



Guidance for the oversight of group operations¹

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FS2 Air Operations & Aerodromes department

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1. Background

Group Operations² (GO) have been a reality for many years as the current regulatory framework does not prevent the implementation of this business model, which accounts for a significant portion of the CAT traffic in the European Union. However, several challenges have been identified in:

- establishing clear boundaries and caveats to the implementation of GO; and
- ensuring an adequate and efficient level of oversight of GO by the affected Competent Authorities (CAs).

Some groups have reached a high level of integration of their AOC management systems, leading to harmonized operations, with increased efficiency and flexibility. In many cases, a “parent” AOC plays a prominent role in the financial management and operational control of the other AOC, also providing centralized services, such as aircraft continuing airworthiness, crew rostering and staff training.

The gains in efficiency and flexibility could be offset by an increased complexity in managing the integration (i.e. ensuring all business, safety, compliance needs are addressed and remain aligned) and in the related oversight by the CA involved, particularly in case of significant sub-contracting. In many GO configurations, some CAs have reported difficulties in identifying clear accountabilities and responsibilities in each AOC management system, although by regulation each AOC is responsible for its management system, even if they all follow common group standards, policies or procedures.

Several factors may hinder the effective oversight of GO, especially when more than one CA is involved, such as:

- different approaches and oversight models;
- different interpretations of the rules, down to inspector’s level;
- difficulties in sharing information and cooperating with other affected CA, also linked to legal considerations and differences in language and culture.

In November 2020, EASA decided, with the support of the Member States, to start a joint EASA/CA project to identify the challenges in the oversight of GO and provide related guidance.

2. Purpose and content

The purpose of this document is to provide CAs with guidance for the oversight of GO in the Air Operations domain, where operators holding AOCs issued by different Member States are engaged in a single business grouping³. Group configurations where one or more operators hold AOC issued by third countries are not addressed in this document.

The document includes an introductory part with a description of key issues and enablers, followed by chapters addressing rule clusters of the Air Operations Regulation that are relevant for GO (e.g. management system, crew training and checking, FTL, etc.).

² There is no formal definition of GO in the relevant EU regulations. The closest relevant definition can be found in Art. 65 of the BR: *two or more organisations forming part of a single business grouping, each of which has a principal place of business in a different Member State and each of which holds a certificate.*

³ *The principles of this guidance may also apply to groups with AOCs in the same country.*

For each cluster, the following is provided in the form of tables:

1. A description of the way(s) the rules can be implemented in the GO context.
2. A list of challenges associated with the CA's verification of compliance with the applicable rules.
3. Recommended solutions for CA to address the challenges and comply with Part-ARO requirements related to certification, approvals, and continued oversight. This section will also detail any operating practice that would be considered as not compliant with the current requirements.

3. Cooperative oversight

To ensure GO are properly overseen, EASA recommends the establishment of a cooperative oversight agreement (COA) between the CAs responsible for the certification and oversight of each AOC holder forming part of the single business grouping.

The scope of the areas of oversight accountability and responsibility for each CA detailed in such COA needs to be clearly defined to mitigate any potential safety risk or to avoid any gap in oversight.

The COA should include details on the group's governance and integration, as well as personal data protection.

Elements recommended to be included in the COA are listed in the last paragraph of this chapter.

Having a standardised approach to the COA also addresses the complexity related to a CA involved in the oversight of multiple GO, with possibly two or more COAs to sign.

Notwithstanding the recommendation to establish a COA, the involved CAs may achieve the same cooperation objectives through other means, which nevertheless have to be documented in each CA's internal procedures. It should be noted that such arrangements pose some challenges in the long term, as each CA could diverge from the initial set-up when no agreed control mechanism is in place.

3.1 Validation

Each CA retains its responsibilities for certification and oversight of the AOCs it has issued; nevertheless, each CA may rely to a certain extent on the verifications (initial or continued) performed by another CA, provided this "validation" is described in the CA procedures and, possibly, in the related COA (note that ARO.GEN.205 "Allocation of tasks to qualified entities" does not apply to COA between CAs).

The more the AOCs' procedures, aircraft equipment and personnel training are harmonised, the broader the extent of the certification and oversight activities that can be validated between the involved CA's. The CA of the operator's principal place of business remains however legally responsible for those tasks, unless they have been reallocated to another Member State or EASA in accordance with Articles 64 or 65 of Regulation (EU) 2018/1139.

One example is where CAs agree on a task-sharing system: each CA is assigned with the verification of certain areas (e.g. CA 1 verifies OM-A, CA 2 verifies OM-D). In this case, all CAs procedures should include provisions for the validation and mutual acceptance (e.g. after an internal review, CA 2 endorses CA 1's verification of OM-A) to ensure each CA fulfils its oversight responsibilities.

The aim of the CA's validation is to ensure the scope, the extent and the adequacy of the other CA's verification fulfil the requesting CA's needs and expectations. The requesting CA's analysis of the other

CA's documentation may identify gaps requiring additional verifications; for example, these can be linked to:

- i. considerations pertaining to the operation in the CA's MS by an AOC, which may not be the same as for the other AOCs belonging to the same business grouping. Frequently, management systems of such AOCs have some differences due to the different people and risks involved. Moreover, unless all AOCs operate in a full "wet-lease in" environment, there may be routes or airports that are used only by one AOC;
- ii. national requirements, applicable in the CA's MS (e.g. Subpart Q);
- iii. compliance with the CA's approval procedures; for example, in the case of FRMS, one CA may require 2 years of data collection and analysis before approving the use of FRM-related provisions such as reduced rest, whereas another CA may require only 1 year of such data collection and analysis.

The validating CA should flag as soon as possible to the CA that conducted the verifications, any issue stemming from its review. This aspect is important to ensure that the outcome of verifications affecting each AOC is notified by its CA only when all involved CAs are satisfied with the outcome (more in the paragraph on synchronisation). The involved CAs should have in place a system to address disagreements, to ensure that unresolved issues do not linger and adversely affect GO harmonisation. CAs could consider involving EASA in the case of particularly difficult topics, as foreseen in article 62(11) of the Basic Regulation.

In any case, validations should be based on the collection of relevant operators' records and certification/oversight files from the CA that conducted the verifications, and their review by the validating CA.

3.2 Joint oversight activities

CAs can also enter a joint oversight system, where activities are conducted in mixed teams, composed by inspectors of each of the participating CA. In this case, efficiency is gained through shared use of resources. CAs may also agree on appointing a lead CA for each of the focus areas (e.g. CA 1 FTL, CA 2 Management System, CA Crew Training and Checking), which will be responsible for coordinating all the verifications related to that focus area in the team. As in the case of validation, each CA is required to maintain records of the verifications in accordance with its own procedures. To enhance the trust in such a system, all participating CAs should agree on:

- i. the inspectors' qualifications needed to carry out joint tasks and, possibly, establish a pool of inspectors qualified to conduct joint oversight tasks;
- ii. the documentation to be used to support the verification of compliance.

3.3 Synchronization of changes applicable to all AOCs

3.3.1 Change requests by AOCs

To facilitate the implementation of the COA, the participating CAs should establish common procedures to be observed by each AOC for the submission of the individual approval requests and manuals revisions that are supposed to be valid for all AOCs. CAs should align expectations regarding the use of each AOC's change management process [ref. AMC1 ORO.GEN.200(a)(3)], whose output should be submitted in conjunction with a change request that may have an adverse impact on safety.

The common timeline for submission of manual revisions, not subject to prior approval, should be synchronized (i.e., same applicability date) and ensure enough lead time for a proper CA verification (e.g. 30 days). This is to avoid manual revisions becoming applicable in one AOC while not yet in another one, thus producing a misalignment in procedures, equipment, or training standards.

To achieve these objectives the participating CAs can agree that all AOCs will be approved for the same procedure for managing and notifying changes not requiring prior approval [ref. ARO.GEN.310(c)]. The notification of the change should reach all participating CAs and its period should allow sufficient time to resolve any issue identified by one or more CAs.

If, after an agreement is reached among the affected CAs, changes to the submitted documentation are required in the context of GO, each AOC should be requested to implement the necessary modifications with the same applicability dates.

Along the same lines, for changes requiring prior approval, the participating CAs should establish common procedures, to be also included in the COA, to manage the verification of the submitted documentation and issue the respective approvals with the same applicability dates. The verification of proposed Alternative Means of Compliance (AltMoC) should also be in the scope; when approved, their notification to EASA should be sent in parallel by the respective CAs, with a note specifying the extent of their GO relevance.

3.3.2 Change stemming from findings raised during oversight activities

When implementing the oversight programme related to a group of AOCs forming part of the same business grouping, the participating CAs should jointly assess any finding raised by any of the CAs that could lead to changes to areas applicable to GO.

The CA raising the finding, and observing a potential GO impact, should activate the related COA provisions to share the information with the other CAs.

Then, a joint impact assessment should be conducted, aiming to identify if there is a need and basis for raising equivalent findings in all AOCs. If this is the case, all CAs should agree on the proposed corrective actions applicable to GO, requesting the respective AOCs to apply the required actions with a common implementation period.

Any change to procedures, aircraft equipment and personnel training should be implemented with a common applicability date to preserve group harmonisation.

The number and extent of the findings raised should trigger the identification of any enforcement measure to be taken by CAs and coordinated between them, as far as possible. Those measures may also lead to changes to the oversight programmes of the AOCs, the latter in the context of risk-based oversight [ARO.GEN.305(b)].

Notwithstanding the above, in case of level 1 findings, the CA (or CAs in case of findings applicable to multiple AOCs) is still expected to take immediate actions as per ARO.GEN.350, if possible, in coordination with the other affected CAs.

3.4 Managing differences between AOCs

Differences between AOCs will always exist, even in single-fleet, fully integrated groups, as diverse national requirements will continue to apply in each country (e.g. in the areas of security, DG or FTL).

