



EUROPEAN AVIATION SAFETY AGENCY  
AGENCE EUROPÉENNE DE LA SÉCURITÉ AÉRIENNE  
EUROPÄISCHE AGENTUR FÜR FLUGSICHERHEIT

# Implementation by operators and Standardisation of NAAs

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D. Defossar, Section Manager, Air Operations, EASA  
Rulemaking

G. Rebender, Section Manager, Air Operations, EASA  
Standardisation

Your safety is our mission.



- OSD non-mandatory (recommendation) elements and alternative Means of Compliance
- How will Standardisation implement OSD in its audits?



# OSD non-mandatory (recommendation) elements and alternative Means of Compliance (altMOC)



# Alternative Means of Compliance

- OSD non-mandatory (recommendation) elements have the status of AMC
- AMC included in ORO.FC, ORO.CC and ORA.ATO

For example

## ***AMC1 ORO.FC.145(b) Provision of training***

### ***NON-MANDATORY (RECOMMENDATION) ELEMENTS***

*When developing the training programmes and syllabi, the operator should consider the non-mandatory (recommendation) elements for the relevant type that are provided in the operational suitability data established in accordance with Regulation (EU) No 748/2013.*



# Alternative Means of Compliance

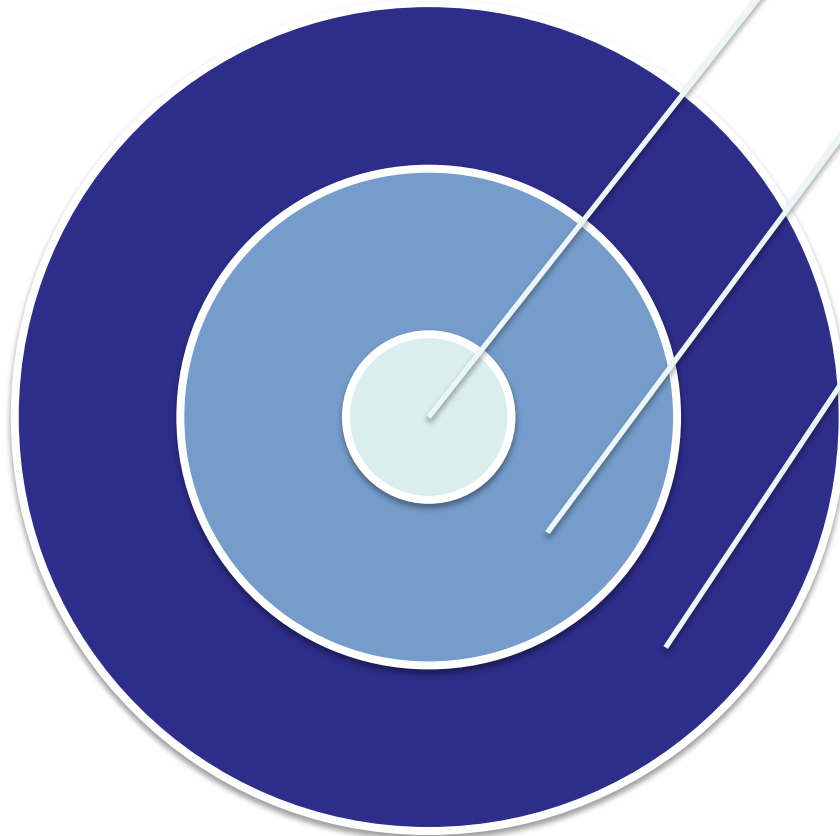


one means to comply  
but not the only means



# Alternative Means of Compliance

ATO/ operator



may develop alternative to OSD recommendations

when developing alternative, apply ORA/ORO.GEN.120 Means of compliance

ensure that altMOC complies with initial intent of OSD mandatory elements and recommendations



# Alternative Means of Compliance

## NAA

when approving training programmes, ensure that recommended OSD elements are included



if not included, require justification from ATO/operator and apply altMOC process



approve altMOC in accordance with ARA/ARO.GEN.120 Means of compliance



altMOC approval could be combined with approval of the training programme – ensure appropriate documentation!



as any other altMOC, send OSD related altMOC to EASA



# Alternative Means of Compliance

## EASA

As for any other altMOC, EASA will publish information on the website

OSD altMOC will be screened by EASA OSD experts to establish if initial OSD is affected

Difference to other altMOC: no rulemaking process to publish them as general AMC

altMOC remains proprietary information of the ATO/operator who developed it





# How will Standardisation implement OSD in its audits?



# OSD output

- The workshop had addressed for the OSD relevant areas:
  - the role of each organisations (operators, training organisations), and
  - the role of the NAAs.
- The OSD output made available by the manufacturers to the relevant organisations are either:
  - Mandatory, or
  - Recommended

- Regulations in the following areas are **or** will be amended to include the legal basis for the OSD mandatory part (Implementing rules) and the OSD recommendations (AMCs and GMs):
  - Air Crew Regulation (EU) 1178/2011 as amended,
  - Air Operations Regulation (EU) 965/2012 as amended,
  - Continuing Airworthiness Regulation (EC) 2042/2003 as amended.
- OSD elements apply directly as soon as the relevant IR are amended.



# Standardisation

- NAA must also ensure that the OSD data are correctly and effectively implemented by all relevant organisations.
- EASA Standardisation process (as set up in the Reg. (EU) No 628/2013, on working methods of the EASA for conducting standardisation inspections and for monitoring the application of Regulation (EC) No 216/2008), applies directly to the OSD elements related to the airworthiness, aircrew and air operations rules.



# Standardisation

- EASA will assess if the NAA has ensured effective oversight of OSD data implementation:
  - OSD mandatory data are strictly and effectively implemented by the organisations;(IRs)
  - that the organisations are making best use of recommendations (AMCs). Compliance with an AMC means that the intent of the rule is met.
  - that a proposed “alternative AMC” (ALTMOC), (today for aircrew and operations) are processed in conformity with the relevant Authorities requirements (Part-ARA/-ARO).



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# Questions?

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