

COMMENT RESPONSE DOCUMENT (CRD) TO NOTICE OF PROPOSED AMENDMENT (NPA) 2009-02E

for an Agency Opinion on a Commission Regulation establishing the Implementing Rules for cabin crew in commercial air transport operations

and

draft Decision of the Executive Director of the European Aviation Safety Agency on Acceptable Means of Compliance and Guidance Material related to the Implementing Rules for cabin crew in commercial air transport operations

"Implementing Rules for Cabin Crew in Commercial Air Transport Operations"

CRD c.2 - Comment Response Summary Table (CRST) Part-CC

Table of Content

CF	RD C.2 – COMMENT RESPONSE SUMMARY TABLE (CRST) PART-CC	1
DF	RAFT OPINION PART-CABIN CREW (PART-CC)	3
SL	JBPART GEN -GENERAL REQUIREMENTS	3
	CC.GEN.001 Competent authority	3
	CC.GEN.005 Scope	3
	CC.GEN.015 Application for a cabin crew attestation	4
	CC.GEN.020 Minimum age	4
	CC.GEN.025 Privileges and conditions	4
SL	JBPART CCA - SPECIFIC REQUIREMENTS FOR THE CABIN CREW ATTESTATION	5
	CC.CCA.100 Issue of the cabin crew attestation	5
	CC.CCA.105 Validity of the cabin crew attestation	7
	CC.CCA.110 Suspension and revocation of the cabin crew attestation	8
SL	JBPART TRA - TRAINING REQUIREMENTS FOR THE CABIN CREW ATTESTATION .	10
	CC.TRA.215 Conduct of training courses, examination and checking	
	CC.TRA.220 Initial training course and examination	11
	CC.TRA.225 Aircraft type-specific training and checking	13
DF	RAFT DECISION - AMC AND GM TO PART-CABIN CREW (PART-CC)	17
SL	JBPART GEN - GENERAL REQUIREMENTS	17
	AMC1-CC.GEN.025(b) Privileges and conditions	
	CONDITIONS	17
SL	JBPART TRA - TRAINING REQUIREMENTS FOR THE CABIN CREW ATTESTATION .	17
	AMC1-CC.TRA.220(b) Initial training course and examination	17
	TRAINING PROGRAMME	
	GM1-CC.TRA.220 (b)Initial training course and examination	23
	CREW RESOURCE MANAGEMENT TRAINING TABLE	23

A: Rule	B: Summary of comments	C: Reason for change, remarks	D: Source ref. and compliance	A: Rule
Draft Opinion Part-Cabin Crew (Part-CC)			Х	х
Subpart GEN -general requirements				
CC.GEN.001 Competent authority For the purpose of this Part, the competent authority shall be the authority designated by the Member Stateto whom where a person applies for the issuance of a cabin crew attestation.	MS: request for flexibility to delegate IA: CCA to be issued by NAA only IA (comment confirmed by indiv. members): CCA to be limited to initial training	Flexibility to delegate the issue of CCA is provided by Article 8(4) of Regulation 216/2008 (BR): see also Part-AR This comments conflict with BR: an attestation of initial training is different from an attestation which BR requires to be maintained, and subject to limitation, suspension or revocation	BR Article 8 (4) & (5)(e)	X
CC.GEN.005 Scope This Part establishes the requirements for the issue of cabin crew attestations and the conditions of their validity and use by cabin crew members in commercial air transport operations.	MS + IA : delete "CAT ops" - all CC to be equal IA (comment confirmed by indiv. members) + MS: CCA to be limited to initial training	N/A – this suggestion conflicts with BR which specifies the applicability of the CCA to CAT only N/A – conflict with BR. Please refer to response to CC.GEN.001	BR Article 8 (4) &(5)(e)	х
CG.CEN.010 Definition For the purpose of this Part, the following definition shall apply: 'Cabin crew member' means a crew member, other than a flight crew member or technical crew member, who performs duties in the interests of safety of passengers and aircraft during operations.	IA (comment confirmed by indiv. members): realign with EU-OPS & ICAO Annex 6 (delete "aircraft") IA (comment confirmed by indiv. members): extend txt ("and holds CCA, meets med. requirements in Part-MED and has successfully completed appropriate training."), NPA definition risks to permit anyone to be a CC MS: definition to be included in Part-OR, Section VI. & Part-AR,	The definition has been clarified: - to encompass all cabin crew duties including those relating to flight safety (e.g. aircraft surface contamination, pilot incapacitation; security), and those performed outside the passenger cabin (e.g. after an evacuation; in the cockpit in case of pilot incapacitation); and - to specify that CC must be qualified to perform the related duties As for other definitions, this definition has been moved to the Cover Regulation, in this case of Part-CC and of Part-OR,	OPS 1.988 (para 2)	Annex 6, Part-I "Definitions" + ICAO Doc 7192- AN/857, Part E-1, "Definitions" Cabin crew member. A crew member who performs, in the interest of safety of passengers, duties assigned by the operator or the pilot- in-command of the aircraft, but who shall not act as a flight crew member.