The area of FTL is rather complex. For air-taxi and helicopter operations, the current setup is that national FTL requirements (for aeroplanes limited to topics not covered by EU-OPS, Subpart Q) either complement Subpart ORO.FTL or result in a different regulatory framework for each AOC. Moreover, CAs may determine different types of disruptive schedules as per ARO.OPS.230.

The extent of the differences will affect the AOCs' harmonization and the complexity in managing procedures, aircraft equipment and personnel training. If, for instance, AOCs operate different aircraft types or are authorised with different areas of operation, the harmonisation may become difficult.

Full alignment should be the end objective and only unresolvable differences should remain and their impact on group interoperability policies should be evaluated.

These differences may be addressed in several ways by the group. In one example, a group may decide that each AOC's operations manual (OM) will include all provisions applicable to every AOC, for instance by applying a colour code system to identify their applicability. If using EFB, OM pages applicable to each AOC may be filtered with a selection tab when accessing the tech documentation library. In another example, provided conflicts between national provisions can be avoided, a group may elect to apply the most stringent requirements for all its AOCs. In any case, the OM content should be presented in a form that can be used without difficulty by all GO members and which observes human factors principles as per ORO.GEN.110(k).

The participating CAs should be aware of the method chosen by the group and accept the fact that the OM may contain provisions (e.g. security) not directly applicable to the AOC holder with a principal place of business located in that particular Member State. Any checklist used for joint activities should reflect the accepted method. In case of validations, each CA should integrate the verification conducted by another CA with its own applicable national requirements (see paragraph 3.1 above on validation) or ensure that these requirements are included in the other CA's scope of work.

It is advisable that the group establishes a protocol, valid for all AOCs, detailing how group harmonization is managed and continuously ensured, with due respect to the accountability of each AOC's management system. This protocol may be included as an annex to the COA between the relevant CAs.

3.5 Managing intra-group dry or wet lease approvals

AOCs belonging to the same business grouping generally operate in business models heavily relying on dry lease and wet lease arrangements. The participating CAs should agree on common procedures to be notified and process lease requests and issue approvals, which may also result in changes to the AOCs operations specifications. Fast-track approval procedures may be put in place, provided all involved CAs quickly receive the request and have access to the related documentation.

It should be noted that each AOC holder must indicate the aircraft model and respective registration marks they operate in the operations specifications or the operations manual. The same aircraft cannot be listed in more than one; otherwise, there would be unclarity about, at any given time:

- which operator is responsible for the operation of each aircraft,
- which CAMO is responsible for its continued airworthiness,
- which CA(s) is/are responsible for its oversight (AOC and CAMO).

Consequently, a group needs to decide under which AOC an aircraft is listed and any transfer between AOCs shall be made in accordance with the applicable dry lease requirements. The involved CAs may nevertheless agree to establish fast-track procedures for transferring aircraft between AOCs.

3.6 Availability of data

Participating CA will have to comply with record keeping provisions, as per ARO.GEN.220, also for GO. Hence, every validation, crediting or joint activity requires that personnel authorised by the CA has full access to the relevant data from the CA responsible for the oversight of an AOC belonging to a business grouping. This data should encompass relevant documentation of all AOCs and the verification files of the CA(s) that conducted the verifications. To this end, the scope of the COA should include provisions to ensure that each of the participating CAs has access to all relevant AOCs' and other CAs' data, which become oversight records. This is in line with the requirements for the mutual exchange of information set forth in ARO.GEN.200(c).

3.7 Establishment of a new AOC

In case a new AOC enters a business grouping, and there is no COA in place between the involved authorities, the new AOC's CA can validate some verifications conducted by another CA during certification, should aircraft, personnel or manuals be transferred from one AOC to the other with very limited changes. In such a case, the previous operator's experience can be "credited" when addressing Specific Approvals application by the new prospective AOC holder, thereby reducing the extent of the verification required. Where regulatory provisions require operational demonstrations or trial period, these can be also "credited" at the discretion of the CA.

In any case, crediting should be based on the collection of relevant operators' records and certification/oversight files from the other CA and their review by the certifying CA.

One way to manage this transition is for the new CA to enter the existing COA between the other CAs.

3.8 Elements of the COA

The following list includes the relevant elements, some optional depending on the setup chosen, that should be covered in the COA:

- a) **Scope**
 - i. Purpose of the COA and its legal basis, i.e. ARO.GEN.200(c) and any relevant CAs' acts or national law relevant for cooperative oversight
 - ii. List of participating CAs, with contact details of key personnel / focal points with their role and expertise (e.g. Principal Operations Inspectors, thematic expert for focus areas)
- b) **Group**
 - i. List of AOCs belonging to the business grouping, aircraft operated (*OPSPECS may be attached*), and contact details of key management personnel
 - ii. Description of group integration, such as

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- a. Integrated group governance structure, overarching the individual AOCs management systems (*which should ensure harmonisation among AOCs while retaining each AOC's final accountability on its operation*)
- b. Integrated systems or functions, such as operational control, (S)MS, CMF, FRMS, crew rostering, personnel training, EFB management, ground handling, continuing airworthiness management, occurrence reporting
- c. Cross-servicing / contracted activities among AOCs (e.g. "parent" AOC or other non-certified entities subcontracting services to other AOCs, as per ORO.GEN.205)
- d. List of differences and method used to manage the differences between AOCs, and notify them to all participating CAs
- iii. Crediting system for crew training and checking (e.g. OPCs or line checks could be valid for all AOCs), including a list of credited activities and qualified instructors and examiners
- iv. Dry lease / wet lease mechanism
- v. Data to be submitted or made available to all participating CAs, such as
 - a. manuals
 - b. personnel training and checking records
 - c. rosters
 - d. reports (e.g. occurrence, safety, fatigue, FDM, SPA.LVO/ETOPS records)
 - e. management systems records (e.g. safety review board / SAG minutes, safety risk assessments, safety audits, compliance monitoring programme, support programme)
 - f. aircraft technical logs
- vi. Method used to share the data listed in the previous point

This section of the COA should be reviewed with the AOCs before implementation and should remain available to the AOCs for the duration of the COA. Alternatively, it can be replaced by a protocol, signed by the AOCs' accountable managers, annexed to the COA.

c) CA Inspectors

- i. Procedures for the mutual recognition of inspectors, based on agreed minimum qualification requirements
- ii. Establishment of a pool of inspectors involved in GO oversight and procedures for its update
- iii. Establishment of an ad hoc training module (initial and recurrent) on GO oversight

d) Oversight methods

- i. Description of methods used for cooperative oversight of the AOCs for initial and continued compliance
 - a. Sharing of oversight programme of each AOC, including any risk identified
 - b. Joint verifications, detailing the coordination aspects (e.g. team composition, lead inspector)
 - c. task sharing with independent verifications with mutual acceptance of outcomes, after validation
- ii. Procedure for managing AOCs' changes requiring approval

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- a. Group procedures for submitting changes
 - b. Activation of the verification of compliance (e.g. either joint or via task sharing)
 - c. Issuance of the approval for each AOC, detailing how synchronization is ensured
 - iii. Procedure for managing AOCs' changes not requiring approval
 - a. Establishment of a common notification period
 - b. Activation of the verification of compliance (e.g. either joint or via task sharing)
 - c. Coordination of any CA's objections
 - d. Coordination of changes in applicability dates for each AOC
 - iv. Procedures for managing findings applicable to GO
 - a. Information sharing
 - b. Activation of joint impact assessment
 - c. Coordination in corrective actions acceptance (action + implementation period)
 - d. Coordination of enforcement measures
 - e. Identification of changes to the AOCs' oversight programmes
 - v. Procedures for managing intra-group lease approvals
 - a. Dry lease, including any fast-track procedure for transferring aircraft between AOCs
 - b. Wet lease
- e) Availability of documentation**
- i. Procedure for the exchange of CAs' oversight documentation and records, including communications flow, use of contact lists, and their update
 - ii. Establishment of a shared site for record keeping [as per ARO.GEN.220]
 - iii. Coordination of any need for language translation
 - iv. Limitations on the use of COA documentation, including any non-disclosure agreement deemed necessary
 - v. An agreement between CAs on the relevant personal data to be exchanged by authorised personnel in the context of the oversight. The content of this agreement shall demonstrate compliance of the exchange of information with the principles of GDPR⁴. Hence, among other matters, this agreement shall refer to the legal basis for the exchange, purposes, categories of personal data to be exchanged, recipients, retention and period. The Data Protection Officer (DPO) of the CA shall be consulted when drafting the agreement.

Note: In accordance with GDPR the CA is considered controller of the processing operation. Therefore, the controller shall have to comply with its obligations towards the data subject (in accordance with Articles 13 to 22 GDPR). In addition, obligations deriving from Article 30 GDPR (keeping updated records of the processing operations) are also affected, and therefore, controllers will have to update their records. The DPO of the CA shall always be consulted in order to do so.

⁴ Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (GDPR - General Data Protection Regulation)

- f) Extension of the COA to another CA**
 - i. Conditions and procedures for the entry of another CA in the COA (e.g. as a result of a new AOC belonging to the same business grouping established in another MS)
- g) Handling of disagreements**
 - i. Procedures for handling disagreements, with defined timelines for amicable resolution and communication strategy with AOCs
- h) Termination of the COA**
 - i. Conditions and procedures for terminating the COA, including in case of revocation /termination of group operations
 - ii. Conditions and procedures for one CA to exit the COA

4. Guidance per Air OPS rule cluster

This chapter is addressing rule clusters of the Air Operations Regulation that are relevant for GO. This chapter will evolve over time and new clusters can be added to this guidance document when new clusters are identified that are relevant for GO.

For each cluster, the following is provided in the form of tables:

- i. A description of the way(s) the rules can be implemented in the GO context.
- ii. A list of challenges associated with the CA's verification of compliance with the applicable rules.
- iii. Recommended solutions for CA to address the challenges and comply with Part-ARO requirements related to certification, approvals, and continued oversight.
- iv. Practices that would be considered as not compliant with the current requirements.

