1.1010/1.1015 Table 1 CRM Training.

comment

848

comment by: *AIR FRANCE*

Comment:

Appendix 2 to EU-OPS 1.1005/1.1010/1.1015 Table 1 CRM Training "Note: In Column (d), if relevant aeroplane type specific case based studies are not available, then case based studies relevant to the scale and scope of the operation shall be considered" has been deleted.

This may cause difficulties with (e.g.) introduction for new aircraft type.

Proposal:

Restore "Note" from Appendix 2 to EU-OPS 1.1005/1.1010/1.1015 Table 1 CRM Training.

comment

877

comment by: *IATA**9. Survival training*

9.1 Survival training on the ground should include hostile environment (e.g. polar, desert or jungle).

9.2 Water survival training should include the actual donning and use of personal flotation equipment in water and use of life-rafts or similar equipment, as well as actual practice in water.

It is unclear if the survival training has to cover all regions or only those which are relevant to the operation.

comment

892

comment by: *Frank Ciupka***Question:**

Survival Training covers all regions (polar **and** desert **and** ...)? Or is there a

choice?

E. IX. Draft Decision Part-CC - Subpart TRA - AMC CC.TRA.125 Aircraft type-specific training and checking p. 11-12

comment 163 comment by: *claire.amos*

AMC CC.TRA.125

5:

Health and Safety Implication: requiring crew to extinguish a fire whilst in a smoke filled cabin is unsafe practice.

Clarification Required: This contradicts AMC OR.OPS.125.CC 5.2 which states that crew should be trained to extinguish an inflight fire AND to don protective breathing equipment in a smoke filled environment.

comment 166 comment by: *claire.amos*

1 1.2

There is no evidence to indicate any benefit in cabin crew knowing the MTOW, etc of their aircraft. This is only of benefit for the pilots and should be removed from this list.

comment 191 comment by: *Austro Control GmbH*

1.

Aircraft description can be omitted:
delete 1.6.

Justification:

Aeroplane general knowledge for cabin crew member is not necessary in that detailed item (no safety relevance and practically useless).

4.

4.1. add at the end:

"... and should also include the actual opening of each type or variant of normal and emergency exit in the normal and emergency modes".

Justification:

the actual opening provides a better training and preparation for emergency situations and therefore has a safety impact.

comment 228 comment by: *UK CAA*

Paragraph No: AMC CC.TRA.125 - 1. & 1.1

Comment: Text changes between aircraft and aeroplane

Justification: This occurs throughout other areas of various NPA's. One term should be used as appropriate.

Proposed Text (if applicable): Use "aircraft" throughout for standardisation and clarity.

comment

229

comment by: UK CAA

Paragraph No: AMC CC.TRA.125 - 1.

Comment: New requirements included for aircraft training.

Justification: Items such as max take off weight, cargo, flight controls, fuel tanks are not necessary knowledge for cabin crew proficiency.

Proposed Text (if applicable):

- 1.2 Speed, altitude and range
- 1.6 Remove and renumber accordingly
- 1.7 Aircraft systems - general

comment

230

comment by: UK CAA

Paragraph No: AMC CC.TRA.125 - 1.8 & 1.11

Comment: Text changes between flight deck and cockpit.

Justification: This occurs throughout other areas of the NPA. One term should be used.

Proposed Text (if applicable): Use one term throughout, preferably "flight deck" for standardisation and clarity.

comment

231

comment by: UK CAA

Paragraph No: AMC CC.TRA.125 - 2.2 & 2.3

Comment: Liferafts, sliderafts and drop out oxygen are included here as they are deemed to be aircraft specific.

Justification: This is not the case; such equipment is determined by the operator dependant on requirements and routes of operation.

Proposed Text (if applicable):

- 2.2 Remove
- 2.3 Remove
- 2.4 Renumber as 2.2
- 2.5 Renumber as 2.3

comment

232

comment by: UK CAA

Paragraph No: AMC CC.TRA.125 - 5.

Comment: This adds a requirement for extinguishing a fire in a smoke-filled environment.

Justification: All other references require fire training, but not in a smoke-filled environment. Often the two parts of training are separated and this may not be possible.

Proposed Text (if applicable): Each cabin crew member should be trained

in extinguishing a fire representative of an in-flight fire as relevant to the aircraft type, with particular emphasis on identifying the actual source of fire and smoke and the use of portable breathing equipment in a smoke filled environment.

comment

251

comment by: Jill Pelan

AMC CC TRA 125

The CFDT France asks for this specific aircraft training to be excluded from initial training and ATTESTATION - as it may lead to discrimination in employment of cabin crew that have an ATTESTATION with type training on aircraft A B & C finding employment with operators having aircraft X Y & Z.

