

“Operations Manuals”

- ➔ Separate manuals or combined one ?
- ➔ Management of OM amendments

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Separate manuals or combined one

Challenges:

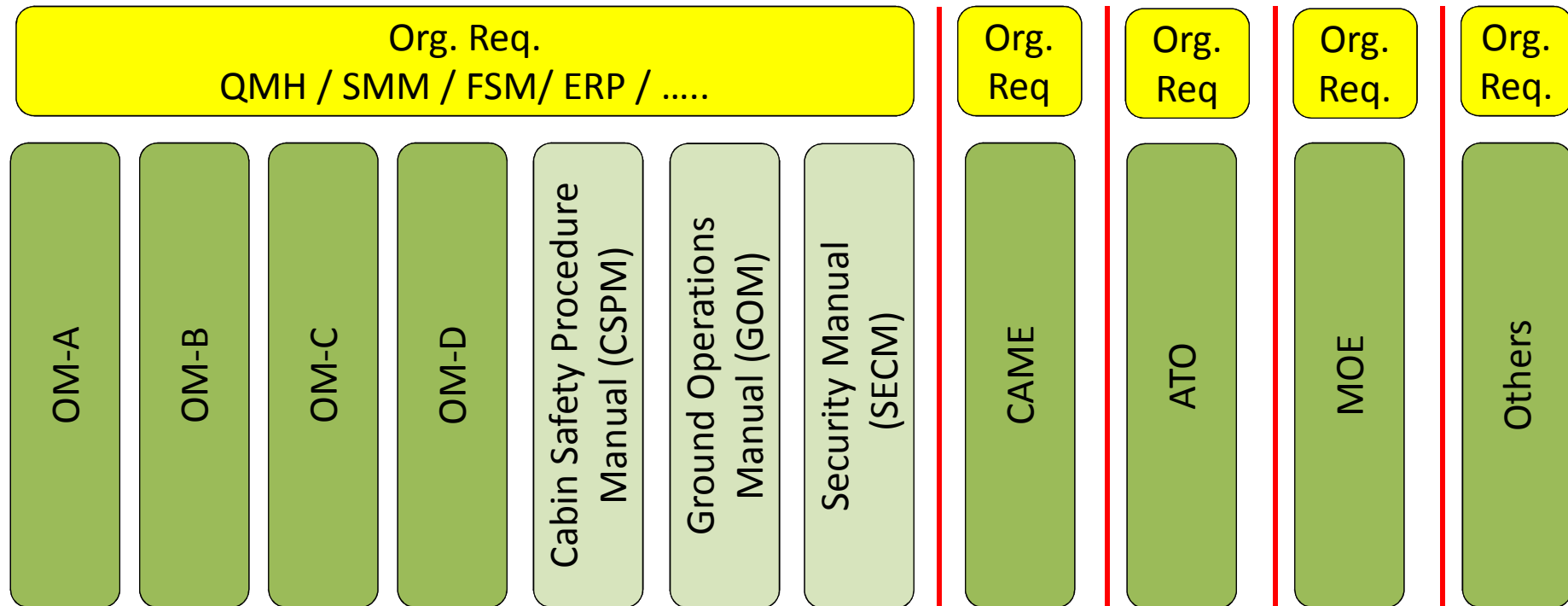
- How many different Manuals?
- Choosing the right structure
- Compliance with IR /AMC / AltMoC
- Instructions & GM from NAA's
- Prior Approval / Approval / Acceptance?
- Amendment & Revisions, Distribution
- Less Paper Concept



Organisations Documentation

Before 965/2012

Operator holding multiple certificates:



Organisations Documentation

Option

Operator holding multiple certificates:

Organisations Management Manual:
Including Safety- and Compliance Management

OM-A

OM-B

OM-C

OM-D

Cabin Safety Procedure
Manual (CSPM)

Ground Operations
Manual (GOM)

Security Manual
(SECM)

CAME

MOE

ATO

Others

Separate manuals or combined one?