4.1 Management System

Overview of tables	
Table #	Title
MS01	Compliance monitoring pooling of audits & auditors
MS02	Accountable Manager (AM) and Nominated Persons (NP) working for several GO members, lines of responsibilities and accountability
MS03	Accountable Manager (AM) and Nominated Persons (NP) across GO members with different levels of responsibilities and accountability
MS04	Operational control
MS05	GO approach to risk management
MS06	Operations manual – customization and control
MS07	Company and safety culture
MS08	FDM
MS09	Contracted activities - Ground handling

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Table#	Title	Regulatory reference/cluster
MS01	Compliance monitoring pooling of audits & auditors	ORO.GEN.200(a)(6)
Description of the way(s) the rules can be implemented in the GO context.		
A GO member could make use of compliance monitoring auditors from other entities in the group to perform the compliance monitoring audits scheduled as part of its monitoring programme. Moreover, GO members could make use of each other's audits to cover their own audit schedule. Ideally, all GO members use an integrated Compliance Monitoring Manual (or equivalent), applicable for all members.		
Challenges associated with the CA's verification of compliance with the applicable rules.		
<ol style="list-style-type: none"> 1. At Group level there may be a low level of integration of common procedures (i.e. CMMs of each GO member are different) 2. Auditors may not be familiar with the standards, processes and procedures described in all CMMs of all GO members 3. GO members may be using different audit checklists 4. GO members may have a different scope of activities/approvals 5. An audit from one GO member may not be sampling documents/evidence from another GO member (e.g. returned flight envelopes, FDM data, Occurrence Reports) 		
Recommended solutions for CA to address the challenges and comply with Part-ARO requirements related to certification, approvals and continued oversight.		
<p>If a GO member is using or intends to use pooling of audits & auditors, the CA should verify if:</p> <ol style="list-style-type: none"> 1. the description of such practice is sufficiently detailed in the CMM to ensure compliance with ORO.GEN.200 (a)(6), with emphasis on the following areas: auditor training & qualification, audit procedures (including mutual crediting), checklists used, approvals held. 2. all auditors are trained and qualified to the standards described in the CMM of each GO member and training records are available for all GO members. 3. GO members are using the same audit checklists 4. <ol style="list-style-type: none"> 4.1. GO members are having the same scope of activities/approvals. 4.2. the level of integration (or lack) of common procedures has an impact on the checklists used in order to verify compliance with the differences amongst GO members (ideally an integrated CMM should be developed) 5. audits valid for more than one GO member are also sampling documents/evidence from the other GO members 		
Practices considered non-compliant		
<ul style="list-style-type: none"> • Delegation of accountability for establishing and implementing the compliance monitoring programme to another GO member • The compliance monitoring manager of a GO member not having the documentation available related to the compliance monitoring programme for his/her CA 		

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Table#	Title	Regulatory reference/cluster
MS02	Accountable Manager (AM) and Nominated Persons (NP) working for several GO members, lines of responsibilities and accountability	ORO.GEN.210, ORO.AOC.135
Description of the way(s) the rules can be implemented in the GO context.		
Individual persons working as AM/NP for several GO members, accepted by the CAs involved.		
Challenges associated with the CA's verification of compliance with the applicable rules.		
<ol style="list-style-type: none"> 1. Workload for the individual when working for several GO members, enough time available to be allocated to each AOC when needed. NP becoming less available for a GO member, with a possible impact on the availability for the CA. 2. Accountability lines not clearly defined 3. NP resisting to implement changes requested by one CA, based on decisions taken / agreed with another CA 4. New proposed NP not familiar yet with all activities of the AOC 5. Official Communication language of CA (due to national administrative law) 		
Recommended solutions for CA to address the challenges and comply with Part-ARO requirements related to certification, approvals and continued oversight.		
<ol style="list-style-type: none"> 1. Verification of the proposed NP's roster to verify if the time allocation presented (detailed time allocation to be provided by the AOC at the time of the application) reflects his actual involvements (including ground duties). Request copy of working contract to verify if the person is contracted for sufficient hours to fulfil the duties (compare with the operators' manpower plan). Interview the proposed person to assess his competence and if his qualifications cover the minima prescribed in the OM. Verify if deputies are nominated in each GO member to ensure continuity. Ensure when accepting the NP that he is readily available to address any significant safety concerns. 2. GO members to describe the accountability lines in the Management System manual. During oversight rosters and attendance to meetings like SRBs could be checked. 3. Ensure that the GO members have to submit proposed changes well enough in advance to all CA involved, to allow the CAs to assess them and align their views. Coordination between CAs is essential. 4. Collect evidence that the NP is familiar with the area of responsibility, (more interviews) or at a later stage collect evidence the NP is not competent and have an open discussion with the accountable manager (AM is responsible the MS is effective). Outcome of interviews performed by one CA could be shared with other CAs involved 5. A certain reaction time could be foreseen that would allow the NP to reply 		
Practices considered non-compliant		
<ul style="list-style-type: none"> • AM/NP refusing to answer questions or to take position without consultation with another GO member (non-independent decision-making process) • NP consistent lack of involvement in the decision making processes (SRB/SAG/risk assessments) 		

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Table#	Title	Regulatory reference/cluster
MS03	Accountable Manager (AM) and Nominated Persons (NP) across GO members with different levels of responsibilities and accountability	ORO.GEN.210, ORO.AOC.135
Description of the way(s) the rules can be implemented in the GO context.		
Every GO member may have its own Nominated Persons, however decisions are vetted by the NP of the Parent AOC		
Challenges associated with the CA's verification of compliance with the applicable rules.		
<ol style="list-style-type: none"> Difficulties in identifying clear lines of responsibilities and accountabilities Difficulties to ensure that decisions taken by the parent AOC are appropriate to all GO members Difficulties to ensure that risk acceptability is appropriate to the GO members classification process when decisions are taken by the Parent AOC A GO member having little influence on decisions taken impacting safety (e.g. veto right by the Parent AOC) A GO member may lose independence and resources (e.g. funding, competences, FTE, appointing management) as a result of decisions taken by the Parent AOC. When decisions are taken at group level it may be not clear if the GO member AM will have the authority to ensure that all activities can be financed. 		
Recommended solutions for CA to address the challenges and comply with Part-ARO requirements related to certification, approvals and continued oversight.		
<p>The CA should verify:</p> <ol style="list-style-type: none"> That responsibilities and accountabilities within the GO member are clearly defined and described in the operator's manuals and also covering the interaction/inter-relationship with the GO parent AOC During its oversight activities that the implementation of the decision-making process is effective and not having an adverse safety impact If a process is in place to manage decisions taken at GO level (e.g. GO governance body) and that such process ensures that every GO member AM can object in case the safety level of its operations would be affected During the meetings with the AM that he/she has direct powers or at least some influence on the selection when nominating key persons. CA should consider observing SRB to ensure that the established AM/NPs accountabilities/responsibilities are fulfilled. During oversight activities (e.g. interviews with key persons) that decisions taken by the group can be properly implemented and sufficient funding is available. 		
Practices considered non-compliant		
<ul style="list-style-type: none"> A decision is applied on a GO member without taking into account its own specificities (without customised safety assessment, acceptance of risks) A decision is made by the parent AOC that impacts one GO member but the related AM/NP are unaware Decisions taken at group level having an adverse safety impact on GO members not being risk-assessed by each GO member before being implemented An AM not having the authority to ensure that all activities can be financed 		

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Table#	Title	Regulatory reference/cluster
MS04	Operational control	ORO.GEN.110; ORO.GEN.205
Description of the way(s) the rules can be implemented in the GO context.		
GO members could contract activities related to operational control to a centralised operational control centre that is providing services for them.		
Challenges associated with the CA's verification of compliance with the applicable rules.		
<p>There may be differences in the organisation and methods to exercise OC (operational control) established by each AOC, such as:</p> <ul style="list-style-type: none"> - system for promulgation of information (incl. those of operational nature) - training and qualification of OCC staff - Aircraft tracking systems - Handling of disruptions (e.g. delayed flights, cancellations), including delayed reporting procedures and commander's discretion - Aircraft diversion management (incl. fuel policy (contingency)) - Dispatch and MEL procedures - Flight planning software may be different amongst the GO members due to aircraft technicalities - ETOPS maximum diversion times - ERP <p>Moreover, the centralised OC may not capture all the peculiarities applicable to each GO member (e.g. a specific aerodrome or a specific approval).</p>		
Recommended solutions for CA to address the challenges and comply with Part-ARO requirements related to certification, approvals and continued oversight.		
<p>The CA should verify:</p> <ul style="list-style-type: none"> - That the activities contracted to the centralised OCC are applicable for the GO member under its oversight. Ideally an integrated OCC manual should be drafted with harmonised procedures applicable to all GO members and staff should be trained accordingly. Where differences cannot be resolved (e.g. different ETOPS maximum diversion time), there should be clear procedures and instructions to identify and manage those differences. - For the GO member receiving the service that: <ul style="list-style-type: none"> o clear lines of responsibilities and supervision (e.g. NP FO and CMM) are described in the operations manual o safety aspects are covered by the SMS o compliance audits are scheduled in the compliance monitoring programme 		
Practices considered non-compliant		
<ul style="list-style-type: none"> • A GO member delegating full responsibility on OPS control to a centralised operational control centre • The organisation managing the centralised OCC refuses to address specificities of one GO member (e.g. because they represent only a minor part of the volume of activity) 		