Aircraft type training must be an ANNEX of the Attestation after operators have provided the training of their cabin crew in order for them to work on board. The Annex must be approved and delivered by the authorities.

This has been the situation in France for many years and works well.

comment

279

comment by: AEA

Relevant Text:

Items

- 1.2 (Typical max take off weight/typical engines/speed/altitude/range),
- 1.4 (Typical flight crew number and typical minimum number of required cabin crew as determined in accordance with Part-21),
- 1.6 (un-pressurised areas/cargo/gears/fuel tanks/flight controls),
- 1.7 (aeroplanes systems – general: APU/Aeroplane Electrical Power / Air conditioning and pressurisations),
- 1.12 (access to avionics bay)

Comment:

Items 1.2, 1.4, 1.6, 1.7, 1.12 have no relevance for the safety duties of cabin crew, Those proposed cabin crew type specific training requirements, which have no safety justification, go beyond EU-OPS

Proposal:

Delete Items 1.2, 1.4, 1.6, 1.7, 1.12 and realign the training requirements with Subpart O of EU-OPS

comment

288

comment by: AEA

Relevant Text:

TRAINING PROGRAMME

The following subjects should be covered as relevant to the aircraft type:

1. Aircraft description

- 1.1 Type of aeroplane; principal dimensions; narrow or wide bodied; single or double deck;*
- 1.2 Typical max takeoff weight/typical engines/speed/altitude/range;*
- 1.3 Typical passenger seating capacity (certified capacity);*
- 1.4 Typical flight crew number and typical minimum number of required cabin crew as determined in accordance with Part 21;*
- 1.5 Cabin doors location and sill height;*
- 1.6 Unpressurised areas/cargo/gears/fuel tanks/flight controls;*
- 1.7 Aeroplane systems – general: APU/Aeroplane electrical power/Air conditioning and pressurisation;*

1.8 Cockpit presentation general: pilot seats and their mechanism; cockpit exits; storage;
 1.9 Typical cabin crew stations;
 1.10 Passenger seats general presentation;
 1.11 Flight deck security general: door components and use;
 1.12 Access to avionics bays;
 1.13 Lavatories general: doors; systems; emergency equipments, calls and signs;
 1.14 Galley general: appliances; water and waste; control panels; calls and signs;
 1.15 Least risk bomb location.
 2. Safety equipment and systems installed
 Each cabin crew member should receiveetc

Comment:

"1.1 to 1.15" not in EU-OPS. Too many systems and too many details not relevant for cabin crew. This must be left to operator type specifics.

Proposal:

Delete "1.1 to 1.15"

comment

296

comment by: *The TUI Airlines group represented by Thomson Airways, TUIfly, TUIfly Nordic, CorsairFly, Arkefly, Jet4U, JetairFly*

AMC CC.TRA.125 Aircraft type-specific training and checking

TRAINING PROGRAMME

The following subjects should be covered as relevant to the aircraft type:

1. Aircraft description
- 1.2 Typical max takeoff weight/typical engines/speed/altitude/range;
- 1.6 Unpressurised areas/cargo/gears/fuel tanks

Comment :

This is new and unnecessary information to be included in cabin crew aircraft type specific training which is not relevant to cabin crew.

Proposal: Delete these sections.

comment

306

comment by: *The TUI Airlines group represented by Thomson Airways, TUIfly, TUIfly Nordic, CorsairFly, Arkefly, Jet4U, JetairFly*

AMC CC.TRA.125 Aircraft type-specific training and checking

TRAINING PROGRAMME

5. Fire and smoke training

Each cabin crew member should be trained in extinguishing a fire representative of an in-flight fire in a smoke-filled environment **as relevant to the aircraft type**, with particular emphasis on identifying the actual source of fire and smoke, and on the use of smoke protection equipment used in aviation.

Comment:

The requirement to fight a fire in a **smoke-filled environment as relevant to the aircraft type** will have two effects.

1. The trainer will be unable to see clearly if the trainee is carrying out fire

fighting procedures correctly.

2. To facilitate good training the amount of smoke will be reduced to a level that will be unrealistic and therefore, from a training prospective worthless.