Consider:

- Complexity of the organisation
- Standardized Design
- Different editors, reviewers and Compliance Monitoring
- How to fit the OM's in your overall Company Documentation
- Controlled production & distribution
- Language
- Duplication
- Workflow Management
- Accessibility and Easy Use
- Factors and conditions that may affect the compliance



Structure and content ?

- OM (A-D)
structure follows AMC 3 ORO.MLR.100
 - Difficulties with numbering
 - Some duplications
 - Deviation from AMC requires AltMoC?
- OM additional Parts ?
 - Example Part E for EFB
 - or Part F for forms



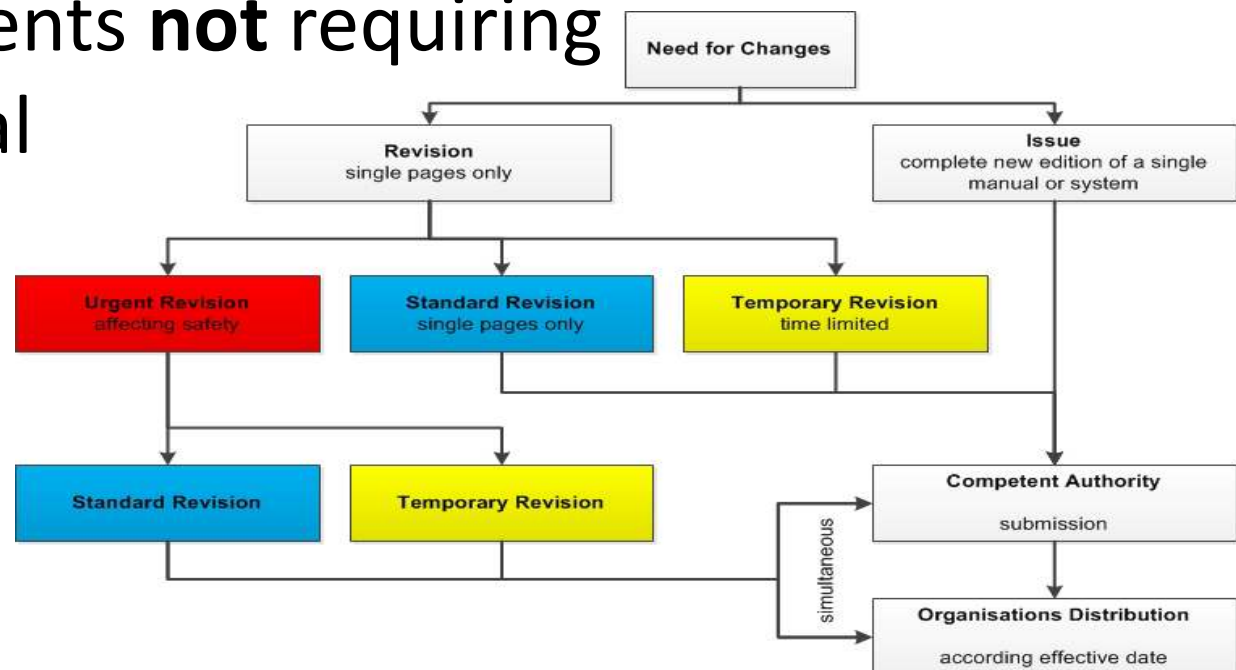
Structure and content ?

Safety Management Manual (SMM) as stand alone manual?

- Living document
- Different or multiple language
- Cross referencing
- Part thereof distributed to contractors
- Approval by the competent authority?