Guidance for the oversight of group operations

Table#	Title	Regulatory reference/cluster
MS05	GO approach to risk management	ORO.GEN.200(a)(3)
Description of the way(s) the rules can be implemented in the GO context.		
GO members sharing safety information, including hazards, risks and SPI. Safety hazards, safety assessments, risk register, risk matrix, safety data are used in a GO context.		
Challenges associated with the CA's verification of compliance with the applicable rules.		
<ul style="list-style-type: none"> - Risk matrix (probability and severity) and/or SPI not tailored to the individual GO members size and scope of activities/approvals. This may result in differences in the risk exposure discussed at group level. - GO members use different risk assessment methodologies, making it difficult to discuss risk assessments at GO level - GO members have different levels of risk tolerability, which could result in mitigations not sufficiently addressing the risks pertinent to one GO member with less risk tolerance - GO members use GO hazard logs / risk registers that include hazards / risks not applicable to them - Safety actions are decided on the basis of analysis conducted at GO level, without taking into account the particular safety issues of each GO member 		
Recommended solutions for CA to address the challenges and comply with Part-ARO requirements related to certification, approvals and continued oversight.		
<ul style="list-style-type: none"> - The involved CAs should verify if the group established a harmonized SMS or alternatively developed a methodology describing how to interpretate data coming from a GO member when using it at group level. GO members can develop their own specific matrix and the group has to define a scale factor in order to be able to compare the results of each GO member. - If different GO members are using or intend to share safety information, the CA should verify if: <ul style="list-style-type: none"> o Safety data (e.g. risk assessment) from another GO member have been adapted to procedures of the GO member under its oversight before its use. o all risk registers contents (undesirable event, risk assessments, etc.) are suitable to the GO member in term of relevance. 		
Practices considered non-compliant		
<ul style="list-style-type: none"> • A GO member using a risk register not applicable to its activities • A GO member having no influence on a GO risk register 		

Guidance for the oversight of group operations

Table#	Title	Regulatory reference/cluster
MS06	Operations manual – customization and control	ORO.MLR.100
Description of the way(s) the rules can be implemented in the GO context.		
GO implements common OM to be used by every GO member.		
Challenges associated with the CA's verification of compliance with the applicable rules.		
<ol style="list-style-type: none"> 1. At Group level there may be a low level of integration of common procedures, including different limitations 2. Differences due to different type of aircraft, operations and subcontractors/providers used (flight planning, performance, M&B, approach charts, EFB) 3. Temporary revisions and/or specific AOC documentation beside the harmonised OM 4. Revisions applicable to all GO member published without a clear consent of each GO member 5. Long revision process due to group commitment and the need to obtain separate CA approvals, leading to GO members being less reactive to change needs 6. OM amendments with different effectivity dates affecting the GO member 		
Recommended solutions for CA to address the challenges and comply with Part-ARO requirements related to certification, approvals and continued oversight.		
<p>The CA should:</p> <ol style="list-style-type: none"> 1. challenge the GO members to go for no or very limited differences. CAs to limit crediting of training and checking if there is no high level of integration of common procedures. 2. verify how differences are addressed by the GO member including a clear distinction between general (OM A) and aircraft specific (OM B) policies. CA to pay particular attention to Human Factor (HF) principles. 3. verify if the GO member described the system of amendment of the operations manual and that it is ensured that when temporary revisions (TRs) are published the content of the OM and TRs can be used without difficulty and observes HF principles 4. verify if the OM amendment procedures ensure that the GO member has to give consent and remains responsible for the publication of a revision to the OM and associated checklists 5. engage with the participating CAs to establish common procedures to be observed by each AOC for the submission of the individual manual revisions that are supposed to be valid for all AOCs. The involved CAs should also agree on a procedure on how to review the manuals. 6. verify that the timeline for submission of manual revisions, not subject to prior approval, is synchronized amongst GO members (i.e. same effectivity date) and ensures enough lead time for a proper CA verification (e.g. 30 days). 		
Practices considered non-compliant		
<ul style="list-style-type: none"> • Revisions published without a clear consent of the GO member 		

Guidance for the oversight of group operations

Table#	Title	Regulatory reference/cluster
MS07	Company and safety culture	ORO.GEN.200
Description of the way(s) the rules can be implemented in the GO context.		
The GO members identify and steer their business and safety objectives through a joint management board/group (e.g. SRB, SAG or an overarching governance body).		
Challenges associated with the CA's verification of compliance with the applicable rules.		
<p>Local differences may exist, also regarding company culture, management style and safety culture. The following challenges could be identified:</p> <ol style="list-style-type: none"> 1. Decisions taken at group level are difficult to be implemented by each GO member (e.g. due to different safety/company culture, when GO members joined as a result of mergers or acquisitions) 2. Not all GO members represented, with influencing power, in the decision-making bodies at group level 3. Differences in safety culture and general company culture across the GO members may affect the reporting culture (e.g. due to a reduction of level of trust between employees and the management) 		
Recommended solutions for CA to address the challenges and comply with Part-ARO requirements related to certification, approvals and continued oversight.		
<p>The CA should verify:</p> <ol style="list-style-type: none"> 1. how decisions taken at group level are implemented at GO member level 2. that all GO members are represented, with influencing power (leverage capacity), in decision making bodies at group level 3. that the group takes initiatives (e.g. safety survey) to identify and address differences in the safety culture that may affect the expected level of maturity across the different GO members 		
Practices considered non-compliant		
<ul style="list-style-type: none"> • A GO member not having any influence in the decision-making process at group level. 		

Guidance for the oversight of group operations

Table#	Title	Regulatory reference/cluster
MS08	FDM	ORO.AOC.130; ORO.GEN.205
Description of the way(s) the rules can be implemented in the GO context.		
A Group could setup an FDM programme where one GO member is processing all FDM data as a contracted activity.		
Challenges associated with the CA's verification of compliance with the applicable rules.		
<ol style="list-style-type: none"> 1. A GO member safety department cannot filter, at all times, its own FDM data out of the group database (valid for the same type of aircraft) 2. A GO member may have a specific SOP that is not captured in the group FDM analysis and parameters/exceedance detection thresholds 3. Customisation of parameters are decided at Group level instead of at the level of the GO Member 4. Protection of GO members' crew identity when FDM data is handed over 5. No involvement of a GO member flight crew representative whenever the disclosure of the name of the crew is needed 6. Lack of identification of operational risks and trends specific to the activities of the GO member 7. The group FDM analysis does not produce statistics relevant for the GO member 8. Changes in a GO members SOPs not promptly implemented in the FDM parameter settings 9. Safety promotion publications not relevant for the GO members' activities 		
Recommended solutions for CA to address the challenges and comply with Part-ARO requirements related to certification, approvals and continued oversight.		
<p>The CA should verify:</p> <ol style="list-style-type: none"> 1. That the GO member has full access to the FDM software and its fleet FDM data 2. That the GO members SOPs are captured in the FDM analysis and thresholds 3. How the GO members specificities and parameter thresholds are taken into account 4. That a gate-keeper is appointed within each GO member 5. The procedure to prevent disclosure of crew identity includes the participation of a flight crew member representative for each GO member in the assessment of the data, the action, the review process and the consideration of recommendations. 6. That FDM analysis reflects the specific operational activities of the GO member and allows for the identification of trends 7. That statistics produced as part of the FDM analysis are relevant for the GO member and only those are used by the GO member safety management system 8. that a process is in place ensuring that when the GO members SOPs are amended, any significant operational change is promptly reflected in the FDM parameter settings 9. That safety promotion publications are including info relevant for the GO members' identified risks. Comparison to other GO members fleets are acceptable. 		

Practices considered non-compliant

- Having no control over FDM data and on the customization of thresholds at GO member level
- FDM Managers or gate-keepers having access to flight crew data not belonging to their GO members staff without an agreement with staff representatives from all GO members

Guidance for the oversight of group operations

Table#	Title	Regulatory reference/cluster
MS09	Contracted activities - Ground handling	ORO.GEN.205, ORO.GEN.215
Description of the way(s) the rules can be implemented in the GO context.		
A GO member may operate flights for another GO member under a wet lease contract using the same ground handler (GRH). All aircraft in the group have the same aircraft livery.		
Challenges associated with the CA's verification of compliance with the applicable rules.		
<ol style="list-style-type: none"> 1. The ground handler is not able to identify to which GO member it is providing services 2. Occurrence reporting responsibilities not covered in the contract with the Ground handler 3. GO member CA access to the ground handler when a contract is negotiated at group level 4. Sharing of GO member ground OPS procedures with the GRH when a contract is negotiated at group level 5. Safety hazards associated with the GRH activities are only considered at group level. 		
Recommended solutions for CA to address the challenges and comply with Part-ARO requirements related to certification, approvals and continued oversight.		
<p>The CA should verify:</p> <ol style="list-style-type: none"> 1. That procedures are established to allow for the identification of the GO member 2. that procedures are established to allow the Ground handler to know to whom he needs to report 3. that the contract is signed at GO member level and if the contract foresees access for the CA 4. that the GRH has received the GO members ground OPS procedures, highlighting any GO member differences 5. that the GRH activities are included in the GO member management system 		
Practices considered non-compliant		
<ul style="list-style-type: none"> • The GRH not able to identify the GO member operating the flight • The GRH is not made aware of any GO member specific ground handling procedure 		

4.2 Crew training and checking

Overview of tables	
Table #	Title
CTC01	Integrated crew qualification and competence management, covering: <ul style="list-style-type: none">• FC operator conversion course• PIC/Commander qualification• FC differences and familiarisation training• CC aircraft type specific training and operator conversion training• CC familiarisation• Senior CC qualification• CC refresher training• Crew recurrent training & checking
CTC02	Integrated crew qualification and competence management, covering crew members CRM T&C
CTC03	Integrated crew qualification and competence management, covering Dangerous Goods (DG) training