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			relevant to CC		
An ap	EN.015 Application for a cabin crew attestation oplication for a cabin crew attestation shall be made in a form and manner established by competent authority.	IA (comment confirmed by indiv. members): CCA to be limited to initial training	N/A – conflict with BR. Please refer to response to CC.GEN.001	BR Article 8 (4) & (5)(e)	х
	EN.020 Minimum age oplicant for a cabin crew attestation shall be at least 18 years of age.	IA (comment confirmed by indiv. members): CCA to be limited to initial training MS: amend txt ("an applicant for the issuance of CCA shall be")	N/A – conflict with BR. Please refer to response to CC.GEN.001 Text is maintained as in line with other comparable wording relating to 'applicants'.	OPS 1.995 (a)	ICAO Doc 7191- AN/857, Part E-1, Para 1.2.2.3
cc.g	EN.025 Privileges and conditions General: The privileges of holders of a cabin crew attestation are to act as cabin crew member on aircraft engaged in commercial air transport operations.	MS + IA delete "CAT ops" – all CC to be equal IA (comment confirmed by indiv. members) + MS: CCA to be limited to initial training	N/A – conflict with BR Article 8 (4) Only CC in CAT are required to hold an attestation N/A – conflict with BR Article 8 (5) (e)	BR, Article 8 (4) & (5)(e)	х
(b)	Conditions: (1) Holders of a cabin crew attestation shall may only exercise their privileges granted by their attestation on a particular aircraft type if they comply with this Part and the applicable requirements of Part-MED, as well as with the applicable relevant requirements of Part-OR and Part-CAT for the aircraft to be operated.	MS: CCA to be a responsibility of the operator; no link between CCA of initial training & medical certificate	Acc. to BR Article 8 (4), MS may decide to delegate to operator or training organisations the task of issuing the CCA, but Article 8 (5)(e) requires conditions to be specified, meaning a 'process' to be followed in all cases under the responsibility of authority. Para (2) and (3) originate from CC.CCA.100 (c) and have been moved to CC.GEN.025 for clarity and consistency and taking into account comments received: please refer to related comments and response below under CC.CCA.100 (c)	BR Article 8 (4) & (5)(e)	X
	(2) When exercising those privileges, holders shall make their cabin crew attestation, and the list of aircraft type(s) they are qualified to operate on, available for inspection by a competent authority.		This point (2) has been moved from CC.CCA.100(c). It has been amended, and with the related newly proposed AMC, provides the requested flexibility whilst ensuring that holders are able to show compliance with the applicable rules, if so requested (CCA		

