

SMS Q&A Webinar

Answers addressing the rules & setting the scene

Focus on Part-145 and Part-21

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22 April 2022 - Version 0.1

Your safety is our mission.

SMS, Part 21 and Part-145



Reg.(EU) 2022/201 & 203 amending Reg. (EU) 748/2012 as regards SMS & occurrence reporting in Design & Production organisations

- [EUR-Lex - 32022R0201 - EN - EUR-Lex \(europa.eu\)](#)
- [EUR-Lex - 32022R0203 - EN - EUR-Lex \(europa.eu\)](#)

→ Applicability date: 7 March 2023

Reg.(EU) 2021/1963 amending Reg. (EU) 1321/2014 as regards SMS & occurrence reporting in maintenance organisations

- <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32021R1963&from=EN>

→ Applicability date: 2 December 2022

“TWO YEARS” transition period for full **implementation** & closure of findings
The approval certificate remains valid; no issuance of a new certificate afterwards.

Applicability of SMS for CAW and Part-21 (IAW)

SMS applicable:

- Part-CAMO – CAMO.A.200
 - <https://www.easa.europa.eu/downloads/95788/en> - Annex Vc
- Part-145 - 145.A.200
- Part 21 Subpart G (Production) – 21.A.139(c)
 - Which includes ETSOA
- Part 21 Subpart J (Design) - 21.A.239(c)
 - Which includes APU

SMS **not** applicable:

- Alternative Procedures to DOA (21.A.14b)
- Part 21 Subpart F (Production without DOA)
- Part-CAO - Annex Vd of [Regulation \(EU\) No 1321/2014](#)



Approach for the AMC development

Align the AMC across all domains, based on Air Ops & Part CAMO

→ For CAT, the Part CAMO has to be integrated into the Air Operator's (S)MS

→ AMC to Part 145 (**to be published soon**)

→ Copy/paste from Part-CAMO – will mirror Decision 2020/002/R

→ <https://www.easa.europa.eu/document-library/agency-decisions/ed-decision-2020002r>

→ AMC to Part-21

→ Same principles but different regulatory structure

→ Will copy/paste from Part-CAMO wherever possible

→ **AMC/GM to publish after summer 2022**

→ <https://www.easa.europa.eu/document-library/notices-of-proposed-amendment/npa-2019-05> (AMC under review)

→ Or use SM.0001 (next slide) [guidance on SMS for Part-21 organisations]

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<https://www.easa.europa.eu/user/register>

SM-0001B - International Industry Standard

SM0001 revision B

- Will be recognised as a Means of Compliance (MC) for Part-21 (without gap analysis).
- Not recognised as a MC for Part-145, awaiting revision C

Note 1: Chapter 6 proposes some generic hazards

Note 2: Appendix B contains a maturity assessment tool that can be used for self-assessment.

SM-0001 Issue B - March 31st, 2022

International Industry Standard

IMPLEMENTING A SAFETY MANAGEMENT SYSTEM
IN
DESIGN, MANUFACTURING AND MAINTENANCE ORGANIZATIONS



Publishers:



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SM-0001 issue B page 1
Copyright 2022, Aerospace Industries Association of America (AIA), Aerospace Industries Association of Brazil (AIA-B), Aerospace Industries Association of Canada (AIA-C), AeroSpace and Defence Association Industries of Europe (ASD), General Aviation Manufacturers Association (GAMA)

For ASD: <https://www.asd-europe.org/aerospace-associations-announce-safety-management-system-sms-industry-standard>
www.asd-europe.org/news-publications/standards

For AIA: <https://www.aia-aerospace.org/news/aerospace-associations-announce-safety-management-system-sms-industry-standard/>
<https://www.aia-aerospace.org/international-safety-management-system-sms-standard-sm-001/>.

For AIAB: <http://www.aiab.org.br/site-ingles/noticias-e-eventos2.asp?codnot=100008>

For AIAC: <https://aiac.ca/aerospace-associations-announce-safety-management-system-sms-industry-standard/>

For GAMA: <https://gama.aero/news-and-events/press-releases/aerospace-associations-announce-safety-management-system-industry-standard/>
https://gama.aero/wp-content/uploads/SMS-Standard_final-issue-A_20180917-1.pdf

SMS and integrated approach

- Compliance monitoring function (QMS) and SMS **should** be integrated
 - Called « **Management System (MS)** » in EU
 - See 145.A.200 (which supersedes ex 145.A.65); 21.A.139; 21.A.239
 - Future placeholder for iSM - (cyber)security and any other, future system or approval
- Multiple approval certificates – one single SMS or an SMS per approval certificate-site?
 - Left to the decision of the organisation
 - While every approval needs an SMS, there is nothing to stop them being connected or merged
- Standalone SMS manual or SMS built on existing procedures?
 - Left to the decision of the organisation but ensure « no gap » (novelties e.g. internal reporting system)
 - While every approval needs an SMS manual, there is nothing to stop them being merged.
- EASA recommends an integrated (S)MS approach
 - As it better addresses interfaces and ensure a corporate, cohesive approach
 - Common risk assessment methodology for multiple domains might not be appropriate



Compliance versus Performance (1/2)

- Quality is about compliance (conformity such as QMS, ISO 9000...)
- SMS is about « Performance » (focus on the safety of operations)
 - Do you manage safety **effectively**?
 - Different from « product safety » – e.g. impact of a massive early retirement plan (Covid19) such as for resources, knowledge, workload etc.
- Compliance monitoring manager and safety manager must talk to each other
 - E.g. A non-conformity may lead to the identification of a significant hazard.
 - Functions can be combined - left to the decision of the organisation



Compliance versus Performance (2/2)

Example for Part-145 - new SMS element: “internal reporting system” based on confidentiality and just culture principles – WHAT DOES THE 2 YEAR TRANSITION PERIOD MEAN?