Table #	Title	Regulatory reference/cluster
CTC01	<p>Integrated crew qualification and competence management, covering:</p> <ul style="list-style-type: none"> • FC operator conversion course • PIC/Commander qualification • FC differences and familiarisation training • CC aircraft type specific training and operator conversion training • CC familiarisation • Senior CC qualification • CC refresher training • Crew recurrent training & checking 	<p>ORO.FC.105 (Designation as PIC) ORO.FC.120 (Conversion) ORO.FC.125 (Differences & familiarisation) ORO.FC.130 (Recurrent T&C) ORO.FC.135 (either pilot seat) ORO.FC.140 (more than one type) ORO.FC.145 (provision of training) ORO.FC.146 Personnel providing T&C and assessment ORO.FC.202 (single pilot ops) ORO.FC.205 (command course) ORO.FC.220 (conversion) ORO.FC.230 (recurrent) ORO.FC.231 (Evidence-based training) ORO.FC.232 EBT programme assessment and training topics ORO.FC.235 Pilot qualification to operate in either pilot's seat ORO.FC.240 (types/variants) ORO.CC.115 (conduct of training) ORO.CC.125 (conversion) ORO.CC.140 (recurrent) ORO.CC.145 (refresher) ORO.CC.200 (senior) ORO.CC.205 (CC reduction) ORO.CC.250 (types) ORO.CC.255 (Single cabin CC) ORO.AOC.130 (FDM) ORO.GEN.110 (a)(d)(e)(f)(g)(h) ORO.GEN.205 (subcontracting) ORO.MLR.105 (MEL)</p>
Description of the way(s) the rules can be implemented in the GO context.		
GO members could aggregate individual flight and cabin crew qualification and competence systems, which are valid for all GO members. Integrated crew T&C events are centrally established to meet GO members' needs.		
Challenges associated with the CA's verification of compliance with the applicable rules		
<ol style="list-style-type: none"> GO members may face <u>coordination issues</u> within the group in establishing an integrated T&C system. In particular, GO members may: <ol style="list-style-type: none"> have reduced trust and willing to share data with other GO members not ensure confidentiality when sharing documents not show willingness to outsource training to other parties not establish an effective communication and clear distinction of responsibilities between GO members 		

2. There may be confusion in CAs oversight responsibilities, especially when the elements of a training course are conducted by different GO members (e.g., theoretical conversion course by AOC A, Flight/FSTD by AOC B and LIFUS in either of members' aircraft).
3. GO members OMs may describe/define differently the:
 - a. ways of managing the training (e.g., different phases of **EBT, ATQP**, etc.)
 - b. procedures or operational restrictions for operation on **more than one type** or variant
 - c. **grading system** to assess the pilot competencies including non-technical skills
 - d. **critical phases** of flight (e.g., taxiing)
 - e. commander and senior CC **qualification standards** and experience
 - f. qualification to operate in **either pilot's seat**
 - g. **LIFUS process (e.g., scope and extent, supervisors' qualifications, etc.)**
 - h. considerations when determining each aircraft as a **type or variant** for the purpose of CC training and qualification
 - i. areas of interest to be covered by the **FDM programme** and the parameters/exceedance detection thresholds
4. GO members and CAs may have differences in applying the regulation, which must be identified and addressed, including:
 - a. **responsibilities** of the individual operator in the context of GO
 - b. use of **T&C personnel** (e.g., instructors/line evaluators/line supervisors) from another GO member, especially when they are supporting the EBT programme
 - c. **T&C events** performed in aircraft not listed in the operator's OPSPECS
 - d. **Use of AltMoCs**
5. GO members may have same aircraft type but different:
 - a. hazards and associated risks inherent in the different **size, nature, and complexity** of GO members
 - b. **type and area of operations** (e.g., pax vs. cargo, Europe vs. worldwide)
 - c. **SPA** privileges and specific operations (e.g., steep approaches, operations without an assured safe forced landing capability, operations to or from a public interest site)
 - d. **standard operations procedures**, i.e., checklists, crew briefings, verbal commands, coordinated procedures and two-way communication between the flight crew compartment and the cabin, coordinated procedures between CC members, etc.
 - e. **route, area, and aerodrome** qualification criteria
 - f. **occurrence reporting** system
 - g. **crew performance standards** and their assessment
 - h. management of trainees that do not achieve or maintain the required performance standards
 - i. training standards for the qualification of instructors/examiners/trainers
 - j. **national rules** applicable in the individual States of the Operators (e.g., security, DG)
 - k. aircraft equipment carried and their location
 - l. cabin **configuration**
 - m. **evacuation and pilot incapacitation** procedures
 - n. operational procedures related to **security**, rescue, and emergency services, with different security threats
 - o. system to monitor **changes to the FSTD** including downgrading with possible effect on SPA privileges
 - p. monitoring of implementation of the integrated **qualification and competence system**

- q. distribution of training elements/EBT modules within the **3-year recurrent training cycle** or synchronisation to cover every year the same elements for all GO crew members (e.g., a/c systems, upset prevention, CRM, etc)
- r. scope, extent, and purpose of the **MEL** (e.g., failures that occur between the commencement of the flight and the start of the take-off, failures that are not listed to determine if they are related to airworthiness and required for safe operation, etc.) commanders MEL Part M privileges for release of a/c may differ between AOCs within GO.
- s. procedure for the extension of the applicable **rectification intervals** B, C and D

6. CAs may have difficulties in the verification of:

- a. integrated **GO OM content**, which may contain provisions not applicable to all GO members, and its approval (it will be managed by GO management systems subgroup)
- b. **suitability of EBT or ATQP** programme for all GO members
- c. **T&C personnel's competence and experience**
- d. T&C conducted at one GO member, which is accepted by the other GO members (**mutual recognition of training**)
- e. **contracted organisation's** continued compliance with the applicable requirements

Recommended solutions for CA to address the challenges and comply with Part-ARO requirements related to certification, approvals and continued oversight.

1. GO members should define and agree on the level of integration regarding the T&C programmes. The T&C elements, which will be mutually recognised should be clearly identified. There is no necessity to integrate all elements of a training course (e.g., integration of FC conversion course excluding LIFUS, etc.). A common qualification/standardisation programme should be established for the T&C personnel, who will be included to all GO members' lists of examiners/instructors/trainers.
2. CAs should make use of a cooperative oversight agreement to coordinate the conduct and the use of oversight tasks for the initial and continued verification of aggregated crew qualification and competence systems.
 - a. CAs should agree on the **scope, extent and adequacy of verifications**, including any task sharing. In case of different GO members oversight cycles due to their risk profiles, CAs should consider aligning oversight cycles at the shortest established
 - b. One CA (of State "A") may be allocated the performance of **tasks on behalf of another CA** (State "B"). However, CA "A" issues the approval valid only for the GO member under its oversight (operator "A")
 - c. In approving the other GO member (operator "B"), CA "B" may **validate the verifications** conducted by CA "A". CA "B" issues the approval valid only for operator "B", keeping records of its validation activities and the ones conducted by CA "A"
 - d. **Mutual trust** in each other's ability to discharge their oversight obligations is important to ensure every CA can rely on the verification of compliance performed by another CA. Therefore, the agreement may foresee that **initial verifications are conducted jointly by the CAs**
 - e. The same principles apply for **verifications following the issuance of the first approvals, such as OM revisions or training audits and inspections** (e.g., joint oversight of EBT programme) using comprehensive checklists and/or compliance checklists
 - f. The agreement should allow CAs to have **access to the other CA's documentation** to demonstrate compliance with ARO.GEN requirements. CAs' clear communication and simplified information exchange are key elements in building reliable long-term T&C integration

- g. The agreement does not relieve CAs from their **individual certification and oversight responsibilities**
3. If a GO member intends to use integrated crew training and checking, and familiarisation, CAs should verify that all OMs have the same description/definition of the:
- a. ways of managing the training (e.g., **EBT, ATQP**, etc.)
 - b. procedures or operational restrictions for operation on **more than one type** or variant
 - c. **grading system** to assess the pilot competencies including non-technical skills
 - d. **critical phases** of flight (e.g., taxiing)
 - e. commander and senior CC **qualification standards and experience**
 - f. qualification to operate in either pilot's seat
 - g. **LIFUS process scope with the same minimum sectors and line supervisors' profile (skills and competences), especially when a GO member uses MPL pilots or ZFTT.**
 - h. considerations when determining each aircraft as a **type or variant** for the purpose of CC training and qualification
 - i. areas of interest to be covered by the **FDM programme** and the parameters/exceedance detection thresholds
4. CAs should confirm that GO members and other CAs, have the same interpretation and implementation of the regulations regarding:
- a. **responsibilities** of the individual operator in the context of GO
 - b. use of **T&C personnel** (e.g., instructors/ examines/ trainers/ line evaluators/ line supervisors), who are trained and qualified to identical standards (e.g., EBT instructor standardisation programme).
 - c. **T&C events** (e.g., line checks, EBT line evaluation of competence) **performed in aircraft not listed** in the operator's OPSPECS
 - d. **Approved AltMoCs**
5. If a GO member intends to use integrated crew T&C, and familiarisation, the CA should verify that **the common training & checking programmes and syllabi** are determined in accordance with the GO member's standards of qualification and experience specified and include its:
- a. hazards and associated risks inherent in the different **size, nature, and complexity** of GO members
 - b. **type and area of operations** (e.g., pax vs. cargo, Europe vs. worldwide)
 - c. **SPA** privileges and specific operations (e.g., steep approaches, operations without an assured safe forced landing capability, operations to or from a public interest site)
 - d. **standard operations procedures**, i.e., checklists, verbal commands, coordinated procedures and two-way communication between the flight crew compartment and the cabin, etc.)
 - e. **route, area, and aerodrome** qualification criteria
 - f. **occurrence reporting** system
 - g. **crew performance standards** and their assessment
 - h. management of trainees that do not achieve or maintain the required performance standards
 - i. training standards for the qualification of instructors/examiners/trainers
 - j. **national rules** applicable in the individual States of the Operators (e.g., security, DG)
 - k. aircraft equipment carried and their location
 - l. cabin **configuration**
 - m. **evacuation and pilot incapacitation** procedures

