



Comment-Response Document 2013-13

SACA & SAFA

CRD TO NPA 2013-13 — RMT.0435 (OPS.087(B)) & RMT.0441 (OPS.087(C))— 28.07.2014
Related Decision 2014/025/R

EXECUTIVE SUMMARY

This Comment-Response Document (CRD) contains AMC (Acceptable Means of Compliance) and GM (Guidance Material) to Part-ARO.RAMP dealing with ramp inspection of community operators and third country operators. The RAMP inspection programme is part of Annex I (Part-ARO) of Commission Regulation (EU) 965/2012¹ (Air OPS). The AMC/GM clarifies the conditions for the approval and continuous validity of ramp inspection training organisations, and includes additional guidance and instructions to inspectors on how to perform ramp inspections.

This CRD contains the comments received to NPA 2013-13 (published on 22.07.2013) and provides a summary of comments and responses in Chapter 2. Based on the comments received the Agency developed Decision 2014/025/R containing the final text of the AMC/GM.

The AMC/GM addresses the continuous need for a harmonised and standardised execution of ramp inspections of EU and third country operators.

It affects EASA, the National Aviation Authorities (NAAs) of EU Member States plus Norway, Iceland, Liechtenstein and Switzerland, as well as SAFA (Safety Assessment of Foreign Aircraft) participating countries. In addition, all operators flying to airports of participating countries are also affected, since they can be subject to inspections.

¹ 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). Regulation as last amended by Commission (EU) No 379/2014 of 24.04.2014, p. 1).

Applicability		Process map	
Affected regulations and decisions:	AMC/GM Part-ARO Acceptable Means of Compliance/ Guidance Material to Authority Requirements for Air Operations	Concept Paper:	No
		Rulemaking group:	No
		RIA type:	Light
Affected stakeholders:	Competent Authorities	Technical consultation during NPA drafting:	No
		Publication date of the NPA:	2013/Q2
		Duration of NPA consultation:	3 months
Driver/origin:	SAFA Directive 2004/36/EC will be repealed with entry into force of Regulation 965/2012	Review group:	No
		Focussed consultation:	No
Reference:	Directive 2004/34/EC	Publication date of the Decision:	In paralel with this CRD

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1 Procedural information

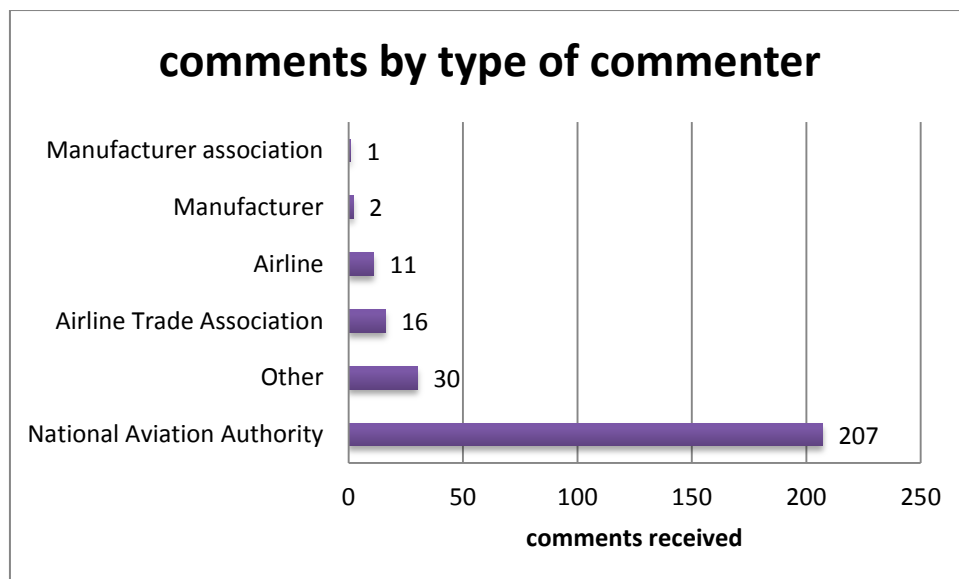
1.1 The rule development procedure

The purpose of this CRD is to consider the adoption of Acceptable Means of Compliance (AMC) and Guidance Material (GM) on ramp inspections, as well as AMC and GM on the approval of training organisations. The scope of this rulemaking activity is outlined in Terms of Reference (ToR) OPS.087(b) (RMT.0435) and OPS.087(c) (RMT.0441) and is described in more detail below.

The European Aviation Safety Agency (hereinafter referred to as the 'Agency') developed this CRD in line with Regulation (EC) No 216/2008² (hereinafter referred to as the 'Basic Regulation') and the Rulemaking Procedure³.

This rulemaking activity is included in the Agency's [4-year Rulemaking Programme](#). The scope and timescale of the task were defined in the related Terms of Reference (see the process map on the title page).

The draft AMC/GM has been developed by the Agency. All interested parties were consulted through NPA 2013-13⁴, which was published on 22 July 2013. The NPA received 267 comments from interested parties. Below is an overview on the type of commenters that contributed with their comments to this CRD.



² Regulation (EC) No 216/2008 of the European Parliament and the Council of 20 February 2008 on common rules in the field of civil aviation and establishing a European Aviation Safety Agency, and repealing Council Directive 91/670/EEC, Regulation (EC) No 1592/2002 and Directive 2004/36/EC (OJ L 79, 19.3.2008, p. 1), as last amended by Commission Regulation (EU) No 6/2013 of 8 January 2013 (OJ L 4, 9.1.2013, p. 34).

³ The Agency is bound to follow a structured rulemaking process as required by Article 52(1) of the Basic Regulation. Such process has been adopted by the Agency's Management Board and is referred to as the 'Rulemaking Procedure'. See Management Board Decision concerning the procedure to be applied by the Agency for the issuing of Opinions, Certification Specifications and Guidance Material (Rulemaking Procedure), EASA MB Decision No 01-2012 of 13 March 2012.

⁴ <http://easa.europa.eu/document-library/notices-of-proposed-amendments/npa-2013-03>.

1.2 The structure of this CRD and related documents

This CRD provides a summary of comments and responses as well as the full set of individual comments received to NPA 2013-13. The resulting rule text is provided in Chapter 3 of this CRD.

1.3 The next steps in the procedure

The ED Decision, containing CS, AMC and GM, will be published by the Agency together with this CRD.

2 Summary of comments and responses

2.1 AMC/GM : key topics raised by commenters and Agency response

2.1.1 General items

Regarding the flow chart on the categorisation of findings (ARO.RAMP.130), commenters highlighted that the flow-chart was outdated. Regarding legal writing commenters stated that the AMC wording should be changed to contain 'shall' instead of 'should'.

- *The Agency agrees with the comments on the wrong flowchart used and has included an updated flow chart.*
- *Regarding the legal writing style, the Agency's response is that the NPA's legal writing style follows the legal writing style of all AMC/GM material developed by the Agency. Therefore the Agency maintains the legal writing style of using 'shall' in Implementing Rules and 'should' in AMC/GM.*

2.1.2 How to deal with whistle-blower information

One Member State commented that the reference to whistleblower information is not suitable for AMC1 ARO.RAMP.100(b).

- *The Agency agrees. The text has been moved under AMC1 ARO.RAMP.110 on Collection of information.*

2.1.3 Tailored inspection checklists with detailed PDFs per aircraft type

Commenters stated that new demand for tailored technical publications is especially difficult for certain general and business aviation OEMs (Original Equipment Manufacturers) to create the documents as well as the long-term requirement to maintain the document for the life of the model. OEM representative organisations requested that the Agency includes additional language where the Agency creates tailored inspection checklists appropriate to the airplane category and operations. The commenters also stated that technical manufacturer's publications are not suitable for RAMP inspections.

- *The Agency responds that it is not the intent of the NPA to request OEMs to alter their technical publications. Regarding the checklists, experience so far shows that they are not operations specific and that they can be used having the "proper knowledge" both in CAT and GA environment.*

2.1.4 Leave more flexibility to NAAs to manage SAFA/SACA Programme

Some commenters stated that there should be less micro-management of NAA procedures. Those commenters stated that e.g. in AMC2 ARO.RAMP.100c). The use of the moderator function/workflow function should be optional for the authorities. Alternative quality control system should be also acceptable, as it has been until now and as it is not necessarily adapted to functional processes applied in some Member States. In addition, those commenters opposed a mandatory requirement that competent authorities should build a knowledge file on operators as the new database enables each individual user to do an evaluation and re-assessment of any detected non-compliance at any point of time. All commenters agreed that authorities should use the SAFA/SACA database.

Finally the promotion of the EU RAMP inspection programme by means of annual reports of publications was not seen as providing any added value as EASA already issues an annual report and as confidentiality requirements apply as well

- *The Agency agrees with all comments received and has amended the AMC2 ARO.RAMP.100(c). NAAs are no longer required to publish a report and the moderator function is recommended, where practicable.*

2.1.5 Calculation of the quota

One NAA commented that the proposed AMC1 ARO.RAMP.100(c) defines a weighting system of inspections, to achieve the quota of points established for the Member State. This weighting system takes assumptions, far from obvious, that are not indicated in Annex II (Part-ARO) nor the NPA. For example, the AMC to ARO.RAMP.100(c)(1)(b) (1) and (2) use the term "new operator". It should be indicated, as agreed during the European SAFA Steering Group (ESSG-11), that a "new operator" is to be interpreted as an operator who has not been inspected by the state during the past 12 months.

- *The Agency agrees with this comment and has amended the text in AMC1 ARO.RAMP.100(c)(1) accordingly, which now states that inspections should be valued differently in accordance with prioritised ramp inspections and the first inspection of a new operator,, i.e. who has not been inspected by the state during the past 12 months.*

2.1.6 Annual RAMP inspection programme

One NAA commented that the long-term planning should only make reference to scheduled aircraft, so as to avoid the assumption that there are, in all cases, aircraft on regular schedule which are suspected of not being compliant with applicable requirements.

- *The Agency notes the comment. The Agency has redrafted the text of AMC3 ARO.RAMP.100(c) to focus the long-term planning on those flights for which a regular flight schedule is known.*

One NAA also commented the operators entering the EU airspace for the first time should be prioritised.

- *The Agency agrees with the comment, but since this is already stated in the Implementing Rule of ARO.RAMP.105(b)(5) there is no need to re-mention rule text in an AMC.*

In addition, several Member State stated that the competent authority should not be required to build a knowledge file on the operator, as this seems obsolete since the same activity is performed through the "Inspection preparation" module in the SAFA Database.

- *The Agency agrees with the comment that the knowledge file can be performed via the Inspection Preparation module of the Database instead of building an operator knowledge file and the text in AMC3 ARO.RAMP.100(c) has been redrafted accordingly.*

One Member State commented on AMC3 ARO.RAMP.100(c) stating that information about prioritised aircraft is also available directly from the list issued by EASA, and the preferred means of access to RAMP information, e.g. by preferring the database is not relevant.

- *The Agency disagrees, since the list is sent by e-mail by EASA to Member States can quickly become outdated and it could also happen that the addressee does not know anymore which list is current, whereas the Database is always up to date and provides reliable information.*

One Member State commented that the AMC3 ARO.RAMP.100(c) should also refer to non-EU participating states of the SAFA Programme.

- *The Agency disagrees with this comment, because EU rules and relevant AMC/GM are drafted for Member States and are then applicable to participating States due to the relevant working arrangements.*

One Member State stated that the part of AMC3 ARO.RAMP.100(c) related to developing an annual programme for spot checks, should be amended to include operators entering the state for the first time, who should then be prioritised for ramp inspections.

- *The Agency disagrees, since checking operators entering the Member State for the first time is not a principle applicable to "Spot-Check" inspections. It is part of the normal short-term planning. In addition, such principle is already spelled out in the Implementing rule (ARO.RAMP.105 (b)(5)).*

2.1.7 Qualification of ramp inspectors

One Member State asked whether the proposed changes in AMC4 ARO.RAMP.115(b)(2), which includes the checklist for on-the-job training of inspectors, would lead to a requirement that inspectors would have to be retrained. The Member State wondered whether inspector's previous training can be grandfathered, since retraining inspectors already performing the tasks will impact delivery of the SAFA programmes and increase costs to NAAs that have already put their inspectors through rigorous training programmes.

- *The Agency confirms that existing SAFA inspectors will not have to be retrained. For SAFA inspectors involved also in the oversight of their national carriers (Community Carriers) a retraining is not necessary since the main scope of the training is to familiarise the inspectors with the specificity of the ramp inspection programme, applicable specific procedures and not the transfer of technical (operational, airworthiness, etc.) knowledge which they should already have. Therefore they can be grandfathered. For inspectors not involved in the oversight of national carriers it should be the responsibility of the competent authorities of the Member States to determine if they possess the required technical knowledge (EU applicable standards) and if necessary to provide them with a difference training.*

Several Member States also commented to improve the checklist items for on-the-job-training of future RAMP inspectors that are contained in AMC4 ARO.RAMP.115(b)(2). They made concrete proposals on items to be included.

- *The Agency agrees and has revised the checklist items for on-the-job-training of RAMP inspectors.*

One Member State asked about the meaning of the word 'Rukowodstwo' as mentioned in the training item under 'Differences regarding manuals of aircraft of ex-Soviet design (e.g. Rukowodstwo).

- *The Agency has amended this item to explain more clearly that the example of Rukowodstwo refers aircraft manual of ex-Soviet design on former CIS (Commonwealth of Independent States) built aircraft.*

2.1.8 Approval of training organisations by the competent authority

Under AMCs accompanying ARO.RAMP.120(a) on the approval of training organisations, commenters stated the AMCs referring to the approval of training organisations are not clear enough. In particular how the competent authority should notify the approval to the organisation. Normally an approved organisation is issued a certificate against a regulation, e.g. Part 147, Part 145 etc.

- *The approval certificate can be issued under the provisions of ARO.RAMP. 120 (a). As regards the notification of the involved organisation, this can be done, e.g. by registered mail.*

Another Member State preferred a limitation for the training organisation's approval of 2-3 years instead of the proposed unlimited approval.

- *The Agency disagrees, since the approval should be issued for an unlimited duration, similar to the AOC of the operator, which is also unlimited. The approval is valid as long as the conditions under which the approval has been granted are fulfilled.*

Regarding training procedures, one Member State commented that small training organisations cannot have a quality system and that this requirement in the proposed AMC4 ARO.RAMP.120(a) of the NPA is too ambitious.

- *The Agency disagrees, since a small training organisation can have a small quality system that is tailored to its size and business. A similar approach has been applied to air operators, who depending on the size should have a management system in place. The Decision now includes a new AMC1 ARO.RAMP.120(a), which foresees a compliance monitoring system, that ensures compliance with the training organisation's own procedures on adequate control of the training development, preparation, delivery process and records keeping, as well as compliance with the legal requirements. Such a system should also evaluate the effectiveness of the training provided, based upon written feedbacks collected from course participants after each training delivery.*

Regarding the detailed requirements for instructors that are mentioned in the NPA's AMC5 ARO.RAMP.120(a), one operator stated that this section suggests that a current trainer who has not conducted an inspection in over 30 months would be training ramp inspectors and requested that this is amended to a minimum recency of inspections of 3 inspections in the previous 6 months, for the trainers own currency. The operator stated that operators' biggest complaint is delays due to documenting the inspection to give copy to inspected crews.

- *The Agency agrees and has included this provision in a newly drafted AMC1 ARO.RAMP.120(a)(4). The AMC now reads that instructors delivering training on inspection items and/or delivering practical training should have conducted at least 72 inspections in the previous 3 years as qualified ramp inspectors before being nominated as instructors; have conducted at least 12 inspections as qualified ramp inspectors in the previous 12 months prior to the date of the training delivery; deliver training only on those inspection items which they are entitled to inspect; and continue to be qualified ramp inspectors during the training provided.*

Another Member State, requested to allow instructors to be non-active inspectors. Those instructors would have to demonstrate a minimum number of inspections as observers in teams of the competent authority for the approval of the training organisation.

- *The Agency disagrees. Instructors for practical training and for theoretical training on inspection items can be only those who are current inspectors.*

Regarding recurrent training of all instructors, who should attend a recurrent training workshop every three years or at the request of the Agency, commenters asked who will be able to organise these recurrent training workshops and that there is a need to clarify if the workshop will be organised by the Agency or by the SAFA Training Organisation itself or alternatively by National Authorities.

- *The Agency replies that the workshop should be organised by the Agency as the most appropriate organisation to update instructors on the EU ramp inspection programme(s) and to provide information on the outcome of the standardisation inspections related to training. This has been clarified in a newly drafted AMC1 ARO.RAMP.120(a)(3).*

Regarding the approval of the training organisation, one Member State asked why the AMC does not foresee that the Agency itself approves the Training organisation.

- *The Agency is not the competent authority for training organisations. The Agency can only indicate in a report to the Member State's competent authority that the training organisation meets the applicable requirements, but the final approval can only be issued by the competent authority. Therefore AMC1 ARO.RAMP.120(b) is entitled verification of the training organisation's compliance and continuous compliance by the Agency.*

2.1.9 Conduct of RAMP inspections

The AMC/GM regarding conduct of RAMP inspections defined in ARO.RAMP.125 attracted many comments. All comments regarding clearer wording have been accepted. Commenters stated that inspections performed by solo inspectors should be limited to exceptional cases, such as last minute unavailability of a team member, very short time to prepare a spot inspection, etc. In addition, Member States should provide inspectors with the respective credentials in order to ensure an unrestricted and unimpeded access.

- *The Agency agrees and has amended GM1 ARO.RAMP.125(a) accordingly. The new text states that Member States should provide inspectors with the respective credentials in order to ensure an unrestricted and unimpeded access and that as a general rule, performance of ramp inspections should be performed preferably by at least two inspectors. Inspections performed by solo inspectors should be limited to exceptional cases, such as last minute unavailability of a team member, very short time to prepare a spot inspection, etc.*

One Member State also suggested expanding the list of equipment that authorities should provide to inspectors to include mobile phones.

- *The Agency agrees and has amended GM1 ARO.RAMP.125(a) accordingly.*

While the AMC reads that an inspection after landing should not jeopardise the total resting time of the flight crew, one Member State proposed to delete this, because it could be misused as an excuse to avoid a RAMP inspection.

- *The Agency disagrees, since FTL is an important element for the safety of the operation.*

One organisation proposed that the inspector should seek authorisation from the commander of the aeroplane before entering the aircraft for inspection in GM1 ARO.RAMP.125(a).

- *The Agency disagrees, since performing ramp inspections is among the obligations of a competent authority to discharge its responsibilities under its oversight programme. In addition, AMC1 ARO.RAMP.125(b) point (c) already ensures that inspectors should identify themselves to the pilot-in-command/commander of the aircraft.*

Another organisation proposed to include that inspections should not interfere in as much as possible with the normal boarding/de-boarding procedures. One organisation stated

that no information leaflets should be handed to passengers by the inspectors. This undermines the authority of the crew and inspectors should not assume the authority of the cabin crew on the issues identified in that guidance; instead, the inspector should inform a uniformed flight crew member to correct any issue involving passengers or boarding processes and the inspector should ensure that crews are not distracted during the flight preparation phase to avoid safety risk.

- *The Agency partly agrees and has amended GM1 ARO.RAMP.125(a) accordingly.*

One Member State commented that the stowing of cabin baggage before departure is considered unreasonable as the cabin crew of most airlines check everything is stowed correctly following departure, after the safety briefing, while the aircraft is taxiing to the runway.

- *The Agency has not amended the GM1 ARO.RAMP.125(a), since this Guidance Material is just referring to the possibility to check something, and is not mandatory. In addition, ramp inspections can also stop just before closing doors/take-off.*

One Member State commented that the number of inspection items should be extended to also cover verification of passenger tickets, boarding passes on suspected illegal commercial flights to prevent illegal commercial air transport

- *The Agency has amended the GM1 ARO.RAMP.125(a), to include the possibility for the inspector to attempt to establish the commercial nature of a flight which is suspected to be performed illegally by analysing information, e.g. from EUROCONTROL, on the operator's schedule. However, the Agency believes the inspector should avoid direct contact with the passengers and therefore verification of passenger tickets has not been included into the revision.*

The guidance to contact the station manager of the operator was questioned as this would create additional administrative burden and since the station manager mainly has a commercial role. In addition commenters stated that inspectors should not hand out information leaflets to passengers as to not undermine the authority of the crew.

- *The Agency agrees with the comments and has amended the GM accordingly.*

2.1.10 Avoiding unreasonable delay due to RAMP inspections

Operator organisations commented that the wording of GM1 ARO.RAMP.125(b) related to avoidance of unreasonable delay should be reworded.

- *The Agency agrees with the comments and has amended the GM accordingly, which now states that the inspector should carefully consider that flight and cabin crew distraction during the flight preparation phase is a significant safety hazard and should therefore be avoided as much as possible.*

Some commenters stated that the text of GM1 ARO.RAMP.125(b) relating to the scenario where the aircraft is delayed for safety reasons should be amended.

- *The Agency agrees and has clarified the Guidance Material.*

2.1.11 Proof of a RAMP inspection

The AMC1 ARO.RAMP.125(c) dealing with the process to issue the Proof of Inspection Form (POI) to the commander attracted comments from industry organisations, who requested that to ensure proper understanding by all parties involved, and to ensure consistency with the proposed legislation, the POI form used for the inspections include the following wording next to the PIC signature field: "This signature only confirms that

the POI has been received by the pilot in command/ operator representative, and that the aircraft has been inspected on the date and at the place indicated; it does in no way imply acceptance of the listed findings."

- *The Agency notes that the POI form is part of the implementing rules of Regulation 965/2012 and therefore cannot be changed with this Agency Decision. In addition the footnote of the POI already includes a similar wording.*

2.1.12 Categorisation of findings & applicable requirements

Next to the conduct of RAMP inspections the categorisation of findings in GM1 ARO.RAMP.130 relating to manufacturer standards received numerous comments. Commenters stated that Manufacturer standards (Aircraft Maintenance Manual (AMM), Structural Repair Manual (SRM), Configuration Deviation List (CDL), Wiring Diagram Manual (WDM), Standard Wiring Practices Manual (SWPM), etc.) are only limited available to SAFA/SACA participation States. This also depends on the aircrafts registered in the particular State, EASA as a TC Holder Authority for products certifies should gain access to relevant non customized master documents as available. In addition, commenters stated that sharing this relevant information would improve the standardisation and harmonisation of technical findings related to manufacturers' limitation definitions.

- *The comment is noted and understood, however applicable copyright requirements do not allow the Agency to disseminate proprietary information. In addition, not all (participating) states can have (legal) access to proposed documents. Furthermore, EASA is not TC holder for each and every aircraft type inspected, it is therefore impossible to expect that these documents are, nor can become, available for each State. Best practises should apply.*

One commenter stated that if, during an inspection, the inspector establishes that there are deviations from national standards, the GM merely advises that only deviations that have an impact on safety should be reported as findings. Operator organisations stated that this GM is too vague and subjective and that findings may be different from one inspector to another as they may have a different perception on the impact a finding can have of the safety of the flight.

- *The Agency has amended GM1 ARO.RAMP.130, which now reads that Member States should develop guidance for the use of their inspectors on the enforcement of national standards.*

2.1.13 Categorisation of Findings & Assessment of Non-compliances

One Member States commented that the GM2 ARO.RAMP.130 on assessment of non-compliances can be understood as 'standardisation through the back door'. The Member State expects that such non-compliances have to be addressed as an Agency finding and should be used for further standardisation measures as part of EASA's yearly scheduled Standardisation Inspection programme.

Another Member State requested more clarification in respect to when life vests are required. When taking off or landing at an aerodrome where the take-off or approach path is so disposed over water that in the event of a mishap there would be a likelihood of a ditching requires further explanation and it would be helpful to prevent misinterpretation of applicable requirements.

- *The Agency notes the comment regarding the assessment of non-compliances. Regarding the comment on life-vests, the GM has been amended accordingly.*

2.1.14 Categorisation of findings & non-compliances with manufacturer standards

Manufacturer associations requested the Agency to include additional language where the Agency creates tailored inspection checklists appropriate to the airplane category and operations. In Air Operations Annex IV Part-CAT, Annex VI Part-NCC and Annex VII Part-NCO are examples of utilising such a methodology. While the tailored ramp inspection checklists would be different, they would have the commonality needed to gain EU-wide standardisation. Additionally, the organisation commented that this standardisation would support the Agency focus on forming detailed pre-described findings (PDFs) to facilitate standardisation and harmonisation of findings. Even considering the best intentions described in the NPA, pressures such as weather, schedules and passenger/customer expectations could easily create the demand for the OEM to provide new documents to support the inspection. This demand could also come from the Agency, in the form of additional rulemaking, intended to address the unintended consequences of using current technical publications.

Therefore, the organisation argued that the proposed GM3 ARO.RAMP.130 on non-compliances with manufacturer standards would create a significant near-term impact for certain general and business aviation OEMs to create the documents as well as the long-term requirement to maintain the document for the life of the model. Both the near-term and long-term impact would grow dramatically for the OEM in case of a national or international airline operator.

