



## Ramp simplification

RMT.0721

### EXECUTIVE SUMMARY

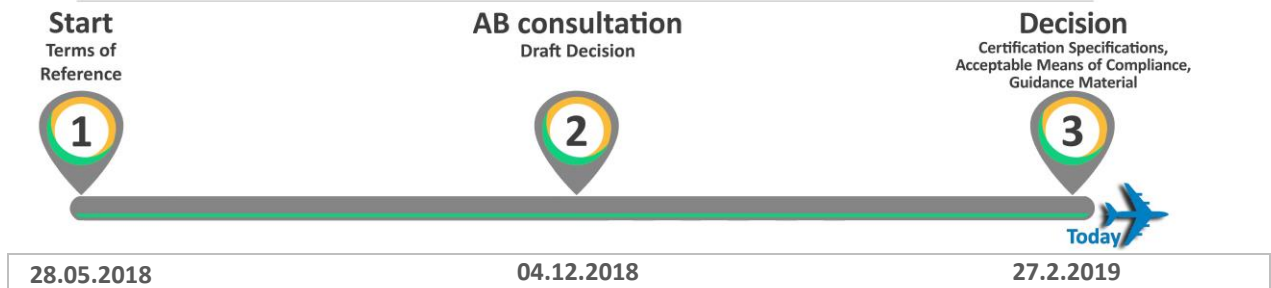
The objective of this Decision is to update and simplify the acceptable means of compliance (AMC) and guidance material (GM) pertaining to ramp inspection in order to modernise and clarify them, and significantly reduce the level of detail.

This Decision deleted the AMC and GM pertaining to ramp inspections, which were considered to be too detailed, and transposes them into a ramp inspection manual, to be published by EASA. The resulting AMC and GM were developed taking into account the comments received during the focused consultation with affected stakeholders and advisory bodies on the draft provisions.

The amendments are expected to maintain the effectiveness of the ramp inspections performed by Member States and the safety assessment of foreign Aircraft (SAFA) participating states and to allow these states to make a better use of their resources, in accordance with risk-based principles.

<b>Action area:</b>	Regular updates/review of Rules		
<b>Affected rules:</b>	AMC & GM to Annex I (Part-DEF) and Annex II (Part-ARO) of Commission Regulation (EU) No 965/2012]		
<b>Affected stakeholders:</b>	CAs and operators (commercial and non-commercial))		
<b>Driver:</b>	Efficiency/Proportionality	<b>Rulemaking group:</b>	No
<b>Impact assessment:</b>	None	<b>Rulemaking Procedure:</b>	Accelerated

● EASA special rulemaking procedure milestones



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## 1. About this Decision

The European Union Aviation Safety Agency (EASA) developed ED Decision 2019/007/R in line with Regulation (EU) 2018/1139<sup>1</sup>] and the Rulemaking Procedure<sup>2</sup>.

This rulemaking activity is included in the European Plan for Aviation Safety (EPAS)<sup>3</sup> under rulemaking task (RMT).0721. The scope and timescales of the task were defined in the related Terms of Reference<sup>4</sup>.

The draft text of this Decision has been developed by EASA, supported by 2 working groups composed of Member States and safety assessment of foreign Aircraft (SAFA) participating states. All interested parties, including EASA relevant advisory bodies (OPS TeB and FS.TEC), were consulted through a focused consultation in December 2018. 41 comments were received from 9 stakeholders, including 7 national aviation authorities, 1 aircraft operator association and 1 ramp inspection training organisation.

EASA reviewed the comments received during the focused consultation with affected stakeholders and advisory bodies. The comments received and EASA's responses to them are summarised under 2.4 below.

The final text of this Decision with the acceptable means of compliance (AMC)/guidance material (GM) has been developed by EASA based on the outcome of the focused consultation.

The major milestones of this rulemaking activity are presented on the title page.

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<sup>1</sup> Regulation (EU) 2018/1139 of the European Parliament and of the Council of 4 July 2018 on common rules in the field of civil aviation and establishing a European Union Aviation Safety Agency, and amending Regulations (EC) No 2111/2005, (EC) No 1008/2008, (EU) No 996/2010, (EU) No 376/2014 and Directives 2014/30/EU and 2014/53/EU of the European Parliament and of the Council, and repealing Regulations (EC) No 552/2004 and (EC) No 216/2008 of the European Parliament and of the Council and Council Regulation (EEC) No 3922/91 (OJ L 212, 22.8.2018, p. 1) (<https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1536149403076&uri=CELEX:32018R1139>).