3. The requirement that the fire-fighting should take place in an environment relevant to the aircraft type is impractical. Same type aircraft have different seating,galley presentations, with different postions of Emergency equipment locations etc. Within a company [Thomson Airways - there are 3 different variations of B757 and 2 different variations of the B767. To suggest that an Operator should provide -in this case- 5 different smoke filled environmental Training devices is nonsense.

Qualified advice from practicing Firefighting advisers confirm that the present present requirement of fighting fire and then separately experiencing a smoke filled cabin whilst wearing a smokehood with all the difficulties of communication that entails is more beneficial.

Proposal:

The existing regulations be retained as under Appendix 1 to EU-OPS 1.1010 Conversion and differences training

(b) Fire and smoke training:

An operator shall ensure that:

1. each cabin crew member is given realistic and practical training in the use of all fire-fighting equipment including protective clothing representative of that carried in the aeroplane. This training must include:

(i) extinguishing a fire characteristic of an aeroplane interior fire except that, in the case of Halon extinguishers, an alternative extinguishing agent may be used; and (ii) the donning and use of protective breathing equipment in an enclosed, simulated smoke-filled environment

comment

310

comment by: *Thomas Cook Airlines*

Justification:

Insufficient detail included as to the level of information that is relevant to cabin crew e.g. MTOW varies.

Proposal:

Requires clarification to the level of detail required as some of these areas will not have any effect on safety with regard to the Cabin Crew

comment

311

comment by: *Thomas Cook Airlines*

Proposal:

Suggest the word conversion added to the title:

Aircraft type-specific conversion training and checking

comment

312

comment by: *Thomas Cook Airlines*

Justification:

Confusing change in terminology from Flight Deck to Cockpit in this section

Proposal:

Suggest standard use of terminolgy adopted throughout i.e. - Flight Deck

comment

313

comment by: *Thomas Cook Airlines*

Justification:

2.1 refers to slides
 2.2 liferafts/sliderafts
 2.3 drop out oxygen systems
 This information varies from operator to operator as is not generic

Proposal:

Suggest removal of all Aircraft type training and checking from the CC.TRA section of Implementing Rules and include in CC. OR.OPS/TRA

comment

314

comment by: *Thomas Cook Airlines*

Justification:

Health and Safety requirements would not permit the extinguishing of a fire in a simulated smoke filled environment

Proposal:

Each Cabin Crew member being given realistic and practical training in the use of all fire fighting equipment, including protective clothing, representative of that carried in the aircraft. This training must include: (a) each cabin crew member extinguishing an actual fire characteristic of an aircraft interior fire except that, in the case of Halon extinguishers, an alternative extinguishing agent may be used. (ii) the donning of PBE and its use by each cabin crew member in an enclosed simulated smoke filled environment.

comment

407

comment by: *AUSTRIAN Airlines***Relevant Text:**

Items

1.2 (Typical max take off weight/typical engines/speed/altitude/range),
 1.4 (Typical flight crew number and typical minimum number of required cabin crew as determined in accordance with Part-21),
 1.6 (un-pressurised areas/cargo/gears/fuel tanks/flight controls),
 1.7 (aeroplanes systems – general: APU/Aeroplane Electrical Power / Air conditioning and pressurisations),
 1.12 (access to avionics bay)

Comment:

Items 1.2, 1.4, 1.6, 1.7, 1.12 have no relevance for the safety duties of cabin crew, Those proposed cabin crew type specific training requirements, which have no safety justification, go beyond EU-OPS

Proposal:

Delete Items 1.2, 1.4, 1.6, 1.7, 1.12 and realign the training requirements with Subpart O of EU-OPS

comment

408

comment by: *AUSTRIAN Airlines***Relevant Text:**

TRAINING PROGRAMME

The following subjects should be covered as relevant to the aircraft type:

1. Aircraft description

1.1 Type of aeroplane; principal dimensions; narrow or wide bodied; single or double deck;

1.2 Typical max takeoff weight/typical engines/speed/altitude/range;

1.3 Typical passenger seating capacity (certified capacity);

1.4 Typical flight crew number and typical minimum number of required cabin crew as determined in accordance with Part 21;
 1.5 Cabin doors location and sill height;
 1.6 Unpressurised areas/cargo/gears/fuel tanks/flight controls;
 1.7 Aeroplane systems – general: APU/Aeroplane electrical power/Air conditioning and pressurisation;
 1.8 Cockpit presentation general: pilot seats and their mechanism; cockpit exits; storage;
 1.9 Typical cabin crew stations;
 1.10 Passenger seats general presentation;
 1.11 Flight deck security general: door components and use;
 1.12 Access to avionics bays;
 1.13 Lavatories general: doors; systems; emergency equipments, calls and signs;
 1.14 Galley general: appliances; water and waste; control panels; calls and signs;
 1.15 Least risk bomb location.
 2. Safety equipment and systems installed
 Each cabin crew member should receiveetc

Comment:

"1.1 to 1.15" not in EU-OPS. Too many systems and too many details not relevant for cabin crew. This must be left to operator type specifics.

