



# EASA

European Aviation Safety Agency

## Frequently Asked Questions on AltMOC

Sarah PORALLA

Email: [sarah.poralla@easa.europa.eu](mailto:sarah.poralla@easa.europa.eu)

Aerodromes Section

Q 2 - 2015

**Your safety is our mission.**

An agency of the European Union



TE.GEN.00409-001



# Alternative Means of Compliance (1)

## **ADR.AR.A.015 Means of compliance**

- (a) The Agency shall develop Acceptable Means of Compliance (AMC) that may be used to establish compliance with Regulation (EC) No 216/2008 and its Implementing Rules. When the Acceptable Means of Compliance are complied with, the related requirements of the Implementing Rules are met.
- (b) Alternative means of compliance may be used to establish compliance with the Implementing Rules.



# Alternative Means of Compliance (2)

## ADR.AR.A.015 Means of compliance (...)

**c) The Competent Authority shall establish a system to consistently evaluate that the alternative means of compliance used by itself or by aerodrome operators or providers of apron management services under its oversight (to) provide for compliance with Regulation (EC) No 216/2008 and its Implementing Rules.**

**(d) The Competent Authority shall evaluate the alternative means of compliance proposed by an aerodrome operator or a provider of apron management services, in accordance with ADR.OR.A.015, by analysing the documentation provided and, if considered necessary, conducting an inspection of the aerodrome operator, the aerodrome or the provider of apron management services.**



# Alternative Means of Compliance (3)

## ADR.AR.A.015 Means of compliance (...)

### (d) (continued)

**When the Competent Authority finds that the alternative means of compliance proposed by the aerodrome operator or the provider of apron management services are in accordance with the Implementing Rules, it shall without undue delay:**

- (1) notify the applicant that the alternative means of compliance may be implemented and, if applicable, amend the certificate or approval of the applicant accordingly;
- (2) inform the Agency of their content, including copies of the relevant documentation;
- (3) inform other Member States about alternative means of compliance that were accepted; and
- (4) inform the other certified aerodromes located in the Member State of the Competent Authority, as appropriate.



# Alternative Means of Compliance (4)

## ADR.AR.A.015 Means of compliance (...)

(e) When the Competent Authority itself uses alternative means of compliance to achieve compliance with Regulation (EC) No 216/2008 and its Implementing Rules, it shall:

- (1) make them available to aerodrome operators and providers of apron management services under its oversight; and
- (2) without undue delay notify the Agency.

**The Competent Authority shall provide the Agency with a full description of the alternative means of compliance, including any revisions to procedures that may be relevant, as well as an assessment demonstrating that the Implementing Rules are met.**



# Alternative Means of Compliance (5)

## ADR.OR.A.015 Means of compliance

(a) **Alternative means of compliance to those adopted by the Agency may be used by an aerodrome operator** or an apron management service provider to establish compliance with Regulation (EC) No 216/2008 and its Implementing Rules.

(b) When an aerodrome operator or an apron management service provider wishes to use an alternative means of compliance to the Acceptable Means of Compliance (AMC) adopted by the Agency to establish compliance with Regulation (EC) No 216/2008 and its Implementing Rules, it shall, prior to implementing it, **provide the Competent Authority with a full description of the alternative means of compliance. The description shall include any revisions to manuals or procedures that may be relevant, as well as an assessment demonstrating that the Implementing Rules are met.**

The aerodrome operator or the provider of apron management services may implement these alternative means of compliance subject to prior approval by the Competent Authority and upon receipt of the notification, as prescribed in ADR.AR.A.015(d).

(c) Where apron management services are not provided by the aerodrome operator itself, the use of alternative means of compliance by providers of such services in accordance with (a) and (b), shall also require prior agreement by the operator of the aerodrome where such services are provided.



# Frequently Asked Questions (1)

## ***What are alternative means of compliance (AltMoC)?***

Regulation (EU) No 139/2014 (Annex 1), define AltMoC as follows:

*Alternative means of compliance' are those that propose an alternative to an existing Acceptable Means of Compliance or those that propose new means to establish compliance with Regulation (EC) No 216/2008 and its Implementing Rules for which no associated AMC have been adopted by the Agency'.*

Complementing the legal provisions, the Agency has developed further criteria that may be used to characterise an AltMoC:

- It is technically different in character to the published EASA AMC;
- A form included in EASA AMC is changed in layout or by adding/deleting fields;
- A change of numbering, e.g. table of contents of the Operations Manual, is not *per se* an AltMoC, only if the order or numbering of whole chapters is changed (e.g. Chapter 7 becomes Chapter 8).
- Editorial changes to an EASA AMC are not considered to constitute an AltMoC.

Please note that the above can only be a general guideline. Organisations and competent authorities may need to evaluate each case to establish if a means of compliance is an AltMoC.



## Frequently Asked Questions (2)

***What happens to current practices and authority approved means of compliance that were established before the entry into force of Regulations (EU) 1178/2011 and 965/2012 and which deviate from EASA AMC?***

**These means of compliances or practices might constitute an AltMoC. The transition periods to the new Regulations should be used to identify such issues. The organisation or competent authority need to assess these means of compliance and possibly submit them as AltMoC.**



## Frequently Asked Questions (3)

***The implementing rule has no corresponding EASA AMC. Consequently, is any means of compliance an AltMoC?***

We need to distinguish between new means of compliance proposed by (1) competent authorities and those proposed by (2) organisations.

(1) If the competent authority proposes a means of compliance for use by organisations, it is most likely an AltMoC. The reason is that the AltMoC might express expectations that need to be met by the regulated entities so as to establish rule compliance.

(2) Conversely, if the competent authority establishes a means of compliance for itself (i.e. to Part-ARx) or an organisation proposes a means of compliance, it might be a description of an organisational process or standard operating procedure, implementing for example a prescriptive implementing rule. Process descriptions or detailed standard operating procedures reflecting the work of an individual entity are not *per se* AltMoC.

Nevertheless, the above can only be a general guideline. Organisations and competent authorities may need to evaluate each case to establish if a means of compliance is an AltMoC.



# EASA Technical Publications

## *Publications in 2014!*



### **ADR Rules - NEW!**

The consolidated rules for Airports (Aerodromes) are now available via the Technical Publications page:  
<http://easa.europa.eu/technical-publications>

They combine the rules with the related Acceptable Means of Compliance & Guidance Material, as well as with the Certification Specifications.



**EASA**  
European Aviation Safety Agency

**Thank you very much**



**Your safety is our mission.**

An agency of the European Union 