<sup>2</sup> EASA is bound to follow a structured rulemaking process as required by Article 115(1) of Regulation (EU) 2018/1139. Such a process has been adopted by the EASA Management Board (MB) and is referred to as the 'Rulemaking Procedure'. See MB Decision No 18-2015 of 15 December 2015 replacing Decision 01/2012 concerning the procedure to be applied by EASA for the issuing of opinions, certification specifications and guidance material (<http://www.easa.europa.eu/the-agency/management-board/decisions/easa-mb-decision-18-2015-rulemaking-procedure>).

<sup>3</sup> [https://www.easa.europa.eu/document-library/general-publications?publication\\_type%5B%5D=2467](https://www.easa.europa.eu/document-library/general-publications?publication_type%5B%5D=2467)

<sup>4</sup> <https://www.easa.europa.eu/document-library/terms-of-reference-and-group-compositions/tor-rmt0721>

## 2. In summary — why and what

### 2.1. Why we need to change the AMC/GM

AMC and GM to air operations requirements in the field of ramp inspections need to be state-of-the-art and clear enough to ensure that competent authorities can effectively plan and conduct ramp inspections based on risks. AMC specify the acceptable means of compliance, which may be used to establish compliance with the IRs. GM should be limited to the areas where doubts may arise in relation to the interpretation of the regulation; thus, by explaining the meaning of the IR and the related AMC, GM can offer a real benefit for competent authorities.

### 2.2. What we want to achieve — objectives

An update and simplification of the AMC and GM to Regulation (EU) 965/2012<sup>5</sup> in the field of ramp inspections is necessary to ensure that competent authorities are provided with a clear interpretation of the European air operational rules, thereby fully taking into account the principles of proportionality and risk-based performance.

This rulemaking task (RMT) aims to improve consistently the quality of the AMC and GM to Regulation (EU) 965/2012. In detail, the objectives are the following:

- to have state-of-the-art and clear AMC and GM pertaining to ramp inspections, taking into account identified implementation issues and feedback from standardisation and industry/NAA stakeholders;
- to introduce the system-wide coordination project, which foresees an EASA-coordinated calculation and distribution of ramp inspections, thus achieving the objectives of risk-based approach and cooperative oversight;
- to introduce the manufacturer's data project, which sets up a matrix for basic risk assessment to give practical guidance for inspectors;
- to ensure alignment with ICAO SARPs;
- to ensure alignment with the amended EU regulatory framework;
- to consider the changes that are introduced by Regulation (EU) 2018/1139;
- to correct any editorial issues;
- to address any regulatory feedback stemming from standardisation visits of competent authorities;
- to address any issues stemming from stakeholder feedback;
- to offer effective support to NAAs in the practical implementation of cooperative oversight; and
- to allow the competent authorities to make better use of their resources.

<sup>5</sup> Commission Regulation (EU) No 965/2012 of 5 October 2012 laying down technical requirements and administrative procedures related to air operations pursuant to Regulation (EC) No 216/2008 of the European Parliament and of the Council (OJ L296, 25 October 2012, page 1). Regulation as last amended by Commission Regulation (EU) 379/2014 of 7 April 2014 (OJ L 123, 24/04/2014, p. 1–94)

### 2.3. How we want to achieve it — overview of the amendments

In general, the main changes introduced are the following:

- Restructuration of the AMC and GM material to ensure a clear interpretation of the rules;
- Removal of unnecessary details contained in the AMC and GM that are either outdated or considered to be too prescriptive and/or disproportionate;
- Amendments to the AMC and GM to introduce more flexibility for, in particular, the training requirements for inspectors;
- Introduction in the AMC and GM of the system-wide coordination concept;
- Development of an EASA ramp inspection manual in ‘plain language’, which includes guidance and detailed training requirements;
- Relocation of the training syllabi into the EASA ramp inspection manual.