Proposal:

Delete "1.1 to 1.15"

comment

458

comment by: Elaine Allan Monarch

Page No. 11

Ref No. NPA 2009 - 2e AMC.CC.TRA.125 1

Summary of EASA Proposed Requirement:

Suggests that the following are included: max take off weight, cargo areas and fuel tanks

Comment:

Is this relevant to cabin crew.

Justification:

Proposed Text (if applicable)

Suggest removal of 1.2 **Typical max take off weight/ typical engines/speed/altitude/range**

comment

459

comment by: Elaine Allan Monarch

Page No. 11

Ref No. NPA 2009 - 2e AMC.CC.TRA.125 1.11

Summary of EASA Proposed Requirement:

Reference made to Flight Deck where previously referred to Cockpit

Comment:

Justification:

Change in terminology from Flight Deck to Cockpit in this section
 Proposed Text (if applicable)
 Suggest standardisation of terminology used throughout i.e. Flight Deck

comment 460 comment by: *Elaine Allan Monarch*

Page No. 12

Ref No. NPA 2009 - 2e AMC.CC.TRA.125 2

Summary of EASA Proposed Requirement:
 2.1 refers to slides 2.2 liferafts/sliderafts 2.3 drop out oxygen systems

Comment:

Suggest that this is operator specific information and therefore is more relevant in AMC OR OPS CC 125

Justification:

This information varies dependent on operator

Proposed Text (if applicable)

Suggest removal of all Aircraft type training and checking from the CC.TRA section of Implementing Rules

comment 461 comment by: *Elaine Allan Monarch*

Page No. 12

Ref No. NPA 2009 - 2e AMC.CC.TRA.125 5

Summary of EASA Proposed Requirement:
 Each Cabin Crew member should be trained in extinguishing a fire representative of an inflight fire in a smoke filled environment as relevant to the aircraft type

Comment:

Currently practical fire fighting is conducted outside.

Justification:

Health and Safety guidelines will not allow extinguishing a fire whilst in a smoke filled environment

Proposed Text (if applicable)

Each Cabin Crew member being given realistic and practical training in the use of all fire fighting equipment, including protective clothing, representative of that carried in the aircraft. This training must include: (a) each cabin crew member extinguishing an actual fire characteristic of an aircraft interior fire except that, in the case of Halon extinguishers, an alternative extinguishing agent may be used. (ii) the donning of PBE and its use by each cabin crew member in an enclosed simulated smoke filled environment.

comment 493 comment by: *KLM*

Relevant Text:

Items

- 1.2 (Typical max take off weight/typical engines/speed/altitude/range),
- 1.4 (Typical flight crew number and typical minimum number of required cabin crew as determined in accordance with Part-21),
- 1.6 (un-pressurised areas/cargo/gears/fuel tanks/flight controls),
- 1.7 (aeroplanes systems – general: APU/Aeroplane Electrical Power / Air conditioning and pressurisations),
- 1.12 (access to avionics bay)

Comment:

Items 1.2, 1.4, 1.6, 1.7, 1.12 have no relevance for the safety duties of cabin crew, Those proposed cabin crew type specific training requirements, which have no safety justification, go beyond EU-OPS

Proposal:

Delete Items 1.2, 1.4, 1.6, 1.7, 1.12 and realign the training requirements with Subpart O of EU-OPS

comment 494

comment by: KLM

Relevant Text:

TRAINING PROGRAMME

The following subjects should be covered as relevant to the aircraft type:

1. Aircraft description

1.1 Type of aeroplane; principal dimensions; narrow or wide bodied; single or double deck;

1.2 Typical max takeoff weight/typical engines/speed/altitude/range;

1.3 Typical passenger seating capacity (certified capacity);

1.4 Typical flight crew number and typical minimum number of required cabin crew as determined in accordance with Part 21;