- *The Agency notes the comment and replies that it is not the intent of the Agency to request OEMs to alter their technical publications. Regarding the checklists, experience so far shows that they are not operations or aircraft type specific and that they can be used having the "proper knowledge" both in a CAT and GA environment.*

2.1.15 Categorisation of findings & detection, reporting and assessment of significant technical defects

One Member State asked for clarification regarding the wording used in GM5 ARO.RAMP.130 for missing fasteners and missing screws.

- *The Agency responds that the definition of aviation fasteners is: aerospace bolts, aerospace rivets & aerospace screws and nuts. Depending on the type used and its location, the impact on flight safety should be weighted. The Approved Maintenance Programme (AMP) should cater for a timely detection of such missing fasteners and it is not part of the pre-flight checklist to do a thorough inspection. Nonetheless, if found proper assessment related to AML should take place.*

One operator disagreed with the text of GM5 ARO.RAMP.130, which in the NPA stated that if such technical defects lead to an out of limits situation, a category 3 finding should be raised, since it seems that the AMP failed to ensure that the aircraft is in a dispatchable condition.

- *The Agency agrees and has changed the GM text, which now reads that manufacturer's data often contains limits on certain defects. This data is normally used during scheduled maintenance. It is generally accepted that, in between scheduled maintenance, defects might appear that are beyond those manufacturer's limit. Inspectors should therefore be reluctant in using such limits during ramp inspections. However, if the manufacturer has specified dispatch limits, and the defect is beyond the dispatch limit, a category 3 finding should be raised.*

One operator commented on GM6 ARO.RAMP.130 which originally stated that the inspector should inspect the aircraft condition after the operator has completed the pre-

flight inspection. The operator stated that most operators will accomplish a pre-flight inspection after service equipment has been removed to assure no damage in related areas. This section cautions on risk of delay due to this operating procedure. Therefore the operator asked to review this section to minimise the delay potential from inspection after removal of service equipment.

- *The Agency responds that the inspector should always perform its outside inspection as soon as possible after "on blocks", this is relevant for a quick check on the cargo compartment(s) condition and fuelling station information. The text of GM6 ARO.RAMP.130 has been changed accordingly, which now states that 'the inspector should delay the inspection of the aircraft until the operator has completed the pre-flight inspection, if time allows. However, the inspector should always start with a quick check on the cargo compartment(s) after arrival of the aircraft.*

One Member State also commented on the examples used to describe multiple findings related to the same system contained in point (7) of GM6 ARO.RAMP.130 stating that dents do not constitute one single system in the ATA taxonomy. Therefore, the first example considering dents on the LH wing and the #2 engine intake is not considered appropriate. Another Member State also commented on the examples stating that the example of missing fasteners is not logical since the primary structure is not visible during a ramp check.

- *With regards to dents, the Agency notes that dents as such are not covered, and that the Member State is correct in their ATA statement. However, for practical reasons the dent location can be 'paired' to the adjoining ATA chapter. With regards to the example of missing fasteners, the Agency notes that in general the primary structure is hidden under several layers. However, the engine pylon has multiple major fasteners contributing to structural strength, the wheel-well and undercarriage is similarly visible for structural fasteners. Therefore the Agency has removed the word primary and has revised the text as a whole.*

2.1.16 Categorisation of findings & assessment of findings on certificates and licences prior to categorisation

One Member State asked for clarification, whether in the case of missing certificates or licenses and if no copy can be provided, which would lead to a cat. 3 finding, the operation cannot be performed and that this could include the grounding of the aircraft, if the operator tries to depart.

- *The Agency clarifies that a missing licences does not justify a grounding of the aircraft, if a copy of the licence or certificate can be obtained before departure. The principle is clarified in GM6 ARO.RAMP.130.*

One operator organisation requested that with the implementation of the ICAO AOC Registry, there should be no need for National Aviation Authorities to check for AOC and OPS Spec validity on board the aircraft. If the State/Operator participates to the ICAO AOC Registry, it should not be subject to any further inspection in this respect. Other commenters stated that the AOC is an ICAO requirement and any finding should be a cat. 3 finding.

- *While the Agency agrees that with an up-to-date registry the AOC could be checked during the inspection preparation in the future. However, it remains to be seen when such registry will be established and how reliable and up-to-date such a registry would be. Therefore, since the presence on board of the AOC and OPSSPECS continues to be an ICAO requirement, this should be checked along with the content of the AOC and OPSSPECS.*

2.1.17 Categorisation of findings : Use of General remarks

One Member States suggested to include a new paragraph in GM8 ARO.RAMP.130 that follow -up corrective actions could be initiated also for General remark items. The Member State listed a number of examples, e.g. smoke goggles at the work station in the cockpit unserviceable or broken. An operators' trade association commented to include a clarification that the section reserved for general remarks (as well as category 1 findings) do not require any follow-up action, either from the inspecting authority or for the operator/relevant oversight authority.

- *The Agency believes that requiring follow-up actions on General remark items should not be foreseen and would require a level of scrutiny that exceeds the established process of a RAMP inspection. Therefore, the Agency improved the text, which now clearly states that general remarks (as well as category 1 findings) do not require any formal follow-up action, either from the inspecting authority or for the operator/relevant oversight authority.*

2.1.18 Follow up actions on findings : Follow up actions on category 2 or 3 findings

Commenters stated on AMC1 ARO.RAMP.135(a) that for CAT G and CAT 1 findings follow up explanation is missing and that it should be explicitly stated that there should not be any follow up. One operator organisation stated that it should not be required to respond to findings that are totally outside of the operator's control, such as, for example, the format of the pilots' licences or the format of the AOC.

- *The Agency has amended GM8 ARO.RAMP.130, which now states that, general remarks (as well as category 1 findings) do not require any formal follow-up action, either from the inspecting authority or for the operator/relevant oversight authority.*
- *The Agency has amended AMC1 ARO.RAMP.135(a), which now states in general no reply is expected when informing the State(s) of oversight. However, findings which indicate possible shortcomings at State level should be emphasised, e.g. when the medical certificate does not indicate the medical class or type / instrument rating validation / expiration date is not mentioned. For such findings which are beyond control of the operator, the State of oversight should be asked for corrective actions; when assessing the operator's corrective action (plan), it should be accepted that for such non-compliances the issue should be escalated to the oversight authority.*

One Member State proposed that the database be used as the primary communication channel with the operator. Another Member State stated that common practice has shown that if no focal point is nominated by an operator, the flight operation department or the management of an operator should be contacted prior the quality department might be involved. In addition, one operator asked to reduce the time after which the operator and the competent authority should be officially informed about the results of the inspection from 30 days to 10 days as this would be of more benefit to companies that proactively monitor the SAFA/SACA programme. Another Member State stated that experience has shown that 30 days for the operator to the reply to the inspection report could be a too short time for big operators to react with correct root cause analysis performed. Moreover the standard time to close a finding in the oversight of the operators is 90 days for level 2 findings. The Agency however would like to clarify that the 30 days deadline for operators to respond to the inspection report is for the response, for which such timeframe is appropriate, and not for the final rectification. In addition, experience shows that operators react promptly to findings via the Data base.

- *The Agency agrees and has amended AMC1 ARO.RAMP.135(a) accordingly.*

One operator organisation requested that EASA controls consistently that airlines receive answers from their comments of the findings, on time, by the national authority where the ramp inspection have been carried out and by the supervisory authority of the airline.

- *The Agency notes this comment. However, the AMC cannot be changed to incorporate this request, since ARO.RAMP has no such requirement. Nevertheless, the Agency is monitoring several performance indicators amongst which the response time of participating states. The results are presented to the States and are used during standardisation visits.*

2.1.19 Follow up actions on findings: Classes of category 3 findings

One Member State stated that in AMC1 ARO.RAMP.130(b) it should be noted that only in exceptional cases it might not be necessary to verify if the restrictions resulting from a Cat. 3 finding are followed or if corrective actions have been taken.

- *The Agency agrees and has amended AMC1 ARO.RAMP.130(b) accordingly.*

2.1.20 Reporting : important safety information

One Member State commented that most of the items quoted are mandatory reporting items under occurrence reporting schemes. Many other items could be quoted as well, but for most occurrences a follow-up under the occurrence reporting schemes is much more appropriate. A SAFA standard report is justified in cases where an occurrence raises questions about safety that can effectively be addressed during SAFA inspections.

- *The Agency notes the comment and has amended GM1 ARO.RAMP.145(b) on reporting.*

2.2 Pre-Described Findings (PDFs) SAFA (Safety Assessment of Foreign Aircraft): key topics raised by commenters and Agency response

2.2.1 General items

Some commenters stated that the references to ICAO standards of several Pre-Described Findings (PDFs) were not based on the latest regulatory publications. The Agency acknowledges this comment. This was due to the time elapsed between the review of the PDFs and the actual publication of the NPA. In addition, some Member States proposed to use other references in addition or in substitution to the ones included in the NPA. The references have therefore been updated whenever necessary or appropriate to better outline the regulatory framework.

One Member State proposed to remove from the Standard Texts all notes which are not relevant to the PDF. The Agency agrees and all non-relevant notes have been deleted, leaving in the Standard Text box the relevant text only.

Two commenters also proposed to have a common set of PDFs with differences between SAFA and SACA highlighted – this was noted by the Agency.

Whenever a comment to the SAFA PDFs or to the SACA PDFs has been considered relevant for the other group, the necessary changes have been consistently applied.

2.2.2 Inspection item A01

Some Member States proposed to move the inspecting instructions and PDFs concerning compliance with flight and duty times to item A20 'Flight Crew Licence/composition'. This was accepted by the Agency.

One Member State commented on the PDF "Equipment installations obviously not in compliance with Annex 8, Part IIIA/B, Chapter 4" which exists also for cabin (B) and cargo (C) items, highlighting that the categorisation is higher for this area of inspections whereas it should be the same in all three cases. The Agency does not agree since such type of non-compliance in the area of Flight deck items was considered to have a potential direct impact on safety.

2.2.3 Inspection item A04

One Member State proposed to upgrade the category of the PDF "No or incomplete parts of the Operations Manual pertaining to flight operations on board" to cat. 3, since this might represent the existence of systemic issues within the operator, and also to be consistent with findings with similar impact (e.g. "Operations Manual published in a language not understood by any of the flight crew members"). The Agency agrees and has changed the category accordingly.

2.2.4 Inspection item A07

One stakeholder commented that findings against the MEL (Minimum Equipment List) should not be raised since the MEL is approved by the competent NAA. The Agency noted this comment, however considered that guidance on the MEL is sufficiently detailed, and that in combination with inspectors training and training bulletins on the subject there is high attention on such matter.

2.2.5 Inspection item A10

One Member State positively commented the enhanced inspecting instructions on the opportunity to raising or not a finding in case there is no mention, in the Operations Specifications or in other official document, of the authorisation to carry dangerous goods.

Another Member State suggested to delete a note highlighting that EU Ops are less restrictive than ICAO on the carriage on board of a copy of the AOC (Air Operator Certificate), which is now outdated. The Agency agrees and deleted the note.

2.2.6 Inspection item A11

One stakeholder commented that checks for administrative compliance, with the exception of the Certificate of Airworthiness and the AOC, should be discontinued since they have no safety relevance. The Agency disagrees since such requirements still exist, and the associated finding category is appropriate for the impact on safety.

2.2.7 Inspection item A12

Three Member States formulated comments on the wording of the inspecting instructions or of some PDFs. The Agency agrees with such comments and has adapted the text accordingly.

2.2.8 Inspection item A13

One Member State has commented that the inspecting instructions and PDF should be revised to take into account that fuel checks are now mandated by ICAO: it is proposed to change a cat. G remark into a category 2 finding, as well as to add a reference from new requirements included in Annex 6 Part I Amendment 36. The Agency agrees and has modified the text accordingly.

Two Member States proposed to add a further PDF to take into account the situation when required fuel on board happens to be adequate by virtue of extra fuel upload (discretionary fuel), however fuel figures in the OFP (operational flight plan) for taxi, trip, contingency, destination, alternate(s), final reserve and additional fuel are less than required by ICAO standards. The Agency agrees and has included a relevant PDF.

2.2.9 Inspection item A18

One Member State has proposed to add inspecting instructions on how to deal with unserviceable smoke goggles, particularly as regards appropriate follow-up measures which might reveal necessary. The Agency agrees and has revised the instructions.

2.2.10 Inspection item A20

One Member State commented on the reference to ICAO Assembly resolutions on ELP (English Language Proficiency). However, in the meantime a further resolution has been adopted and the instructions have been amended accordingly.

Also, this item was amended so as to include the inspecting instructions and PDFs on crew composition and compliance with flight and duty times.

Following a comment from one Member State, the Agency agrees to modify the PDF on the lack of carriage of an appropriate FCL (Flight Crew Licence) to include the case of medical certificate not carried on board at the time of the inspection.

2.2.11 Inspection item B01

One Member State suggested adding a PDF on missing/unreadable markings and/or placards as foreseen for item C01. The Agency agrees and the PDF has been added.

One Member State commented that the standard reference from ICAO Annex 8 for two PDFs concerning equipment or objects not duly secured in the cabin is not appropriate, and proposed adding a further reference from Annex 6, Part I. The Agency agrees and has modified the text accordingly.

One stakeholder has proposed to modify the text of a PDF removing the reference to stowage in the toilets as 'inappropriate'. The Agency agrees and has modified the PDF.

2.2.12 Inspection item B02

One Member State proposed to align the category of the PDF 'Strap or buckle worn or damaged' for crew seats to the same PDF concerning passenger seats. The Agency does not agree since a different approach is needed.

2.2.13 Inspection item B06

Following a comment from a stakeholder, the PDF on extension belts has been reworded to 'No extension belts available on board when necessary', to take into account that the requirement is not their presence on board, but their availability whenever needed.

2.2.14 Inspection item B07

The Agency takes note of the comment from a stakeholder proposing to delete the PDF 'Number of passengers on board exceeds the maximum allowed in case of unserviceable emergency exit(s)', since MEL (Minimum Equipment List) limitations should be applied in such occurrence and in case of non-compliance the findings should be raised against the lack of enforcement. However, the Agency considers that it is appropriate to maintain the PDF since a similar situation deserves to be identified and reported under this inspection item.

2.2.15 General comment on C items

One stakeholder commented that items regarding the aircraft condition are too specialised and beyond the competence of flight crew members. The Agency disagrees and considers that a pilot should be trained and qualified to detect non-compliant conditions.

2.2.16 Inspection item C01

One Member State proposed to delete two PDFs since they would not enhance flight safety levels: for the PDF 'Aircraft very dirty affecting the ability to inspect it', the Agency agrees; however, the Agency does not agree with the proposal to remove the PDF 'Paint damage with exposed composite', particularly since composite materials are more and more used and expertise knowledge should be built in this area.

2.2.17 Inspection items C05 and C06

One Member State commented that the PDFs 'Significant signs of corrosion' affecting the undercarriage/skids/floats and the wheel well should have the same category. The Agency agrees and has lowered the category of the latter to category 2.

2.2.18 Inspection item C08

One stakeholder has commented that addressing the status of repairs is beyond the competency of pilots. The Agency partially agrees, since flight crew might not be aware of the status of temporary repairs, as these could be under the control of the maintenance organisation, and has modified the inspecting instructions accordingly. Also, the PDF 'No information about temporary repairs' has been deleted.

2.2.19 General comments on D items

One Member State has commented that the description of the inspection items implies that ICAO Technical Instructions need to be carried along during the inspections, seeing it as not practicable. The Agency does not agree, since such items are not expected to be checked on a routine basis, and since a qualified Dangerous Good inspector is needed.

2.3 PDFs SACA (Safety Assessment of Community Aircraft): key topics raised by commenters and Agency response

2.3.1 General items

Some commenters stated that the references to EU Regulations of several PDFs were not correct. The Agency takes notes of these comments. This was caused by the new SACA PDFs being created while the EU standards were still to be published. All references have been updated.

In addition, several commenters highlighted that the PDF code is missing for SACA PDFs. The Agency notes this comment, however the numbering will be applied only once all PDFs have been agreed upon.

One stakeholder observed that in some cases, reference is maintained also to ICAO Standards, whereas these should be mentioned only in case where there is no applicable relevant EU requirement. The Agency agrees and has removed all references which were not necessary and that can be a source of confusion.

2.3.2 Inspection item A01

Regarding the check for compliance with door area monitoring requirements, one Member State commented that it is up to the State of oversight to decide the requirements applicable to an operator, and if a State is exempting from the use of CCTV (closed-circuit television) systems this should be mutually recognised by the other Member States and no findings should be raised in this case. The Agency does not agree since the existing EU Implementing Rules must be applied by all Member States and ORO.SEC.100.A applies to all aircraft above a certain threshold and reads: *'means shall be provided for monitoring from either pilot's station the entire door area outside the flight crew compartment to identify persons requesting entry to the flight crew compartment and to detect suspicious behaviour or potential threat.'*

Some Member States proposed to move the inspecting instructions and PDFs concerning compliance with flight and duty times to item A20 'Flight Crew Licence/composition'. This was accepted by the Agency.

Two Member States commented that the standard reference used for the PDF 'Cockpit installations significantly decreasing pilots' vision' is not appropriate. The Agency agrees and has modified the reference.

2.3.3 Inspection item A02

Several Member States commented that the standard reference used for the PDF 'Access to emergency exit impeded' is not appropriate. The Agency agrees and has modified the reference.

2.3.4 Inspection item A03

One Member State commented that the inspecting instructions regarding TCAS/ACAS II system do not take into account that aeroplanes having an MCTOM (Maximum Certified Take-Off Mass) of 5700 Kg or less and/or a MOPSC (Maximum Operational Passenger Seating Configuration) of 19 or less, while can be subject of inspections, are not required to be equipped with an ACAS II installation. The agency agrees and has modified the text accordingly.

2.3.5 Inspection item A05

One Member State proposed to create a new PDF 'Checklists do not take into account latest relevant documentation from the aircraft manufacturer', with reference to Part-ORO. The Agency agrees and has added this new PDF.

2.3.6 Inspection items A07 and A08

Some Member States highlighted that, in the inspecting instructions, two notes, one on MEL (Minimum Equipment List) approval and one on carriage of the certificate of registration, are still present whereas they are not relevant in the context of EU requirements. The Agency agrees and has removed the notes.

2.3.7 Inspection item A10

One Member State proposed to raise a category 1 finding whenever the layout of the AOC and/or of the Operations Specification is not in accordance with EU rules – but the content is. The Agency disagrees due to the low safety significance, and decides to maintain that in such case no finding should be raised, but only a category G remark.

One Member State commented that a cat. 3 PDF 'No original nor copy of the AOC, and/or of the operations specifications on board or cannot be shown by the crew' should be added to reflect the SAFA PDFs list, however the Agency disagrees since in such case the existing PDF 'Commercial Air Transport operations without a valid AOC' should be used.

2.3.8 Inspection item A12

One stakeholder suggested dismissing, during ramp inspections, the check of compliance with requirements considered to be not safety related, such as the format of licences/certificates. The Agency disagrees since it considers that there is sufficient guidance so that the correct consideration is given to the verification of compliance with similar requirements, and that their categorisation is appropriate.

2.3.9 Inspection item A13

Some Member States commented that the note on meteorological information should be amended to reflect the EU requirements to have them on board. The Agency agrees and has aligned the note accordingly. In addition, the standard references of a number of PDFs have been amended following comments received.

2.3.10 Inspection item A14

One Member State has suggested that the inspecting instruction should be modified adding a reference to the requirement of the signature of the loading supervisor and the mass and balance sheet. The Agency agrees and the text has been changed accordingly.

2.3.11 Inspection item A16

Two Member States have advised to modify the note in the inspecting instructions in order to fully align it to EU requirements. The Agency agrees and it has included a reference to Part-CAT.

2.3.12 Inspection item A17

A Member State has commented that the wording of the PDF 'No or unserviceable safety harness for a flight crew seat other than the pilot seats (e.g. large crew configurations)' is

unclear and does not comprise flight navigator/radio operator seats, for which a category 3 finding should be raised. The Agency partially agrees and has modified the PDF text to 'No or unserviceable safety harness for a flight crew seat other than the seats for active crew (e.g. large crew configurations)'; there is no need to change the category since in combination with the next PDF all situations should be covered.

2.3.13 Inspection item A18

Following a proposal from some Member States, the note on quick donning masks has been removed since it is not relevant in the context of SACA.

2.3.14 Inspection item A20

This section has been amended to mirror, when relevant, the changes made to the SAFA corresponding section. Also, a number of comments have been taken into account to better reflect Part-FCL requirements.

2.3.15 Inspection item B01

Following a comment from a stakeholder, the Agency has agreed to complement the text of the PDF 'Obviously defective brakes of food/beverage cart(s)' with the sentence 'for new models of carts identified and manufactured after 4 November 2005', since the rule and its enforcement are restricted to such carts.

2.3.16 Inspection item B03

A number of comments from some Member States have prompted the Agency to modify the notes of the inspecting instructions, clarifying the different applicable requirements as regards emergency medical kit and first aid kit, also depending on the aeroplane operating the flight.

2.3.17 Inspection item B04

Following comments from two Member States, the Agency has agreed to delete the PDF 'HFE (hand-held fire extinguisher) not marked with the appropriate operating instructions' since this is not required by EU rules, and has amended the inspecting instructions accordingly.

2.3.18 Inspection items B07 and B12

One Member States has proposed to add a PDF addressing the situation when no cabin crew member has a serviceable independent portable light available/readily accessible. The Agency agrees and has created such category 3 PDF.

Three Member States have commented that the issue of emergency exits not marked with the appropriate operating instructions is addressed twice, under both referenced inspection items. The Agency agrees and has removed the corresponding PDF under item B12.

2.3.19 Inspection item C01

Similarly to the comments to the SAFA PDFs, one Member State proposed to delete two PDFs since they would not enhance flight safety levels: also for SACA PDFs, as regards the PDF 'Aircraft very dirty affecting the ability to inspect it', the Agency agrees; however, the Agency does not agree with the proposal to remove the PDF 'Paint damage with exposed composite', particularly since composite materials are more and more used and expertise knowledge should be built in this area.

2.3.20 Inspection item C08

Some Member States proposed to create a separate table of PDFs for propellers and rotors, separating them from fan blades. One Member State stated that the renumbering of inspection items due to the merging of C08 and C09 will entail re-printing the proof of inspection sheets. The Agency does not agree with the comments, since those items have been merged into a one single item by Regulation No 965/2012, also making the re-numbering necessary.

One stakeholder commented that, since this item foresees only PDFs with category 3, more clarification is needed, particularly to avoid the grounding of aircraft for less significant findings. The Agency takes notes of this comment, which is duly addressed in GM 5 and GM 6 ARO.RAMP.130.

2.3.21 General comments on D items

Some Member States have proposed a number of changes, including using dynamic references to the current ICAO Technical Instructions so as to avoid regular amendments, and a different categorisation of PDFs related to incorrect/incomplete information in NOTOC (Notification to Captain) when they concern or not CAO (Cargo aircraft only) packages. The Agency agrees or partially agrees with the comments formulated, and has modified the text whenever necessary.

3 Draft AMC/GM

Please refer to the document 'Change Information to ED Decision 2014/025/R - Part-ARO'.

4 PDFs SAFA/SACA on instructions on the categorisation of findings

The revised PDFs will not be attached to this CRD. They will be issued separately by the Agency.

5 Individual comments (and responses)

5.1 CRD table of comments, responses and resulting text

(General Comments)		-
comment	47	comment by: <i>Swiss International Airlines / Bruno Pfister</i>
	SWISS Intl Air Lines supports the proposed legislation as a move into the right direction for standardizing and optimizing the SAFA/SACA Inspection program without hampering day to day operations.	
response	Please see chapter 2 for a summary of comments and Agency responses	
comment	74	comment by: <i>UK CAA</i>
	<p>Page No: All Paragraph No: All General Comment: A common set of PDF's between SAFA and SACA would be helpful with significant differences highlighted. For example: SAFA states that an unserviceable flight deck flashlight is not a finding on a daylight flight however SACA states that serviceable flight deck flashlights are required on all flights. Justification: To provide clarity and ease of reference.</p>	
response	Please see chapter 2 for a summary of comments and Agency responses	
comment	82	comment by: <i>IATA</i>
	AEA/IATA welcome the proposed legislation and believes it is a right step towards greater standardization of the SAFA program. Some specific comments are provided to reinforce the need to avoid any undue delay to Airlines' flight operations and to ensure the the SAFA programme will move towards a more risk based approach, in accordance with the development, at a global and European level, of a performance and risk based oversight system.	
response	Please see chapter 2 for a summary of comments and Agency responses	
comment	166	comment by: <i>FNAM-French Aviation Industry Federation</i>
	<p>FNAM (Fédération Nationale de l'Aviation Marchande) is the French National Professional Union / Trade Association for Air Transport, grouping as full-members:</p> <ul style="list-style-type: none"> • CSTA: French Airlines Professional Union (incl. Air France) • SNEH: French Helicopters Operators Professional Union • CSAE: French Handling Operators Professional Union • GIPAG: French General Aviation Operators Professional Union • GPMA: French Ground Operations Operators Professional Union • EBAA France: French Business Airlines Professional Union <p>And as associated members:</p> <ul style="list-style-type: none"> • SAMERA: French Airport Material Handling & Catering Professional Union • UAF: French Airports Professional Union <p><u>Introduction</u> The NPA 2013-13 introduces many changes in comparison with:</p>	

- The Subpart ARO.RAMP of Annex II to Commission Regulation (EC) No 965/2012,
- The Guidance Material (GM) of Subpart ARO.RAMP of Annex II to Commission Regulation (EC) No 965/2012,
- The Acceptable Means of Compliance (AMC) of Subpart ARO.RAMP of Annex II to Commission Regulation (EC) No 965/2012.