Management of OM amendments

- Types of Revisions (Definitions)
 - Standard, Temporary, Urgent
- Changes/Elements requiring (prior) Approval
- Changes/Elements **not** requiring (prior) Approval



Management of OM amendments

Managing the changes according to ORO.GEN.130

– GM3 ORO.GEN.130 b

- **Non-exhaustive** check-list of items that require prior approval, as specified in the applicable IR
- Unclear as this is only GM
- Clarification approval / prior approval
- Different approach from NAA's



Ensuring Compliance using a Compliance Lists

- As an example 3 different NAA Compliance Lists

Compliance List Operators Manual Part A

Note: This compliance list is based on Regulation (EU) No. 965/2012 ("Air Operations")

Operator's name and address: _____ Operator's AOC number: _____

Revision no.: _____ Revision date: _____

List created by (competent person assigned by the operator): _____ Date: _____

List checked by (person checking the list on behalf of the compliance management system of the operator): _____ Date: _____

Accountable Manager (name/signature): _____

(For Authority use only)
Austro Control POI: _____

Compliance List Aeroplane AOC-complex

Document Reference: 58-01 Compliance List (A) AOC
Date: 01.10.2013
Registration: 311.120.1
Revision: Iss.1/Rev.0
Prepared by: SB OC / Iur
Released by: SB AFS 01.10.2013
Distribution: Internal/External

The Compliance List shall be tailored for each individual part of the Operations Manual System. For a revision of a part of the operations manual system, the Compliance List shall be filed according to the affected paragraphs. Send the filtered Compliance List together with the PRA and the respective Operations Manuals to: Federal Office of Civil Aviation (FOCA) Safety Division Operations Complex Aeroplanes CH-3003 Bern

AOC No.: _____
OAS No.: _____
Gever No.: _____

Compliance Statement of the Operator :

We confirm to be compliant with the terms and conditions of:


- Basic Regulation (EC) No 216/2008 of 20/02/2008 on common rules in the field of civil aviation, its implementing rules and applicable amendments concerning technical requirements and administrative procedures including ICAO Standards and Procedures as well as National Rules and Regulations - Basic - Commission 1702/2003 of 24/03/2003 laying down implementing rules for the airworthiness and environmental certification of products, parts and appliances.
- Directive 2003/42/EC of the European Parliament and of the Council of 13 June 2003 on occurrence reporting in civil aviation.
- Directive 2000/79/EC of the European Parliament and of the Council of 27 November 2000 concerning the European Agreement on the organization of working time in civil aviation.