1.5 Cabin doors location and sill height;

1.6 Unpressurised areas/cargo/gears/fuel tanks/flight controls;

1.7 Aeroplane systems – general: APU/Aeroplane electrical power/Air conditioning and pressurisation;

1.8 Cockpit presentation general: pilot seats and their mechanism; cockpit exits; storage;

1.9 Typical cabin crew stations;

1.10 Passenger seats general presentation;

1.11 Flight deck security general: door components and use;

1.12 Access to avionic bays;

1.13 Lavatories general: doors; systems; emergency equipments, calls and signs;

1.14 Galleys general: appliances; water and waste; control panels; calls and signs;

1.15 Least risk bomb location.

2. Safety equipment and systems installed

Each cabin crew member should receiveetc

Comment:

"1.1 to 1.15" not in EU-OPS. Too many systems and too many details not relevant for cabin crew. This must be left to operator type specifics.

Proposal:

Delete "1.1 to 1.15"

comment 535

comment by: Virgin Atlantic Airways

Relevant Text:

Safety equipment and systems installed

Each cabin crew member should receive realistic training on, and demonstration of, the location and use of all type specific equipment including the following;

2.1 slides and where non self supporting slides are carried the use of any associated ropes;

2.2 life- rafts and slide- raft, including the equipment attached to and/or carried in the raft;

2.3 drop out oxygen system.

Comments

This is operator specific information and varies from operator to operator, therefore it should be included in AMC.OR.OPS.CC.125

Proposed Text: As above

comment

536

comment by: *Virgin Atlantic Airways*

Relevant Text:

Each cabin crewmember should be trained in extinguishing a fire representative of an in flight fire in a smoke filled environment as relevant to the aircraft type,

Comments

Is this reference to practical training? if so Health and Safety requirements will not allow for extinguishing a fire whilst in a smoke filled environment.

Proposed Text:

This training must include;

(iii) Each cabin crew member extinguishing a fire characteristic of an aircraft interior fire using the operators equipment.

The donning and use of protective breathing equipment by each cabin crew member in an enclosed simulated smoke-filled environment.

comment

567

comment by: *Deutsche Lufthansa AG*

Relevant Text:

Items

1.2 (Typical max take off weight/typical engines/speed/altitude/range),

1.4 (Typical flight crew number and typical minimum number of required cabin crew as determined in accordance with Part-21),

1.6 (un-pressurised areas/cargo/gears/fuel tanks/flight controls),

1.7 (aeroplanes systems – general: APU/Aeroplane Electrical Power / Air conditioning and pressurisations),

1.12 (access to avionics bay)

Comment:

Items 1.2, 1.4, 1.6, 1.7, 1.12 have no relevance for the safety duties of cabin crew, Those proposed cabin crew type specific training requirements, which have no safety justification, go beyond EU-OPS

Proposal:

Delete Items 1.2, 1.4, 1.6, 1.7, 1.12 and realign the training requirements with Subpart O of EU-OPS

comment

568

comment by: *Deutsche Lufthansa AG*

Relevant Text:

TRAINING PROGRAMME

The following subjects should be covered as relevant to the aircraft type:

1. Aircraft description

1.1 Type of aeroplane; principal dimensions; narrow or wide bodied; single or double deck;

1.2 Typical max takeoff weight/typical engines/speed/altitude/range;

1.3 Typical passenger seating capacity (certified capacity);

1.4 Typical flight crew number and typical minimum number of required cabin crew as determined in accordance with Part 21;

1.5 Cabin doors location and sill height;

1.6 Unpressurised areas/cargo/gears/fuel tanks/flight controls;

1.7 Aeroplane systems – general: APU/Aeroplane electrical power/Air conditioning and pressurisation;

1.8 Cockpit presentation general: pilot seats and their mechanism; cockpit exits; storage;

1.9 Typical cabin crew stations;

1.10 Passenger seats general presentation;

1.11 Flight deck security general: door components and use;

1.12 Access to avionics bays;

1.13 Lavatories general: doors; systems; emergency equipments, calls and signs;

1.14 Galleys general: appliances; water and waste; control panels; calls and signs;

1.15 Least risk bomb location.

2. Safety equipment and systems installed

Each cabin crew member should receiveetc

Comment:

"1.1 to 1.15" not in EU-OPS. To many systems and to many details not relevant for cabin crew. This must be left to operator type specifics.

