European Union Aviation Safety Agency

FAQ n.19143

FAQs:

ORO.GEN, Part-ORO, Air Operations, Regulations

Question:

Regarding ORO.GEN.200, could a commercial operator of complex motor powered aircraft, such as the Cessna Citation Bravo that operates within Europe and with no SPAs, be considered non-complex?

Answer:

Reference: Regulation (EU) No 965/2012 on Air Operations, Annex III (Part ORO)

As defined in AMC1 ORO.GEN.200(b) the criterion in terms of full-time equivalents (FTEs) is the first one to be checked. This relates not only to the required organisational capability to implement and maintain a management system in line with Part ORO, but also to the fact that the larger the organisation gets, the more complex its procedures, communication and feedback channels will be, hence the need for robust processes related to hazard identification, safety risk management, performance measurement etc. For an organisation up to 20 FTEs, it is important to assess the 'risk profile' of the organisation in relation to the way it operates and this may justify the need for robust management processes for safety. The AMC defines the most relevant ones. The extent of contracting, the number, complexity and diversity of aircraft operated and type of operations (CAT, commercial, local, standard routes, hostile environment etc.) are all to be considered. It is important to note that the complexity criteria are included in an AMC to Part ORO and this makes a strong point as to the responsibility of the operator to make the assessment and justify the option chosen (complex or non-complex management system) to the satisfaction of the competent authority. If the option is to implement the provisions applicable to complex organisations, having details of management system implementation included in the form of AMCs to ORO.GEN.200, the operator may apply for an alternative means of compliance should it consider any of the elements of these AMCs inadequate for its specific type of organisation and operations.

Last updated:

14/02/2014

Link:

https://www.easa.europa.eu/en/faq/19143