- n. operational procedures related to **security**, rescue, and emergency services, with different security threats
 - o. system to monitor **changes to the FSTD including downgrading with possible effect on SPA privileges**
 - p. monitoring of implementation of the integrated qualification and competence system
 - q. distribution of training elements/EBT modules within the **3-year recurrent training cycle** or synchronisation to cover every year the same elements for all GO crew members (e.g., a/c systems, upset prevention, CRM, etc)
 - r. scope, extent and purpose of the **MEL** (e.g., failures that occur between the commencement of the flight and the start of the take-off, failures that are not listed to determine if they are related to airworthiness and required for safe operation, etc.) with identical commanders MEL Part M privileges for release of a/c.
 - s. procedure for the extension of the applicable **rectification intervals B, C and D**
6. If a GO member intends to use integrated crew training and checking, and familiarisation, the CA should verify that the integrated training and checking provided:
- a. is properly described in the **integrated GO OM** (see also point 7)
 - b. includes identical EBT or ATQP syllabi, if applicable
 - c. is relevant to the **type** or variant of aircraft on which the GO member operates, including training on the **location and use** of all emergency and safety equipment carried.
 - d. is provided in FSTD/mock-up that **replicates the aircraft** used by the GO member.
 - e. includes all aircraft systems, and normal, abnormal, and emergency procedures as specified in GO member's integrated OM.
 - f. takes place **in conjunction** with cabin/technical crew undergoing similar training.
 - g. uses instructors/examiners/trainers who are trained and qualified to identical standards (i.e. using uniform syllabi)

If conducting T&C events valid for all GO members, **single training forms** (e.g., OPC form, etc.) may be used, provided that they are referenced in each GO member documentation system (e.g., all logos in the forms) together with a common list of training personnel (i.e. instructors, trainers, line supervisors and line checkers). Each GO member should include these forms in their **record keeping system** (which could be integrated).

7. The cooperative oversight agreement could foresee the **approval of an integrated training and checking** system, which includes training elements or methods that are **not applicable to a particular GO member** (e.g., equipment, specific airport, etc.). In this case, each GO member OM should clearly reflect the relevant **limitations regarding the applicability of operations** for which training was conducted. Differences between GO members OM's should be recorded and compared regularly.
8. CAs should develop **guidance material (process and checklist)** specific to integrated training and checking to ensure effective oversight. Emphasis should be given to GO members verification of compliance regarding the:
- a. **uniform implementation** of each element of the approved integrated T&C programme
 - b. **mutually recognised** T&C events
 - c. **monitoring of implementation** of the integrated qualification and competence system
 - d. validity of the **list of approvals** for each GO member

Practices considered non-compliant

- Crew T&C documentation valid for GO members is not available to all members.
- Integrated T&C programmes are not considering operator-specific requirements.
- Subcontracted activities (e.g. ATO) are implementing procedures not in accordance with all GO members OMs.
- GO members have not established common qualification criteria for T&C personnel (e.g. OPC checkers, line supervisors, line checkers, ground/refresher/ESET trainers, HESLO/HEC instructors, relief pilots, etc.)
- Use of GO member's instructors/examiners not qualified by another GO member.
- Approval of integrated EBT programme just because GO members had approved individual EBT approval.

Table#	Title	Regulatory reference/cluster
CTC02	Integrated crew qualification and competence management, covering crew members CRM T&C	ORO.FC.115 ORO.FC.215 ORO.FC.220 ORO.FC.230 ORO.AOC.130
Description of the way(s) the rules can be implemented in the GO context.		
GO members could aggregate individual flight and cabin crew qualification and competence systems, which are valid for all GO members. Integrated crew members CRM T&C events are centrally established to meet GO members' needs.		
Challenges associated with the CA's verification of compliance with the applicable rules		
<ol style="list-style-type: none"> 1. GO members OMs may <u>describe/define differently</u> the: <ol style="list-style-type: none"> a. crew member duties and responsibilities b. safety culture and/or company culture c. security policy to restrict information, access to commonly authorised persons without preventing disclosure of crew identity or interference with national laws and unions d. need to repeat FC initial operator's CRM, when GO members have different type of operations e. coordination of tasks and functions of FC, CC and TC f. operations policy concerning the use of automation g. CRM-related aspects of operation monitoring and structured intervention h. CRM methodology, including the required CRM standards and the terminology used for the assessment i. behaviour that results in an unacceptable reduction in safety margin j. training standards of CRM trainer and the assessment process 2. Integrated GO member's CRM T&C may not: <ol style="list-style-type: none"> a. provide combined training for FC, CC and TC during recurrent CRM training to address mixed multinational and cross-cultural crews b. be specific to the Group size, nature, and complexity of activities c. address hazards and risks identified by each GO member's management system. d. is characterised by a performance orientation, with emphasis on standards of performance and their measurement, and the development of training to the specified performance standards e. cover the specific culture, type of operations and the associated procedures of all GO members f. distribute CRM elements within the 3-year recurrent training cycle or be synchronised to cover every year the same elements for all GO crew members g. use identical CRM trainers' qualification process including contracted CRM trainers, if any h. be revised considering information from each GO member's management system including the results of the CRM assessment i. integrate the same elements of CRM training into the command course j. cover case studies, based on the information available within each GO member's management system k. use a mutually accepted methodology in the context of the overall performance l. evaluate de-identified summaries of all GO members CRM assessments 		

<p>m. cover the specific culture, the type of operations and the associated procedures of each GO member, even when the CRM T&C is contracted.</p>
<p>Recommended solutions for CA to address the challenges and comply with Part-ARO requirements related to certification, approvals and continued oversight.</p>
<p>1. If a GO member intends to use integrated crew T&C, and familiarisation, the CA should verify that all <u>OMs have the same description/definition</u> of the:</p> <ul style="list-style-type: none"> a. crew member duties and responsibilities b. safety culture and/or company culture c. security policy to restrict information, access to commonly authorised persons without preventing disclosure of crew identity or interference with national laws and unions d. need to repeat FC initial operator's CRM when its type of operations is different from the previous operator e. coordination of tasks and functions of FC, CC and TC f. operations policy concerning the use of automation g. CRM-related aspects of operation monitoring and structured intervention h. CRM methodology, including the required CRM standards and the terminology used for the assessment i. behaviour that results in an unacceptable reduction in safety margin j. training standards of CRM trainer and the assessment process <p>2. If a GO member intends to use integrated crew training and checking, and familiarisation, the CA should <u>verify that the integrated</u> CRM T&C checking provided by other GO members:</p> <ul style="list-style-type: none"> a. provides combined training for FC, CC and TC during recurrent CRM training to address mixed multinational and cross-cultural crews b. is specific to the Group size, nature and complexity of activities c. addresses hazards and risks identified by each GO member's management system. d. is characterised by a performance orientation, with emphasis on standards of performance and their measurement, and the development of training to the specified performance standards. e. covers the specific culture, type of operations and the associated procedures of all GO members f. distributes CRM elements within the 3-year recurrent training cycle and is synchronised to cover every year the same elements for all GO crew members g. uses identical CRM trainers' qualification process, including contracted CRM trainers, if any h. is revised considering information from each GO member's management system including the results of the CRM assessment i. integrates the same elements of CRM training into the command course j. covers case studies, based on the information available within each GO member's management system k. uses a mutually accepted methodology in the context of the overall performance. l. evaluates de-identified summaries of all GO members CRM assessments m. covers the specific culture, the type of operations and the associated procedures of each GO member, even when the CRM T&C is contracted
<p>Practices considered non-compliant</p>

Guidance for the oversight of group operations

- Use of GO Member's CRM trainer, who is not qualified by another GO Member
- In case of contracted CRM training, the provider does not consider all GO members' Operations Manuals.
- Crew members are assigned duty by a GO member before having received CRM training and checking covering the operator's specifics
- CRM training is not linked to the GO Member's Management System

Table#	Title	Regulatory reference/cluster
CTC03	Integrated crew qualification and competence management, covering Dangerous Goods (DG) training	ORO.GEN.110 CAT.GEN.MPA.200 SPA.DG.100/105
Description of the way(s) the rules can be implemented in the GO context.		
GO members could aggregate individual flight and cabin crew qualification and competence systems, which are valid for all GO members. Integrated crew DG training events are centrally established to meet GO members' needs.		
Challenges associated with the CA's verification of compliance with the applicable rules.		
<p>1. GO members <u>OMs may describe/define differently</u> the:</p> <ul style="list-style-type: none"> a. procedures to ensure that all reasonable measures are taken to prevent DG from being carried on board inadvertently b. operating procedures to ensure the safe handling of DG at all stages of air transport c. information about dangerous goods, which are provided to passengers d. DG accident and incident reporting e. response to emergency situations involving dangerous goods f. the course objectives and the training programme syllabus/curricula of the formal training courses g. means of DG T&C, i.e. tuition, self-study, or a mixture of both h. DG training intervals i. training standards of DG instructor j. volume of information provided to the pilot-in-command/commander <p>2. Integrated GO member's DG T&C <u>may not</u>:</p> <ul style="list-style-type: none"> a. commensurate with the responsibilities of all GO member personnel b. be approved by the CAs of all GO members c. include a written, oral, or computer-based examination covering all areas of the training programme d. be based on latest amendment of the 'Technical instructions for the safe transport of dangerous goods by air' (Technical instructions) e. consider national regulations f. consider GO members DG privileges g. be uniformly implemented by all GO members 		
Recommended solutions for CA to address the challenges and comply with Part-ARO requirements related to certification, approvals and continued oversight.		