In particular, the following changes have been made to the AMC and GM to ARO.RAMP:

- GM1 Annex I has been amended to introduce the definition of ‘ramp inspection tool’;
- A new GM1 to ARO.RAMP.005 has been added to make reference to the ramp inspection manual developed by EASA;
- AMC1 ARO.RAMP.100 has been deleted and its content has been transferred to the ramp inspection manual;
- AMC1 ARO.RAMP.100(b) has been amended for clarity;
- AMC1 ARO.RAMP.100(c)(1) has been deleted as the calculation methodology is no more applicable due to the implementation of the system-wide coordination project (SWC);
- A new AMC1 ARO.RAMP.100(c) has been added related to the SWC project;
- AMC2 ARO.RAMP.100(c) has been deleted and its content has been transferred to the ramp inspection manual;
- AMC3 ARO.RAMP.100(c) has been deleted and its content has been transferred to the ramp inspection manual;
- GM1 ARO.RAMP.100(c) and GM1 ARO.RAMP.100(c)(1) have been deleted and their content has been transferred to the ramp inspection manual;
- AMC1 ARO.RAMP.115(a) has been deleted and its content has been transferred to the ramp inspection manual;
- AMC1 ARO.RAMP.115(b)(1) has been renumbered to AMC1 ARO.RAMP.115(a)(b) and amended to provide more flexibility on the education and experience of ramp inspectors;
- GM1 ARO.RAMP.115(b)(1) has been deleted and its content has been transferred to the ramp inspection manual;
- AMC1 ARO.RAMP.115(b)(2) has been renumbered to AMC8 ARO.RAMP.115(a)(b) and amended to clarify the conditions to maintain the senior qualification and to simplify the conditions to regain a lost qualification.



- AMC2 ARO.RAMP.115(b)(2) has been deleted and its content has been transferred to new AMCs or to the ramp inspection manual;
- AMC3 ARO.RAMP.115(b)(2) has been deleted and its content has been transferred to new AMCs or to the ramp inspection manual;
- AMC4 ARO.RAMP.115(b)(2) has been deleted and its content has been transferred to the ramp inspection manual;
- GM1 ARO.RAMP.115(b)(2) and GM2 ARO.RAMP.115(b)(2) have been deleted and their content has been transferred to the RAMP inspection manual;
- A new AMC2 ARO.RAMP.115(a)(b) has been added related to the overall qualification process of ramp inspectors;
- A new AMC3 ARO.RAMP.115(a)(b) has been added related to the initial theoretical and practical training;
- A new AMC4 ARO.RAMP.115(a)(b) has been added related to on-the-job training;
- A new AMC5 ARO.RAMP.115(a)(b) has been added related to the extension of the ramp inspectors privileges;
- A new AMC6 ARO.RAMP.115(a)(b) has been added related to the recent experience and requalification of ramp inspectors;
- AMC1 ARO.RAMP.115(b)(3) has been renumbered to AMC7 ARO.RAMP.115(a)(b) and amended for clarity;
- AMC1 ARO.RAMP.115(b)(2)(i) and AMC2 ARO.RAMP.115(b)(2)(i) have been deleted and their content transferred to the ramp inspection manual;
- AMC2 ARO.RAMP.115(b)(3) has been deleted and its content transferred to new AMCs or to the ramp inspection manual;
- GM1 ARO.RAMP.115(b)(3) has been deleted;
- GM1 ARO.RAMP.115(c), GM2 ARO.RAMP.115(c) and GM3 ARO.RAMP.115(c) have been removed and their content transferred to the ramp inspection manual;
- AMC1 ARO.RAMP.120 has been renumbered AMC2 ARO.RAMP.120(a) and its content clarified;
- AMC1 ARO.RAMP.120(a) has been amended for clarity. Part of its content has been transferred to the ramp inspection manual;
- AMC1 ARO.RAMP.120(a)(1), AMC1 ARO.RAMP.120(a)(2) and AMC1 ARO.RAMP.120(a)(3) have been deleted and their content transferred to the ramp inspection manual;
- AMC1 ARO.RAMP.120(a)(4) has been amended for clarity and to reflect the current practices;
- AMC1 ARO.RAMP.120(b) has been deleted and its content has been transferred to the ramp inspection manual;
- AMC1 ARO.RAMP.125 has been amended for clarity;