The comments hereafter SHALL BE considered as an identification of some of the major issues the FNAM asks EASA to discuss with third-parties before any publication of the proposed regulation.

In consequence, the comments hereafter SHALL NOT BE considered:

- As a recognition of the third-parties consultation process carried out by the European Parliament and of the Council;
- As an acceptance or an acknowledgement of the proposed regulation, as a whole or of any part of it;
- As exhaustive: the fact that some articles (or any part of them) are not commented does not mean the FNAM has (or may have) no comments about them, neither the FNAM accepts or acknowledges them. All the following comments are thus limited to our understanding of the effectively published proposed regulation, not withstanding their consistency with any other pieces of regulation.

FNAM General Comments

The FNAM welcomes these proposed amendments focused on the execution of ramp inspections and the training organisation, which will ensure a harmonised way of performing ramp inspections through common standards, in accordance with Part-ARO.RAMP.

These changes can have an expectation of beneficial effect on safety level. The harmonisation of the Regulation will imply a strengthening of the harmonisation and the Level Playing Field within the European States.

As it will give a full scope to the Commission Regulation (EC) No 965/2012 regarding ramp inspections, it will allow this regulation to be considered as a reference for some other Third Party countries Ramp Inspection Programme.

The promotion of the EASA should be an objective through the development of it regulation.

Nevertheless, the FNAM considers that during the transition period of the Commission Regulation (EC) No 965/2012 which is actually in establishment, the EASA should leave a certain time period for the stakeholders in order to gain some stabilities. NPA should not be written until the Regulation is not entered into force.

response Please see chapter 2 for a summary of comments and Agency responses

comment 172 comment by: *Luftfahrt-Bundesamt*

Attachment [#1](#)

Enclosed please find the table including the LBA comments.

The last column appears at the end of the document, the headline is 'Additional comments'. Additional comments are in line 62 and 67.

It took quite a long time to put the comments together, therefore we kept the table as a whole, but mentioned the chapter number for each comment.

response Please see chapter 2 for a summary of comments and Agency responses

comment 224 comment by: *DGAC France*

Manufacturer's certification standards references

	<p>Parts C (SAFA) and D (SACA) of this NPA include a number of PDFs with references to manufacturer's certification standards (ICAO Annex 8 for SAFA and CS25 for SACA). These standards are applicable to the manufacturer but not to the operator. When applicable, the references accompanying these PDF should be the manufacturer's references (AMM, SRM...). However, from our experience with the previous PDFs in the Guidance Material that refer to a manufacturer standard (noted as "M" and devoid of standard's text), the ramp inspectors do not always note down the precise manufacturer reference (ex : "SRM 51-10-05"). Removing the standard's text from these PDFs with manufacturer certification standards references would thus result, for all the inspections where the ramp inspector couldn't note down the manufacturer reference (AMM/SRM), in having no reference at all accompanying the finding.</p> <p>Therefore it is advised to keep these Annex 8 / CS 25 references in the standard text of these PDFs, but to also add an instruction in the preamble indicating that for these PDFs that only carry manufacturer's certification standard references the ramp inspector should add, when applicable, the manufacturer's reference.</p>	
response	Please see chapter 2 for a summary of comments and Agency responses	
comment	225	comment by: DGAC France
	<p>Correspondence between SACA and SAFA PDFs</p> <p>Almost all SACA PDFs have an equivalent SAFA PDF in terms of requirement. For most of these SACA/SAFA PDF couples, only the regulatory reference changes, but not the requirement applicable to the operator. Sometimes the requirements differ slightly, but they always remain close and equivalent. Matching these couples of SAFA and SACA PDFs by attributing them the same PDF code (ex: A01-05) would largely facilitate the use of SACA and SAFA sets of PDF in day to day practice and for the post-treatment of inspections' results.</p>	
response	Please see chapter 2 for a summary of comments and Agency responses	
comment	226	comment by: DGAC France
	<p>References to more detailed equivalent requirements</p> <p>In the NPA, several SAFA and SACA PDFs refer to broad requirements from, respectively, ICAO Annex 2 (for SAFA) and EC 216/2008 (for SACA), when more detailed and precise equivalent requirements exist in, respectively, ICAO Annex 6 (for SAFA) and EC 965/2012 and EC 2042/2003 (for SACA).</p> <p>Many SACA PDFs in this NPA refer to ICAO requirements, although EC 965/2012 and EC 2042/2003 include equivalent and more precise requirements on the same matter.</p> <p>The attached files including comments on part-C and part-D identify the PDFs concerned and indicate the more detailed (and not longer) reference that should be used in order to avoid interpretation issues with the operators. Examples are PDFs related to flight planning and continuing airworthiness, cabin safety equipments, cabin crew and cargo bay.</p>	
response	Please see chapter 2 for a summary of comments and Agency responses	
comment	227	comment by: DGAC France

References to DOC 7030

DOC 7030 "Regional Supplementary Procedures" does not hold the same status as the Chicago Convention and the ICAO Annexes. It contains requirements stemming from European regulations. Unlike DOC 7030, these regulations are applicable to the operators. It is considered that each PDF that mentions a reference to DOC 7030 ("EUR") should also indicate the reference to the applicable European regulation.

For instance, EUR 3.2.1 "All aircraft operating above FL 195 in the European Region shall be equipped with 8.33 kHz channel spacing capable radio equipment" has a corresponding regulatory provision (Commission implementing regulation (EU) No 1079/2012).

response Please see chapter 2 for a summary of comments and Agency responses

comment 232

comment by: DGAC France

Layout improvements

- For both part-C and part-D, when a standard reference is applicable to several PDFs, it should only be mentioned once in order to avoid repetitive regulatory text.
- Following the example of part-C, the references in part-D should only indicate the code of the reference and not the whole textual name of the reference (ex : "CAT.IDE.A.100" instead of "CAT.IDE.A.100 Instruments and equipment – general").

These improvements should reduce the size of the documents used during inspections.

response Please see chapter 2 for a summary of comments and Agency responses

comment 246

comment by: GAMA

The General Aviation Manufacturers Association (GAMA) is an international trade association representing over 80 of the world's leading manufacturers of general aviation airplanes and rotorcraft, engines, avionics, components and related services. GAMA's members also operate repair stations, fixed based operations, pilot and maintenance training facilities and they manage fleets of aircraft.

GAMA appreciates the opportunity to provide feedback regarding EASA NPA 2013-13 Safety Assessment of Community Aircraft & Safety Assessment of Foreign Aircraft and offers the following feedback.

GENERAL COMMENTS

GAMA appreciates the Agency's efforts to clarify the conditions for the approval and continuous validity of ramp inspection training organizations, as well as to provide additional guidance and instructions to inspectors on how to perform ramp inspections. However, GAMA is concerned that the guidance could potentially lead to situations where the airplane technical publications, including flight manuals and instructions for continued airworthiness, would be inappropriately applied. Given that technical publications are intended to support safe airplane operations and maintenance, but still allow latitude for professional judgment, GAMA feels utilizing them as a primary standard for conducting ramp inspections is questionable. These conditions could easily result in a demand for

the airplane original equipment manufacturer (OEM) to develop new documents in order to support the owner/operator during a ramp inspection. This scenario can be readily drawn from the new guidance at GM3 ARO.RAMP.130 Categorisation of findings, NON-COMPLIANCES WITH MANUFACTURER STANDARDS. Paragraph (a) establishes that, "A finding against manufacturer standards should always be demonstrated in relation to aircraft technical documentation...and MEL references." Even considering the best intentions described in the NPA, pressures such as weather, schedules and passenger/customer expectations could easily create the demand for the OEM to provide new documents to support the inspection. This demand could also come from the Agency, in the form additional rulemaking, intended to address the unintended consequences of using current technical publications. This new requirement from owner/operators or the Agency would create a significant near-term impact for certain general and business aviation OEMs to create the documents as well as the long-term requirement to maintain the document for the life of the model. For a national or international airline operator, both the near-term and long-term impact grows dramatically for the OEM. Therefore, GAMA requests EASA includes additional language where the Agency creates tailored inspection checklists appropriate to the airplane category and operations. EU-OPS 1, and Air Operations Annex IV Part-CAT, Annex VI Part-NCC and Annex VII Part-NCO are examples of utilizing such a methodology. While the tailored ramp inspection checklists would be different, they would have the commonality needed to gain EU-wide standardization. Additionally, their standardization would support the Agency focus on forming detailed pre-described findings (PDFs) to facilitate standardization and harmonization of findings. GAMA appreciates your attention to these comments and would welcome the opportunity to answer any questions regarding our feedback.

response Please see chapter 2 for a summary of comments and Agency responses

comment 260 comment by: ENAC - CAA

It is highly recommendable to have a glossary, considering that there are many acronyms that either should be written in complete form or have an explanation in a glossary.

response Please see chapter 2 for a summary of comments and Agency responses

comment 279 comment by: Boeing

This comment concerns the tables on pages: 153, 156, 160, 345, 347, 351
Row/Inspection Item: C01, C03, C07

Throughout the NPA, fasteners or rivets loose or missing outside AMM/SRM limits are considered a Cat 3 finding.

REQUESTED CHANGE:
Change the finding category to "**Cat 2**" in all places. Provide more detail for Cat 3 consideration where airworthiness is suspected to be an issue.

JUSTIFICATION:

Missing or loose fasteners are not always airworthiness issues, even if they are not covered in the AMM/SRM. The OEM can analyze individual conditions and determine if airworthiness is affected.

response Please see chapter 2 for a summary of comments and Agency responses

Executive Summary

p. 2

comment

91

comment by: *Austro Control GmbH*

Nbr	Reference	NPA original text	ACG proposed text	reason for change
1	General	All	review complete NPA to make sure that the latest EASA SAFA GM V2 and SAFA Training Bulletin 2012-1 is reflected adequately. The standard used for SAFA and SACA inspection should meet the harmonized standardization of the SAFA program used prior 28.10.2014	NPA obviously not based on the latest EASA GM (V 2.0) and EASA SAFA TB (2012-12), therefore the NPA 2013-13 should be reworked from EASA SAFA Experts prior any further evaluation.

response Please see chapter 2 for a summary of comments and Agency responses

A. Explanatory Note – III. Overview of the changes proposed in this NPA

p. 6-7

comment

11

comment by: *ENAC - CAA*

The aim of simply transfer the existing guidance material into AMC/GM is understood. Nevertheless there is in the European system quite a big number of potential new findings that are not addressed in PDFs. That will probably cause a growth of UDFs in SACA that undermines the standardisation of the reporting, especially at the beginning of the new implementation. The industry will surely be concerned about this; don't you think that it will be worth to make the effort to draft a list of PDFs applicable only to SACA to limit this potential source of trouble?

response Please see chapter 2 for a summary of comments and Agency responses

B. DRAFT DECISION – AMC AND GM TO PART-ARO – SUBPART RAMP – AMC1 ARO.RAMP.100(b) General – SUSPECTED AIRCRAFT

p. 9

comment

48

comment by: *Swedish Transport Agency, Civil Aviation Department (Transportstyrelsen, Luftfartsavdelningen)*

Original:

	<p>(h) information received from whistleblowers (ground handling or maintenance personnel) regarding poor maintenance, obvious damage or defects, incorrect loading, etc.;</p> <p>Proposal SE:</p> <p>should be amended to include all types of whistleblowers:</p> <p>(h) information received from whistleblowers (such as but not limited to; ground handlers, maintenance personnel, etc.) regarding poor maintenance, obvious damage or defects, incorrect loading, etc.;</p>
response	Please see chapter 2 for a summary of comments and Agency responses

**B. DRAFT DECISION — AMC AND GM TO PART-ARO — SUBPART RAMP —
AMC2 ARO.RAMP.100(c) General — ANNUAL PROGRAMME**

p. 9-10

comment	2	comment by: <i>LBA</i>
	<p>(a) entering ramp inspection reports into the centralised database WITHOUT DELAY BUT LATEST within the timeframe defined in ARO.RAMP.145(a)</p> <p>The phrase "without delay" would be helpful to underline the necessity of a fast and effective data exchange</p>	
response	Please see chapter 2 for a summary of comments and Agency responses	

comment	2	comment by: <i>LBA</i>
	<p>p) Reporting to EASA, the Commission and the Member States, Contact with authorities and operators</p> <p>For the tasks of the NC the following items are missing (in reference to the former App. 7):</p>	
response	Please see chapter 2 for a summary of comments and Agency responses	

comment	2	comment by: <i>ENAC - CAA</i>
	AMC2 ARO.RAMP.100(c): At point (o) the reference to the standardisation regulation is obsolete	
response	Please see chapter 2 for a summary of comments and Agency responses	

comment	50	comment by: <i>Swedish Transport Agency, Civil Aviation Department (Transportstyrelsen, Luftfartsavdelningen)</i>
	<p>Original:</p> <p>(l) implementing a national ramp inspection quality control system by making use of the moderator function/workflow function which is available in the centralised database referred to in ARO.RAMP.150(b)(2);</p>	

The quality control system should be decided on a national level and not connected to the moderator function which should be a option only since the one size fits all approach does not fit all States and their national legislation.

proposal:

l) implementing a national ramp inspection quality control system by making use of the the centralised database referred to in ARO.RAMP.150(b)(2);

Original:

(o) proposing appropriate team members for ramp inspection standardisation visits in accordance

with Article 6.2 of Commission Regulation (EC) No 736/2006 628/2013 *is the new regulation*

response Please see chapter 2 for a summary of comments and Agency responses

comment 92 comment by: *Austro Control GmbH*

Reference	NPA original text	ACG proposed text	reason for change
AMC2 ARO.RAMP.100(c)	(b) prioritising ramp inspections in accordance with the criteria defined in ARO.RAMP.105;	(b) prioritising ramp inspections in accordance with ARO.RAMP.105;	ARO.RAMP.105 addresses task for agency

response Please see chapter 2 for a summary of comments and Agency responses

comment 93 comment by: *Austro Control GmbH*

Reference	NPA original text	ACG proposed text	reason for change
AMC2 ARO.RAMP.100(c)	(h) promoting the EU Ramp Inspection Programme within the Member State by means of annual reports or other publications;	delete item	additional administrative burden for the state

response Please see chapter 2 for a summary of comments and Agency responses

comment 217 comment by: *Direction de l'Aviation Civile Luxembourg*

Delete:

"(h) promoting the EU Ramp Inspection Programme within the Member State by means of annual reports or other publications;"

Justification:

response	There is no added value from national reports, as EASA is already issuing an annual report and as confidentiality requirements apply as well.	
	Please see chapter 2 for a summary of comments and Agency responses	
comment	218	comment by: <i>Direction de l'Aviation Civile Luxembourg</i>
	Delete: "(I) implementing a national ramp inspection quality control system by making use of the moderator function/workflow function which is available in the centralised database referred to in ARO.RAMP.150(b)(2);" Justification: Use of the moderator/workflow function should remain optional, as it is not necessarily adapted to functional processes applied in some Member states.	
response	Please see chapter 2 for a summary of comments and Agency responses	
comment	247	comment by: <i>AESA SNC</i>
	The use of the moderator function/workflow function should be optional for the authorities. Alternative quality control system should be also acceptable, as it has been until now.	
response	Please see chapter 2 for a summary of comments and Agency responses	

**B. DRAFT DECISION — AMC AND GM TO PART-ARO — SUBPART RAMP —
AMC3 ARO.RAMP.100(c) General — ANNUAL PROGRAMME**

p. 10-11

comment	12	comment by: <i>ENAC - CAA</i>
	Paragraph (b) seems obsolete: the same activity is performed through the "Inspection preparation" module in the SAFA DB	
response	Please see chapter 2 for a summary of comments and Agency responses	
comment	51	comment by: <i>Federal Office of Civil Aviation FOCA</i>
	„Competent authorities should build a knowledge file on operators” FOCA suggests to delete this particular sentence as the new database enables each individual user to do an evaluation and re-assessment of any detected non-compliance at any point of time.	
response	Please see chapter 2 for a summary of comments and Agency responses	

comment	2	comment by: <i>LBA</i>
	(b) By using the information sources and the information specified in AMC1 ARO.RAMP.100(b) and AMC1 ARO.RAMP.110, THE AGENCY should build a knowledge file on operators, in order to enable inspectors to verify the rectification of previously found non-compliance and t	

	<p>o select the items to be inspected if the time available does not permit full inspection.</p> <p>It is not the task of the national authorities to build up a knowledge file. In our opinion all data inserted into the SAFA Database are the basis for this file. So the NAA enters the data and the EASA is building up and managing the knowledge</p>
response	Please see chapter 2 for a summary of comments and Agency responses

comment

61

comment by: *Swedish Transport Agency, Civil Aviation Department (Transportstyrelsen, Luftfartsavdelningen)*

Proposal:

Another "bullet" should be added to promote inspections of operators entering the state for the first time (either via spot or planned)

(iii) Operators entering the state for the first time should be considered/prioritized for ramp inspections.

Proposal:

The database should be the main source for the competent authority and knowledge file's should only be optional in all phases of SAFA/SACA to minimize the administrative burdens of the inspecting state

(b) By using the information sources and the information specified in AMC1 ARO.RAMP.100(b) and

AMC1 ARO.RAMP.110, competent authorities **should use the database and knowledge files *if established*** on operators, in order to enable inspectors to verify the rectification of previously found noncompliance and to select the items to be inspected if the time available does not permit full inspection.

response

Please see chapter 2 for a summary of comments and Agency responses

comment

94

comment by: *Austro Control GmbH*

Reference	NPA original text	ACG proposed text	reason for change
AMC3 ARO.RAMP.100 (c)	(b) By using the information sources and the information specified in AMC1 ARO.RAMP.100(b) and AMC1 ARO.RAMP.110, competent authorities should build a knowledge file on operators, in order to enable inspectors to verify the rectification of previously found noncompliance	(b) By using the information sources and the information specified in AMC1 ARO.RAMP.100(b) and AMC1 ARO.RAMP.110, competent authorities should use the SAFA/SACA Database or built their own knowledge file on operators, in order to enable inspectors to verify the rectification of previously found	additional administrative burden for the state to build an additional separate knowledge file, SAFA Database is available for any SAFA inspector to be used as knowledge file

		and to select the items to be inspected if the time available does not permit full inspection.	noncompliance and to select the items to be inspected if the time available does not permit full inspection.	
response	Please see chapter 2 for a summary of comments and Agency responses			
comment	219	comment by: <i>Direction de l'Aviation Civile Luxembourg</i> Change text to: "(a) The annual programme for the performance of ramp inspections should make use of the centralised database, from where information about prioritised aircraft can be retrieved . The annual programme should include:" Justification: Information about prioritised aircraft is also available directly from the list issued by EASA, and the means of access to this information is not relevant.		
response	Please see chapter 2 for a summary of comments and Agency responses			
comment	220	comment by: <i>Direction de l'Aviation Civile Luxembourg</i> Change text to: "(1) A longterm planning of inspections of those scheduled aircraft, if any , suspected of not being compliant with applicable requirements, since their schedule is known to the competent authority. Information leading to a suspicion could originate from the elements described in AMC1 ARO.RAMP.100(b)." Justification: The original text assumes that there are, in all cases, aircraft on regular schedule which are suspected of not being compliant with applicable requirements. This assumption may prove wrong for some smaller participating states.		
response	Please see chapter 2 for a summary of comments and Agency responses			
comment	221	comment by: <i>Direction de l'Aviation Civile Luxembourg</i> Change text to: "(b) By using the information sources and the information specified in AMC1 ARO.RAMP.100(b) and AMC1 ARO.RAMP.110, competent authorities should build a use the SAFA/SACA Database or build their own knowledge file on operators, in order to enable inspectors to verify the rectification of previously found noncompliance and to select the items to be inspected if the time available does not permit full inspection." Justification: The SAFA Database is available for any SAFA inspector to be used as knowledge file. It has a far wider sampling base than that of any national authority. So it is likely to contain good information whereas a national file, especially in smaller states, is necessarily far more limited despite any efforts to maintain it.		
response	Please see chapter 2 for a summary of comments and Agency responses			

comment	228	comment by: DGAC France
	Comment on existing AMC ARO.RAMP.100(c)(1)(b)	
	Annex ED to decision 2012/016/R defines a weighting system of inspections, to achieve the quota of points established for the member state. This weighting system takes assumptions, far from obvious, that are not indicated in the Annex nor the current NPA. For example, AMC ARO.RAMP.100(c)(1)(b) (1) and (2) use the term "new operator". It should be indicated, as agreed during ESSG-11, that a "new operator" is to be interpreted as an operator who has not been inspected by the state during the past 12 months.	
response	Please see chapter 2 for a summary of comments and Agency responses	
comment	263	comment by: Ryanair
	AMC3 ARO.RAMP.100 (c) (3) (1). Strongly agree. If the excuse is a series of partial inspections then a review of the inspection schedule is warranted. It is called ramp inspection and it should be tailored as a ramp inspection and should be doable within the turnaround time for the operator.	
response	Please see chapter 2 for a summary of comments and Agency responses	

**B. DRAFT DECISION — AMC AND GM TO PART-ARO — SUBPART RAMP — GM1
ARO.RAMP.100(c) General — ANNUAL PROGRAMME**

p. 11

comment	79	comment by: Swedish Transport Agency, Civil Aviation Department (Transportstyrelsen, Luftfartsavdelningen)
	<p>Proposal:</p> <p>In addition to the ramp inspection national coordinator, the competent authority of each Member State can appoint a coordinator of national operators to act as the focal point for other Member and participating States with regard to ramp inspections performed on operators under its oversight.</p>	
response	Please see chapter 2 for a summary of comments and Agency responses	

**B. DRAFT DECISION — AMC AND GM TO PART-ARO — SUBPART RAMP — GM1
ARO.RAMP.105(b)(2)(i) Prioritisation criteria — LIST OF OPERATORS**

p. 11

comment	238	comment by: ENAC - CAA
	<p>Please add:</p> <p>GM1 ARO.RAMP.105(b)(1)</p> <p>For this purpose, the analysis referred to in ARO.RAMP.150 (b)(4) shall be based upon:</p> <ol style="list-style-type: none"> 1. the information filed with the Agency's centralised database by the competent authorities as per ARO.RAMP.110 (Standard Reports), and 2. the ratio "number of cat.2&3findings/number of ramp inspections" computed for each inspected operator. <p>However, since not all findings have the same impact on safety – even in the case an immediate action is required - each finding shall be carefully "weighed", taking into account the severity of its consequences and their probability to occur; the operators' ratio determined as above shall be adjusted accordingly.</p>	

The weight of each cat. 2 and cat.3 PDF will be determined by the Agency with the involvement of all stakeholders.

response Please see chapter 2 for a summary of comments and Agency responses

**B. DRAFT DECISION — AMC AND GM TO PART-ARO — SUBPART RAMP —
AMC1 ARO.RAMP.110 Collection of information — COLLECTION OF
INFORMATION**

p. 11-12

comment

95

comment by: *Austro Control GmbH*

Reference	NPA original text	ACG proposed text	reason for change
AMC1 ARO.RAMP.110	[...] (6) EASA TCO monitoring activities.	delete item	information to EASA TCO monitoring activities, if EASA TCO knowledge file not evident

response

Please see chapter 2 for a summary of comments and Agency responses

comment

96

comment by: *Austro Control GmbH*

Reference	NPA original text	ACG proposed text	reason for change
AMC1 ARO.RAMP.110	[...] (6) EASA TCO monitoring activities.	delete item	information to EASA TCO monitoring activities, if EASA TCO knowledge file not evident

response

Please see chapter 2 for a summary of comments and Agency responses

**B. DRAFT DECISION — AMC AND GM TO PART-ARO — SUBPART RAMP —
AMC4 ARO.RAMP.115(b)(2) Qualification of ramp inspectors — CHECKLIST ON-
THE-JOB TRAINING OF INSPECTORS**

p. 12

comment

75

comment by: *UK CAA*

Page No: 12

Paragraph No: AMC4 ARO.RAMP.115(b)(2) Qualification of ramp inspectors

Comment: Will the existing SAFA inspectors, have to be retrained in accordance with ARO.RAMP.115 or can their previous training be grandfathered ?