Proposal:

Delete "1.1 to 1.15"

comment

642

comment by: *British Airways Flight Operations*

Relevant Text:

Items

1.2 (Typical max take off weight/typical engines/speed/altitude/range),

1.4 (Typical flight crew number and typical minimum number of required cabin crew as determined in accordance with Part-21),

1.6 (un-presurised areas/cargo/gears/fuel tanks/flight controls),

1.7 (aeroplanes systems – general: APU/Aeroplane Electrical Power / Air conditioning and pressurisations),

1.12 (access to avionics bay)

Comment:

Items 1.2, 1.4, 1.6, 1.7, 1.12 have no relevance for the safety duties of cabin crew, Those proposed cabin crew type specific training requirements, which have no safety justification, go beyond EU-OPS

Proposal:

Delete Items 1.2, 1.4, 1.6, 1.7, 1.12 and realign the training requirements with Subpart O of EU-OPS

General Comment:

NPA 2009-2 in its entirety is unfit for the purpose for which it is intended and must be withdrawn and reconsidered.

comment

643

comment by: *British Airways Flight Operations***Relevant Text:**

TRAINING PROGRAMME

*The following subjects should be covered as relevant to the aircraft type:**1. Aircraft description**1.1 Type of aeroplane; principal dimensions; narrow or wide bodied; single or double deck;**1.2 Typical max takeoff weight/typical engines/speed/altitude/range;**1.3 Typical passenger seating capacity (certified capacity);**1.4 Typical flight crew number and typical minimum number of required cabin crew as determined in accordance with Part 21;**1.5 Cabin doors location and sill height;**1.6 Unpressurised areas/cargo/gears/fuel tanks/flight controls;**1.7 Aeroplane systems – general: APU/Aeroplane electrical power/Air conditioning and pressurisation;**1.8 Cockpit presentation general: pilot seats and their mechanism; cockpit exits; storage;**1.9 Typical cabin crew stations;**1.10 Passenger seats general presentation;**1.11 Flight deck security general: door components and use;**1.12 Access to avionics bays;**1.13 Lavatories general: doors; systems; emergency equipments, calls and signs;**1.14 Galleys general: appliances; water and waste; control panels; calls and signs;**1.15 Least risk bomb location.**2. Safety equipment and systems installed**Each cabin crew member should receiveetc***Comment:**

"1.1 to 1.15" are not in EU-OPS. Too many systems and too many details not relevant for cabin crew. This must be left to operator type specifics.

Proposal:

Delete "1.1 to 1.15"

General Comment:

NPA 2009-2 in its entirety is unfit for the purpose for which it is intended and must be withdrawn and reconsidered.

comment

669

comment by: *Swiss International Airlines / Bruno Pfister***Relevant Text:**

Items

1.2 (Typical max take off weight/typical engines/speed/altitude/range),

1.4 (Typical flight crew number and typical minimum number of required cabin crew as determined in accordance with Part-21),

1.6 (un-presurised areas/cargo/gears/fuel tanks/flight controls),

1.7 (aeroplanes systems – general: APU/Aeroplane Electrical Power / Air conditioning and pressurisations),

1.12 (access to avionics bay)

Comment:

Items 1.2, 1.4, 1.6, 1.7, 1.12 have no relevance for the safety duties of cabin crew, Those proposed cabin crew type specific training requirements, which have no safety justification, go beyond EU-OPS

Proposal:

Delete Items 1.2, 1.4, 1.6, 1.7, 1.12 and realign the training requirements with Subpart O of EU-OPS

comment

670

comment by: *Swiss International Airlines / Bruno Pfister***Relevant Text:**

TRAINING PROGRAMME

*The following subjects should be covered as relevant to the aircraft type:**1. Aircraft description**1.1 Type of aeroplane; principal dimensions; narrow or wide bodied; single or double deck;**1.2 Typical max takeoff weight/typical engines/speed/altitude/range;**1.3 Typical passenger seating capacity (certified capacity);**1.4 Typical flight crew number and typical minimum number of required cabin crew as determined in accordance with Part 21;**1.5 Cabin doors location and sill height;**1.6 Unpressurised areas/cargo/gears/fuel tanks/flight controls;**1.7 Aeroplane systems – general: APU/Aeroplane electrical power/Air conditioning and pressurisation;**1.8 Cockpit presentation general: pilot seats and their mechanism; cockpit exits; storage;**1.9 Typical cabin crew stations;**1.10 Passenger seats general presentation;**1.11 Flight deck security general: door components and use;**1.12 Access to avionics bays;**1.13 Lavatories general: doors; systems; emergency equipments, calls and signs;**1.14 Galley general: appliances; water and waste; control panels; calls and signs;**1.15 Least risk bomb location.**2. Safety equipment and systems installed**Each cabin crew member should receiveetc***Comment:**

"1.1 to 1.15" not in EU-OPS. Too many systems and too many details not relevant for cabin crew. This must be left to operator type specifics.