1. If a GO member intends to use integrated DG T&C, the CA should verify that all OMs have the same description/definition of the:
 - a. procedures to ensure that all reasonable measures are taken to prevent DG from being **carried on board inadvertently**
 - b. **operating procedures** to ensure the safe handling of DG at all stages of air transport.
 - c. information about dangerous goods, which are **provided to passengers and** promote the same DG-information material to passengers within the Group
 - d. DG accident and incident **reporting**
 - e. response to **emergency situations** involving dangerous goods
 - f. the **course objectives and the training programme** syllabus/curricula of the formal training courses-i.e. by using identical training software(CBT)
 - g. means of **DG T&C**, i.e. tuition, self-study, or a mixture of both
 - h. DG training at **intervals**
 - i. training standards of **DG instructor**
 - j. volume of **information provided to the pilot-in-command/commander**

2. If a GO member intends to use integrated crew training and checking, and familiarisation, the CA should verify that the integrated DG T&C:
 - a. is commensurate with the **responsibilities** of all GO member personnel
 - b. is **approved** in coordination by all involved CAs
 - c. includes a written, oral, or computer-based **examination** covering all areas of the training programme
 - d. is based on **latest amendment** of the 'Technical instructions'
 - e. considers national regulations
 - f. considers GO members **DG privileges**
 - g. is **uniformly implemented**

Practices considered non-compliant

- Use of GO Member's DG instructor, who is not qualified by another GO Member or who is not aware of the applicable national regulations

4.3 Flight time limitations

Overview of Tables	
Table#	Title
FTL01	Determination of Disruptive Schedules
FTL02	Individual Flight Time Specification Schemes (IFTSS)
FTL03	GO within Air Taxi
FTL04	Operator Responsibilities in Flight and Duty Time Limitations and Rest Requirements
FTL05	Fatigue Risk Management (FRM) Policy and Procedures
FTL06	Home Base
FTL07	Flight Duty Periods and Reporting Times
FTL08	Commander's Discretion
FTL09	Delayed Reporting
FTL10	Standby and duties at the airport
FTL11	FTL Records
FTL12	Fatigue Management Training

Guidance for the oversight of group operations

Table#	Title	Regulatory reference/cluster
FTL01	Determination of Disruptive Schedules	ARO.OPS.230
Description of the way(s) the rules can be implemented in the GO context.		
GO members under different CA may be subject to different type of disruptive schedules.		
Challenges associated with the CA's verification of compliance with the applicable rules.		
<ol style="list-style-type: none"> 1. CA to ensure that the approved FTL scheme is adapted for crew operating under different type of disruptive schedules. 2. FTL oversight activities and methods on crew operating on more than one AOC of the same group may need to be modified to consider different disruptive schedules. 3. To verify that each GO member ensures that the specific applicable limitations are planned and executed. 4. Each GO member needs to ensure a safe transition from one type of disruptive schedule to the other type of disruptive schedule. 5. CA to ensure that its oversight methods are adapted to include GO specific limitations. 		
Recommended solutions for CA to address the challenges and comply with Part-ARO requirements related to certification, approvals and continued oversight.		
<ol style="list-style-type: none"> 1. When approving the FTL scheme, the CA shall ensure that the OM includes the processes and procedures applicable to GO, including provisions related to crew operating under different type of disruptive schedules. 2. GO members to provide CA with customised FTL records, clearly showing where crew members have operated for other GO members. 3. GO members shall record instances when crew was operating for another GO member . 4. GO members should ensure that the transition between types of disruptive schedule is performed during an extended recovery rest period (when duties are performed during early starts or late finishes as applicable). 5. CA to verify that the operator's FTL scheme and its implementation is covering the GO specific limitations. 		
Practices considered non-compliant		
<ul style="list-style-type: none"> • GO members not able to produce FTL records for each AOC as required by each CA. • GO members not able to ensure that FTL limitations and rest requirements for all crew members operating for another GO members are adhered to. 		

Guidance for the oversight of group operations

Table#	Title	Regulatory reference/cluster
FTL02	Individual Flight Time Specification Schemes (IFTSS)	ARO.OPS.230
Description of the way(s) the rules can be implemented in the GO context.		
A Group may implement a common FTL scheme, however the IFTSS shall cover the specificities of the individual GO member's operation.		
Challenges associated with the CA's verification of compliance with the applicable rules.		
<ol style="list-style-type: none"> GO members may have different specificities (e.g., different reporting times) linked to their own operation. Common IFTSS is subject to a different approval process by each CA. Oversight activities may lead to findings that have an impact on a common FTL scheme. 		
Recommended solutions for CA to address the challenges and comply with Part-ARO requirements related to certification, approvals and continued oversight.		
<ol style="list-style-type: none"> CAs will need to ensure that the approval of the IFTSS is covering the specificities of the operation of the GO member under its oversight. CAs need to agree on a common interpretation and understanding of the regulations and this should be part of the CAs FTL approval processes. CAs need to share oversight results with other CA involved to allow them to verify the applicability/impact on the other FTL schemes. 		
Practices considered non-compliant		
<ul style="list-style-type: none"> A GO member could request its CA to approve an individual flight time scheme based on knowledge and principles that would not cover the specificities of its own operation. Inability of a GO member to adapt its own approved scheme based on the specificities of its own operation due to limitations imposed by GO. 		

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Table#	Title	Regulatory reference/cluster
FTL03	GO within Air Taxi, Emergency medical service and single pilot CAT operations by aeroplanes	Subpart Q
Description of the way(s) the rules can be implemented in the GO context.		
<p>Air Taxi, Emergency medical service and single CAT operations by aeroplanes operators within GO may require crew to operate on different GO member AOC's, however the specificities of the individual GO member need to be taken into account. Furthermore, Subpart Q allows member states to implement different limits subject to national regulations that need to be addressed as well. This could include the following topics:</p> <ul style="list-style-type: none"> - Aeroplane emergency medical service operationsSingle Pilot Operations; - Split duty; - Additional rest due to the effects of time zone differences; - Reduced rest arrangements; - Extension of flight duty period due to in-flight rest (Augmented Crew); - Airport Standby; - Standby at home or hotel. 		
Challenges associated with the CA's verification of compliance with the applicable rules.		
<ol style="list-style-type: none"> 1. Each CA may have stipulated different national provisions for split duty, augmented crew, time zone crossing, standby duty, and reduced rest. The CAs may not have knowledge of the other CA's national provisions applicable to crew operating for another AOC within the group. 2. FTL oversight activities and methods on crew operating on more than one AOC of the same group may need to be modified to consider different national provisions. 3. To verify that each GO member ensures that the specific applicable limitations are planned and executed. 		
Recommended solutions for CA to address the challenges and comply with Part-ARO requirements related to certification, approvals and continued oversight.		
<ol style="list-style-type: none"> 1. CAs to exchange all the required information related to national provisions. 2. GO members to provide CA with customised FTL records, clearly showing where crew members have operated for other GO members. 3. CAs to share oversight results with counter CA to ensure common non-compliances are resolved by each GO member. 		
Practices considered non-compliant		
<ul style="list-style-type: none"> • GO member not able to produce FTL records for each AOC as required by each CA. • GO member not implementing the correct national provisions (including those provisions applicable to operations conducted for another GO member) 		

Guidance for the oversight of group operations

Table#	Title	Regulatory reference/cluster
FTL04	Operator Responsibilities in Flight and Duty Time Limitations and Rest Requirements	ORO.FTL.110
Description of the way(s) the rules can be implemented in the GO context.		
GO member and related crew members operate within GO AOC's but on different type of operation (ACMI vs Scheduled). Common scheduling and crew planning can be systematically applied across GO members.		
Challenges associated with the CA's verification of compliance with the applicable rules.		
<ol style="list-style-type: none"> GO members with different crew scheduling departments or systems may not be able to ensure that duties are planned in a way that enables crew members to remain sufficiently free from fatigue. GO members may have different reporting times approved as part of their approved flight time specification schemes. GO members may have different roster publication procedures. Crew member might be planned on different rosters with different frequency/pattern of flight duty periods from different GO members. GO members may have different schedule types, resulting in different duty patterns (e.g., day/night duties). 		
Recommended solutions for CA to address the challenges and comply with Part-ARO requirements related to certification, approvals, and continued oversight.		
<ol style="list-style-type: none"> CA to verify that the crew scheduling system for the AOC under its oversight is customised and adequate to its specific operation, and ensures duties are planned in a way that crew members remain sufficiently free from fatigue. This should also include verification that duties of crew members operating for other members of the group, are taken into account. CAs to ensure that the crew duty records of all the crew members reflect the actual duty times conducted in every AOC (taking into account the applicable reporting time of the other AOC's). Common and integrated scheduling and crew planning can be systematically applied across GO. This can be implemented through contracting of this service. CAs may request that one common roster is published at GO level to ensure that the frequency /pattern of flight duty periods and rest periods are taken into account. CAs to verify that the operator's procedures to allocate duty patterns take the activities at the other GO members into account to ensure that practices that cause a serious disruption of sleep/work pattern are avoided. 		
Practices considered non-compliant		
GO members not able to provide sufficient and adequate information to allow effective oversight by the CA.		

Guidance for the oversight of group operations

Table#	Title	Regulatory reference/cluster
FTL05	Fatigue Risk Management (FRM) Policy and Procedures	ORO.FTL.120
Description of the way(s) the rules can be implemented in the GO context.		
Integrated FRM established and harmonised throughout the GO members.		
Challenges associated with the CA's verification of compliance with the applicable rules.		
<ol style="list-style-type: none"> 1. CAs to deal with members of the GO that could claim that they are not required to implement FRM, or one GO member size and complexity of the operation would not require the establishment of FRM. 2. Different levels of integration within GO members may lead to different FRM processes. 3. GO members may challenge CAs and not provide access to Fatigue Reporting for crew members operating for another GO member. 4. In GO FRM process could be "integrated". The CA responsible for the oversight of the FRM could not be fully aware of the different accountabilities for different parts of the FRM process. 5. Under a FRM, the AOC holder may need to conduct scientific studies. These studies might need to collect data on sleep duration and quality. This is sensitive, private information, that may not be applicable to all members for GO. 6. CAs to verify/assure that crews when performing the duties for different GO members are not negatively affected by the discrepancies between different systems used, such as controlled rest procedures 		
Recommended solutions for CA to address the challenges and comply with Part-ARO requirements related to certification, approvals, and continued oversight.		
<ol style="list-style-type: none"> 1. FRM to be recommended for all GO members. As soon as any member of a GO is exposed to flights that are conducted under FRM, the entire roster of the GO should be under FRM. 2. FRM needs to be an integral part of the management system on GO level. The GO members may apply <i>one</i> integrated management system to ensure that FRM safety assurance process is the same. (e.g., establish a common Fatigue Safety Action Group). 3. CAs may establish cooperative oversight agreements to allow the required access to reports and processes. 4. The CAs to agree to look at the same performance indicators with similar agreed thresholds for acceptable performance with all GO AOC holders for the management of fatigue reports and cumulative elements. 5. The GO members could establish one single repository for records on FRM. The FRM of the GO to describe the mechanism for the data protection and ongoing involvement of involved personnel across different AOCs. 6. The GO to develop and maintain common fatigue hazard identification processes and tools (e.g., same fatigue reporting system, same bio-mathematical model...). 		