Justification: Retraining inspectors already performing the tasks will impact delivery of the SAFA programmes and increase costs to NAAs that have already

response put their inspectors through rigorous training programmes.
Please see chapter 2 for a summary of comments and Agency responses

comment 76 comment by: UK CAA
Page No: 12
Paragraph No: AMC4 ARO.RAMP.115(b)(2), Documentation, Manuals
Comment: The final bullet in the 3rd column has a word "Rukowodstwo". Is this an error ?
Justification: The word is not understood.

response Please see chapter 2 for a summary of comments and Agency responses

comment 97 comment by: Austro Control GmbH

Reference	NPA original text	ACG proposed text	reason for change
AMC4 ARO.RAMP.115(b)(2)	• Rukowodstwo	• on CIS build aircraft: Rukowodstwo (if applicable)	more clarification to be added to prevent misinterpretation of the term • Rukowodstwo on former CIS build aircrafts

response Please see chapter 2 for a summary of comments and Agency responses

comment 248 comment by: AESA SNC
EASA TCO authorisation should be checked just once, during A4 (Manuals) or A10 (AOC) checking.

response Please see chapter 2 for a summary of comments and Agency responses

comment 270 comment by: Ryanair
AMC4 ARO.RAMP.115 (b) (2): 4 Manuals: Rukowodstwo = typo?

response Please see chapter 2 for a summary of comments and Agency responses

**B. DRAFT DECISION — AMC AND GM TO PART-ARO — SUBPART RAMP —
AMC1 ARO.RAMP.120(a) Approval of training organisations — APPROVAL OF
TRAINING ORGANISATIONS BY THE COMPETENT AUTHORITY**

p. 14

comment 77 comment by: UK CAA
Page No: 14
Paragraph No: AMCs to ARO.RAMP.120

	<p>Comment: The AMCs refer to the approval of training organisations. It is not clear how the competent authority should notify the approval to the organisation. Normally an approved organisation is issued a certificate against a regulation, e.g. Part 147, Part 145 etc.</p> <p>Justification: Clarity required.</p>
response	Please see chapter 2 for a summary of comments and Agency responses
comment	<p>167 comment by: <i>FNAM-French Aviation Industry Federation</i></p> <p>Regarding the paragraph (b) of the "AMC1 ARO.RAMP.120(a)", the FNAM completely agrees on the fact that for evaluating an organisation's capability, the competent authority should use only one model of checklist in order to have common evaluation and thus, it involves a real harmonisation of training organisations.</p>
response	Please see chapter 2 for a summary of comments and Agency responses

**B. DRAFT DECISION — AMC AND GM TO PART-ARO — SUBPART RAMP —
AMC5 ARO.RAMP.120(a) Approval of training organisations — TRAINING
INSTRUCTORS**

p. 15-16

comment	<p>13 comment by: <i>ENAC - CAA</i></p> <p>paragraph (b) - instructors for practical training are requested only to be active inspectors before being nominated as instructors. The changing environment of the program would suggest the opportunity to set a recurrent training for practical instructors that are not active inspectors anymore. This could be achieved with a minimum number of inspections as an observer in teams of the Competent Authority for the approval of the training organisation.</p>
response	Please see chapter 2 for a summary of comments and Agency responses
comment	<p>249 comment by: <i>AESA SNC</i></p> <p>Section(c)(2). Who will be able to organise recurrent training workshop? Please clarify if the workshop will be organised by EASA or by the SAFA TO itself or alternatively by National Authorities.</p>
response	Please see chapter 2 for a summary of comments and Agency responses
comment	<p>271 comment by: <i>Ryanair</i></p> <p>AMC5 ARO.RAMP.120 (a)(b) (1): This section suggests that a current trainer who has not conducted an inspection in over 30 months would be training ramp inspectors!! Consider amending this to a minimum recency of inspections of 3 in previous 6 months, for the trainers own currency. Operators biggest complaint is delays due documenting the inspection to give copy to inspected crews.</p>
response	Please see chapter 2 for a summary of comments and Agency responses

**B. DRAFT DECISION — AMC AND GM TO PART-ARO — SUBPART RAMP —
AMC1 ARO.RAMP.125 Conduct of Ramp Inspections & ARO.RAMP.130**

p. 17

**Categorisation of findings — INSPECTION INSTRUCTIONS ON THE
CATEGORISATION OF FINDINGS**

comment 104

comment by: *Austro Control GmbH*

Reference	NPA original text	ACG proposed text	reason for change
AMC1 ARO.RAMP.125	- relevant information missing -	in case of an approved electronic flight bag system (EFB) is used by the inspected operator, the inspector should ask the operator representative or flight crew to get access to the relevant part of the EFB. In respect to perform the inspection acc ARO. Ramp. 125 the relevant sections of Operational Manual, Checklists, Navigation Charts, MEL, Operational Flight Plan, mass and balance, etc. should be available to the inspector. if the operator is not willing to provide this information to the inspector according to her or his requests to perform a ramp inspection for the relevant item (especially A-items) action acc GM 1 ARO RAMP.140(a) might be required.	to be added to make sure that such a case is considered in the SAFA/SACA GM and AMC

response Please see chapter 2 for a summary of comments and Agency responses

**B. DRAFT DECISION — AMC AND GM TO PART-ARO — SUBPART RAMP — GM1
ARO.RAMP.125(a) Conduct of ramp inspections — STANDARDISED
PERFORMANCE OF RAMP INSPECTIONS**

p. 17-19

comment 21

comment by: *ENAC - CAA*

(7) Performance of ramp inspections preferably by at least two inspectors. [...]
Text suggested:
(7) Performance of ramp inspections ~~preferably~~ by at least two inspectors.
Inspections performed by solo inspectors shall be limited to exceptional cases, such as last minute unavailability of a team member, very short time to prepare a spot inspection, etc. [...]

response	Please see chapter 2 for a summary of comments and Agency responses	
comment	22	comment by: ENAC - CAA
	<p>(12) After the inspection [...]</p> <p>Text suggested:</p> <p>(12) Either before or after the inspection, as appropriate according to circumstances, [...]</p>	
response	Please see chapter 2 for a summary of comments and Agency responses	
comment	52	comment by: Federal Office of Civil Aviation FOCA
	<p>GM1 ARO.RAMP.125 (a)(5): As there is no standardized method, Member States should be legally obliged by the Agency to furnish the SAFA inspectors with the respective credentials in order to guarantee an unrestricted and unimpeded access.</p>	
response	Please see chapter 2 for a summary of comments and Agency responses	
comment	78	comment by: UK CAA
	<p>Page No: 18</p> <p>Paragraph No: 9(i)</p> <p>Comment: The stowing of cabin baggage before departure is considered unreasonable as the cabin crew of most airlines check everything is stowed correctly following departure, after the safety briefing, while the aircraft is taxiing to the runway.</p> <p>Justification: To avoid an unnecessary burden.</p>	
response	Please see chapter 2 for a summary of comments and Agency responses	
comment	80	comment by: Swedish Transport Agency, Civil Aviation Department (Transportstyrelsen, Luftfartsavdelningen)
	<p>(a) (9)</p> <p>(v) passenger repartition in the cabin, compared to the loadsheet data; SE believe that complicated words will complicate the AMC and it would be highly appreciated if words as "repartition" was avoided, pls consider rewording.</p>	
response	Please see chapter 2 for a summary of comments and Agency responses	
comment	84	comment by: IATA
	<p>Although AEA/IATA acknowledge that some Inspection items may have to be checked while the passenger are on-board, it should be reinforced that the Inspectors shall not interfere, in as much as possible, with the normal boarding/de-boarding procedures, in order to avoid any unnecessary delay.</p> <p>We recommend the following changes:</p> <p><i>GM1 ARO.RAMP.125(a) Conduct of ramp inspections</i></p> <p>STANDARDISED PERFORMANCE OF RAMP INSPECTIONS</p> <p><i>(9) Any unnecessary contact with passengers should be avoided; however, when inspecting certain elements in the cabin this may be justified, for example such as:</i></p>	

...after (vii) add: " In the above cases, the Inspection shall anyway not interfere, in as much as possible, with the normal boarding/de-boarding procedures."

response

Please see chapter 2 for a summary of comments and Agency responses

comment

85

comment by: IATA

The Commander is responsible for the safety and security of the aircraft, the crew and the passengers. Therefore, in accordance with national and international legislation, and in order to ensure protection from unauthorised access on board, access to the aircraft by the Inspectors must be specifically authorized by him. We recommend the following changes:
GM1 ARO.RAMP.125(a) Conduct of ramp inspections
STANDARDISED PERFORMANCE OF RAMP INSPECTIONS
(a) When preparing a ramp inspection, the following should be taken into account:
After (8) add: "(9) Authorization from the Commander of the aeroplane shall be obtained before entering the aircraft for the Inspection."

response

Please see chapter 2 for a summary of comments and Agency responses

comment

98

comment by: Austro Control GmbH

Reference	NPA original text	ACG proposed text	reason for change
GM1 ARO.RAMP.125(a)(a)(7)	Performance of ramp inspections preferably by at least two inspectors. The authority should provide inspectors with the necessary tools (e.g. flashlights, digital camera, mobiles) and protective clothing suitable for environmental circumstances (e.g. fluorescent vests, ear protection, antistatic clothing).	Performance of ramp inspections preferably by at least two inspectors. The authority should provide inspectors with the necessary tools (e.g. flashlights, digital camera, Notebook or tablet with mobile internet access, mobiles) and protective clothing suitable for environmental circumstances (e.g. fluorescent vests, ear protection, antistatic clothing).	a notebook and a mobile internet connection might be useful for Ramp Inspectors to get access to relevant information (e.g arrival departure times of the inspected flight) and documents (e.g. Revision Staus of AFM, MMEL, QRH, TCO authorization, SAFA database). To prevent unnecessary delay of the aircraft inspected due to missing information.

response

Please see chapter 2 for a summary of comments and Agency responses

comment 99

comment by: *Austro Control GmbH*

Reference	NPA original text	ACG proposed text	reason for change
GM1 ARO.RAMP.125(a)(a)(5)	Cooperation with security, ground, and all other officials involved in airport activities, to enable the inspecting team to reach the aircraft to be inspected. When officials from different organisations (i.e. customs, security, DG inspectorate) have to work in cooperation during the inspection, a procedure on cooperation might need to be developed at a national level. Since most Member States have different airport procedures for inspectors, there is no standardised method.	Cooperation with security, ground, and all other officials involved in airport activities, to enable the inspecting team to reach the aircraft to be inspected. When officials from different organizations (i.e. customs, security, Dangerous Goods inspectorate) have to work in cooperation during the inspection, a procedure on cooperation might need to be developed at a national level. Since most Member States have different airport procedures for inspectors, there is no standardized method.	common understanding of DG inspectorate

response Please see chapter 2 for a summary of comments and Agency responses

comment 100

comment by: *Austro Control GmbH*

Reference	NPA original text	ACG proposed text	reason for change
GM1 ARO.RAMP.125(a)(a)(8)	(8) Depending on the items to be inspected, a ramp inspection	(8) Depending on the items to be inspected, a ramp inspection may be performed on landing or on	delete last sentence due to this might be used by operators to prevent a ramp inspection, without access to the

	may be performed on landing or on departure of the aircraft. The remaining fuel and cargo area (overloading, restraining, segregation, etc.) are examples of items that could be checked on landing. Flight preparation and storage of baggage in the cabin could be checked on departure. An inspection after landing should not jeopardise the total resting time of the flight crew.	departure of the aircraft. The remaining fuel and cargo area (overloading, restraining, segregation, etc.) are examples of items that could be checked on landing. Flight preparation and storage of baggage in the cabin could be checked on departure.	relevant documents of the operator the inspector could not verify such a prediction. In such a case action acc ARO RAMP.140(d)(4) might be considered as well
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response Please see chapter 2 for a summary of comments and Agency responses

comment 101

comment by: *Austro Control GmbH*

Reference	NPA original text	ACG proposed text	reason for change
GM1 ARO.RAMP.125(a)(a)(9)(1)	(9) Any unnecessary contact with passengers should be avoided; however, when inspecting certain elements in the cabin this may be justified, for	(9) Any unnecessary contact with passengers should be avoided; however, when inspecting certain elements in the cabin this may be justified, for	if dedicated information is evident to the inspector verification of passenger tickets/boarding passes should be authorized to prevent illegal commercial air

	example such as:(i) proper stowage of cabin baggage under the seat;(ii) excessive overweight in overhead luggage bins;(iii) baggage in front of emergency exit;(iv) infants/children over the minimum age determined by the State of operator should have their own seat;(v) passenger repartition in the cabin, compared to the loadsheet data;(vi) sufficient number of seats;(vii) observing the boarding process during normal operations and/or during refuelling in process.	example such as:(i) proper stowage of cabin baggage under the seat;(ii) excessive overweight in overhead luggage bins;(iii) baggage in front of emergency exit;(iv) infants/children over the minimum age determined by the State of operator should have their own seat;(v) passenger repartition in the cabin, compared to the load sheet data;(vi) sufficient number of seats;(vii) observing the boarding process during normal operations and/or during refueling in process.(viii) verification of passenger tickets, boarding passes on suspected illegal commercial flights(ix) verification of fuel receipt	transport
Please see chapter 2 for a summary of comments and Agency responses			

102

comment by: Austro Control GmbH

Reference	NPA original text	ACG proposed text	reason for change
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GM1 ARO.RAMP.125(a)(a)(11)	(11) Whenever possible, the inspector should contact the operator's representative at the airport so that he or she can be present during the ramp inspection. Experience shows that the operator's representative may be helpful in providing support, especially in facilitating communication with the crew or the operator's home base.	(11) Experience shows that the operator's representative may be helpful in providing support, especially in facilitating communication with the crew or the operator's home base.	Deleted first sentence, due to requesting the inspector to inform the station manager prior each ramp inspection would be an additional administrative burden only. experience showed that If a station manager is on duty during an aircraft inspection she or he will be at the aircraft during the turn a round of the relevant flight
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response Please see chapter 2 for a summary of comments and Agency responses

comment 168 comment by: *FNAM-French Aviation Industry Federation*

Regarding the paragraph (a.3) of the "GM1 ARO.RAMP.125(a)", EASA is stating that:

"(a) When preparing a ramp inspection, the following should be taken into account:

(3) Distribution of the tasks between ramp inspectors involved, especially in the case of limited inspection time and/or size and complexity of the aircraft."

The FNAM wants to point out the importance of this guidance. As a matter of fact, smaller the aircraft is, shorter the turnaround time is. Thus, the ramp inspection must be proportionate business model of the airline and to the size and complexity of the aircraft inspected in order to avoid any delay not linked to safety reasons.

In no way, as it often happens at the time being, ramp inspection should bring any delay in the turnaround of a flight if there is no safety issue.

response Please see chapter 2 for a summary of comments and Agency responses

comment 169 comment by: *FNAM-French Aviation Industry Federation*

Regarding the paragraph (a.7) of the "GM1 ARO.RAMP.125(a)", EASA is stating that *"The authority should provide inspectors with the necessary tools (e.g. flashlights, digital camera, mobiles) and protective clothing suitable for*

environmental circumstances (e.g. fluorescent vests, ear protection, antistatic clothing).".

Therefore, it is mandatory for any employee working on the apron of the airside zone, that he/she must carry protective clothing. Thus, the FNAM is suggesting to EASA to change the sentence as follows :

"The authority should provide inspectors with the necessary tools (e.g. flashlights, digital camera, mobiles) and **shall provide** protective clothing suitable for environmental circumstances (e.g. fluorescent vests, ear protection, antistatic clothing).".

response Please see chapter 2 for a summary of comments and Agency responses

comment 229 comment by: DGAC France

GM1 ARO.RAMP.125 (a) (11)

The operator's representative is mostly in charge of commercial matters. His/her help for most issues encountered during a ramp inspection is limited. The instruction should be rephrased as a recommendation: "If deemed necessary, the inspector could contact the operator's representative [...]".

response Please see chapter 2 for a summary of comments and Agency responses

comment 278 comment by: Boeing

Page: 19

Paragraph: **GM1 ARO.RAMP.125(a)(12) -- Conduct of ramp inspections**

The proposed text states:

"(12) After the inspection ... Information leaflets may be handed out to the flight crew, attached to the written communication sent to the operator or handed out to the passengers if they raise questions about the inspection performed. ..."

REQUESTED CHANGE: Delete this statement.

JUSTIFICATION: It is inappropriate and unnecessary for Inspectors to communicate with or hand out material to passengers concerning inspections. It is also contrary to the other guidance in GM1 ARO.RAMP.125(a). Inspectors should not usurp the authority of the cabin crew on the issues identified in that guidance; instead, the inspector should inform a uniformed flight crew member to correct any issue involving passengers or boarding processes.

response Please see chapter 2 for a summary of comments and Agency responses

**B. DRAFT DECISION — AMC AND GM TO PART-ARO — SUBPART RAMP — GM2
ARO.RAMP.125(a) Conduct of ramp inspections — DEFICIENCIES UNDER THE
CONTROL OF THE OPERATOR**

p. 19

comment 236 comment by: IATA

To ensure that crews are not distracted during the flight preparation phase, the following should be modified:

GM1 ARO.RAMP.125(b) Conduct of ramp inspections

cancel: (b) In order to minimise hindrance to flight and cabin crew, the inspector should:

add: (b) "when planning and undertaking the ramp inspections, the Inspectors should carefully consider that flight and cabin crews distraction during the flight preparation phase is a significant safety hazard and should therefore be avoided in as much as possible. In order to minimise distraction to the flight and cabin crew, the inspector should:"

response Please see chapter 2 for a summary of comments and Agency responses

**B. DRAFT DECISION — AMC AND GM TO PART-ARO — SUBPART RAMP — GM1
ARO.RAMP.125(b) Conduct of ramp inspections — UNREASONABLE DELAY**

p. 19

comment 81 comment by: *Swedish Transport Agency, Civil Aviation Department (Transportstyrelsen, Luftfartsavdelningen)*

Proposal:

(3) debrief the aircraft pilot in command **or appropriate staff representing the airline** after the inspection task is completed;

To avoid interference with crew rest time and unnecessary disturbance to the operator

response Please see chapter 2 for a summary of comments and Agency responses

comment 103 comment by: *Austro Control GmbH*

Reference	NPA original text	ACG proposed text	reason for change
GM1 ARO.RAMP.125(b)	(c) A delay of the aircraft might be justified for safety reasons, such as when an inspector detects a category 3 finding, or whenever there are technical noncompliances not properly assessed or identified by the operator, and therefore further investigation is necessary, for example: (1) tyres appear to be worn beyond the limits (central groove	(c) A delay of the aircraft might be justified for safety reasons, such as when an inspector detects a category 3 finding, or whenever there are technical and or operational noncompliances not properly assessed or identified by the operator or not available, and therefore further investigation is necessary, for example: (1) tyres appear to be worn beyond the limits (central groove no longer visible); however, reference is	Operational impact to be considered to prevent any misinterpretation

	no longer visible); however, reference is to be made to the applicable Aircraft Maintenance Manual (AMM) to determine the actual limit; (2) oil leakage (e.g. 5 drops per minute) is to be checked against the applicable AMM to determine the actual limit; (3) a flight crew member cannot produce a valid licence. Clarification is to be sought from the operator to confirm that the flight crew member has a valid licence by requesting, for instance, a copy of the licence to be sent to the inspectors for verification.	to be made to the applicable Aircraft Maintenance Manual (AMM) to determine the actual limit; (2) oil leakage (e.g. 5 drops per minute) is to be checked against the applicable AMM to determine the actual limit; (3) a flight crew member cannot produce a valid licence. Clarification is to be sought from the operator to confirm that the flight crew member has a valid licence by requesting, for instance, a copy of the licence to be sent to the inspectors for verification. (4) missing relevant flight operational data (e.g. missing or incorrect performance calculation, incorrect operational flight plan, incorrect weight and balance calculation)	
response	Please see chapter 2 for a summary of comments and Agency responses		

**B. DRAFT DECISION — AMC AND GM TO PART-ARO — SUBPART RAMP —
AMC1 ARO.RAMP.125(c) Conduct of ramp inspections — PROOF OF RAMP
INSPECTION**

p. 20

comment 87

comment by: IATA

To ensure proper understanding by all Parties involves, and to ensure consistency with the proposed legislation, we do recommend that the POI form used for the inspections include the following wording next to the PIC signature field:
" This signature only confirms that the POI has been received by the pilot in command/ operator representative, and that the aircraft has been inspected on the date and at the place indicated; it does in no way imply acceptance of the listed findings."

response Please see chapter 2 for a summary of comments and Agency responses

**B. DRAFT DECISION — AMC AND GM TO PART-ARO — SUBPART RAMP — GM1
ARO.RAMP.130 Categorisation of findings — APPLICABLE REQUIREMENTS**

p. 20

comment 105

comment by: *Austro Control GmbH*

Reference	NPA original text	ACG proposed text	reason for change
GM1 ARO.RAMP.130 (c)	(c) Manufacturers' standards should be used for checking the technical condition of the aircraft.	(c) Manufacturers' standards should be used for checking the technical condition of the aircraft. the agency as TC Authority should provide access to relevant sections of Master Documents (AMM, SRM, CDL, WDM, SWPM, etc.) as available to SAFA/SACA member states and or participating state for verification of defects during ramp inspections	manufacturer standards (Aircraft Maintenance Manual (AMM), Structural Repair Manual (SRM), Configuration Deviation List (CDL), Wiring Diagram Manual (WDM), Standard Wiring Practices Manual (SWPM), etc.) are only limited available to SAFA Participation states, pending on the aircrafts registered in the particular state, EASA as TC Holder Authority for products certifies should gain access to relevant non customized master documents as available. additional sharing this relevant information would improve the standardization and harmonization of technical findings related to manufactures limitation definitions

response Please see chapter 2 for a summary of comments and Agency responses

comment 170

comment by: *FNAM-French Aviation Industry Federation*

Regarding the paragraph (d) of the "GM1 ARO.RAMP.130", EASA is stating that "Deviations from national standards should be reported as findings only if they have an impact on safety". The FNAM would like to insist on the fact that this

report of finding may be different from one inspector to an other as they may have a different perception on the impact a finding can have of the safety of the flight. This guidance stays too subjective and should be more developed.

response Please see chapter 2 for a summary of comments and Agency responses

**B. DRAFT DECISION — AMC AND GM TO PART-ARO — SUBPART RAMP — GM2
ARO.RAMP.130 Categorisation of findings — ASSESSMENT OF NON-
COMPLIANCES**

p. 20-21

comment 53 comment by: *Federal Office of Civil Aviation FOCA*

This must be considered as „standardization through the back door“. FOCA would expect that such non-compliances have to be addressed as an Agency finding and should be used for further standardization measures as part of EASA's yearly scheduled Standardisation Inspection program.

response Please see chapter 2 for a summary of comments and Agency responses

comment 123 comment by: *Austro Control GmbH*

Reference	NPA original text	ACG proposed text	reason for change
GM2 ARO.RAMP.130 (a)	...(e.g. for third countries operators, no electric torch on board is, a finding, but only during nightflight operations; or not sufficient number of lifevests, but only if the flight is overwater on a distance greater than 50 NM from the coastline).	...(e.g. for third countries operators, no electric torch on board is, a finding, but only during night flight operations; or not sufficient number of life vests, but only if the flight is overwater on a distance greater than 50 NM from the coastline or when taking off or landing at an aerodrome where, in the opinion of the State of the Operator, the take-off or approach path is so disposed over water that in the event of a mishap there would be a likelihood of a ditching.	more clarification in respect to: live vests required "When taking off or landing at an aerodrome where the take-off or approach path is so disposed over water that in the event of a mishap there would be a likelihood of a ditching," would be helpful to prevent misinterpretation of applicable requirements

response Please see chapter 2 for a summary of comments and Agency responses

**B. DRAFT DECISION — AMC AND GM TO PART-ARO — SUBPART RAMP — GM3
ARO.RAMP.130 Categorisation of findings — NON-COMPLIANCES WITH
MANUFACTURER STANDARDS**

p. 21

comment

106

comment by: *Austro Control GmbH*

Reference	NPA original text	ACG proposed text	reason for change
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<p>GM3 ARO.RAMP.130 a</p>	<p>Categorisation of findings NONCOMPLIANCES WITH MANUFACTURER STANDARDS A finding against manufacturer standards should always be demonstrated in relation to aircraft technical documentation — Aircraft Maintenance Manual (AMM), Structural Repair Manual (SRM), Configuration Deviation List (CDL), Wiring Diagram Manual (WDM), Standard Wiring Practices Manual (SWPM), etc. — and MEL references. If significant defects are suspected, the operator should be asked to demonstrate compliance with the standards. Deviations from these standards can only be acceptable if the State of oversight has issued a formal waiver or concession detailing conditions and/or limitations to allow the aircraft to continue to operate for a specific period of time before final repair, or if the aircraft will perform a noncommercial flight (with less prescriptive standards and requirements) provided that the validity of the CofA is not affected.</p>	<p>add additional definition: the agency as TC Authority should provide access to relevant sections of Master Documents (AMM, SRM, CDL, WDM, SWPM, etc.) as available to SAFA/SACA member states and or participating state for verification of defects during ramp inspections</p>	<p>manufacturer standards (Aircraft Maintenance Manual (AMM), Structural Repair Manual (SRM), Configuration Deviation List (CDL), Wiring Diagram Manual (WDM), Standard Wiring Practices Manual (SWPM), etc.) are only limited available to SAFA Participation sates, pending on the aircrafts registered in the particular state, EASA as TC Holder Authority for products certifies should gain access to relevant non customized master documents as available. additional sharing this relevant information would improve the standardization and harmonization of technical findings related to manufactures limitation definitions</p>
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response Please see chapter 2 for a summary of comments and Agency responses

**B. DRAFT DECISION — AMC AND GM TO PART-ARO — SUBPART RAMP — GM5
ARO.RAMP.130 Categorisation of findings — DETECTION, REPORTING AND
ASSESSMENT OF SIGNIFICANT TECHNICAL DEFECTS**

p. 22

comment 3 comment by: CAA Poland

(a) Although minor defects are not considered to be non-compliances, they should be brought to the attention of the operator using general remarks as described in GM9 ARO.RAMP.130. Underlined text should be replaced by GM8

response Please see chapter 2 for a summary of comments and Agency responses

comment 20 comment by: ENAC - CAA

(c) [...] However, if time allows the inspector should not delay the inspection of the aircraft condition until the operator has completed the preflight inspection.

