

FAQ n.20080**FAQs:**

[Part-NCC/NCO](#), [Air Operations](#), [Regulations](#)

Question:

How can an NCC operator establish if its organisation is complex or non-complex?

Answer:

[AMC1 ORO.GEN.200\(b\) 'Management system. Size, nature and complexity of the activity'](#) provides criteria to determine if an operator belongs to the group of complex organisations or the one of non-complex organisations. These criteria are based on the assessment of the size, nature and complexity of the operator's activity.

The idea behind this AMC is to provide some basic criteria for an organisation (an operator) to establish which AMCs on management system they should follow — the more 'comprehensive' ones for complex organisations, or those including some specific 'alleviations' for the non-complex ones.

It is important to note that the assessment of organisational complexity is not only a function of size, but it also needs to consider the specific activities, the operating environment, the scope, the variety of different aircraft types operated, the contracted activities, etc. Therefore, the AMC includes some specific risk criteria.

The fact that this AMC is included in Part-ORO indicates that it is the operator's responsibility to determine the right 'layout' of their management system. The competent authority will need to validate this determination during the oversight activities, and it may challenge the operator on the option retained (complex or non-complex).

At the same time, AMC1 ORO.GEN.200(b) does not include any overly detailed complexity criteria. This is because it is impossible to address all cases and, more importantly, it is not the intent that the AMC be used as a substitute for the operator's own risk assessment.

The main 'alleviations' for a non-complex operator are the following:

- The operator may use simple procedures and tools for its safety risk management process (e.g. checklists), and safety performance monitoring and measurement (no need to perform extensive safety studies, surveys, etc.).
- The accountable manager or a person with an operational role in the organisation may

fulfil the role of safety manager.

- The organisation does not need to have a safety review board.
- The accountable manager may also be the compliance-monitoring manager if he or she has demonstrated to have the required competence and that the independence of the internal audits is maintained.
- Simple checklists may be used to document compliance monitoring audits and inspections.

Before the operator decides which AMCs to follow, it should demonstrate proper understanding of the risks entailed by its activities. Upon initial implementation of the EASA management system framework, the organisation will normally start describing and analysing its activity and processes, to determine not only how best to implement the management system framework, but also where to focus the risk management efforts. Not investing in this step will lead to inefficient/costly management system implementation and require subsequent rework.

Such system description and related analysis will be an effective means for identifying hazards proactively. It will also create a baseline for the management of changes and will allow identifying safety performance requirements for safety relevant processes, as well as related performance indicators and controls in order to manage the defined performance goals.

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