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			recognised across all EU)		
		IA: agree (see proposals) IND unnecessary attempt to escalate existing document to the status of a Licence; what will this do to improve safety?	Noted BR Article 8 (5)(e) requires conditions to be specified, meaning a 'process' to be followed under the responsibility	BR Article 8 (4) & (5)(e)	X
CC.C	CA.100 Issue of the C cabin crew attestation	MS + IND: disagree with CCA	of MS. BR Article 8 (5)(e) requires conditions to be specified, meaning a 'process' to be followed under the responsibility of MS.	BR Article 8 (4) & (5)(e)	X
(a)	A cCabin crew attestations shall only be issued to an applicants after the have successfully completedion of:	IA + AME – agree IS: 08 – CCA to be limited to initial training	Noted BR Article 8 (5)(e) requires conditions to be specified, meaning a 'process' to be followed under the responsibility of MS.	BR Article 8 (5)(e) + OPS 1.1005(d)	X
	(1) the initial medical examination and assessment in accordance with Part-MED; and	IND+ MS: disagree / delete IND+ MS provide flexibility with only initial med. examination or medical questionnaire or assessment IA (comment confirmed by indiv. members): specify exact	Point (1) has been deleted to avoid duplication as already covered in Subpart E of Part MED, which may lead to confusion. The necessary links to Part-MED are provided in CC.GEN.025(b)(1) and CC.CCA.105(a)(1) Conflict with BR Article 8(5)(e) Please refer to the CRD on Part MED (more flexibility has been provided). Self-assessment or assessment using questionnaire only without a medical doctor intervention conflicts with BR Annex IV 7.(b)(ii) Reference will be specified if needed under CC.GEN.025(b) (1) and CC.CCA.105(a)(1) in	BR Annex IV (7)(b)(ii) 7.b. Cabin crew members must: (ii) be periodically assessed for medical fitness to safely exercise their assigned safety duties. Compliance must be shown by appropriate assessment based on aero-medical best practice. + OPS 1.995 (b)	ICAO Doc 7192- AN/857, Part E-1, Para 1.2.2.3 "Medical"
	(2) anthe examination following completion of the initial safety training course and the associated examination of aircraft type-specific training and checking for at least one aircraft type in accordance with this Part.	location of medical requirements for CC in Part-MED IA: amend txt "in accordance with CC.TRA.120"	the Opinion when final numbering is confirmed. All applicable requirements shall apply,, not only CC. TRA.120 This text has been amended for	OPS 1.995(c) OPS 1.005 (d)	ICAO Doc 7192- AN/857, Part E-1, Para 1.1.4; 1.2.3.

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		clarification purposes: CCA is required to be maintained by BR, it must therefore include at least aircraft type-specific training in addition to initial training		+ 1.2.4 + 2.1.4
 (b) A cCabin crew attestations shall be issued by: (1) the competent authority, or (2) an organisation approved by the competent authority to issue attestations on its behalf in accordance with this Part and with the procedures established by that competent authority, by: 	IA (comment confirmed by indiv. members): CCA to be issued by competent authority only	Conflict with BR Article 8 (4) that allows MS to delegate the task of issuing to operators or training organisations approved to do so.	BR Article 8 (4)	×
(1) the operator specifically approved to do so in accordance with Part-OR, or	MS: text referring to Part-OR – paragraph with relevant requirement not available	See text (b)(2) above that has been amended for clarity	BR Article 8 (4)	х
(2) the training organisation specifically approved to do so in accordance with the applicable national requirements	No comments		BR Article 8 (4)	х
that conducted the examination following the initial safety training cours	MS: delete (superfluous)	This is iaw Appendix 1 to OPS 1.175 (h) Text however simplified as item covered in Part-AR and Part-OR.	OPS 1.1005(d) Appendix 1 to OPS 1.175 (h)	х
(c) Holders of a cabin crew attestation shall carry it when exercising their privileges together with the list of aircraft type(s) they are proficient to operate on.	IA (comment confirmed by indiv. members) + IND+ MS: clarify purpose of carrying and/or delete	Para (c) has been moved above under CC.GEN.025(b) which with the related newly proposed AMC provide the requested flexibility whilst ensuring that holders are able to show compliance with the applicable rules, if so requested (CCA recognised across EU)	X	×
	MS + IA + IND+ INDIV: list of a/c types to be listed on CCA (list of a/c types itself not sufficient – does not give certification status to attestation) MS: determine (list of a/c types): 1.who will issue doc 2.standardize format recognizable in MS or replace by CC Member Licence issued by & valid at that particular	1.List of a/c as an annex to the CCA is considered easier to be issued by TO or OP and is proposed to avoid reissuing of the CCA. 2 + 3.Standard format can be developed inc. validity dates 4. operator specific training remains as in the past the operator's responsibility: no change		