Text suggested:

This sentence makes no sense to me, when seen in its context: in my opinion, this should say either

- the inspector should not delay or
- if time does not allow

Compare with GM6 ARO.RAMP.130(b)(1) on page 23

response Please see chapter 2 for a summary of comments and Agency responses

comment 107 comment by: Austro Control GmbH

Reference	NPA original text	ACG proposed text	reason for change
GM5 ARO.RAMP.130 (a)	(a) A technical defect is considered to be any material fault pertaining to the aircraft, its systems or components. Minor defects are typically without influence on safety. Although minor defects are not considered to be noncompliances, they should be	(a) A technical defect is considered to be any material fault pertaining to the aircraft, its systems or components. Minor defects are typically without influence on safety. Although minor defects are not considered to be noncompliances, they should be brought to the attention of the operator using a CAT 1 finding as described in GM9 ARO.RAMP.130.	ref to GM 7 ARO.RAMP.13 definition and as well acc to the common used SAFA/SACA guidance material the finding categorization definition according to the former class of action matrix should be applied so that a CAT 1 finding should be raised for minor discrepancies

	<p>brought to the attention of the operator using general remarks as described in GM9 ARO.RAMP.130. Those defects which are potentially out of limits are considered to be significant defects. Further assessment is needed to determine if the significant defect is within or outside the applicable limits. Such defects should be known to the operator since they should have been detected during regular maintenance, aircraft acceptance procedure or preflight inspections.</p>	<p>Those defects which are potentially out of limits are considered to be significant defects. Further assessment is needed to determine if the significant defect is within or outside the applicable limits. Such defects should be known to the operator since they should have been detected during regular maintenance, aircraft acceptance procedure or preflight inspections.</p>	
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response Please see chapter 2 for a summary of comments and Agency responses

comment 108

comment by: *Austro Control GmbH*

Reference	NPA original text	ACG proposed text	reason for change
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GM5 ARO.RAMP.130 (d)	A 'defect within limits but not recorded' should not be considered as a technical noncompliance. If the significant defect appeared to be within limits, the safety focus changes from the defect itself to the noncompliance of the defect not being detected/assessed by the operator.	A 'defect within limits but not recorded' should not be considered as a technical noncompliance, however such discrepancies should be brought to the attention of the operator using general remarks as described in GM9 ARO.RAMP.130. If the significant defect appeared to be within limits, the safety focus changes from the defect itself to the noncompliance of the defect not being detected/assessed by the operator.	to follow GM 9 ARO. RAMP 130 definition
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response Please see chapter 2 for a summary of comments and Agency responses

comment 111

comment by: *Austro Control GmbH*

Reference	NPA original text	ACG proposed text	reason for change
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<p>GM6 ARO.RAMP.130 (b)(3) versus GM5 ARO.RAMP.130 (b)</p>	<p>(3) The inspector should subsequently check if the operator detected the significant defects found by the inspector, such as for example: (i) multiple screws missing in the corner area or in the leading edge of panels; (ii) running/dropping leaks;</p> <p>vs.</p> <p>b) Technical defects which were not detected by the operator, because the Approved Maintenance Programme (AMP) did not require the operator to detect such defects during turnaround inspections, do not necessarily qualify as a finding under A23/A24. Examples of such defects are: (1) missing fasteners, (2) bonding wires, (3) the cabin emergency lighting, which are not supposed to be part of the preflight inspection. However, if such defects lead to an out of limits situation, a category 3 finding should be raised, since it seems that the AMP failed to ensure that the aircraft is in a dispatchable condition. (iii) dents in pressurised areas of the fuselage.</p>	<p>update GM6 ARO.RAMP.130 (b)(3) and GM5 ARO.RAMP.130 (b) to reflect the same definitions</p>	<p>According to GM6 the operator should detect multiple screws missing but under GM5 this is only required when AMP requires it</p>
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response Please see chapter 2 for a summary of comments and Agency responses

comment 274 comment by: *Liam Murphy*

Dear Sir/Madam

In Ref GM5 ARO.RAMP.130(b) paragraph 2

Ryanair feel that this finding against an AMP should not be deemed a category 3 finding and should be reduced to a category G, as aircraft at the time of inspection will be operating between their respective maintenance programme intervals. The maintenance opportunity will remedy any defects that are present at the time of maintenance check.

If any other information is required, please do not hesitate to contact me.

Regards

Liam Murphy

Engineering Quality Manager Ryanair.

response Please see chapter 2 for a summary of comments and Agency responses

**B. DRAFT DECISION — AMC AND GM TO PART-ARO — SUBPART RAMP — GM6
ARO.RAMP.130 Categorisation of findings — DETECTION, REPORTING AND
ASSESSMENT OF SIGNIFICANT TECHNICAL DEFECTS**

p. 23-24

comment 4 comment by: *CAA Poland*

(a a) Appendix to GM8 ARO.RAMP.130 provides a flowchart that can be used as guidance for the steps to be taken. Underlined text should be replaced by GM6
(b) (6) ... a category 2 finding mentioning 'Pre-flight inspection performed but without noticing significant defects' should be raised under A24... Underlined text should be replaced by recording.

response Please see chapter 2 for a summary of comments and Agency responses

comment 14 comment by: *ENAC - CAA*

paragraph (7) (ii) - is there any example of aircraft where it is allowed to have missing fasteners on primary structures?

response Please see chapter 2 for a summary of comments and Agency responses

comment 109 comment by: *Austro Control GmbH*

Reference	NPA original text	ACG proposed text	reason for change
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GM6 ARO.RAMP.130 (b)(1)	The following procedure should be used when inspecting Aircraft Condition (C-items) or, if appropriate, items A, B and D. (1) If time allows, the inspector should inspect the aircraft condition after the operator has completed the preflight inspection.	The following procedure should be used when inspecting Aircraft Condition (C-items) or, if appropriate, items A, B and D. (1) if time allows the inspector could delay the inspection of the aircraft condition until the operator has completed the preflight inspection	update definition to be in line with definition per GM5 ARO.RAMP.130 (c)
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response Please see chapter 2 for a summary of comments and Agency responses

comment 110

comment by: Austro Control GmbH

Reference	NPA original text	ACG proposed text	reason for change
GM6 ARO.RAMP.130 (b) (3)	(3) The inspector should subsequently check if the operator detected the significant defects found by the inspector, such as for example: (i) multiple screws missing in the corner area or in the leading edge of panels; (ii) running/dropping leaks; (iii) dents in pressurized areas of the fuselage.	(3) The inspector should subsequently check if the operator detected the significant defects found by the inspector, such as for example: (i) multiple fasteners missing in the corner area or in the leading edge of panels; (ii) running/dropping leaks; (iii) dents in pressurized areas of the fuselage. (iv) damages to emergency systems (e.g., escape hatches, escape slides, RAT, cargo compartment blow out panels)	the term fasteners to be used to prevent misinterpretation emergency systems to be considered too

response Please see chapter 2 for a summary of comments and Agency responses

comment 112

comment by: *Austro Control GmbH*

Reference	NPA original text	ACG proposed text	reason for change
GM6 ARO.RAMP.130 (b)(3) versus GM5 ARO.RAMP.130 (b)	<p>(3) The inspector should subsequently check if the operator detected the significant defects found by the inspector, such as for example:</p> <ul style="list-style-type: none"> (i) multiple screws missing in the corner area or in the leading edge of panels; (ii) running/dropping leaks; <p>vs.</p> <p>b) Technical defects which were not detected by the operator, because the Approved Maintenance Programme (AMP) did not require the operator to detect such defects during turnaround inspections, do not necessarily qualify as a finding under A23/A24. Examples of such defects are:</p> <ul style="list-style-type: none"> (1) missing fasteners, (2) bonding wires, (3) the cabin emergency lighting, which are not supposed to be part of the preflight inspection. <p>However, if such defects lead to an out of limits situation, a category 3 finding should be raised, since it seems that the AMP failed to ensure that the aircraft is in a dispatchable condition.</p> <ul style="list-style-type: none"> (iii) dents in pressurised areas of the fuselage. 	update GM6 ARO.RAMP.130 (b)(3) and GM5 ARO.RAMP.130 (b) to reflect the same definitions	According to GM6 the operator should detect multiple screws missing but under GM5 this is only required when AMP requires it

response Please see chapter 2 for a summary of comments and Agency responses

comment 113

comment by: *Austro Control GmbH*

Reference	NPA original text	ACG proposed text	reason for change
GM6 ARO.RAMP.130 (4)	(4) A single screw missing in the middle of a fairing, traces of old leaks and nonstructural damages to e.g. fairings can, in many cases, be considered as 'minor defects'.	(4) A single fastener missing in the middle of a fairing, traces of old leaks and nonstructural damages to e.g. fairings can, in many cases, be considered as 'minor defects'. Such defects needs to be pre-assessed by the inspector acc to the relevant manufacturer limitation instruction (e.g. AMM, SRM etc.)	to follow GM3 ARO.RAMP 130

response Please see chapter 2 for a summary of comments and Agency responses

comment 117

comment by: *Austro Control GmbH*

Reference	NPA original text	ACG proposed text	reason for change
GM6 ARO.RAMP.130	- missing -	Detection of defects during pre-flight inspectionsGM 6 ARO RAMP 13 describes a process how to deal with significant technical defects which were not detected by the operator and were found after assessment to be within limits. The justification to raise a category 2 finding for a finding within limits is that the operator missed the significant defect, which could also have been out of limits. However, such finding can only be raised if the operator had to detect such defect during the receding pre-flight/daily inspection.The inspector might notice a defect which was not detected by the operator, but at the same time the operator was not supposed to detect it since it is not part of the pre-flight or daily	the latest SAFA GM and SAFA Training Bulletin Status and level of information should be use to build up AMC for SAFA & SACA

		inspection checklist. Therefore, the argument that a significant defect (but within limits) was missed is in this case not valid; such defect should have been detected during other inspections/maintenance.If such significant defect appears after assessment to be outside limits, a category 3 finding should be raised to highlight that apparently the approved maintenance programme failed to detect such defect in time. However, contrary to the other significant defects where the operator should perform an assessment as part of their normal process as if they detected the defect themselves, the initial assessment of the other defects should be done by the inspector; it would be nothing but fair that the inspector would only report such findings if he has some evidence like generic maintenance data for the type of aircraft indicating that the defect is out-of-limits. For clarity, the above policy is added to the flow diagram per Appendix to GM8 ARO.RAMP.130.	
response	Please see chapter 2 for a summary of comments and Agency responses		
comment	230	comment by: <i>DGAC France</i>	
	GM6 ARO.RAMP.130 (b) (3) (i) : A single screw missing in the corner or the leading edge of a panel can be outside limits. It is considered more appropriate to discard the word "multiple". (3) (ii) : A light leakage can be outside limits. It is considered more appropriate to discard the words "running/dropping". (7) (i) : Dents do not constitute one single system in the ATA taxonomy. Therefore, the first example considering dents on the LH wing and the #2 engine intake is not considered appropriate. (7) (ii) The primary structure is not visible during a ramp check. The instruction could be simplified by stating only "(ii) Those on missing fasteners".		
response	Please see chapter 2 for a summary of comments and Agency responses		
comment	264	comment by: <i>Ryanair</i>	
	Most operators will accomplish a pre-flight inspection after service equipment has been removed to assure no damage in related areas. This section cautions on risk of delay due to this operating procedure. Review this section to minimise the delay potential from inspection after removal of service equipment		

response Please see chapter 2 for a summary of comments and Agency responses

**B. DRAFT DECISION — AMC AND GM TO PART-ARO — SUBPART RAMP —
Appendix to GM8 ARO.RAMP.130**

p. 25

comment 6 comment by: CAA Poland

Appendix to GM8 ARO.RAMP.130 Underlined text should be replaced by GM6.
Applied old version of the flow diagram should be replaced by the updated one.

response Please see chapter 2 for a summary of comments and Agency responses

comment 15 comment by: ENAC - CAA

Clerical error: Appendix to **GM6** ARO.RAMP.130

response Please see chapter 2 for a summary of comments and Agency responses

comment 114 comment by: Austro Control GmbH

Reference	NPA original text	ACG proposed text	reason for change
Appendix to GM8 ARO.RAMP.130	Flow Chart	not in line with latest EASA GM for identification of defects during RIs ref to EASA SAFA TB 2013 Appendix 1 to SAFA GM 4.2	the latest SAFA GM and SAFA Training Bulletin Status and level of information should be use to build up AMC for SAFA & SACA

response Please see chapter 2 for a summary of comments and Agency responses

comment 115 comment by: Austro Control GmbH

Reference	NPA original text	ACG proposed text	reason for change
Appendix to GM8 ARO.RAMP.130	Format	not readable	Not readable

response Please see chapter 2 for a summary of comments and Agency responses

comment 116 comment by: Austro Control GmbH

Attachment [#2](#)
see attached file

response Please see chapter 2 for a summary of comments and Agency responses

comment 236 comment by: DGAC France

Appendix to GM8 ARO.RAMP.130

This appendix does not take into account the new flow diagram described in Attachment 1 of the Training Bulletin issued on 16th november 2012 that corrects the one originally issued in the Guidance Material V2 of august 2012. This correction of the flow chart, considering defects that are not supposed to be detected by the operator, should be taken into account in the flow chart described here.

response Please see chapter 2 for a summary of comments and Agency responses

B. DRAFT DECISION — AMC AND GM TO PART-ARO — SUBPART RAMP — GM7 ARO.RAMP.130 Categorisation of findings — ASSESSMENT OF FINDINGS ON CERTIFICATES AND LICENSES PRIOR TO CATEGORISATION

p. 26

comment 5 comment by: CAA Poland

(a) The principle described in GM8 ARO.RAMP.130 should be applied for the assessment of findings on certificates and licenses prior to their categorisation. Underlined text should be replaced by GM6.

response Please see chapter 2 for a summary of comments and Agency responses

comment 83 comment by: Swedish Transport Agency, Civil Aviation Department (Transportstyrelsen, Luftfartsavdelningen)

Proposal:

This wording and principle is not in compliance with ICAO which dictates what to be carried onboard, if the flight has taken place it should be classified on incoming flt.

amend or delete para

response Please see chapter 2 for a summary of comments and Agency responses

comment 88 comment by: IATA

With the implementation of the ICAO AOC Registry, there should be no need for National Aviation Authorities to check for AOC and OPS Spec validity on board the aircraft. If the State/Operator participates to the ICAO AOC Registry, it shall not be subject to any further inspection in this respect.

response Please see chapter 2 for a summary of comments and Agency responses

comment 250 comment by: AESA SNC

Please clarify that in the case of missing **certificates** or licenses and if any copy can be provided (CAT3), the operation cannot be performed. This could include the grounding of the aircraft, in the case of the operator tries to depart the airport.

response Please see chapter 2 for a summary of comments and Agency responses

**B. DRAFT DECISION — AMC AND GM TO PART-ARO — SUBPART RAMP — GM8
ARO.RAMP.130 Categorisation of findings — USE OF GENERAL REMARKS**

p. 26

comment 118

comment by: *Austro Control GmbH*

Reference	NPA original text	ACG proposed text	reason for change
GM8 ARO.RAMP.130	(a) Although not being a noncompliance, any relevant safety issues identified during ramp inspections should be reported as a General Remark (Category G) under each inspection item. Examples are: (1) an electrical torch missing or unserviceable during a flight conducted entirely in daylight; (2) any noncompliance not recorded in the Proof of Inspection (POI), as well as any other relevant information; (3) minor defects.	(a) Although not being a noncompliance, any relevant safety issues identified during ramp inspections should be reported as a General Remark (Category G) under each inspection item. Examples are: (1) an electrical torch missing or unserviceable during a flight conducted entirely in daylight; (2) any noncompliance not recorded in the Proof of Inspection (POI), as well as any other relevant information; (3) minor deviations	ref to GM 7 ARO.RAMP.13 definition and as well acc to the common used SAFA/SACA guidance material the finding categorization definition according to the former class of action matrix should be applied so that a CAT 1 finding should be raised for minor discrepancies

response Please see chapter 2 for a summary of comments and Agency responses

comment 262

comment by: *ENAC - CAA*

GM8 ARO.RAMP.130
Use of General Remarks:
The example (1) may be a source of misunderstanding, considering that the lack of malfunctioning of torches during day flights can constitute a remark with different categorization in SAFA (G) and SACA (cat. 3).

response Please see chapter 2 for a summary of comments and Agency responses

comment 273

comment by: IATA

Although follow-up actions for category 2 and 3 findings are described, category G and 1 follow up is not detailed. It is suggested to add a statement to clarify that follow-up actions for category G and 1 findings do not require any formal answer from the Operator to the Authority.

response Please see chapter 2 for a summary of comments and Agency responses

**B. DRAFT DECISION — AMC AND GM TO PART-ARO — SUBPART RAMP —
AMC1 ARO.RAMP.135(a) Follow-up actions on findings — FOLLOW-UP
ACTIONS FOR CATEGORY 2 OR 3 FINDINGS**

p. 26-28

comment 16

comment by: ENAC - CAA

paragraph (b)(6) - Give the operator a period of 30 days to reply. Experience has shown that 30 days could be a too short time for big operators to react with correct root cause analysis performed. Moreover the standard time to close a finding in the oversight of the operators is 90 days for level 2 findings.

response Please see chapter 2 for a summary of comments and Agency responses

comment 86

comment by: Swedish Transport Agency, Civil Aviation Department
(Transportstyrelsen, Luftfartsavdelningen)

(4) Inform the relevant State(s) of oversight no later than 30 working days after the inspection in order to permit appropriate action to be taken, as well as to confirm to the operator the findings raised. The primary source of information to enable operators to take swift action to address safety deficiencies is the **database and secondly** POI (Proof of Ramp Inspection). SE suggest all communication and notifications is done via the database for full transparency into the process and it could also be useful in the IDEA process.
(5) ~~Only send a communication to the operator, if the operator's response has not satisfied the inspecting authority, based on the information contained in the POI.~~
(e) Any followup communication from operators and States of oversight should be acknowledged, and they should be informed about the closure of findings. Requests for clarification should be responded by the inspecting authority. Acknowledgement or clarifications from the inspecting authority should be given within 30 working days after receipt of communications or requests. **however; it's sufficient to communicate via the database and inspecting states should do limit correspondance via other chanel.**

response Please see chapter 2 for a summary of comments and Agency responses

comment 89

comment by: IATA

Operators shall not be required to respond to findings that are totally outside of their control, such as, for example, the format of the pilots' licences or the format of the AOC.

response Please see chapter 2 for a summary of comments and Agency responses

comment	119	comment by: <i>Austro Control GmbH</i>										
	<table><tr><th>Reference</th><th>NPA original text</th><th>ACG proposed text</th><th>reason for change</th></tr><tr><td>AMC1 ARO.RAMP.135(a) (b) (2)</td><td>(2) Communicate findings to the operator's focal points or, failing this, their quality departments.</td><td>(2) Communicate findings to the operator's focal points or flight operational department or to the management of the operator, failing this, their quality departments.</td><td>common practice showed that if no focal point is nominated by an operator, the flight operation department or the management of an operator should be contacted prior the quality department might be involved</td></tr></table>				Reference	NPA original text	ACG proposed text	reason for change	AMC1 ARO.RAMP.135(a) (b) (2)	(2) Communicate findings to the operator's focal points or, failing this, their quality departments.	(2) Communicate findings to the operator's focal points or flight operational department or to the management of the operator, failing this, their quality departments.	common practice showed that if no focal point is nominated by an operator, the flight operation department or the management of an operator should be contacted prior the quality department might be involved
Reference	NPA original text	ACG proposed text	reason for change									
AMC1 ARO.RAMP.135(a) (b) (2)	(2) Communicate findings to the operator's focal points or, failing this, their quality departments.	(2) Communicate findings to the operator's focal points or flight operational department or to the management of the operator, failing this, their quality departments.	common practice showed that if no focal point is nominated by an operator, the flight operation department or the management of an operator should be contacted prior the quality department might be involved									
response	Please see chapter 2 for a summary of comments and Agency responses											

comment	171	comment by: <i>FNAM-French Aviation Industry Federation</i>		
	<p>Although there are mentioned of follow-up actions for category 2 and 3 findings , category G and 1 findings are not mentioned. The FNAM is suggesting to add a clear statement about follow-up actions for category G and 1 findings. In fact, they don't trigger any formal answer from the Operator to the Authority as category 2 and 3 findings. This is the way SAFA findings are dealt with today. Category 1 findings will enter the ORB index for 0.25 points each. These inspection findings can't be compared to audit findings and it would be inefficient, time consuming and not relevant from a risk analysis to treat them as per AMC1 ORO.GEN.150.</p> <p>Thus the FNAM is suggesting adding an AMC as follows: <i>"FOLLOW-UP ACTIONS FOR CATEGORY 1 OR G FINDINGS Category G and 1 findings are mentioned for information only, the Operator has no obligation to answer formally to the Authority about the root cause analysis and the corrective action taken."</i></p>			
response	Please see chapter 2 for a summary of comments and Agency responses			

comment	174	comment by: <i>FNAM-French Aviation Industry Federation</i>		
	<p>Regarding the paragraph (e) of the "AMC1 ARO.RAMP.135(a)", <i>"(e) Any follow-up communication from operators and States of oversight should be acknowledged, and they should be informed about the closure of findings. Requests for clarification should be responded by the inspecting authority. Acknowledgement or clarifications from the inspecting authority should be given within 30 working days after receipt of communications or requests."</i></p> <p>the FNAM is requesting that the EASA controls consistently that the airlines receive answers from their comments of the findings, on time, by the national authority where the ramp inspection have been carried out and by the supervisory authority of the airline.</p>			
response	Please see chapter 2 for a summary of comments and Agency responses			

comment	251	comment by: AESA SNC
	Section (b)(1) Please clarify that, given that corrective actions can be taken before the departure, preventive actions are then required. This is compatible with the corrective action plan mentioned in this section.	
response	Please see chapter 2 for a summary of comments and Agency responses	
comment	252	comment by: AESA SNC
	Section (b)(4) Operator and oversight authority should be informed at the same time. Information included in POI is just a draft of the results of the information, as mentioned in the template for the POI included in the Regulation. Evidences are expected after the communication of the report approved in the data base to both the operator and the oversight authority.	
response	Please see chapter 2 for a summary of comments and Agency responses	
comment	275	comment by: Liam Murphy
	<p>Dear Sir/Madam</p> <p>In ref AMC1 ARO.RAMP.135(a) (e)</p> <p>Ryanair wish to question the format for functionality & introduction of this AMC1; What are the next steps an Airline should proceed with if no answer is given from the inspecting Authority to queries raised by the airline inspected? And is there a process in place to take this to a mediator or EASA?</p> <p>Ryanair feel that the inspecting authorities should have some form of feedback in a shorter timeline than 30 working days. A more natural 10 working days would be of more benefit to companies that proactively monitor the SAFA/SACA programme.</p> <p>If any other information is required, please do not hesitate to contact me.</p> <p>Regards</p> <p>Liam Murphy</p> <p>Engineering Quality Manager Ryanair.</p>	
response	Please see chapter 2 for a summary of comments and Agency responses	

**B. DRAFT DECISION — AMC AND GM TO PART-ARO — SUBPART RAMP —
AMC1 ARO.RAMP.135(b) Follow-up actions on findings — CLASSES OF
CATEGORY 3 FINDINGS**

p. 28-29

comment	7	comment by: CAA Poland								
	(d) ... operator refuses to permit the performance of a <u>SAFA</u> inspection... <u>Underlined text should be replaced by SAFA/SACA.</u>									
response	Please see chapter 2 for a summary of comments and Agency responses									
comment	120	comment by: Austro Control GmbH								
	<table><tr><th>Reference</th><th>NPA original text</th><th>ACG proposed text</th><th>reason for change</th></tr><tr><td></td><td></td><td></td><td></td></tr></table>		Reference	NPA original text	ACG proposed text	reason for change				
Reference	NPA original text	ACG proposed text	reason for change							