Name of Accountable Manager : _____ Date: _____

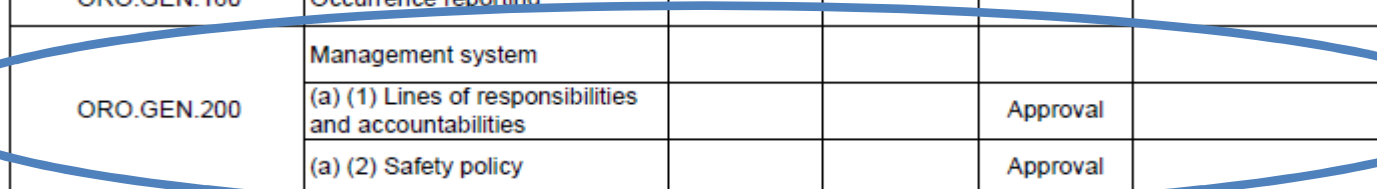
Signature: _____

Respective legal reference	Requirement	Paragraph	Title and Subject	Sequential number	Approval required	Acceptance required	Compliance List IFR EASA OPS [VO (EU) 965/2012]	EU OPS 1 (until 28.10.2014)	Changes	Operations Manual	Compliance-Statement	In Charge Competence	Remarks?			
							Paragraph	Content	Paragraph	Content	Part	Chapt	Page	Date	Signature	
PART A 1.1	Duties and responsibilities of the commander															
1.1045 Appendix 1 A 1.4 AMC3 ORO.MLR.100 / 1 A 1.4	A statement defining the authority, duties and responsibilities of the pilot-in-command/commander. A statement defining the responsibilities of the pilot-in-command/commander.	1	General	1	X		AMC3 ORO.MLR.100	Operations Manual - Contents								
1.085 (a)(1) CAT.GEN.MPA.100 (a)(1)	A crew member shall be responsible for the prop his/her duties that: (1) are related to the safety of its occupants. The crew member shall be responsible for the prop his/her duties that are related to the safety of the occupants.	2	A	2	X		ORO.MLR.100 (b)	Operations manual - general	P 1.1040 m	Replacement of Manuals to be carried, use of Electronic Flight Bag (EFB)	n					B 2
1.085 (a)(2) CAT.GEN.MPA.100 (a)(2)	A crew member shall be responsible for the prop his/her duties that: are specified in the instruction laid down in the Operations Manual. The crew member shall be responsible for the prop his/her duties that are specified in the instruction in the operations manual.	3	A.0.1	3	X		ORO.GEN.110	Operator responsibilities	B 1.020	Laws, Regulations and Proc	n					B 2
1.085 (b)(3) AMC1 CAT.GEN.MPA.100(b)(3)	A crew member shall: make use of the operator's reporting schemes in accordance with OPS 1.03 cases, a copy of the report(s) shall be communicated to the commander concerned. COPIES OF REPORTS. Where a written report of the report should be communicated to the commander concerned, unless the terms of the operator's report prevent this.	4	A.0.1	4	X		ORO.MLR.100	Operations manual - general	P 1.1040	General rules for operations manuals P1.1045 c Prepare the OM in other than english language. App 1 OPS 1.005(a) b 40	y					B 2
1.085 (d)(1) CAT.GEN.MPA.100 (c)	A crew member shall not perform duties on an air under the influence of any drug that may affect his/her manner contrary to safety. The crew member shall not perform duties on an air under the influence of psychoactive substances (causes; (2) until a reasonable time period has elapsed water diving or following blood donation; (3) if any requirements are not fulfilled; (4) if he/she is in a state of fatigue or if he/she is suffering from fatigue of Annex IV to Regulation (EC) No 216/2008 or if unfit, to the extent that the flight may be endangered. Official Journal of the European Union 25.10.2011	5	A.0.1	5	X		ORO.AOC.100(a)	Application for an air operator certificate			y					B 2
		6	A.0.1	6	X		ORO.AOC.105	Operations specifications and privileges of an AOC holder			y					B 2
		7	A.0.1	7	X		CAT.GEN.100	Competent authority			y					B 2
		8	A.0.1	8	X		SPA.GEN.105	Competent authority			y					B 2
		9	A.0.1	9	X		SPA.GEN.110	Application for a specific approval			y					B 2
		10	A.0.1	10	X		SPA.GEN.115	Privileges of an operator holding a specific approval			y					B 2
		11	A.0.1	11	X		SPA.GEN.120	Changes to a specific approval			y					B 2
		12	A.0.1	12	X		SPA.GEN.125	Continued validity of a specific approval			y					B 2
		13	A.1.1	13	X		CAT.GEN.MPA.120	Common Language	B 1.025	Common Language	n					B 2
		14	A.1.1	14	X		ORO.AOC.135	Personnel requirements	C 1.175 (h)	Nomination of Accountable Manager	n					B 2/T 5
		15	A.1.2	15	X		ORO.AOC.135	Personnel requirements	C 1.175 (i)	Nomination of post holders	n					B 2/T 5
		16	A.1.3	16	X		ORO.AOC.135	Personnel requirements	C 1.175 (j)	Nomination and qualification of one post holder for more than one post	n					B 2/T 5
		17	A.1.3	17	X		ORO.GEN.110	Operator responsibilities	D 1.205	Competence of operations personnel	y					B 2
		18	A.1.4	18	X		CAT.GEN.MPA.110	Authority of the commander	B 1.086	Authority of the commander	n					B 2
		19	A.1.5	19	X		CAT.GEN.MPA.125	Training of aeroplanes	B 1.095	Authority to taxi an aeroplane	n					B 2
		20	A.1.5	20	X		CAT.GEN.MPA.100	Crew responsibilities	B 1.085	Crew responsibilities	n					B 2
		21	A.2.1	21	X		ORO.MLR.115(a), (f)	Record-keeping	B 1.195	Preservation of documentation	n					B 2
		22	A.2.1	22	X		ORO.GEN.110(c)	Operator responsibilities	D 1.195	Operational Control & Supervision	n					B 2
		23	A.2.1	23	X		ORO.MLR.115	Record-keeping	P 1.1065	Document storage periods App 1 OPS 1.065 Form and accessibility for document storage	y					B 2/T 5
		24	A.2.1	24	X		CAT.GEN.MPA.195	Preservation, production and use of flight recorder recordings	B 1.160	Preservation, production and use of flight recorder recordings	y					B 2
		25	A.2.3	25	X		ORO.GEN.200	Management system	B 1.037	Accident prevention	y					B 2
		26	A.2.3	26	X		CAT.GEN.MPA.145	Information on emergency and survival equipment carried	B 1.055	Info on emergency & survival equipment	n					B 2