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	operator 3.validity of privileges related to different a/c types 4.who is authorized to provide type / company specific training			
CC.CCA.105 Validity of the cabin crew attestation			х	x
(a) The c Cabin crew attestations shall remain valid as long as the holders:	No comments		Х	х
(1a) complyies with the requirements for medical fitness of cabin crew specified in this Part and the applicable requirements of Part-MED; and	IA (comment confirmed by indiv. members) + IND+ MS: no requirement for medical examination, only assessment, as referred in BR	By referring to aero-medical assessment, BR Annex IV, 7.b. (ii) requires it to be conducted by a medical practitioner qualified in aviation medicine ('assessment' is also used for pilots in Art.7) Self-assessment and/or use of questionnaires only without a doctor (particularly for the initial) would mean it be completed by a person not qualified as a medical practitioner, and may lead to self-incrimination aspects.	BR Article 8 (5)(e) + Annex IV (7)(b)(ii)	X
(b) complies with the training requirements specified in this Part; and	IA (comment confirmed by indiv. members) + IND+ MS: CCA to be limited to initial training	N/A – the comment conflicts with BR Article 8 (5) (e) This requirement has been moved to (1) above	BR Article 8 (5)(e) + Annex IV (7)(b)(i)	х
(2e) maintain the validity of the privileges granted by their attestation for the aircraft type(s) they are qualified to operate on. has exercised their privileges within the preceding 6 months on at least one aircraft typeor has undergone the appropriate training course on the type in accordance with this Part and with Part-OR as relevant.		The text has been revised for clarity and consistency purposes and to ensure that holders are made aware of the conditions that must be complied with.	BR Article 8 (5)(e) + Annex IV (7)(b)(i) +	Annex 6, Part-I, Para 12.4 + ICAO Doc 7192- AN/857, Part E-1,
(b) To maintain the validity of the privileges granted by their attestation for the aircraft type(s) they are qualified to operate on, holders of a cabin crew attestation shall:	MS: CCA to be issued by operator for easy compliance	BR Article 8 (4) leaves this aspect to the discretion of each MS.	OPS 1.1020	Para 1.2.3.1
(1) have exercised within the preceding six months the privileges granted by their attestation for the relevant aircraft type(s); or	with (b) & (c) IND: delete all reference to	Recency requirements are transposed from EU-OPS		
(2) if they have not carried out flying duties on one of those aircraft type(s),complete the applicable training and checking on that type as specified in Part-OR; or	recency	1.1020. In addition, BR Article 8 (5) (e) requires conditions to be specified for maintaining the validity of the attestation.		

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(2) if they have not carried out any flying duties for more than six months, or when the validity of the applicable recurrent training and checking required by Part-OR has expired, complete aircraft type-specific training and checking for each aircraft type as specified inCC.TRA.225, as well as applicable training and checking as specified in Part-OR when relevant.		Conditions have therefore been developed on the basis of the requirements of Annex IV 7.(b) (i) and (ii), and EU-OPS related requirements		
(c) All training completed shall be recorded by the holders, or by the operator(s) engaging their services provided that such records are made available upon request of the holders.		Comments show that text had to be clarified to ensure compliance with Art. 8 (5)(e) and includes a reference to the a/c type specific training.		
CC.CCA.110 Limitation, sSuspension and revocation of the cabin crew attestation		All texts relating to 'limitations for medical conditions' under this Part have been deleted to avoid duplication and confusion as these aspects are already covered in Subpart E of Part-MED	BR Article 8 (5)(e)	
	IA (comment confirmed by indiv. members): create new paragraph: "CC.CCA.111 Complaints of decisions by CA may be presented to Commission or Arbitration committee"	- N/A - MS are responsible for the implementation of EU rules and the related oversight. Appeals can therefore be submitted but in accordance with national administrative law established by each MS		
	IND: delete	- Would conflict with BR		
	MS+ IA (comment confirmed by indiv. members) CCA to be limited to initial training IND: section to affect a/c type training only, not CCA	BR Article 8 (5) (e) requires conditions to be specified for maintaining, limiting, suspending, revoking the attestation. Conditions are based on the essential requirements of Annex IV 7.(b) (i) and (ii), and EU-OPS related requirements.		
	MS + IND: Clarify whether CCA managed by operator or CA	- This aspect is addressed under Authority requirements. BR allows a MS to delegate the issuing of attestations on its behalf, meaning under its responsibility. Suspension and revocation can only be decided by the competent authority as part of its oversight responsibilities.		