Proposal:

Delete "1.1 to 1.15"

comment

713

comment by: *Irish Aviation Authority*

Comment:

Paragraph 5 - As per ORs, the text is written in such a way that it is not clear that each cabin crewmember has to extinguish a fire and don the PBE in a smoke filled environment.

Justification:

Fire and smoke is the biggest risk in the cabin and training programmes should prepare cabin crew adequately for such situations.

Proposed text:

Each cabin crew member should be trained in:

(i) extinguishing an actual fire characteristic of an aircraft interior fire, except that in the case of halon extinguishers, an alternative extinguishing agent may be used. **"This training should include the extinguishing of an actual fire by each cabin crewmember".**

(ii) the donning and use of protective breathing equipment in an enclosed simulated smoke-filled environment. ***"This training should include the donning of PBE by each cabin crewmember in a smoke filled environment"***.

comment

740

comment by: TAP Portugal

Relevant Text:

Items

1.2 (Typical max take off weight/typical engines/speed/altitude/range),
 1.4 (Typical flight crew number and typical minimum number of required cabin crew as determined in accordance with Part-21),
 1.6 (un-pressurised areas/cargo/gears/fuel tanks/flight controls),
 1.7 (aeroplanes systems – general: APU/Aeroplane Electrical Power / Air conditioning and pressurisations),
 1.12 (access to avionics bay)

Comment:

Items 1.2, 1.4, 1.6, 1.7, 1.12 have no relevance for the safety duties of cabin crew, Those proposed cabin crew type specific training requirements, which have no safety justification, go beyond EU-OPS

Proposal:

Delete Items 1.2, 1.4, 1.6, 1.7, 1.12 and realign the training requirements with Subpart O of EU-OPS

comment

741

comment by: TAP Portugal

Relevant Text:

TRAINING PROGRAMME

The following subjects should be covered as relevant to the aircraft type:

1. Aircraft description

1.1 Type of aeroplane; principal dimensions; narrow or wide bodied; single or double deck;

1.2 Typical max takeoff weight/typical engines/speed/altitude/range;

1.3 Typical passenger seating capacity (certified capacity);

1.4 Typical flight crew number and typical minimum number of required cabin crew as determined in accordance with Part 21;

1.5 Cabin doors location and sill height;

1.6 Unpressurised areas/cargo/gears/fuel tanks/flight controls;

1.7 Aeroplane systems – general: APU/Aeroplane electrical power/Air conditioning and pressurisation;

1.8 Cockpit presentation general: pilot seats and their mechanism; cockpit exits; storage;

1.9 Typical cabin crew stations;

1.10 Passenger seats general presentation;

1.11 Flight deck security general: door components and use;

1.12 Access to avionic bays;

1.13 Lavatories general: doors; systems; emergency equipments, calls and signs;

1.14 Galley general: appliances; water and waste; control panels; calls and signs;

1.15 Least risk bomb location.

2. Safety equipment and systems installed

Each cabin crew member should receiveetc

Comment:

"1.1 to 1.15" not in EU-OPS. Too many systems and too many details not

relevant for cabin crew. This must be left to operator type specifics.

Proposal:

Delete "1.1 to 1.15"

comment 824

comment by: *cfdt france*

AMC CC TRA 125

The CFDT France asks for this specific aircraft training to be excluded from initial training and ATTESTATION - as it may lead to discrimination in employment of cabin crew that have an ATTESTATION with type training on aircraft A B & C finding employment with operators having aircraft X Y & Z.

Aircraft type training must be an ANNEX of the Attestation after operators have provided the training of their cabin crew in order for them to work on board.

comment 849

comment by: *AIR FRANCE*

Comment:

Items 1.2, 1.4, 1.6, 1.7, 1.12 have no relevance for the safety duties of cabin crew. Those informations are available in the OM if needed.