- AMC2 ARO.RAMP.125 has been deleted and its content has been transferred to the ramp inspection manual;
- GM1 ARO.RAMP.125(a) and GM2 ARO.RAMP.125(a) have been deleted and their content has been transferred to the ramp inspection manual;
- AMC1 ARO.RAMP.125(b) has been amended for clarity and part of its content has been transferred to the ramp inspection manual;
- GM1 ARO.RAMP.125(b) has been deleted and its content has been transferred to the ramp inspection manual;
- AMC1 ARO.RAMP.125(c) has been amended for clarity and to reflect the transfer of the (proof of inspection) POI to the ramp inspection manual;
- GM1 ARO.RAMP.130, GM2 ARO.RAMP.130, GM3 ARO.RAMP.130, GM4 ARO.RAMP.130, GM5 ARO.RAMP.130, GM6 ARO.RAMP.130, GM7 ARO.RAMP.130 and GM8 ARO.RAMP.130 have been deleted and their content has been transferred to the ramp inspection manual;
- The appendix to GM5 and GM6 ARO.RAMP.130 has been deleted and its content has been transferred to the ramp inspection manual;
- AMC1 ARO.RAMP.135(a) has been amended for clarity and part of its content has been transferred to the ramp inspection manual;
- AMC1 ARO.RAMP.135(b) has been amended for clarity and part of its content has been transferred to the ramp inspection manual;
- GM1 ARO.RAMP.135(b) has been deleted and its content has been transferred to the ramp inspection manual;
- GM1 ARO.RAMP.140(a) and GM1 ARO.RAMP.140(d)(4) have been deleted and their content have been transferred to the ramp inspection manual;
- GM1 ARO.RAMP.145(b) has been deleted and its content upgraded to the new AMC1 ARO.RAMP.145 and to the ramp inspection manual;
- A new AMC1 ARO.RAMP.145 has been added related to the introduction of important safety information into the ramp inspection tool;
- A new AMC1 ARO.RAMP.150(b)(4)(iii) has been added to introduce the EASA tasks in the context of the system-wide coordination of ramp inspections;
- GM1 ARO.RAMP.160(a) has been deleted and its content has been transferred to the ramp inspection manual;

#### 2.4. What are the stakeholders' views

41 comments were received during the focused consultation, including 4 comments on provisions which were outside the scope of the consultation.

41 % of the comments were either accepted or partially accepted, while 39 % of them were rejected.



The main topic on which comments were received was ramp inspector qualification and training with 49 % of the comments. The other topics had a number of comments representing less than 10 % of the total number of the comments.

Here is a summary of the main comments received:

– Ramp inspector qualification and training:

- Language proficiency: A comment was received requesting to update the proposed provisions on the need to have an English proficiency certificate for native English speakers. The comment has been accepted and a provisions stating that when English was used as a medium of instruction during secondary or higher education, no such certificate is necessary;
- Training crediting principles: A comment was received asking to remove the proposed provisions allowing to reduce the duration of the initial training by crediting previous trainings. The comment was rejected as this additional flexibility has been added based on requests from Member States and, in addition, is consistent with the same principle applied for other inspectors;
- Integrated course: A comment was received asking to remove the existing possibility to combine technical training with the initial theoretical training. This comment was rejected as this possibility is already used by stakeholders and considering that no negative impact on the initial theoretical training of inspectors has been identified.
- Ramp inspectors' recent experience: A comment was received highlighting the discrepancy between the current implementing rule (IR) and the proposed amended AMC, as the IR is referring to a 12-month period and the amended AMC to a calendar year. This discrepancy was presented during the last ramp inspections coordination and standardisation (RICS) workshop where the feedback of Member States was requested. It was agreed that the use of the calendar year was more appropriate and less burdensome, that the IR would be amended at the first available opportunity and that in the meantime standardisation activities would be performed in accordance with the amended AMC. Therefore, the comment was rejected.
- Ramp inspector requalification: A comment was received on the fact that the new requirements for the requalification of ramp inspectors not having conducted the minimum number of ramp inspections to keep their qualification valid, was more prescriptive than the previous one. The previous requirements were in fact not defining the process for requalification when the missing number of inspections were not performed during the next half calendar year. Instead, requirements when no ramp inspections were performed during a certain period were provided. The new requirements are considered to provide criteria related to this missing process. When no ramp inspection is performed during a certain period, the same requirement may now be used. It is agreed that they are slightly more prescriptive than the previous one, but this is because the previous requirements were taking half calendar years as a reference, instead of a calendar year for the new requirements. Therefore, the comment was rejected.