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		When the If holders does not comply with the requirements of this Part, their cabin crew attestation may be suspended or revoked by the competent authority in accordance with AR.CC.215.	MS: re-phrase txt "or revoked according to National regulations"	Editorial changes for clarity This is covered in Part-AR by requirements relating to procedures to be established by each authority in this matter.	BR Article 8 (5)(e)	X	
			AME IA— amend txt "this Part except in respect of temporary medical unfitness, CCA may be limited"	Circumstances and conditions for limitation are covered in Subpart E of Part-MED, as they are restricted to medical conditions,. Conversely, suspension and revocation remain under the responsibility of the authority iaw Part-AR, as part of their oversight function			
(b)	•	n limitation, the holder shall exercise the privilegesof their cabin crew attestation in ordance with the applicable limitation.	AME IA – replace "their" with "his/her"	N/A	BR Article 8(5)(e) + BR Annex IV (7)(b)(ii)	х	
(be)		n-In case of suspension or revocation of their cabin crew attestation by the npetent authority, the holders shall not exercise:	AME IA - replace "their" with "his/her"	This para has been amended for clarity and consistency purposes BR Article 8(5)(e)	BR Article 8(5)(e)	х	
	(1)	be informed in writing of this decision, and of their right of appeal in accordance with national law;		par	iaw comments received, particularly (1) and (3) as		
	(2)	not exercise the privileges of granted by their cabin crew attestation;		requested by comments placed under other segments			
	(3)	inform without undue delay the operator(s) employing their services; and shall					
	(3)	return their cabin crew- attestation in accordance with the applicable procedure established by the competent authority.					

A: Ru	ıle	B: Summary of comments	C: Reason for change, remarks	D: Source ref. and compliance	A: Rule
S	ubpart TRA - Training requirements for the cabin crew attestation	IA (comment confirmed by indiv. members) CCA to be limited to initial training	N/A – conflict with BR. Please refer to response to CC.GEN.001	х	Annex 6, Part-II, Para 3.12.4 Annex 6, Part-I, Para
		IA: create in IR: minimum syllabi / duration of training / CS for operators & training organizations	Training elements to be covered are specified in IRs under each training course and further developed in AMC (as for other personnel)		12.4 ICAO Doc 7192- AN/857, Part E-1
CC.TI	RA. 1 215 Conduct of training courses, examination and checking	No comments		BR Annex IV (7)(b)(i)	Annex 6, Part-II, Para 3.12.4
(a)	The training courses and the associated examination or and checking specified in this Part shall be:				Annex 6, Part-I, Para 12.4 ICAO Doc 7192- AN/857, Part E-1, Para 1.1.2: 1.1.4 + 1.2.4 + 2.1.4
	(1a) be-conducted according to a-documented training programmes and syllabi approved by the competent authority;	No comments	Text amended for consistency and to avoid duplication as training programmes are in all cases approved as part of the approval of the TO or of the AOC as relevant	OPS 1.1005(c)	ICAO Doc 7192- AN/857, Part E-1, Para 1.1.2 Annex 6, Part-I, Para 12.4
	(2b) be performed by personnel suitably qualified and experienced; and (3e) provided only by organisations approved by the competent authority in		Text clarified in accordance with EU-OPS	OPS 1.1005 (b)	Х
(b)	accordance with AR.CC.100. Approved organisations referred to in (a)(3) shall be either: (1) an operator or a training organisations; or (2) commercial air transport operators. that are specifically approved to do so by the competent authority; and	MS+ IND: develop requirements / criteria / approval process / scope of applicability of ATO	Criteria listed under IEM to Appendix to JAR-OPS 1.1005/1.1010/1.1015/1.1020 'Training methods' and ACJ OPS1.1005/1.1010/1.1015/1.10 20'Representative Training Devices' have been transferred as AMC1 to AR.CC.100 'Approval of organisations providing CC training'	+ Appendix 1 to OPS 1.175 (h) last item of the list	
		MS + IA (comment confirmed by indiv. members) amend txt with "be provided only by an operator, an organization acceptable to operator / AOC	Operators may sub-contract activities and when doing so remain responsible: refer to OR.GEN relating to contracting activities		
		holder"	The numerous comments requiring further requirements / criteria for TO and instructors are noted to be mentioned with the Opinion as an issue that might need an amendment to the BR to give EASA the legal		