Ensuring Compliance using a Compliance Lists



Paragraph	Title and Subject	OM	Chapter	Sanction	Legal Act
Annex III - PART - ORO - ORGANISATION REQUIREMENTS FOR AIR OPERATIONS					
Subpart GEN - GENERAL REQUIREMENTS					
ORO.GEN.120	Means of compliance				
	(b) Implementation of alternative means of compliance			Approval	
ORO.GEN.125	Terms of Approval and privileges of an operator				
ORO.GEN.130	Changes				
	(a) affecting the scope of the AOC or the Operation			Approval	AOC
	(c) procedure for the management of changes not requiring prior approval			Approval	
ORO.GEN.135	Continued validity				
ORO.GEN.140	Access				
ORO.GEN.150	Findings				
ORO.GEN.155	Immediate reaction to a safety problem				
ORO.GEN.160	Occurrence reporting				
ORO.GEN.200	Management system				
	(a) (1) Lines of responsibilities and accountabilities			Approval	
	(a) (2) Safety policy			Approval	




Ensuring Compliance using a Compliance Lists

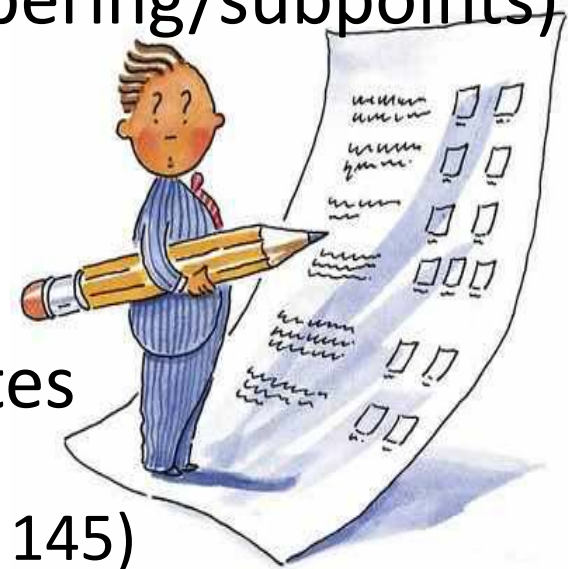
	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q
1	Sequential number	Operations Manual Part	Approval required	Acceptance required	I. Regulation					II. Unternehmen:			[NAME]		In Charge / Competence	(S)pecialist's judgement and decision required (C)onsultation with specialist required	Remarks? (on extra page)
2					Compliance List IFR OPS [VO (EU) 965/2012]		EASA EU OPS 1 (until 28.10.2014)		Changes	Operations Manual			Compliance-Statement				
3					Paragraph	Content	Paragraph	Content		Part	Chapt.	Page	Date	Signature			
31	27	A 2.3			CAT.OP.MPA.275	Simulated abnormal situations in flight	D 1.370	Simulated abnormal situations in flight	n						B 2		
32	28	A 2.4		X	CAT.GEN.MPA.180	Documents, manuals and information to be carried	B 1.130	Manuals to be carried B1.130 a (3) Replacement of the AFM by OM, Part B,	y						B 2		
33	29	A 2.4	X		ARO.OPS.110 ORO.AOC.110	Leasing agreements Leasing agreement	B 1.165	Leasing	y						B 2		
34	30	A 2.5			ORO.GEN.140	Access	B 1.145	Power to inspect	n						B 2		
35	31	A 2.5			CAT.GEN.MPA.190	Provision of documentation and records	B 1.150	Production of documentation & records	n						B 2		
36	32	A 3		X	ORO.GEN.200	Management system	B 1.035	Quality System B1.035 c Quality System and Quality Manager, App.1 OPS 1.005(a) b 1	y						B 2	C	
37	33	A 3		X	ORO.GEN.120	Means of compliance			y						B 2	C	
38	34	A 3		X	ORO.GEN.150	Findings			y						B 2		
39	35	A 3		X	ORO.AOC.115	Code-share agreements			y						B 2	C	
40	36	A 4			ORO.CC.005	Scope	O 1.988	Applicability	y						B 2		
41	37	A 4		X	ORO.FC.100 ORO.FC.200	Composition of flight crew	N 1.940	Composition of flight crew N1.940 a (4) Inexperienced flight crew N1.940 a (6) System panel operator App. 1 OPS 1.940 Para. f System panel operator, App.1 OPS 1.005(a) b 31	y						B 2		