AMC1 ARO.RAMP.135(b) (b)	Whenever restrictions on the aircraft flight operation (Class 3a action) have been imposed, it is inappropriate to conduct appropriate verification of adherence to such restrictions. Examples of Class 3a actions, and related verification, are: (1) restrictions on flight altitudes if oxygen system deficiencies have been found — this might be verified by checking the ATC flight plans and/or the actual altitude flown as reported by the EUROCONTROL CFMU system; (2) a noncommercial flight to the home base — if allowed by applicable requirements and the MEL (provided that the validity of the CofA is not affected); (3) seats that may not be used by passengers — it might be verified just before departure to confirm that seats are not occupied; (4) a cargo area that may not be used.	Whenever restrictions on the aircraft flight operation (Class 3a action) have been imposed, it is appropriate to conduct appropriate verification of adherence to such restrictions. Examples of Class 3a actions, and related verification, are: (1) restrictions on flight altitudes if oxygen system deficiencies have been found — this might be verified by checking the ATC flight plans and/or the actual altitude flown as reported by the EUROCONTROL CFMU system; (2) a noncommercial flight to the home base — if allowed by applicable requirements and the MEL (provided that the validity of the CofA is not affected); (3) seats that may not be used by passengers — it might be verified just before departure to confirm that seats are not occupied; (4) a cargo area that may not be used (5)	to prevent any misinterpretation additional operational aspects to include too
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response Please see chapter 2 for a summary of comments and Agency responses

comment 121

comment by: *Austro Control GmbH*

Reference	NPA original text	ACG proposed text	reason for change
AMC1 ARO.RAMP.135(b) (c)	(c) Whenever the operator is required to take corrective actions before departure (Class 3b), inspectors should verify that the operator has taken such actions. Examples of immediate corrective actions to be taken before departure are: (1) (temporary) repairs to defects according to the AMM; (2) recalculation of mass and balance, performance calculations and/or fuel figures; (3) a copy of a missing licence/document to be sent by fax or other electronic means; (4) proper restraining of cargo.	(c) Whenever the operator is required to take corrective actions before departure (Class 3b), inspectors should verify that the operator has taken such actions. Examples of immediate corrective actions to be taken before departure are: (1) (temporary) repairs to defects according to the manufactures definitions (e.g. AMM and or SRM) (2) recalculation of mass and balance, performance calculations and/or fuel figures; (3) a copy of a missing licence/document to be sent by fax or other electronic means; (4) proper restraining of cargo. (5) missing documents to be provided (6) application of approved or relevant procedures	refer to GM 3 ARO. RAMP.130 to use a common standard

response Please see chapter 2 for a summary of comments and Agency responses

comment 122

comment by: *Austro Control GmbH*

Reference	NPA original text	ACG proposed text	reason for change
AMC1 ARO.RAMP.135(b) (f)	(f) In case of a Cat. 3 finding it might not always be necessary to verify if the restrictions are respected or if corrective actions have been taken (e.g. if the inspector has indications that appropriate actions will be taken) or if they are possible (e.g. for flight segments outside the EUROCONTROL area). The inspecting authority should determine on a case by case basis if it is necessary or feasible to verify that restrictions are respected or if corrective actions have been taken.	(f) In exceptional cases it might not be necessary to verify if the restrictions resulting from a Cat. 3 finding are respected or if corrective actions have been taken (e.g. if the inspector has indications that appropriate actions will be taken) or if they are possible (e.g. for flight segments outside the EUROCONTROL area). The inspecting authority should determine on a case by case basis if it is necessary or feasible to verify that restrictions are respected or if corrective actions have been taken.	to be restricted to exceptional case only to prevent raising a CAT 3 findings without proper validation of required corrective action
response	Please see chapter 2 for a summary of comments and Agency responses		

B. DRAFT DECISION – AMC AND GM TO PART-ARO – SUBPART RAMP – GM1 ARO.RAMP.145(b) Reporting – IMPORTANT SAFETY INFORMATION

p. 29-30

comment	17	comment by: ENAC - CAA
	paragraph (a)(7) - it is worth to remember that the Standard report it is not meant to be a substitute of the mandatory occurrence report, therefore information related to accident should not repeat information already disclosed in that system.	
response	Please see chapter 2 for a summary of comments and Agency responses	

comment	<p>222 comment by: <i>Direction de l'Aviation Civile Luxembourg</i></p> <p>Change text to: " (a) If available, any relevant information contained in documents and pictures should be attached to the 'Standard report'" available in the centralised database. Examples of relevant information includes: (1) Significant safety-related occurrences where, in addition to the follow-up required by occurrence reporting regulations, ramp checks of an aircraft or operator are desirable, (1) ATC reports on level busts; (2) communication failure or difficulties; (3) abnormal takeoff lengths; (4) information received from maintenance organisations with regard to lack of AD compliance or maintenance work performed incorrectly; (5) (2) reports from the general public/whistleblower concerning perceived unsafe situations; (6) reports from airport personnel on observed unsafe practices; or (7) (3) factual information concerning accidents and serious incidents which occurred in Member States' airspace. Justification: Most of the items quoted are mandatory reporting items under occurrence reporting schemes. Many other items could be quoted as well, but for most occurrences a follow-up under the occurrence reporting schemes is much more appropriate. A SAFA standard report is justified in cases where an occurrence raises questions about safety that can effectively be addressed during SAFA inspections.</p>
response	Please see chapter 2 for a summary of comments and Agency responses
comment	<p>223 comment by: <i>Direction de l'Aviation Civile Luxembourg</i></p> <p>Add text at the end of <i>GM1 ARO.RAMP.145(b) Reporting</i>: "In any case, safety-related information should be verified by the reporting authority before insertion in the centralised database as "Standard report"." Justification: It is important that the information contained in the SAFA database can be trusted. Unverified allegations should not be inserted to ensure information integrity of the database, especially as operators do not have the possibility to reply directly to such reports.</p>
response	Please see chapter 2 for a summary of comments and Agency responses
comment	<p>265 comment by: <i>Ryanair</i></p> <p>GM1 ARO.RAMP.145(b)(5) &(6): Non technical personnel expressing technical opinions to technical organisations should be assigned a low level of significance or ignored.</p>
response	Please see chapter 2 for a summary of comments and Agency responses

comment 56 comment by: Alitalia

The PDFs inspecting instructions related to B-RNAV, P-RNAV and generally to item 10 of ICAO ATS Flight Plan are referring to outdated references.
The European Regional Supplementary Procedures are now at their 7th amendment, which aligned the flight plan provision to the latest version of the ICAO Doc. 4444 PANS-ATM (15th edition, amendment 4).
Amendment 4 of PANS-ATM has extensively revised the Item 10 provisions, taking into account the new PBN concept.
I propose the following actions:

- The ICAO Doc. 4444 PANS-ATM should be included in the standard references list.
- All inspecting instructions dealing with ICAO Flight Plan should be revised in accordance with the latest edition of PANS-ATM Appendix 2, chapter 2 "Instructions for the completion of the flight plan form".

response Please see chapter 2 for a summary of comments and Agency responses

comment 57 comment by: Federal Office of Civil Aviation FOCA

Reference to the ICAO Technical Instruction is outdated. The actual edition that applies is 2013-2014. FOCA recommends that the reference to ICAO TI should be dynamic (general reference to the actual valid TI in its latest version)

response Please see chapter 2 for a summary of comments and Agency responses

comment 124 comment by: Austro Control GmbH

Reference	NPA original text	ACG proposed text	reason for change
C. DRAFT DECISION on instructions on the categorisation of findings for SAFA	CAT G items not defined	Add detailed pre-described findings for relevant CAT-G items (e.g. under item A06, A07, A11, A16, A18, A19, A20, B05, B08, C01)	e.g. under item A06, A07, A11, A16, A18, A19, A20, B05, B08, C01 a discrepancy should be reported as general remark, therefore more guidance should be provided to have the same standardized approach during ramp inspections performed acc to ARO.RAMP. definitions

response Please see chapter 2 for a summary of comments and Agency responses

comment 126 comment by: Austro Control GmbH

Reference	NPA original text	ACG proposed text	reason for change
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	<table><tr><td>C. DRAFT DECISION on instructions on the categorisation of findings for SAFA Inspection</td><td>Standard Reference for Item with Std. "M" missing</td><td>add applicable ATA reference for effected items</td><td>ATA Reference is already available for "M" Std. Items in the latest issue of the EASA SAFA GM</td></tr></table>	C. DRAFT DECISION on instructions on the categorisation of findings for SAFA Inspection	Standard Reference for Item with Std. "M" missing	add applicable ATA reference for effected items	ATA Reference is already available for "M" Std. Items in the latest issue of the EASA SAFA GM
C. DRAFT DECISION on instructions on the categorisation of findings for SAFA Inspection	Standard Reference for Item with Std. "M" missing	add applicable ATA reference for effected items	ATA Reference is already available for "M" Std. Items in the latest issue of the EASA SAFA GM		
response	Please see chapter 2 for a summary of comments and Agency responses				
comment	<div>175<div>comment by: ENAC - CAA</div><div><div><div>- Convention on International Civil Aviation (ICAO) (also known as Chicago Convention), 9th Edition, 2006.</div><div>- ICAO Annex 1 (11th Edition, July 2011, Amendment 170)</div><div><i>mere clerical error</i></div><div>...</div><div>— ICAO Annex 6, Part I (9th Edition, July 2010, Amendment 37-A, July 2013)</div><div><i>(Amendment 37-A is currently effective. References to be adjusted accordingly where needed.)</i></div><div>...</div><div>- ICAO Annex 10, Volume IV (4th Edition, July 2007, Amendment 85, November 2010)</div><div><i>(ACAS/TCAS)</i></div><div>...</div><div>— European (EUR) Regional Supplementary Procedures (ICAO Doc 7030) (5th Edition, Amendment 5, July 2011)</div><div><i>Amendment 7 of DOC 7030 is currently in force. It should be noted that some standard references threof are no longer valid (i.e. designators to be inserted in Item 10 of ATC FPL, now required by DOC 4444 PANS-ATM , have been withdrawn from DOC 7030)</i></div></div></div></div>				
response	Please see chapter 2 for a summary of comments and Agency responses				

C. DRAFT DECISION on instructions on the categorisation of findings for SAFA — Part 1 Operations: International Commercial Air Transport — Aeroplanes

p. 32-172

comment	<p>1 comment by: Liam Murphy</p> <p>Dear Sir/Madam, Inspection item A07 Ryanair feels that this item content detail contained within this finding and category needs to be clarified due to the fact that the MEL carried by Ryanair is an approved document by the NAA and therefore a finding can not be raised against an air operator if the MEL is approved by its respective NAA. The inspection system/inspector should be conversant in the approval method and status of MEL in which they are inspecting. Ryanair feels that this point/instruction is not clear enough to distinct the fact for the inspector and deter the inspector from raising findings against the MEL which would be at a later stage found the item raised to be in compliance. Best Regards Liam Murphy</p>
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	Ryanair Quality Manager murphyli@ryanair.com
response	Please see chapter 2 for a summary of comments and Agency responses
comment	<p>8 comment by: CAA Poland</p> <p>A01-15 Equipment installations obviously not in compliance with Annex 8, Part IIIA/B, Chapter 4. cat. 3</p> <p>B01-01 Equipment installations obviously not in compliance with Annex 8, Part IIIA/B, Chapter 4. cat. 2</p> <p>D01-02 Equipment installations obviously not in compliance with Annex 8, Part IIIA/B, Chapter 4. cat. 2</p> <p>The same noncompliance should result in the same category of finding.</p> <p>A04-01 No or incomplete parts of the Operations Manual pertaining to flight operations on board. cat. 2</p> <p>A04-08 Operations Manual published in a language not understood by any of the flight crew members. cat. 3</p> <p>For the particular inspected crew there is no difference between not having OM on board or having but not understanding it. Therefore both findings should be the same category.</p> <p>A12-04 A valid CofA was issued but <u>not carried on board</u> at the time of the inspection.</p> <p>A12-06 No valid CofA <u>on board</u>. More precise description required clearly differing both findings.</p> <p>A20 Inspecting Instructions - Check for presence and validity of crew licences and appropriate ratings. If the licence of a flight crew member is not carried on board at the time of the inspection, apply the procedure described in <u>GM8 ARO.RAMP.130</u> Underlined text should be replaced by GMZ.</p> <p>B02-01 Strap or buckle worn or damaged. cat 1</p> <p>B06-03 Strap or buckle worn out or damaged. cat 2</p> <p>The same noncompliance should result in the same category of finding.</p> <p>C05-08 Significant signs of corrosion. cat 2</p> <p>C06-05 Significant signs of corrosion. cat 3</p> <p>The same noncompliance should result in the same category of finding.</p>
response	Please see chapter 2 for a summary of comments and Agency responses
comment	<p>54 comment by: Federal Office of Civil Aviation FOCA</p> <p>Page 160 (Annex C): C Items (8): Inspections Item Title: Fan blades, propellers, rotors (main/tail)</p> <p>As the document is designated to <u>Aeroplanes</u> only (page 32), the rotor as a consequence should not be indicated as a possibly affected part. This particular situation can be found under Annex D as well.</p> <p>The following areas are affected:</p> <ul style="list-style-type: none"> • Inspections Item Title • Inspecting instructions <p>C Items (8) and (9): As the inspection items Propeller/Fan Blades (C 8 & 9) have been merged into a single item, the subsequent PDF structure needs to be renumbered. As there is no benefit of this integration, the original structure should be maintained.</p>

response Please see chapter 2 for a summary of comments and Agency responses

comment 58 comment by: *Federal Office of Civil Aviation FOCA*
DO2: The description of the inspections items implies that the ICAO TI need to be carried along during the inspections which is not realistic and impracticable as the material is too vast (and there is no electronic version of the TI).

response Please see chapter 2 for a summary of comments and Agency responses

comment 59 comment by: *Federal Office of Civil Aviation FOCA*
Inspection item A10, Note 2: FOCA welcomes this solution. The current practise does not correspond with this procedure.

response Please see chapter 2 for a summary of comments and Agency responses

comment 125 comment by: *Austro Control GmbH*

Reference	NPA original text	ACG proposed text	reason for change
C. DRAFT DECISION on instructions on the categorisation of findings for SAFA Inspection item A03	For aircraft with their first CoA issued on or after 1 March 2012, check if ACAS II, software version 7.1 is installed. This can be done by performing a test of aural warnings; version 7.1 will have the extra resolution advisory "Level off, level off" (this requirement is only applicable in the territory of the EU Member States, Iceland, Norway and Switzerland).	For aircraft with their first CoA issued on or after 1 March 2012, check if ACAS II, software version 7.1 is installed. (this requirement is only applicable in the territory of the EU Member States, Iceland, Norway and Switzerland).	"level off, level off" is not transmitted during the TCAS test, therefore delete: This can be done by performing a test of aural warnings; version 7.1 will have the extra resolution advisory "Level off, level off"

response Please see chapter 2 for a summary of comments and Agency responses

comment 176 comment by: *ENAC - CAA*
Item A01, Std Ref: A6-I-4.10.2, 3, 4 and Appendix 2 2.1.2(a)(b) Amdt 37 (standards' text to be amended accordingly)

response Please see chapter 2 for a summary of comments and Agency responses

comment 177 comment by: *ENAC - CAA*

	<p>A03- Inspecting intructions B) ACAS II(TCAS) ...</p> <p>For aircraft with their first CoA issued on or after 1 March 2012, 1 January 2014, check if ACAS II, software version 7.1 is installed. This can be done by performing a test of aural warnings (version 7.1 will have the extra resolution advisory "Level off, level off"), or by checking relevant AFM/FCOM pages. (this requirement is only applicable in the territory of the EU Member States, Iceland, Norway and Switzerland).</p> <p>After 1 January 2017 all ACAS units shall run software version 7.1</p>	
response	Please see chapter 2 for a summary of comments and Agency responses	
comment	178	comment by: LE PUIL
response	Please see chapter 2 for a summary of comments and Agency responses	
comment	179	comment by: LE PUIL
	<p>PDF A01-15 : There is no reason to include in the finding a possible operational limitaion expected from the MEL , so "and their usage due to precipitation " should be deleted , the MEL will state when it's required</p>	
response	Please see chapter 2 for a summary of comments and Agency responses	
comment	181	comment by: ENAC - CAA
	<p>A03 Add Std Ref A10 Vol IV 4.3.5.3.1 and 4.3.5.3.3</p> <p>4.3.5.3.1 New ACAS installations after 1 January 2014 shall monitor own aircraft's vertical rate to verify compliance with the RA sense. If non-compliance is detected, ACAS shall stop assuming compliance, and instead shall assume the observed vertical rate.</p> <p>Note 2.— Equipment complying with RTCA/DO-185 or DO-185A standards (also known as TCAS Version 6.04A or TCAS Version 7.0) do not comply with this requirement.</p> <p>Note 3.— Compliance with this requirement can be achieved through the implementation of traffic alert and collision avoidance system (TCAS) Version 7.1 as specified in RTCA/DO-185B or EUROCAE/ED-143.</p> <p>4.3.5.3.3 After 1 January 2017, all ACAS units shall comply with the requirements stated in 4.3.5.3.1.</p> <p>PDF A03-03:</p> <p>Aircraft with first CoA issued on or after 1 March 2012 1 January 2014 not equipped with ACAS II, software version 7.1</p> <p>New PDF</p> <p>Aircraft not equipped with ACAS II, software version 7.1 (as of 1 January 2017)</p>	
response	Please see chapter 2 for a summary of comments and Agency responses	
comment	182	comment by: LE PUIL
	<p>A04-07</p> <p>In case of an emergency ,the impact of lack of procedure relevant to DG in the operations manual will nor be important , the crew will use the emergency check list and will never use the operations manual . therefore the categorisation should</p>	

response	<p>be reduce to cat 2 as any part of the operations manual missing</p> <p>Please see chapter 2 for a summary of comments and Agency responses</p>
comment	<p>183 comment by: LE PUIL</p> <p>PDF B01-08 : there is no convinient stowage of luggage in the toilets , so delete "inappropriate" ine the PDF text , the present text car be confusing , making an inspector thinking it can be sometimes acceptable to have luggage stowed in toilets</p>
response	<p>Please see chapter 2 for a summary of comments and Agency responses</p>
comment	<p>186 comment by: LE PUIL</p> <p>PDF B03-03 : the ICAO requirement beeing to have medical supplies onboard , the PDF should be : medical supplies with expiry date overdue , first aid kit or precaution kit are only listed in recommandation</p>
response	<p>Please see chapter 2 for a summary of comments and Agency responses</p>
comment	<p>187 comment by: LE PUIL</p> <p>PDF B06-01 : there is no ICAO requirement to have extension belt , but a general requirement to have seat belts on board of every people so including fat people , the PDF should be worded : No extension belts vailable onboard when NECESSARY</p>
response	<p>Please see chapter 2 for a summary of comments and Agency responses</p>
comment	<p>188 comment by: LE PUIL</p> <p>PDF B06-06 : the baby berths are used only inflight , so there is no possibility to use theis finding , delete it</p>
response	<p>Please see chapter 2 for a summary of comments and Agency responses</p>
comment	<p>189 comment by: LE PUIL</p> <p>PDF B07-10 : this situation is only a particular of an inoperative system . this is a normal and usual procedure to apply MEL limitations relevant to an inoperative system . it's not necessary to describe a particular one in a PDF , or create another one for passenger seat inop , for flight attendant seat inop , etc... ; delete this PDF</p>
response	<p>Please see chapter 2 for a summary of comments and Agency responses</p>
comment	<p>192 comment by: LE PUIL</p> <p>PDF D01-04 the cargo bay smoke detection test is not an operationnal test , there is no reason to ask the crew to do it . it's a cockpit item and we do not have a PDF for the engine fire detection which is at least as important</p>

response	delete this finding	
	Please see chapter 2 for a summary of comments and Agency responses	
comment	193	comment by: LE PUIL
	A03 : there is no PDF relevant to an aircraft not being RVSM capable due to an inoperative equipment create one , Cat 3 : Aircraft intended to operate in RVSM airspace without RVSM capability ref A6- I- 7.2.1	
response	Please see chapter 2 for a summary of comments and Agency responses	
comment	194	comment by: LE PUIL
	PDF B03-02 the medical kit is only an ICAO RECOMMANDATION , so it be not be onboard , additionnaly , it's supposed to be use only by medicakl personnel , who he suppose to identify any content that can not be used , therefore the finding should be replaced by a Cat G remark only	
response	Please see chapter 2 for a summary of comments and Agency responses	
comment	195	comment by: LE PUIL
	PDF D02-17 : there is no requirement for shipper's declaration to be accessible in flight , sometimes it's carried in the cargo compartment and in any case , will not be used by the crew , so , not to have it on board is a bad procedure but as nearly none , if any , impact on the flight safety , decrease the finding to Cat 1	
response	Please see chapter 2 for a summary of comments and Agency responses	
comment	196	comment by: LE PUIL
	PDF D02-13 , the purpose of the NOTOC is to INFORM the captain , the absence of a NOTPOC may have an impact on flight safety , but no major impact if other procedures are properly applied , and they are not dependant on the NOTOC , reduce the category to Cat 2	
response	Please see chapter 2 for a summary of comments and Agency responses	
comment	197	comment by: ENAC - CAA
	Item A06, PDF A01-1 should be modified as follows: Navigation databases out of currency, within MEL limits but not recognized as such - Prescribed operational procedures not applied And categorized as Cat. 3 <i>Comment: No finding should be raised if database(s) expiration does not exceed rectification timeframe set forth by MEL and the occurrence is properly dealt with (it may be noticed and reported as a general remark)</i>	
response	Please see chapter 2 for a summary of comments and Agency responses	
comment	198	comment by: ENAC - CAA

	<p>Item A10 Inspecting instructions</p> <p>Note: ICAO requires a certified true copy, EUOPS requires in OPS 1.125 that "the original or copy" is carried during each flight. Therefore, if an inspector finds a noncertified copy of the AOC on board this may not constitute a finding (however may be recorded as a cat. G remark).</p> <p>Superseded by Cat.Gen. MPA 180</p> <p>The following instructions should be added:</p> <p>Check for the TCO authorisation (presence and validity).</p> <p>Check that the privileges and the scope of the operations do not exceed what has been granted by the TCO Authorisation</p>
response	Please see chapter 2 for a summary of comments and Agency responses
comment	<p>199 comment by: ENAC - CAA</p> <p>A13 – Inspecting Instructions</p> <p>...</p> <p>Check the fuel consumption monitoring of the incoming flight (if required by the OPS manual).</p> <p><i>(Fuel checks are now mandated by ICAO).</i></p> <p>...</p> <p>Check whether the flight crew has reviewed all the last available meteorological information (including for alternate aerodromes)</p>
response	Please see chapter 2 for a summary of comments and Agency responses
comment	<p>200 comment by: ENAC - CAA</p> <p>Item A13 PDF A13-04</p> <p>Standard References and standard text should be updated to A6-I Amendment currently in force (see A6-I 4.3.6.1, 4.3.6.2, 4.3.6.3, 4.3.6.5, 4.3.6.6).</p> <p>A new Cat. 2 PDF is suggested:</p> <p>"Fuel on board at or above minimum ICAO requirements but fuel planning not in accordance with ICAO requirements."</p> <p>to be raised when the required fuel on board happens to be adequate by virtue of extra fuel upload (discretionary fuel) but fuel figures in OFP for taxi, trip, contingency, dest. alternate(s), final reserve and additional fuel are less than required by ICAO standards.</p> <p>(Std Ref are the same as in PDF A13-04).</p>
response	Please see chapter 2 for a summary of comments and Agency responses
comment	<p>201 comment by: ENAC - CAA</p> <p>PDF A13-07: current Std. Ref. is A6-I-4.3.5.5</p> <p>PDF A13-08: current Std. Ref. is A6-I-4.3.5.6</p>
response	Please see chapter 2 for a summary of comments and Agency responses
comment	<p>202 comment by: ENAC - CAA</p> <p>PDF A13-11 Standard's text: extended range diversion time operations</p>
response	Please see chapter 2 for a summary of comments and Agency responses

comment	203	comment by: ENAC - CAA
	PDF A13-13 Standards relating to fuel calculation should be updated to A6-I Amdt currently in force (see A6-I 4.3.6.1, 4.3.6.2, 4.3.6.3, 4.3.6.5, 4.3.6.6). Following standards should be added: A8-IIIA 2.2.3 , A8-IIIB 2.2.7	
response	Please see chapter 2 for a summary of comments and Agency responses	
comment	204	comment by: ENAC - CAA
	PDF A13-14: description should be modified as follows "Required en-route alternate(s) (ETOPS / EDTO) not available" for consistency with A6-I	
response	Please see chapter 2 for a summary of comments and Agency responses	
comment	234	comment by: DGAC France
	Attachment #3 Part C of this NPA is not based on the latest regulatory publications: <ul style="list-style-type: none"> • Annex 6 Part I amendment 35 (October 2011) is considered, when amendment 36 (November 2012) is applicable • Annex 10, volume V amendment 86 is considered, when amendment 87 (November 2012) is applicable • DOC 7030 amendment 5 (July 2011) is considered, when amendment 7 (November 2012) is applicable Please consult the attached file for detailed comments by DGAC France on SAFA PDFs.	
response	Please see chapter 2 for a summary of comments and Agency responses	
comment	239	comment by: ENAC - CAA
	Please add the following: <div style="background-color: #f0f0f0; padding: 5px;"> A06 – Inspection Instructions If possible, check navigation databases for newly added/withdrawn routes/procedures/waypoints/reporting points A06 - New PDF proposal: Navigation databases with incorrect/missing routes/procedures/waypoints/reporting points Std Ref: A-I—7-4-2 Cat 2, or 3 if deficiencies affect inbound/outbound inspected flight ops </div>	
response	Please see chapter 2 for a summary of comments and Agency responses	
comment	240	comment by: ENAC - CAA
	Item A13 – PDF A13-11 Add Std Ref: A6-I-4.1.1, A6-I-4.1.4, A6-I-4.1.5 and Attachment K	

response	Please see chapter 2 for a summary of comments and Agency responses
comment	241 comment by: ENAC - CAA Item B08, PDF B08-04 Std Ref should be updated to currently in force Amendment of A6-I
response	Please see chapter 2 for a summary of comments and Agency responses
comment	242 comment by: ENAC - CAA Item B11, PDF B11-04 and B11-05 Std Ref should be updated to currently in force Amendment of A6-I
response	Please see chapter 2 for a summary of comments and Agency responses
comment	243 comment by: ENAC - CAA Item C01 PDF C01-01 and C01-04: These PDFs should be dropped. See comment #45.
response	Please see chapter 2 for a summary of comments and Agency responses
comment	253 comment by: ENAC - CAA A12: In the inspecting instructions it is used also the acronym CoA. As per AIR OPS (Reg. EU 965/2012) GM2 Annex I it is recommendable to use CofA.
response	Please see chapter 2 for a summary of comments and Agency responses
comment	255 comment by: ENAC - CAA ITEM A4 - Inspecting Instructions Note: Information on Fuel planning and in-flight fuel management policies and procedures
response	Please see chapter 2 for a summary of comments and Agency responses
comment	266 comment by: Ryanair A11: Is a radio licence really relevant in 2013? Get rid of all this admin except valid CofA and AOC.
response	Please see chapter 2 for a summary of comments and Agency responses
comment	267 comment by: Ryanair C items are frequently too specialised and beyond the competence of a pilot exercising due care and attention on a walkaround. The cleanliness (relating to the ability to inspect - eg main gear, wheel well (C06) is not under the operators control on occasions.