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		basis to initiate a rulemaking task in this field.		
(c) be performed by personnel suitably qualified and experienced	MS + IA + IND: define scope of qualification & experience or replace with "authorized instructors" / delete	(c) moved as (b) for consistency and easier readability	BR Annex IV (8)(a)(2)	х
	IA: develop qualification standards & harmonized training elements for authorized instructors	See response to segment above		
CC.TRA.+220 Initial safety training course and examination	MS: replace Initial Safety Training with "initial training" (due to extensive scope covered in the course)	Change accepted	X	Annex 6 – Part-I, Para 12.4 Annex 6, Part-II, Para 3.12.4 ICAO Doc 7192- AN/857, Part E-1, Para 1.1.2 +1.2.3.2 +1.1.4; 1.2.4; 2.1.4
(a) Applicants for a cabin crew attestation shall undergo-complete an initial safety-training course to familiarise themselves with the aviation environment and to acquire the adequatesufficient general knowledge and basic proficiency required to perform cabin crewthe duties and discharge the responsibilities related to the safety of passengers and flight during operations.	No comments	Editorial changes	BR Article 8 (4) & (5)(e) + BR Annex IV (7)(b)(i)	ICAO Doc 7192- AN/857, Part E-1, Para 1.2.3.2 Annex 6 -Part-I, Para 12.4 Annex 6, Part-II, Para 3.12.4
(b) The programme of the initial safety training course shall include theoretical and practical training and shall cover at least the following elements:	MS: include subject "common language between CC and PAX"	Editorial change as above This has been proposed by a Safety Recommendation deriving from an accident investigation and has been proposed as a future rulemaking task subject to appropriate RIA.	Appendix 1 to OPS 1.1005 Appendix 2 to OPS 1.1005/1.1010/1.101 5 Appendix 3 to OPS 1.1005/1.1010/1.101	ICAO Doc 7192- AN/857, Part E-1, Para 1.2.3.2 + Para 2.1.2.9 + Table 1-1
(1) general theoretical knowledge on aviation and , aviation regulations covering all elements relevant to cabin crew and the safety functions duties and responsibilities of required from cabin crew;	MS + IA (comment confirmed by indiv. members) clarify & replace with "awareness of aviation regulations"	'General knowledge' is synonym to 'awareness' + Editorial change for clarity	Appendix 1 to OPS 1.1005(g)(1)(3)	ICAO Doc 7192- AN/857, Part E-1, Para 3.2 + Para 4.1.1 + Para 4.1.2
(2) communication;	No comments		Appendix 1 to OPS 1.1005(f)	