Ensuring Compliance using a Compliance Lists

Respective legal reference	Requirement	Manual Reference	App/ Acc	Remarks (for Authority use only)	Doc Stat
	and the qualifications of personnel are supervised. In particular, the procedures related to the following items should be described: control, analysis and storage of the required records.				
1.1045 Appendix 1 A 2.2 AMC3 ORO.MLR.100 1 A 2.2	System of promulgation of additional operational instructions and information. A description of any system for promulgating information which may be of an operational nature but is supplementary to that in the Operations Manual. The applicability of this information and the responsibilities for its promulgation must be included. System and responsibility for promulgation of additional operational instructions and information. A description of any system for promulgating information which may be of an operational nature, but which is supplementary to that in the OM. The applicability of this information and the responsibilities for its promulgation should be included.				
1.1045 Appendix 1 A 2.3 and 1.037 (a) AMC3 ORO.MLR.100 1 A2.3 and AMC1 ORO.GEN.200(a)(1) and AMC1 ORO.GEN.200(a)(3) and ORO.GEN.200(a)(3) and AMC1 ORO.GEN.200(a)(4) and AMC1 ORO.AOC.130 and Annex 1	Accident prevention and flight safety programme. A description of the main aspects of the flight safety programme. Accident prevention and flight safety programme. (a) An operator shall establish and maintain an accident prevention and flight safety programme, which may be integrated with the quality system, including: (1) programmes to achieve and maintain risk awareness by all persons involved in operations; and (2) an occurrence reporting scheme to enable the collation and assessment of relevant incident and accident reports in order to identify adverse trends or to address deficiencies in the interests of flight safety. The scheme shall protect the identity of the reporter and include the possibility that reports may be submitted anonymously; and (3) evaluation of relevant information relating to accidents and incidents and the promulgation of related information, but not the attribution of blame; and (4) a flight data monitoring programme for those aeroplanes in excess of 27 000 kg MCTOM. Flight data monitoring (FDM) is the pro-active use of digital flight data from routine operations to improve aviation safety. The flight data monitoring programme shall be non-punitive and contain adequate safeguards to protect the source(s) of the data; and (5) the appointment of a person accountable for managing the programme. REFERENCE TO RULE				
1.037 (a)(1) AMC1 ORO.GEN.200(a)(4)	An operator shall establish and maintain an accident prevention and flight safety programme, which may be integrated with the quality system, including: Programmes to achieve and maintain risk awareness by all persons involved in operations.				

Wish List

- More guidance
- Clear definitions for prior approval / approval / «acceptance»
- AMC instead of GM for changes requiring prior approval
- Review AMC 3.ORO.MLR.100 (numbering/subpoints)
- Standardised Compliance List
- Standardisation between NAA's
- Communication
- Same concept for multiple certificates
 - Harmonise the regulations regarding organisational requirements (Part M / 145)





Thank you for your attention.

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