Proposal:

Delete Items 1.2, 1.4, 1.6, 1.7, 1.12 and realign the training requirements with Subpart O of EU-OPS

comment 910

comment by: *IACA International Air Carrier Association*

1.2 Typical max takeoff weight/typical engines/speed/altitude/range;

1.6 Unpressurised areas/cargo/gears/fuel tanks

This is new and unnecessary information to be included in cabin crew aircraft type specific training which is not relevant to cabin crew.

Proposal: delete these sections.

comment 912

comment by: *IACA International Air Carrier Association*

Fire and smoke training differs from Appendix 1 to EU-OPS 1.1010 Conversion and differences training (b) Fire and smoke training.

The requirement to fight a fire in a smoke-filled environment as relevant to the aircraft type will have two effects:

1. The trainer will be unable to see clearly if the trainee is carrying out fire fighting procedures correctly. To facilitate good training the amount of smoke will be reduced to a level that will be unrealistic and therefore, from a training prospective worthless.
2. The requirement that the fire-fighting should take place in an environment relevant to the aircraft type is impractical. Same type aircraft have different seating, galley presentations, with different positions of Emergency equipment locations etc. Suggesting that an operator should provide different smoke filled environmental Training devices for each LOPA is non-sense.

Qualified advice from practicing Fire-fighting advisers confirm that the present requirement of fighting fire and then separately experiencing a smoke filled cabin whilst wearing a smoke-hood with all the difficulties of communication

that entails is more beneficial.

Proposal: The existing regulations be retained as under Appendix 1 to EU-OPS 1.1010 Conversion and differences training (b) Fire and smoke training.

E. IX. Draft Decision Part-CC - Subpart TRA - AMC CC.TRA.135 Recurrent training and checking

p. 13

comment 152 comment by: *International Air Transport Association*

AMC CC.TRA.135

As commented for CC.TRA.135 there is no reference to cabin being required to undertake recurrent dangerous goods training as is required by the ICAO Technical Instructions.

Proposed amendment.

Insert a new 2. into this part as follows:

"2. Dangerous goods within intervals not exceeding 24 months

Dangerous goods recurrent training for cabin crew should address the aspects with they should be familiar as set out in the current edition of the ICAO Technical Instructions. However, if training is completed within the the final three months of validity of previous training, the period of validity extends from the date on which the recurrent training was completed until 24 months from the expiry day of that previous training."

comment 169 comment by: *ETF*

Delete: 2. Operation of doors and exits ~~within intervals not exceeding 3 years~~

Reason: Door training should be every year. See comment to CC.TRA.135

comment 356 comment by: *Jill Pelan*

AMC CC TRA 135
CFDT France and ETF ask :

Delete: 2. Operation of doors and exits ~~within intervals not exceeding 3 years~~

Reason: Door training should be every year. See comment to CC.TRA.135

comment 379 comment by: *kapers Cabin Crew Union*

Delete: 2. Operation of doors and exits ~~within intervals not exceeding 3 years~~

Reason: Door training should be every year. See comment to CC.TRA.135

comment 823 comment by: *cfdt france*

CC.TRA 135 (

(2) in addition to (1), within intervals not exceeding 3 years, each cabin crew member shall complete for each aircraft type or variant to be operated:
(i) actual operation and opening in a representative training device or in the actual aircraft of each type or variant of normal and emergency exits in the normal and emergency modes; and
(ii) training on the use of equipment and systems relevant to pilot incapacitation.
The CFDT FRANCE and ETF cabin crew demand the deletion of this paragraph the procedures mentioned should be part of the aircraft type/variant training every 12 Months.

comment

914

comment by: IACA International Air Carrier Association

3.

EU-OPS 1.1015 (c)

The period of validity of recurrent training and the associated checking required by OPS 1.1025 shall be 12 calendar months in addition to the remainder of the month of issue. If issued within the final three calendar months of validity of a previous check, the period of validity shall extend from the date of issue until 12 calendar months from the expiry date of that previous check.

Proposal: reinstate the period of validity from EU-OPS 1.1025.

Appendix A

Attachments

 [ETF Position on CC certification 020709.pdf](#)
Attachment #1 to comment [#147](#)

 [ETF Position on CC certification.pdf](#)
Attachment #2 to comment [#373](#)

 [circular dgac curso basico tcp 961104.pdf](#)
Attachment #3 to comment [#854](#)

 [AttachToCommentFODCOM.pdf](#)
Attachment #4 to comment [#239](#)

 [2009 07 24 Opinion de la CGT sur la NPA 2009.pdf](#)
Attachment #5 to comment [#146](#)