- Before 02/12/22, 145.A.202 not yet mandatory
- 02/12/22 onwards, implement an internal safety reporting scheme.
- Between 02/12/22 and 02/12/24, the Competent Authority may come; audit; and issue findings if not implemented (**compliance**).
 - Finding(s) to close before 02/12/24
- After 02/12/24, the NCA may revoke the approval certificate if not compliant.
- After 02/12/24: remain compliant and demonstrate the **effectiveness** of the process (**PERFORMANCE BEYOND COMPLIANCE**)
 - Analyse each report or occurrence : what does it tell you about the **safety of your operations** and its robustness?
 - Identify the hazard; assess the risk (Probability versus Severity)
 - Select the areas of greater risks and establish safety objectives
 - E.g. too many deviations to the maintenance procedures; safety culture to improve; training to deliver; monitor (audit) etc.
 - Mitigation measures must be established, monitored and effective so that the risk remains under control.
 - Keep the system continuously active and be data-rich: e.g. complement your analysis by interviewing the staff (proactive approach anticipating negative outcomes)
- The oversight thus drifts **from compliance-based towards performance-based**.
 - For self assessment – assessors to be trained – please use:
 - EASA MS assessment tool at <https://www.easa.europa.eu/document-library/general-publications/management-system-assessment-tool>
 - The PSOE model – see pictogram
 - SM.0001B Appendix B: SMS maturity assessment method



“Being compliant” does not necessarily mean “being safe”



All risks cannot be addressed by the rules. Local context, crisis, changes have to be considered...
Procedures/process... may not be effective...
This is what SMS tries to target...safe operations...

Back-up slides - available literature

→ SMICG products

[https://www.skybrary.aero/index.php/Safety_Management_International_Collaboration_Group_\(SM_ICG\)#SM_ICG_Products](https://www.skybrary.aero/index.php/Safety_Management_International_Collaboration_Group_(SM_ICG)#SM_ICG_Products)

- 10 Things You Should Know About SMS
- A Common Approach to Safety Performance
- Measuring Safety Performance – Guidelines for Service Providers
- A Systems Approach to Measuring Safety Performance – The Regulator Perspective
- Development of a Common Hazard Taxonomy
- The Senior Manager's Role in SMS
- The Frontline Manager's Role in SMS
- SMS Evaluation Tool – updated in 2019
- Safety Management Terminology
- Risk Based Decision Making Principles
- How to Support a Successful SSP and SMS Implementation – Recommendations for Regulators
- SMS Inspector Competency Guidance
- Hazard Taxonomy Examples – updated in 2019
- SSP Assessment Tool – updated to be consistent with Annex 19 Amendment 1 in 2020
- SMS for Small Organizations
- SMS for Small Organizations – Considerations for Regulators – updated in 2020
- SMS Integration – Points to Consider – updated in 2020
- Determining the Value of SMS
- SMS and SSP Reference Library
- Training Program Outline for Inspector SMS Competency
- SM ICG Description Paper
- SM ICG Findings on SMS Equivalence
- SM ICG Terms of Reference
- Safety Culture for Effective Safety Management (pamphlet)
- Safety Culture Self-Assessment Tool for Regulators
- Industry Safety Culture Evaluation Tool
- SM ICG position paper on SMS and QMS
- Sector Safety Risk Profiling at the State Level
- State Evaluation of Industry Safety Cases
- Comprehensive Safety Performance Management in an SSP
- SSP Brochure
- Attitudes and Behaviors for Effective SMS (brochure)

SMS fundamentals basics

- 2013 SMS fundamentals basic by FAA - [Safety Management Systems \(SMS\) Fundamentals: Basics – YouTube](#)
- 27 Mai 2019 - Aviation safety management by NTSB CANADA [Aviation Safety Management - Kathy Fox of the TSB at McGill University - YouTube](#) (systemic approach)
- 17 Nov.2016 SMS basic refresher course online [SMS basic refresher course online - YouTube](#)
- <https://www.youtube.com/watch?v=QcFLxqbZMVU&feature=youtu.be> Developing a SMS
- Transport CANADA: <https://www.youtube.com/watch?v=po9wxKCHdUI> – risk of “icing” (SMS and SSP)
- [TSB Watchlist 2020 - Release - YouTube](#) – why an SSP



EASA COVID19 resources



- [EASA safety week](#) on 21-24 June 2021
 - 5 domain [video-recorded sessions \(also on YouTube\)](#) were on “**effective safety management**” as well as “**skills and knowledge degradation**” during **COVID times** + additional video recordings on the [EASA risk portfolio](#) and the **role of leadership in “SMS”**
- [SAFE 360 Edition 2021](#)
 - Recordings about “[New safety landscape](#)” on YouTube
- **Various guidelines**, notably:
 - [Return to service of aircraft from storage](#) (CAW)
 - [The role of operator’s Management System in the Covid-19 recovery phase](#)
 - [3 practical scenarios](#) for the operator’s recovery phase (Hazards / Threats / consequences / mitigation measures)
 - [Review of safety issues arising from COVID-19](#) (Risk portfolio – issue 2)



<https://www.easa.europa.eu/domains/safety-management>
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