- Senior ramp inspector requalification: A similar comment to the above was received for senior ramp inspectors, asking also to try to clarify the proposal, as the proposed requirements were referring to the initial qualification eligibility criteria. Similar to ramp inspectors, the process to requalify a senior ramp inspector when the missing number of inspections were not performed during the next half calendar year, was not existing and the new requirements are now defining how this should take place. It should be nevertheless noted that the conditions for this requalification do not include the criteria to be a qualified ramp inspector for 36 months, as this would further complicate the possibility to requalify a senior ramps inspector. For these reasons, and to avoid making the process more complex, no amendments have been made to the proposed requirements.
  - Recurrent training: A comment was received asking to exempt trainers from the recurrent training that is applicable to all ramp inspectors. This exemption was considered not acceptable. However, the issue was partially addressed by adding new requirements to state that ad hoc trainings, including trainings delivered by EASA, may be considered as recurrent training by the competent authority.
- Conduct of ramp inspections:
- 2 comments were received asking to provide more flexibility to ramp inspectors so that they may open themselves doors, hatches, and panels during inspections. The comment was partially accepted by stating that doors, hatches, and panels designed to be operated by passengers during normal operations may be operated by ramp inspectors during inspections. The limitation to operate the other doors by ramp inspectors has been kept as it is currently.
- Follow-up actions:
- 2 comments were received related to the use of the term ‘preventive actions’ in the context of ramp. One comment requested to remove references to preventive actions and the other comment to add additional reference to preventive actions. Preventive actions are defined as actions to eliminate the cause of a potential non-compliance or other undesirable potential situation. It is therefore not applicable to ramp as it is about potential non-compliances and not about identified non-compliances (i.e. ramp findings). Therefore, all references to preventive actions were removed from the new requirements.
- Proof of inspection (POI):
- 3 comments were received on the POI form. All the comments requested EASA to move the form to the ramp inspection manual to allow easier amendment of the form rather than to keep it at AMC level. These comments were accepted and the form removed from the AMCs to ARO.RAMP and introduced as an appendix to the ramp inspection manual.
- In addition, one commentator asked about compliance with Regulation (EU) No 2016/679 related to the processing of personal data, since the name and signature of the flight crew or operator representation may be entered on the POI. The comment was accepted and the template amended with a reference to the general data protection regulation (GDPR) and an information on how these data will be processed.
- Terminology:



One comment was received regarding the use of a non-defined new terminology at AMC level to designate the 'centralised database'. This new terminology was used to reflect that the IT tool used is no longer only a database due to all its functionalities. The comment was accepted and the terminology defined in a GM to Annex I (Part-DEF). The alignment of the terminology used at IR level will be performed in the frame of another rulemaking task.

## 2.5. What are the benefits and drawbacks

The proposed changes are considered non-controversial and, as explained above, are triggered by the need to remove some requirements that are considered to be too prescriptive, to provide more flexibility and to improve the existing AMC and GM. The proposed amendments are therefore not considered difficult to implement and do not impose any burden to the competent authorities, training organisations or pilots.

Therefore, EASA does not expect any drawbacks in the implementation of the above-mentioned AMC and GM.



### 3. How do we monitor and evaluate the rules

EASA will monitor and evaluate the new AMC and GM through its regular ramp standardisation activities. Through this evaluation, it will be assessed how well the adopted AMC and GM have been complied with.



## 4. References

### 4.1. Related regulations

- Commission Regulation (EU) No 965/2012 of 5 October 2012 laying down technical requirements and administrative procedures related to air operations pursuant to Regulation (EC) No 216/2008 of the European Parliament and of the Council (OJ L 296, 25.10.2012, p. 1)

### 4.2. Affected decisions

- Decision 2012/015/R of the Executive Director of the Agency of 24 October 2012 adopting Guidance Material to Annex I of Regulation (EU) No 965/2012 ‘Guidance Material to Annex I — Definitions’
- Decision 2014/025/R of the Executive Director of the Agency of 28 July 2014 adopting Acceptable Means of Compliance and Guidance Material to Part-ARO of Regulation (EU) No 965/2012 and repealing Decision 2014/014/R of the Executive Director of the Agency of 24 April 2014 ‘AMC and GM to Part-ARO — Issue 3’

### 4.3. Other reference documents

- Inspection instructions on the categorisation of ramp inspection (SAFA/SACA) findings — Issue 2