Cont'd

Guidance for the oversight of group operations

Practices considered non-compliant

- GO FRM "integrated" in such a manner to differ significantly from the Operations Manuals. Additionally, there is a possibility that no (actual?) accountability could be determined.
- Operator without FRM benefiting from FRM from another GO member without having the CAs approval.
- Confidential, Fatigue and other reports not processed by the responsible person or i.e., processes of the AOC.

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Table#	Title	Regulatory reference/cluster
FTL06	Home Base	ORO.FTL.200 / CS FTL.1.200
Description of the way(s) the rules can be implemented in the GO context.		
Ideally a crew member should be assigned the same home base for all GO members. However, the current rules allow a crew member to be assigned a home base by one GO member that is different from the home base assigned by another GO member.		
Challenges associated with the CA's verification of compliance with the applicable rules.		
1. CA not able to verify which home base has been assigned for a crew member by another GO member under the oversight of another CA. (As a consequence, the CA would not be able to analyse if there could be a negative impact on safety in case the home base would be different).		
Recommended solutions for CA to address the challenges and comply with Part-ARO requirements related to certification, approvals, and continued oversight.		
1. CAs need to agree and exchange information during group ops discussions and limitations to be imposed. 2. Such an assignment of different home bases should be considered under FRM. 3. GO should consider CS FTL.1.200 requirements related to change of home base.		
Practices considered non-compliant		
<ul style="list-style-type: none"> Group AOC's assigning crew members different Home Bases outside the constraints of the regulations. And leading to crew members being fatigued as they may have to travel on their own behest when changing from one operator to another. 		

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Table#	Title	Regulatory reference/cluster
FTL07	Flight Duty Periods and Reporting Times	ORO.FTL.205 / CS FTL.1.205 / ORO.FTL.210
Description of the way(s) the rules can be implemented in the GO context.		
GO members may implement different reporting times as part of their scheme.		
Challenges associated with the CA's verification of compliance with the applicable rules.		
<ol style="list-style-type: none"> 1. CAs not aware of difference in reporting times that may be applicable to crew members operating for other GO members. 2. Crew member from one GO member may be requested to perform duties on another AOC with different reporting times. 3. CAs oversight activities of crew FTL records need to take into account differences in approved schemes. 		
Recommended solutions for CA to address the challenges and comply with Part-ARO requirements related to certification, approvals, and continued oversight.		
<ol style="list-style-type: none"> 1. CAs need to agree and exchange information during GO oversight to become aware of any differences in schemes. 2. Ensure oversight includes checks and elements to ensure that the FDP and related reporting times are suitable for its own operation. 3. CAs to ensure that the crew duty records of all the crew members reflect the actual duty times conducted in every AOC (taking into account the applicable reporting time of the other AOC's). 		
Practices considered non-compliant		
<ul style="list-style-type: none"> • GO members not able to provide sufficient and adequate information to allow effective oversight by the CA. Exceedances in Flight Times and Duty Periods because of operating across different GO members with different reporting times. 		

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Table#	Title	Regulatory reference/cluster
FTL08	Commander's Discretion	ORO.FTL.205
Description of the way(s) the rules can be implemented in the GO context.		
Common policy on commanders' discretions (CDs) that can be systematically applied across GO using harmonised criteria.		
Challenges associated with the CA's verification of compliance with the applicable rules.		
<ol style="list-style-type: none"> 1. Verification that the same policy is applied to all GO members. 2. Access to the data/records of CDs stored in a central repository at GO level. 3. GO members' reporting obligations on the use of CD when data/records are stored in a central repository. 		
Recommended solutions for CA to address the challenges and comply with Part-ARO requirements related to certification, approvals, and continued oversight.		
<ol style="list-style-type: none"> 1. CAs should share information related to CDs policy with the other CAs involved in GO through cooperative oversight agreement or other mechanisms. 2. CAs to ensure that GO members provide full access to data/records of CDs used for the AOC under their oversight. 3. CAs to ensure that GO members document and implement the process on how to report the use of CD to their CA. 		
Practices considered non-compliant		
<ul style="list-style-type: none"> • GO member not providing access to the central repository to all the CAs overseeing the GO Members. 		

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Table#	Title	Regulatory reference/cluster
FTL09	Delayed Reporting	ORO.FTL.205 (g) / CS FTL.1.205(d)
Description of the way(s) the rules can be implemented in the GO context.		
Common policy on delayed reporting can be systematically applied across GO using the harmonised criteria.		
Challenges associated with the CA's verification of compliance with the applicable rules.		
<ol style="list-style-type: none"> 1. Verification that the same policy is applied to all GO members, may be challenging due to different approval process/procedures of the CAs. 2. Verification that the GO member application of delayed reporting to a crew member also operating for another AOC does not infringe on the crew member's minimum rest before the following duty period. 		
Recommended solutions for CA to address the challenges and comply with Part-ARO requirements related to certification, approvals, and continued oversight.		
<ol style="list-style-type: none"> 1. CAs should share information related to delayed reporting procedure with the other CAs involved in GO through cooperative oversight agreement or other mechanisms. 2. CAs to be provided access to the complete FTL records of all the crew members which may include delayed reporting instances while operating for another Group AOC. 		
Practices considered non-compliant		
<ul style="list-style-type: none"> • GO member having divergent delayed reporting procedures. 		

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Table#	Title	Regulatory reference/cluster
FTL10	Standby and duties at the airport	ORO.FTL.225(f) CS FTL.1.225(a)
Description of the way(s) the rules can be implemented in the GO context.		
Common policy and procedures on standby and duties at the airport can be systematically applied across GO. (Those procedures should also ensure that combination of standby, and FDP do not lead to more than 18 hours awake time).		
Challenges associated with the CA's verification of compliance with the applicable rules.		
<ol style="list-style-type: none"> 1. Verification that the same policy is applied to all GO members, may be challenging due to different approval process/procedures of the CAs. 2. Access to the data/records of rostering on a GO level. 3. Verification that the GO member application of standby and duties at the airport, to a crew member also operating for another AOC does not infringe on the crew member's minimum rest before the following duty period. 		
Recommended solutions for CA to address the challenges and comply with Part-ARO requirements related to certification, approvals, and continued oversight.		
<ol style="list-style-type: none"> 1. CAs should share information related procedures related to standby and duties at the airport with the other CAs involved in GO through cooperative oversight agreement or other mechanisms. 2. Operators to grant CAs full access to rostering for all the GO members. 3. CAs to be provided access to the complete FTL records of all the crew members which may include standby and duties at the airport while operating for another Group AOC 		
Practices considered non-compliant		
<ul style="list-style-type: none"> • Procedures related to the response time between call and reporting time established that does not allow the crew member to arrive from his/her place of rest to the designated reporting point within a reasonable time. 		

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Table#	Title	Regulatory reference/cluster
FTL11	FTL Records	ORO.FTL.245
Description of the way(s) the rules can be implemented in the GO context.		
Common technological solutions and arrangements can be applied for effective central data storage and retrieval.		
Challenges associated with the CA's verification of compliance with the applicable rules.		
<ol style="list-style-type: none"> 1. Access to FTL data stored in a central repository at GO level. 2. Oversight and review of FTL records held in one repository may make verification of records for own AOC difficult. 		
Recommended solutions for CA to address the challenges and comply with Part-ARO requirements related to certification, approvals, and continued oversight.		
<ol style="list-style-type: none"> 1. CAs to ensure that GO members provide full access to data/records of CDs used for the AOC under their oversight. 2. GO members to provide CA with customised FTL records, clearly showing where crew members have operated for other GO members. 		
Practices considered non-compliant		
<ul style="list-style-type: none"> • CAs not having access to required records. • Operators not maintaining complete FTL records for individual crew members preventing complete information about other duties (e.g., freelance, or part-time basis). 		

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Table#	Title	Regulatory reference/cluster
FTL12	Fatigue Management Training	ORO.FTL.250
Description of the way(s) the rules can be implemented in the GO context.		
The same fatigue management training can be used by all GO members.		
Challenges associated with the CA's verification of compliance with the applicable rules.		
<ol style="list-style-type: none"> 1. In case there is no common IFTSS, CAs ability to verify that differences in IFTSS are adequately addressed when approving the fatigue management training programme would be limited. 2. CAs to verify that GO members provide the same fatigue management training programme which shall include differences between GO member (e.g., topics, frequency, staff targeted). 		
Recommended solutions for CA to address the challenges and comply with Part-ARO requirements related to certification, approvals, and continued oversight.		
<ol style="list-style-type: none"> 1. CAs to exchange information on IFTSS to ensure that differences are addressed through the fatigue management training when approving such a training programme. 2. CAs to cooperate and exchange oversight results if any non-compliances are detected during delivery of the training programme. 		
Practices considered non-compliant		
<ul style="list-style-type: none"> • Harmonised fatigue management training throughout the GO not covering the specific differences of GO members. 		