response Please see chapter 2 for a summary of comments and Agency responses

comment 268 comment by: *Ryanair*
 C01: minor or significant corrosion, fasteners would be picked up on operators scheduled inspections. The admin required to document these and the potential for delay not warranted.

response Please see chapter 2 for a summary of comments and Agency responses

comment 269 comment by: *Ryanair*
 C09-C12C11: It is typically beyond the competence of a pilot to address these items. Instead of these being assessed on a ramp inspection, the Agency should consider a Safety Assessment during operators maintenance activities and or CRS activity. It is unfair for an inspector to have a different standard than a pilot on a RAMP inspection.

response Please see chapter 2 for a summary of comments and Agency responses

D. DRAFT DECISION on instructions on the categorisation of findings for SACA p. 173

comment 24 comment by: *ENAC - CAA*
 General comment about the use of CS-25 articles as reference in PDFs for SACA - although I agree to have CS-25 as reference to correctly classify non conformity noted during inspection, we have to be very careful to highlight specific CS-25 articles that could either not be applicable to the aircraft inspected, or applicable with different standard due to different amendment of CS-25 or FAR 25 used as a basis for certification.
 There is no specific requirement for a SAFA inspector to be an aircraft certification expert (although the maintenance experience could support the knowledge), therefore we must assume that not everybody is familiar with the certification basis concept.
 In conclusion I suggest to insert a "disclaimer" at the beginning of the section to correctly address the use of CS-25 reference throughout the document.

response Please see chapter 2 for a summary of comments and Agency responses

comment 25 comment by: *ENAC - CAA*
 In "Inspecting Instructions" of many checklist items are still present reference to ICAO standards instead of EU regulation standards

response Please see chapter 2 for a summary of comments and Agency responses

comment 127 comment by: *Austro Control GmbH*

Reference	NPA original text	ACG proposed text	reason for change
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		D. DRAFT DECISION instructions on the categorisation of findings for SACA	Format	review and update format of several pages	To prevent a mixture of showing more than one item on page e.g. 180, 185, 188
response	Please see chapter 2 for a summary of comments and Agency responses				
comment	128	comment by: <i>Austro Control GmbH</i>			
		Reference	NPA original text	ACG proposed text	reason for change
		D. DRAFT DECISION instructions on the categorisation of findings for SACA	inspection instructions	Inspection Instruction still contains ICAO Requirements and definitions instead of the applicable EU legislation reference.	Inspection Instruction still contains ICAO Requirements and definitions instead of the applicable EU legislation reference.
response	Please see chapter 2 for a summary of comments and Agency responses				
comment	129	comment by: <i>Austro Control GmbH</i>			
		Reference	NPA original text	ACG proposed text	reason for change
		D. DRAFT DECISION instructions on the categorisation of findings for SACA	Format	add headline where required	to improve readability of the tables
response	Please see chapter 2 for a summary of comments and Agency responses				
comment	130	comment by: <i>Austro Control GmbH</i>			
		Reference	NPA original text	ACG proposed text	reason for change

D. DRAFT DECISION instructions on the categorisation of findings for SACA	CAT G items not defined	Add detailed pre-described findings for relevant CAT-G items (e.g. under item A06, A07, A11, A16, A18, A19, A20, B05, B08, C01)	e.g. under item A06, A07, A11, A16, A18, A19, A20, B05, B08, C01 a discrepancy should be reported as general remark, therefore more guidance should be provided to have the same standardized approach during ramp inspections performed acc to ARO.RAMP. definitions
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response Please see chapter 2 for a summary of comments and Agency responses

comment 131 comment by: *Austro Control GmbH*

Reference	NPA original text	ACG proposed text	reason for change
D. DRAFT DECISION instructions on the categorisation of findings for SACA	PDF code	add relevant PDF code per item as applicable	PDF code not applied to all predefined findings mentioned in section D

response Please see chapter 2 for a summary of comments and Agency responses

comment 132 comment by: *Austro Control GmbH*

Reference	NPA original text	ACG proposed text	reason for change
D. DRAFT DECISION on instructions on the categorisation of findings for SACA Inspection	Standard Reference for Item with Std. "M" missing	add applicable ATA reference for effected items	ATA Reference is already available for "M" Std. Items in the latest issue of the EASA SAFA GM

response Please see chapter 2 for a summary of comments and Agency responses

comment 133 comment by: *Austro Control GmbH*

Reference	NPA original text	ACG proposed text	reason for change
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D. DRAFT DECISION instructions on the categorisation of findings for SACA - first page (introduction)	- The Annexes to 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;	- 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; - The Annexes to 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;	Commission Regulation (EU) No 965/2012 is missing
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response Please see chapter 2 for a summary of comments and Agency responses

comment 164

comment by: *Austro Control GmbH*

Reference	NPA original text	ACG proposed text	reason for change
D. DRAFT DECISION instructions on the categorization of findings for SACA - general	CAT.IDE.A. 215 Internal doors and curtains (a) in the case of aeroplanes with an MOPSC of more than 19, a door between the passenger compartment and the flight crew compartment, with a placard indicating 'crew only' and a locking means to prevent passengers from opening it without the permission of a member of the flight crew; (d) a placard on each internal door or adjacent to a curtain that is the	Add M.A.710 Airworthiness review (c) Through the physical survey of the aircraft, the airworthiness review staff shall ensure that: 1. all required markings and placards are properly installed, and;	Mentioned Standard reference does not match with the PDF Example - item A01, PDF "Operational flight deck markings and/or placards missing or incorrect" - item A04, PDF "Operations Manual published in a language not understood by a member of the flight crew": instead of

	<p>means of access to a passenger emergency exit, to indicate that it must be secured open during takeoff and landing; and</p> <p>CAT.IDE.A. 275 Emergency lighting and marking</p> <p>(b) In the case of aeroplanes with an MOPSC of more than 19, the emergency lighting system, referred to in (a) shall include:</p> <p>(1) sources of general cabin illumination;</p> <p>(2) internal lighting in floor level emergency exit areas;</p> <p>(3) illuminated emergency exit marking and locating signs;</p> <p>(4) in the case of aeroplanes for which the application for the type certificate or equivalent was filed before 1 May 1972, when operated by night, exterior emergency lighting at all verwing exits and atexits where descent assist means are required;</p> <p>(5) in the case of aeroplanes for which the application for the type certificate or equivalent was filed after 30 April 1972, when operated by night, exterior emergency lighting at all passenger emergency exits; and</p> <p>(6) in the case of aeroplanes for which the type certificate was first issued on or after 31 December 1957, floor proximity emergency escape path marking system(s) in the passenger compartments</p>		<p>ORO.MLR.100 (d)(e)(f) use ORO.MLR.100 (k)</p>
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response Please see chapter 2 for a summary of comments and Agency responses

comment 205 comment by: *Fons Schaeffers/SGI Aviation*
 Comment on entire Section D:
 Many references to Part-CAT are incorrect. E.g. CAT.OP.MPA, CAT.GEN.MPA, CAT.POL.MAB, FCL.MED.A/B

response Please see chapter 2 for a summary of comments and Agency responses

comment 206 comment by: *Fons Schaeffers/SGI Aviation*
 Comment on entire Chapter D:
 In some cases, reference is made to ICAO standards. Whilst this makes sense for those ICAO Annexes that are outside the scope of EASA (such as Annex 7 and possibly Annex 15), it is not appropriate for the Annexes for which EASA is competent for transposition into EASA standards, such as Annex 1 (e.g. Language Proficiency Endorsement), Annex 2 (e.g. item A03 –responsibility of P-I-C) and Annex 6 (A20 - RT licence, B11 – two-way communication), as EASA should have transposed these ICAO standards in their regulatory system.
 Similarly, references to the Chicago Convention should not appear (e.g. under A12 references to Article 39a and 40), nor references to ICAO Doc 7030 (e.g. under A13).

response Please see chapter 2 for a summary of comments and Agency responses

comment 207 comment by: *Fons Schaeffers/SGI Aviation*
 Comment on entire Chapter D:
 References to CS-25 are inappropriate. Many EASA aircraft have **not** been certificated against CS-25 but other airworthiness standards, such as JAR-25, FAR-25, BCAR standards or even CAR4b. **None** of the EASA aircraft in service or to be manufactured in the coming years comply with the **current** edition of CS-25, which is apparently taken here. Although some of the CS references are to sections that have not been updated for many years and therefore seem applicable, there are other sections that are relatively new and would have a high impact when indeed taken as the applicable standard, such as 25.562 and 25.807. The only reliable means to determine the certification basis is the TCDS. However, interpretation of the TCDS requires a level of expertise that is beyond that of SAFA inspectors.
 In a number of cases where reference to CS-25 is made, this can better be replaced by a reference to Part-26 and CS-26. For the remaining cases, it is suggested to refer to the TCDS and to add a note that in case of possible findings, EASA or national certification experts should be consulted. Alternatively, these pdf's may be dropped. Verification of proper use of the TCDS when issuing, or keeping valid, Certificates of Airworthiness can better be done by means of the standardization visits.

response Please see chapter 2 for a summary of comments and Agency responses

comment 208 comment by: *Fons Schaeffers/SGI Aviation*

response	Comment on entire Chapter D: 2 nd column: the 'E' is not explained	
	Please see chapter 2 for a summary of comments and Agency responses	
comment	209	comment by: <i>Fons Schaeffers/SGI Aviation</i>
	748/2012 and 290/2012 are referred to in this chapter, but not listed here	
response	Please see chapter 2 for a summary of comments and Agency responses	
comment	210	comment by: <i>Fons Schaeffers/SGI Aviation</i>
	This comment is applicable to the title of the next page (which is not commentable in the CRT): This title does not specifically refer to SACA and is therefore confusing with the title of the corresponding section in the SAFA chapter (page 32)	
response	Please see chapter 2 for a summary of comments and Agency responses	
comment	244	comment by: <i>ENAC - CAA</i>
	Attachment #4	
	As a principle, since the goal of this NPA is "to transfer the existing EASA SAFA GM (developed and published pursuant to Commission Directive 2008/49/EC) and complement it with AMC and GM on the performance of ramp inspections on EU operators", it could be useful to include the ICAO reference together with the EC regulations reference, especially when ICAO reference is clearer or more specific. Pls. see attached page of examples.	
response	Please see chapter 2 for a summary of comments and Agency responses	
comment	245	comment by: <i>ENAC - CAA</i>
	Whenever available and applicable, adopted AMCs should be quoted as Standard References for SACA PDFs, and the relevant EASA Decisions and annexes should be included in the list found at page 173. Perhaps a reminder may be added about the non-binding nature of such standards, that could be overrun under given conditions. Here is a short list of AMCs that should be included in the SACA Standard References: AMC1, AMC2 CAT.OP.MPA.150(b) Fuel policy AMC1 CAT.OP.MPA.195 Refuelling/defuelling with passengers embarking, on board or disembarking AMC1 ORO.MLR.100 Operations manual – general AMC3 ORO.MLR.100 Operations manual – general - Contents... AMC2 CAT.IDE.A.280 Emergency locator transmitter (ELT) AMC1,2,3 CAT.IDE.A.205 Seats, seat safety belts, restraint systems and child restraint devices AMC1,2 CAT.IDE.A.220 First-aid kit AMC1,2,3 CAT.IDE.A.225 Emergency medical kit ...	
response	Please see chapter 2 for a summary of comments and Agency responses	

**D. DRAFT DECISION on instructions on the categorisation of findings for
SACA – Part 1 Operations: International Commercial Air Transport –
Aeroplanes**

p. 174-366

comment	9	comment by: CAA Poland
	<p>PDFs codes should be added like in a SAFA part. A01,A03,A04,A07-A12, A13, A15-A18,A20,A21, B03-B05,B07-B10,C01,C05,C07 Inspecting instructions refer to ICAO standards instead of relevant EU regulations. A10 Inspecting instructions <i>Note: The OPS Regulation in CAT.GEN.MPA.180 requires "a certified true copy of the air operator certificate (AOC) to be carried during each flight. Therefore, if an inspector finds a noncertified copy of the AOC on board <u>this may constitute a finding</u>. The relevant PDF should be established concerning the underlined statement.</i> A13 Actual weather and weather forecast <u>not checked before departure</u>. Underlined text should be replaced by <u>not on board</u> as required by CAT.GEN.MPA.180(a)(18) A14 Inspecting instructions Check for presence of a completed mass and balance sheet (either paper or digital format) and accuracy of the mass and balance calculations <u>including a signature of loading supervisor</u>. Underlined text should be added as required by CAT.POL.MAB.105 (c) A19 Inspecting instructions B07 Inspecting instructions and relevant PDFs A term <u>torch(es)</u> should be replaced by <u>portable light(s)</u> as defined by CAT.IDE.A.1 15 (a) C03 Flight controls unserviceable. The standard of this PDF should be <u>E</u> instead of <u>I</u></p>	
response	Please see chapter 2 for a summary of comments and Agency responses	
comment	23	comment by: ENAC - CAA
	<p>The fuel consumption monitoring is required per CAT.OP.MPA.280. "No fuel consumption monitoring performed..." should be categorised as Cat. 2 Finding instead of a General Remark. Std. E instead of O and Std. ref.: CAT.OP.MPA.280 In-flight fuel management – aeroplanes The operator shall establish a procedure to ensure that in-flight fuel checks and fuel management are carried out according to the following criteria. (a) In-flight fuel checks (1) The commander shall ensure that fuel checks are carried out in-flight at regular intervals. The usable remaining fuel shall be recorded and evaluated to: (i) compare actual consumption with planned consumption; (ii) check that the usable remaining fuel is sufficient to complete the flight, in accordance with (b); and (iii) determine the expected usable fuel remaining on arrival at the destination aerodrome. (2) The relevant fuel data shall be recorded.</p>	
response	Please see chapter 2 for a summary of comments and Agency responses	

comment	26	comment by: ENAC - CAA
	in inspection instructions reference is made to ICAO Annex 8 Part III instead of CS	
response	Please see chapter 2 for a summary of comments and Agency responses	
comment	27	comment by: ENAC - CAA
	AMC2 CAT.OP.MPA 165 reference appear not suitable for emergency exits in the cockpit	
response	Please see chapter 2 for a summary of comments and Agency responses	
comment	28	comment by: ENAC - CAA
	ICAO reference in inspecting instructions	
response	Please see chapter 2 for a summary of comments and Agency responses	
comment	29	comment by: ENAC - CAA
	the PDF on flight manual should read: <u>no or incomplete aircraft flight manual or equivalent document on board</u>	
response	Please see chapter 2 for a summary of comments and Agency responses	
comment	30	comment by: ENAC - CAA
	Add a new PDF on checklist with reference in ORO.GEN.110 (h): <u>Checklist do not take into account latest manufacturer's standard</u>	
response	Please see chapter 2 for a summary of comments and Agency responses	
comment	31	comment by: ENAC - CAA
	ICAO reference in inspecting instructions	
response	Please see chapter 2 for a summary of comments and Agency responses	
comment	32	comment by: ENAC - CAA
	ICAO reference in inspecting instructions, we have now Appendix 1 in part ARO	
response	Please see chapter 2 for a summary of comments and Agency responses	
comment	33	comment by: ENAC - CAA
	After years of useless findings on the ICAO layout, now that is available a european layout <u>in the rule</u> , it seems too generous only a category G. I suggest a category 1 Maybe it is also worth to restore the PDF on true copy of the AOC	
response	Please see chapter 2 for a summary of comments and Agency responses	

comment	34	comment by: ENAC - CAA
	Inspecting instructions: 1. the consumption monitoring is mandatory in the european system, so it is always required by the OPS manual 2. is it worth to maintain the designators in the bottom of the instructions after the changes in flight plan dated november 2012?	
response	Please see chapter 2 for a summary of comments and Agency responses	
comment	35	comment by: ENAC - CAA
	ICAO reference in inspecting instructions	
response	Please see chapter 2 for a summary of comments and Agency responses	
comment	36	comment by: ENAC - CAA
	ICAO reference in inspecting instructions	
response	Please see chapter 2 for a summary of comments and Agency responses	
comment	37	comment by: ENAC - CAA
	Inspecting instructions: "Masks that do not meet all the ... EU-OPS criteria must be reported as general remark". This is not anymore valid in SACA. Again ICAO reference in inspecting instructions	
response	Please see chapter 2 for a summary of comments and Agency responses	
comment	38	comment by: ENAC - CAA
	Add FCL reference to ICAO Annex 1 among the possible standards in inspecting instructions. The last note in instruction has to be deleted or updated	
response	Please see chapter 2 for a summary of comments and Agency responses	
comment	39	comment by: ENAC - CAA
	A22 add a new PDF: Maintenance release incorrect with reference in 145.A.50	
response	Please see chapter 2 for a summary of comments and Agency responses	
comment	40	comment by: ENAC - CAA
	In B01, both SAFA nad SACA, a finding on markings and labels like that in C01 is missing	
response	Please see chapter 2 for a summary of comments and Agency responses	
comment	41	comment by: ENAC - CAA
	Old EU OPS reference in inspecting instructions of B09	

response	Please see chapter 2 for a summary of comments and Agency responses	
comment	42	comment by: ENAC - CAA
	All the reference to the rule for this PDF appear not to be relevant. The problem is the location, not the need to have the equipment or not.	
response	Please see chapter 2 for a summary of comments and Agency responses	
comment	43	comment by: ENAC - CAA
	No two way communication... - this Pdf maintains reference to ICAO Annex 6?	
response	Please see chapter 2 for a summary of comments and Agency responses	
comment	44	comment by: ENAC - CAA
	ICAO reference in inspecting instructions	
response	Please see chapter 2 for a summary of comments and Agency responses	
comment	45	comment by: ENAC - CAA
	<p>After years of experience I think it is time to get rid of two PDFs that have proven to be useless to enhance flight safety levels and at the same time have made some inspector wrongly proud of the job done:</p> <p>aircraft very dirty affecting the ability to inspect it - there is no requirement in MPDs to perform a detailed visual inspection in the ramp that could be hindered by dirt. During transit, inspections are at the general visual inspection level or even for "what is visible", therefore there is no maintenance requirement during transit that really needs the aircraft clean.</p> <p>paint damage with exposed composite - 99.9% of these findings are on the radome or wing-to-body fairings for which possible (?) absorption of humidity is not a safety problem. All the operators tend to consider this a cosmetic issue for which they suffer a category 2 finding. Significant impact on flight safety?</p> <p>As a general comment in C items, several reference to CS could be effectively changed with reference to applicable AMM ch. xx</p>	
response	Please see chapter 2 for a summary of comments and Agency responses	
comment	46	comment by: ENAC - CAA
	<p>Brake(s), Tyre(s) worn or fasteners missing outside limits, but dispatch allowed.... Shall we do an analysis of the goods and bads delivered by this sort of findings over the past years? I have no "goods" and an endless list of "bads" during follow-up due to operators sincerely not understanding why we raise findings pointing to an "M" standard, when the manufacturer itself allow the dispatch of the aircraft with the same defect.</p> <p>There is no point in my opinion in asking operators to make evident the positive assessment of the defect, only suspecting that they did no assessment at all.</p>	
response	Please see chapter 2 for a summary of comments and Agency responses	
comment	55	comment by: Federal Office of Civil Aviation FOCA

Annex D (Item) SACA	Comment
<i>General (I)</i>	In terms of better/easier identification, the PDF numbering as under Annex C should be used according the same methodology..
<i>General (II)</i>	By considering all points it is questionable if the additional effort put into the system for doing SACA- instead of SAFA-checks is justified.
<i>General (III)</i>	It has to be emphasised that it cannot be the idea of the SAFA program to check standardisation items as e.g. CS items. This is a matter of the respective certification and airworthiness authorities. Furthermore, there are still aircraft certified in accordance to FAR/JAR standards which cannot be checked towards the EASA certification standard (CS).
<i>A Items (General Comment)</i>	Many references are too generic resp. not specific enough for the respective finding. It might be helpful to number the findings individually (as the SAFA-pdf's)
<i>A Items (1)</i>	Cockpit installation Reference not adequate resp. incorrect
<i>A Items (1)</i>	Pilots vision Reference not adequate resp. incorrect
<i>A Items (2)</i>	Emergency exit u/s PDF OK, however with incorrect reference (reference pertains to next PDF) PDF)
<i>A Items (2)</i>	Access to emergency exit PDF OK, however reference pertains to passenger compartment (which pertains to B-Part) PDF
<i>A Items (3)</i>	Inspecting Instructions, Equipment TAWS is not complete insofar as aircraft < 5700 and/or max. 9 Pax do not fall under this requirement.
<i>A Items (3)</i>	Inspecting Instructions, Equipment ACAS II is not complete insofar as aircraft < 5700 and/or max. 19 Pax do not fall under this requirement.
<i>A Items (5)</i>	A new finding / standard might be introduced (G or Cat.1): Checklist revision number not mentioned
<i>B Items (11)</i>	4.3.7.1 An aeroplane shall not be refueled when... The standard (STD.) used (ref. A6I 4.3.7) should be ICAO (I) not EASA (E)
<i>B Items (12) Page 338</i>	Access to emergency exits PDF: Emergency exit not marked with the appropriate operating instructions As this particular issue (item) has already been addressed under Item B07 (page 302), it has to be considered as a duplication. Therefore, one of the indicated items (either B12 or 07) has to be deleted (ref. to Annex C SAFA, which in our opinion is specified correctly)
<i>B Items (12)</i>	Pre-described Finding: Tray table latches can be opened in the direction of evacuation

	(not recessed or special oneway lock) This item should be specified as under Annex C SAFA Item B (12) Annex C (SAFA) Pre-described Finding: Tray table locks can be opened in the direction of evacuation whilst certificated with special locks
<i>C Items (8) Page 352</i>	Inspections Item Title: Fan blades, propellers, rotors (main/tail) Because the document is designated to <u>Aeroplanes</u> (page 174) only, the rotor as a consequence, should not be indicated as a possibly affected part. This particular situation can be found under Annex C as well. The following areas are affected: <ul style="list-style-type: none"> • Inspections Item Title • Inspecting instructions
<i>C Items (8) and (9)</i>	As the inspection items Propeller/Fan Blades (C 8 & 9) have been merged into a single item, the subsequent PDF structure needs to be renumbered. As there is no benefit of this integration the original structure should be kept.
<i>D Items (3)</i>	Safety of cargo on board: The reference used CAT.OP.MPA.230 (securing of passenger compartment and galley) is not applicable for safety of cargo on board.

response Please see chapter 2 for a summary of comments and Agency responses

comment 60 comment by: Federal Office of Civil Aviation FOCA
(also p. 359 and 363): Inspection item 02, SPA.DG.105 (e): Description is not up to date as the text has been amended in the 2013-2014 edition of the ICAO TI. FOCA suggests to refer in a general manner to the valid TIs (which are amended biannually) with a dynamic reference without specific indication of the year of edition.

response Please see chapter 2 for a summary of comments and Agency responses

comment 62 comment by: ENAC - CAA
- A01 "Operational flight deck markings and/or placards missing or incorrect": the first reference is correct; the second one is referred to the cabin (CAT. IDE.A. 275) and should be displaced under B01 and B07 (where, on the contrary it isn't included)

response Please see chapter 2 for a summary of comments and Agency responses

comment 63 comment by: ENAC - CAA
- Inspecting Instructions for item A-10: the instruction dictates "Check for TCO authorization (presence and validity)" appears to be here by mistake, it should be

	in Part C (SAFA).	
response	Please see chapter 2 for a summary of comments and Agency responses	
comment	64	comment by: ENAC - CAA
	- A13: the remark "OFP not signed by the PIC" is missing: is it done on purpose or is it unintentionally forgotten?	
response	Please see chapter 2 for a summary of comments and Agency responses	
comment	65	comment by: ENAC - CAA
	- A13: according to the text of CAT. GEN MPA 180 a) accompanying the remark "Fuel on board less than minimum requirements" the appropriate meteorological information documents must be present on board, but there is no specific remark concerning the physical presence of the document; on the contrary, there is a remark phrasing "Actual weather and weather forecast not checked before departure" which stresses the necessity of the knowledge but it's not connected to the actual presence of the document.	
response	Please see chapter 2 for a summary of comments and Agency responses	
comment	66	comment by: ENAC - CAA
	- A20: FCL 045 requires that not only a valid licence be carried on board but also that the pilot shall carry an ID with his/her photograph. What to do in case the ID is missing?	
response	Please see chapter 2 for a summary of comments and Agency responses	
comment	67	comment by: ENAC - CAA
	B01: the reference for the remark "Cabin equipment not properly secured" doesn't match with the text. The reference is CS25.561/CS23.561 and may be correct (see reference for previous remark) but the text is belonging to Annex 1 to Regulation (EC) 216/2008, 6 Continuing Airworthiness (e.g. see pag. 274, ref. for Remark "pre-flight inspection not performed")	
response	Please see chapter 2 for a summary of comments and Agency responses	
comment	68	comment by: ENAC - CAA
	- B07: the reference for "Electric torches not readily available for some of the cabin crew" is repeated twice (one without the remark) – is it a printing mistake or the reference is related to the missing remark "Insufficient number of serviceable torches for each cabin crew member" that is present in the SAFA Guidance material, although referred only to night operations?	
response	Please see chapter 2 for a summary of comments and Agency responses	
comment	69	comment by: ENAC - CAA
	- mistake in D02 "Incorrect or incomplete information in NOTOC <u>not concerning</u> CAO packages" and "incorrect or incomplete information in NOTOC <u>concerning</u>	

	CAO packages” are categorized in the same way whilst the first is cat. 2 and the second cat. 3 in SAFA Guidance material.		
response	Please see chapter 2 for a summary of comments and Agency responses		
comment	70comment by: ENAC - CAA - printing errors concerning the remark code (ex: C08 should be iso C09 but it’s not, whilst nonsense C10C09 + C11C10)		
response	Please see chapter 2 for a summary of comments and Agency responses		
comment	71comment by: ENAC - CAA - printing errors concerning the remark code (ex: C08 should be iso C09 but it’s not, whilst nonsense C10C09 + C11C10)		
response	Please see chapter 2 for a summary of comments and Agency responses		
comment	72comment by: ENAC - CAA - Mistake: the remark “Emergency exit/s not marked with the appropriate operating instructions” is already present in B07		
response	Please see chapter 2 for a summary of comments and Agency responses		
comment	73comment by: ENAC - CAA - printing error: the reference for the first remark “Floor/carpet in poor condition affecting the rapid evacuation” is repeated twice (reference, not text)		
response	Please see chapter 2 for a summary of comments and Agency responses		
comment	90comment by: IATA In order to achieve the main objective of the SAFA program, which is the safety of flights into the participating countries, it needs to be ensured that the program is able to address the real safety risks associated with the operation. The list of pre-defined findings includes some ICAO requirements that are not safety related, such as the format of the CofA, the Noise Certificate, the format of the AOC and the format of the Pilots' licences, as an example. These non safety related items should be removed from the list. This will allow for the Inspectors to concentrate on real important safety items, without losing time on bureaucratic issues. Formal issues , such as the ones listed above, can be subject to discussion and consultation between Sates and at ICAO level, but should not be subject to safety ramp inspections.		
response	Please see chapter 2 for a summary of comments and Agency responses		
comment	134comment by: Austro Control GmbH		

D. DRAFT DECISION instructions on the categorisation of findings for SACA item A01, inspection instructions	Check that no equipment is installed such that it obviously does not meet the systems design features and emergency landing provisions in Annex 8 Part IIIA/B, Chapter 4 (e.g. when equipment installed on the glare shield significantly impairs the pilots vision).	Check that no equipment is installed such that it obviously does not meet the systems design features and emergency landing provisions in CAT.IDE.A.100 and M.A. 501 Installation (e.g. when equipment installed on the glare shield significantly impairs the pilots vision).	reference is made to ICAO
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response Please see chapter 2 for a summary of comments and Agency responses

comment 135

comment by: *Austro Control GmbH*

Reference	NPA original text	ACG proposed text	reason for change
D. DRAFT DECISION on instructions on the categorisation of findings for SACA Inspection item A03, inspection instructions	For aircraft with their first CoA issued on or after 1 March 2012, check if ACAS II, software version 7.1 is installed. This can be done by performing a test of aural warnings; version 7.1 will have the extra resolution advisory "Level off, level off" (this requirement is only applicable in the territory of the EU Member States, Iceland, Norway and Switzerland).	For aircraft with their first CoA issued on or after 1 March 2012, check if ACAS II, software version 7.1 is installed. (this requirement is only applicable in the territory of the EU Member States, Iceland, Norway and Switzerland).	"level off, level off" is not transmitted during the TCAS test, therefore delete: This can only be done by performing a "maintenance test" of aural warnings; version 7.1 will have the extra resolution advisory "Level off, level off"

response Please see chapter 2 for a summary of comments and Agency responses

comment 136

comment by: *Austro Control GmbH*

Reference	NPA original text	ACG proposed text	reason for change
D. DRAFT DECISION on instructions on the categorisation of findings for SACA Inspection item A03-3	A2-2.3.1	change the rules reference to Commission regulations EC 1332/2011 applicable item, to reflect the STD Ref and Standard's Text	reference is made to ICAO

response Please see chapter 2 for a summary of comments and Agency responses

comment 137 comment by: *Austro Control GmbH*

Reference	NPA original text	ACG proposed text	reason for change
D. DRAFT DECISION on instructions on the categorisation of findings for SACA Inspection item A04, inspection instructions	Note: ICAO standards do not require the manuals to be written in English language. Such a case does not constitute a finding unless it is obvious that the pilot(s) do not understand the language in which the manuals are written.	change the rules reference to Commission regulations according EC 965/2012 applicable item, to reflect the STD Ref and Standard's Text	reference is made to ICAO

response Please see chapter 2 for a summary of comments and Agency responses

comment 138 comment by: *Austro Control GmbH*

Reference	NPA original text	ACG proposed text	reason for change
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D. DRAFT DECISION on instructions on the categorisation of findings for SACA Inspection item A07, inspection instructions	Note: Annex 6 does require that the MEL is approved by the State of Operator. However, the Annex 6 does not require that proof of such approval be contained in the MEL itself or has to be carried on board. It is up to each and every Contracting State to determine how they approve a manual and whether evidence of such approval is required in the manual. The absence of a specific approval of the MEL on board of the aircraft does not constitute a finding.	change the rules reference to Commission regulations according EC 965/2012 applicable item, to reflect the STD Ref and Standard's Text	reference is made to ICAO
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response Please see chapter 2 for a summary of comments and Agency responses

comment 139 comment by: *Austro Control GmbH*

Reference	NPA original text	ACG proposed text	reason for change
D. DRAFT DECISION on instructions on the categorisation of findings for SACA Inspection item A08, inspection instructions		change the rules reference to Commission regulations according EC 965/2012 applicable item, to reflect the STD Ref and Standard's Text	reference is made to ICAO

response Please see chapter 2 for a summary of comments and Agency responses

comment 140 comment by: *Austro Control GmbH*

Reference	NPA original text	ACG proposed text	reason for change
D. DRAFT DECISION on instructions on the categorisation of findings for SACA Inspection item A08-1, A08-2, A08-3, A08-4, Std. Reference		change the rules reference to Commission regulations according EC 965/2012 applicable item, to reflect the STD Ref and Standard's Text	reference is made to ICAO

response Please see chapter 2 for a summary of comments and Agency responses

comment 141 comment by: *Austro Control GmbH*

Reference	NPA original text	ACG proposed text	reason for change
D. DRAFT DECISION on instructions on the categorisation of findings for SACA Inspection item A09, inspection instructions		change the rules reference to Commission regulations according EC 965/2012 applicable item, to reflect the STD Ref and Standard's Text	reference is made to ICAO

response Please see chapter 2 for a summary of comments and Agency responses

comment 142 comment by: *Austro Control GmbH*

Reference	NPA original text	ACG proposed text	reason for change
D. DRAFT DECISION on instructions on the categorisation of findings for SACA Inspection item A10, inspection instructions		change the rules reference to Commission regulations according EC 965/2012 applicable item, to reflect the STD Ref and Standard's Text Delete reference to TCO authorization	reference is made to ICAO TCO not applicable to Community operators

response Please see chapter 2 for a summary of comments and Agency responses

comment 143 comment by: *Austro Control GmbH*

Reference	NPA original text	ACG proposed text	reason for change
D. DRAFT DECISION on instructions on the categorisation of findings for SACA Inspection item A11, inspection instructions		change the rules reference to Commission regulations according EC 965/2012 applicable item, to reflect the STD Ref and Standard's Text	reference is made to ICAO

response Please see chapter 2 for a summary of comments and Agency responses

comment 144 comment by: *Austro Control GmbH*

Reference	NPA original text	ACG proposed text	reason for change
D. DRAFT DECISION on instructions on the categorisation of findings for SACA Inspection item A13, inspection instructions		change the rules reference to Commission regulations according EC 965/2012 applicable item, to reflect the STD Ref and Standard's Text	reference is made to ICAO

response Please see chapter 2 for a summary of comments and Agency responses

comment 145 comment by: *Austro Control GmbH*

Reference	NPA original text	ACG proposed text	reason for change
D. DRAFT DECISION on instructions on the categorisation of findings for SACA Inspection item A15, inspection instructions		change the rules reference to Commission regulations according EC 965/2012 applicable item, to reflect the STD Ref and Standard's Text	reference is made to ICAO

response Please see chapter 2 for a summary of comments and Agency responses

comment 146 comment by: *Austro Control GmbH*

Reference	NPA original text	ACG proposed text	reason for change
D. DRAFT DECISION on instructions on the categorisation of findings for SACA Inspection item A16, inspection instructions		change the rules reference to Commission regulations according EC 965/2012 applicable item, to reflect the STD Ref and Standard's Text	reference is made to ICAO

response Please see chapter 2 for a summary of comments and Agency responses

comment 147 comment by: *Austro Control GmbH*

Reference	NPA original text	ACG proposed text	reason for change
D. DRAFT DECISION on instructions on the categorisation of findings for SACA Inspection item A17, inspection instructions		change the rules reference to Commission regulations according EC 965/2012 applicable item, to reflect the STD Ref and Standard's Text	reference is made to ICAO

response Please see chapter 2 for a summary of comments and Agency responses

comment 148 comment by: *Austro Control GmbH*

Reference	NPA original text	ACG proposed text	reason for change
D. DRAFT DECISION on instructions on the categorisation of findings for SACA Inspection item A18 inspection instructions		change the rules reference to Commission regulations according EC 965/2012 applicable item, to reflect the STD Ref and Standard's Text	reference is made to ICAO

response Please see chapter 2 for a summary of comments and Agency responses

comment 149 comment by: *Austro Control GmbH*

Reference	NPA original text	ACG proposed text	reason for change
D. DRAFT DECISION on instructions on the categorisation of findings for SACA Inspection item A20 inspection instructions		change the rules reference to Commission regulations according EC 965/2012 applicable item, to reflect the STD Ref and Standard's Text	reference is made to ICAO

response Please see chapter 2 for a summary of comments and Agency responses

comment 150 comment by: *Austro Control GmbH*

Reference	NPA original text	ACG proposed text	reason for change
D. DRAFT DECISION on instructions on the categorisation of findings for SACA Inspection item A20-2	A6-I-9.1.2	change the rules reference to Commission regulations according EC 965/2012 applicable item, to reflect the STD Ref and Standard's Text	reference is made to ICAO

response Please see chapter 2 for a summary of comments and Agency responses

comment 151 comment by: *Austro Control GmbH*

Reference	NPA original text	ACG proposed text	reason for change
D. DRAFT DECISION on instructions on the categorisation of findings for SACA Inspection item A20-5, A20-6, A20-7, A20-8, A20-9		delete the ICAO requirements because the FCL requirement is applicable	reference is made to ICAO

response Please see chapter 2 for a summary of comments and Agency responses

comment 152 comment by: *Austro Control GmbH*

Reference	NPA original text	ACG proposed text	reason for change
D. DRAFT DECISION on instructions on the categorisation of findings for SACA Inspection item A20-no proper validation issued by the State of Registry		change the rules reference to Commission regulations according EC 965/2012 applicable item, to reflect the STD Ref and Standard's Text	reference is made to ICAO

response Please see chapter 2 for a summary of comments and Agency responses

comment 153 comment by: *Austro Control GmbH*

Reference	NPA original text	ACG proposed text	reason for change
D. DRAFT DECISION on instructions on the categorisation of findings for SACA Inspection item A20-Flight crew member without appropriate licence		change the rules reference to Commission regulations according EC 965/2012 applicable item, to reflect the STD Ref and Standard's Text	reference is made to ICAO

response Please see chapter 2 for a summary of comments and Agency responses

comment 154 comment by: *Austro Control GmbH*

Reference	NPA original text	ACG proposed text	reason for change
D. DRAFT DECISION on instructions on the categorisation of findings for SACA Inspection item B03 inspection instructions		change the rules reference to Commission regulations according EC 965/2012 applicable item, to reflect the STD Ref and Standard's Text	reference is made to ICAO

response Please see chapter 2 for a summary of comments and Agency responses

comment 155 comment by: *Austro Control GmbH*

Reference	NPA original text	ACG proposed text	reason for change
D. DRAFT DECISION on instructions on the categorisation of findings for SACA Inspection item B04 inspection instructions		change the rules reference to Commission regulations according EC 965/2012 applicable item, to reflect the STD Ref and Standard's Text	reference is made to ICAO

response Please see chapter 2 for a summary of comments and Agency responses

comment 156 comment by: *Austro Control GmbH*

Reference	NPA original text	ACG proposed text	reason for change
D. DRAFT DECISION on instructions on the categorisation of findings for SACA Inspection item B05 inspection instructions		change the rules reference to Commission regulations according EC 965/2012 applicable item, to reflect the STD Ref and Standard's Text	reference is made to ICAO

response Please see chapter 2 for a summary of comments and Agency responses

comment 157 comment by: *Austro Control GmbH*

Reference	NPA original text	ACG proposed text	reason for change
D. DRAFT DECISION on instructions on the categorisation of findings for SACA Inspection item B07 inspection instructions		change the rules reference to Commission regulations according EC 965/2012 applicable item, to reflect the STD Ref and Standard's Text	reference is made to ICAO

response Please see chapter 2 for a summary of comments and Agency responses

comment 158 comment by: *Austro Control GmbH*

Reference	NPA original text	ACG proposed text	reason for change
D. DRAFT DECISION on instructions on the categorisation of findings for SACA Inspection item B08 inspection instructions		change the rules reference to Commission regulations according EC 965/2012 applicable item, to reflect the STD Ref and Standard's Text	reference is made to ICAO

response Please see chapter 2 for a summary of comments and Agency responses

comment 159

comment by: *Austro Control GmbH*

Reference	NPA original text	ACG proposed text	reason for change
D. DRAFT DECISION on instructions on the categorisation of findings for SACA Inspectionitem B09 inspection instructions		change the rules reference to Commission regulations according EC 965/2012 applicable item, to reflect the STD Ref and Standard's Text	reference is made to ICAO

response Please see chapter 2 for a summary of comments and Agency responses

comment 160

comment by: *Austro Control GmbH*

Reference	NPA original text	ACG proposed text	reason for change
D. DRAFT DECISION on instructions on the categorisation of findings for SACA Inspection item B10 inspection instructions		change the rules reference to Commission regulations according EC 965/2012 applicable item, to reflect the STD Ref and Standard's Text	reference is made to ICAO

response Please see chapter 2 for a summary of comments and Agency responses

comment 161

comment by: *Austro Control GmbH*

Reference	NPA original text	ACG proposed text	reason for change
D. DRAFT DECISION on instructions on the categorisation of findings for SACA Inspection item B12 following "Floor/carpet in poor condition affecting the rapid evacuation"	Std. reference is mentioned, but no finding defined	delete format error	format error

response Please see chapter 2 for a summary of comments and Agency responses

comment 162 comment by: *Austro Control GmbH*

Reference	NPA original text	ACG proposed text	reason for change
D. DRAFT DECISION on instructions on the categorisation of findings for SACA Inspection item C01 inspection instructions		change the rules reference to Commission regulations according EC 965/2012 applicable item, to reflect the STD Ref and Standard's Text	reference is made to ICAO

response Please see chapter 2 for a summary of comments and Agency responses

comment 163 comment by: *Austro Control GmbH*

Reference	NPA original text	ACG proposed text	reason for change
D. DRAFT DECISION on instructions on the categorisation of findings for SACA Inspection item B11- "no two way communication..."		change the rules reference to Commission regulations according EC 965/2012 applicable item, to reflect the STD Ref and Standard's Text	reference is made to ICAO

response Please see chapter 2 for a summary of comments and Agency responses

comment 165 comment by: *Swedish Transport Agency, Civil Aviation Department (Transportstyrelsen, Luftfartsavdelningen)*

A01 page 174:

There are different views amongsts member states regarding CCTV systems, it should be stated clearly the the State of "oversight" decides what's applicable for the operator. If exempted by the state it should be mutually reckognized by other member states to avoid administrative burdens for all parties. No finding should be raised in this case.

There are some things only related to SAFA, the doc needs to be SACA only.

ex A10 refers to TCO authorisation. And references should be to 965/2012 iso ICAO

A03 page 182:

There are references to CIS built aircrafts and since there is a very limited

	<p>number (if any) and very few types, perhaps they could be listed? Imposing an immediate operating ban on a community operator could be difficult since the operator does not need an traffic entry permit. A04 page 185: <i>Note: Not all parts of the OPS Manual have to be carried on board. As a minimum there shall be available those parts pertaining to flight operations. The manuals in use during flight should be easily accessible for the crew in all flight phases.</i> A10 page 196: There are some things only related to SAFA, the doc needs to be SACA only. ex A10 refers to TCO authorisation. A12 page 199 CAT.GEN.MPA.180 clearly requires original for C of And Nat & Reg, the note should be deleted and the finding should not be downgraded. B3 page 287: it could be useful to refer to AMC CAT.IDE.A.220/225 in a note to guide inspectors and operators to the appropriate GM C07 page 351: <i>Note: When inspecting markings and placards, inspectors should differentiate between those required by ICAO EASA those required only by the manufacturer, Type certificate holder or OEM.</i> C08-12 page 352-353, the numbering is confusing and makes it hard to fill in EASA form 136 (POI), on top of that it will most likely force all states to reprint their Proof of inspections</p>
response	Please see chapter 2 for a summary of comments and Agency responses
comment	<p>173 comment by: ENAC - CAA</p> <p>Pages from 296 to 306: personally, and generally speaking, for remarks where reference is made to MEL, I'd also include as reference the CAT.GEN.MPA 105 (a) that prescribes as follows: "The commander, in addition to complying with CAT.GEN.MPA.100, shall:(11)decide on acceptance of the aircraft with unserviceabilities in accordance with the configuration deviation list (CDL) or the minimum equipment list (MEL)"</p>
response	Please see chapter 2 for a summary of comments and Agency responses
comment	<p>211 comment by: Fons Schaeffers/SGI Aviation</p> <p>A08 - Assuming E means EASA or EU rules, then why is an E listed instead of I in the items where reference is made to Annex 7?</p>
response	Please see chapter 2 for a summary of comments and Agency responses
comment	<p>212 comment by: Fons Schaeffers/SGI Aviation</p> <p>A10 - Inspecting Instructions - last line: Delete - TCO authorisation is not required for SACA operators.</p>
response	Please see chapter 2 for a summary of comments and Agency responses
comment	<p>213 comment by: Fons Schaeffers/SGI Aviation</p>

response	<p>A20 - several pdf items refer to Part-ARA. These items should not be a SACA item, but an EASA standardization item, as the operator has no authority over the form of the licences / medical certificates issued by the NAA.</p> <p>Please see chapter 2 for a summary of comments and Agency responses</p>
comment	<p>214 comment by: <i>Fons Schaefers/SGI Aviation</i></p> <p>Whilst the pdf entry for service carts is correct by restricting the standard to new models certified and manufactured after 5 November 2005, the inspection instruction omits the words 'new models certified'</p>
response	<p>Please see chapter 2 for a summary of comments and Agency responses</p>
comment	<p>215 comment by: <i>Fons Schaefers/SGI Aviation</i></p> <p>Inspecting instructions note on escape path illumination for smoke filled cabins: Contradicts CAT.IDE.A.275 which does require FPEEPM for a/c type certificated after 1957</p>
response	<p>Please see chapter 2 for a summary of comments and Agency responses</p>
comment	<p>216 comment by: <i>Fons Schaefers/SGI Aviation</i></p> <p>what is the link between oxygen bottles and seats?</p>
response	<p>Please see chapter 2 for a summary of comments and Agency responses</p>
comment	<p>233 comment by: <i>CAA-NL</i></p> <p>Attachment #5</p> <p>Please find attached some detailed comments on the inspection items table.</p>
response	<p>Please see chapter 2 for a summary of comments and Agency responses</p>
comment	<p>235 comment by: <i>DGAC France</i></p> <p>Attachment #6</p> <p>As expressed in an earlier comment DGAC France believes that attributing a same PDF code for SAFA and SACA PDFs would largely facilitate the use of SACA and SAFA sets of PDF. DGAC France would also like to point out that for future updates, Part 26 requirements, which are directly applicable to the operators, should be taken into account in SACA PDFs.</p> <p>Please consult the attached file for detailed comments by DGAC France on SACA PDFs.</p>
response	<p>Please see chapter 2 for a summary of comments and Agency responses</p>
comment	<p>254 comment by: <i>ENAC - CAA</i></p> <p>A12: In the inspecting instructions it is used also the acronym CoA. As per AIR OPS (Reg. EU 965/2012) GM2 Annex I it is recommendable to use CofA.</p>

response	Please see chapter 2 for a summary of comments and Agency responses
comment	256 comment by: ENAC - CAA Item A04 Inspecting instructions: see comment #255
response	Please see chapter 2 for a summary of comments and Agency responses
comment	257 comment by: ENAC - CAA Item A06: see comment # 197, 239
response	Please see chapter 2 for a summary of comments and Agency responses
comment	258 comment by: ENAC - CAA Item A13: see comment # 200 (new PDF proposal)
response	Please see chapter 2 for a summary of comments and Agency responses
comment	259 comment by: ENAC - CAA Item A04, inspecting instructions: Operations manual check for compliance with relevant AMCs or approval of alternative means of compliance Suggested PDF: Rules/procedures in OM not in compliance with EASA AMCs and no evidence of approval of alternative means of compliance by the competent authority. Std Ref.: ARO.GEN.120 (a)(b)(c)(d)
response	Please see chapter 2 for a summary of comments and Agency responses
comment	276 comment by: Liam Murphy Dear Sir/Madam In ref NPA 2013-13 D, SACA page 273 of 373 In relation to the term 'significant defects' used in many places within SAFA/SACA. Ryanair feel that this term is bringing any small or minor defect found to a much more elevated level than is warranted. There is no 'minor' defect to counteract this finding thus always leading both the inspector and the airline to a status of possible immediate action with follow on delays and engineering interaction for defects that are within limits on inspection. This will also increase the workload of pilots on pre-flight inspections to a level that is misleading in its intent, to ensure a safe departure of the aircraft. If any further information is required, please do not hesitate to contact me. Regards Liam Murphy Engineering Quality Manager Ryanair
response	Please see chapter 2 for a summary of comments and Agency responses

comment	277	comment by: <i>Liam Murphy</i>
	<p>Dear Sir/Madam</p> <p>In ref NPA 2013 D, SACA page 352 of 373</p> <p>In reference to SACA PDF inspection item C08, there is only one classification for this item, a level 3 finding. There should be more clarification given in this item to cater for small nicks which are within limits and therefore a category G classification could be added for clarity, this allows the inspecting authority to note the item found but not to ground an aircraft for less significant findings. If any further information is required, please do not hesitate to contact me.</p> <p>Regards Liam Murphy Engineering Quality Manager Ryanair</p>	
response	Please see chapter 2 for a summary of comments and Agency responses	

6 Appendix A - Attachments

 [131008 NPA2 2013-13 Zusammenfassung Kommentare.pdf](#)

Attachment #1 to comment [#172](#)

 [2nd SAFA Training Bulletin - 2012 Anhang GM 4.2.pdf](#)

Attachment #2 to comment [#116](#)

 [Attached file with comments on part C SAFA.pdf](#)

Attachment #3 to comment [#234](#)

 [SACA EXAMPLES ICAO STD REF.pdf](#)

Attachment #4 to comment [#244](#)

 [Commentaar NL op SACA insp items.pdf](#)

Attachment #5 to comment [#233](#)

 [Attached file with comments on part D SACA.pdf](#)

Attachment #6 to comment [#235](#)