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(:	introductory course to-on human factors (HF) in aviation and to-crew resource management (CRM) conducted by at least one cabin crew CRM instructor;	IA (comment confirmed by indiv. members) amend txt " conducted by at least one suitably qualified CRM instructor"	NPA text is in line with EU-OPS Text maintained	Appendix 1 to OPS 1.1005(h)(1) & (1)(iii)	Annex 6, Part-II, Para 3.12.4.2 Annex 6, Part-I, Para 12.4(f) ICAO Doc 7192- AN/857, Part E-1, Chapter 7
(4	1) passenger handling and cabin surveillance;	No comments		Appendix 1 to OPS 1.1005(e)	ICAO Doc 7192- AN/857, Part E-1, Chapter 4
(!	5) aero-medical aspects and first aid;	No comments		Appendix 1 to OPS 1.1005(d)	ICAO Doc 7192- AN/857, Part E-1, Chapter 8
((b) dangerous goods;	MS: amend txt " DG as established in the current version of ICAO Tech. instructions"	P/accepted: reference has been included in related AMC	Appendix 1 to OPS 1.1005(e)(7)	Annex 6, Part -I, Para 12.4(e) ICAO Doc 7192- AN/857, Part E-1, Chapter 6
(1	7) security aspects in aviation ;	IA (comment confirmed by indiv. members) amend txt "security training" IA (comment confirmed by indiv. members): delete paragraph	NPA text is in line with EU-OPS but clarified to avoid conflict/overlapping with R.300/2008	Appendix 1 to OPS 1.1005(e)(8)	Annex 6, Part-I, Para 13.4 EC 300/2008, Annex 10.2
(1	3) fire and smoke training; and	No comments		Appendix 1 to OPS 1.1005(a)	ICAO Doc 7192- AN/857, Part E-1, Para 5.4 ; 5.5
(1	9) survival training on ground and in water.	MS: to be required for specific areas of ops only	This is initial course to cover the general principles and knowledge relevant to survival. Aspects relevant to specific areas of operations should be covered under the operator conversion training as specified in Part-OR	Appendix 1 to OPS 1.1005(b) & (c)	ICAO Doc 7192- AN/857, Part E-1, Para 5.8.2 (18)(19) + Para 5.9.2 (6)(7)(8)(9)(10)
е	pplicants for a cabin crew attestation shall undergo an examination covering all subjects lements of the training programme specified in (b) to demonstrate that they have trained the level of knowledge and proficiency required in (a).	IA: standardize examination process	This can only be addressed through a rulemaking task that would define common criteria, and be subject to the appropriate RIA	OPS 1.1025(a)	ICAO Doc 7192- AN/857, Part E-1, Para 2.1.4 + Para 1.2.4
		IND: re-phrase for "examinations" (pl.) – series of	Examination is a generic term that may include several tests		

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	examinations, not only 1			
CC.TRA.+225 Aircraft type-specific training and checking	IA + IND: move type training to CC.OR.OPS	The requirement for aircraft type specific training remains as the necessary linkto specify conditions to 'maintain' the validity of CCA iaw BR Article 8(5)(e). However, the training programme (transposed from EU-OPS related requirements) has been transferred to Part-OR Section VI(OR.OPS.CC) as requested by comments.	OPS 1.1010 (a)	Annex 6, Part-I, Para 12.4 Annex 6, Part-II, Para 3.12.4 ICAO Doc 7192- AN/857, Part E-1, Para 1.2.3.5; 2.1.4 + 1.2.4
 (a) For extending the privileges of their cabin crew attestation on an aircraft type determined in accordance with the applicable requirements of Part-21, cabin crew membersshall undergo: In addition to the initial training course, applicants for a cabin crew attestation shall 	IA (comment confirmed by indiv. members): re-phrase as in EU-OPS; operator has no influence on Part 21	Partially accepted: the text has been amended.		Refer to the above box (CC.TRA.125)
complete for at least one aircraft type:	IA: type specific training to be defined in a/c's OSC	This is now covered under OR.OPS.CC.125(b)(2). Please note that changes for consistency with NPA OSD outcome may be made at a further stage		
	MS: re-phrase txt "To grant a privilege to the holder of a CCA for assignment to duties on an a/c type, CCM shall undergo:"	It is considered that this point is covered by CC.GEN.025 together with CC.TRA.225. However, reactions to the CRD would be appreciated on whether a new specific rule (e.g. CC.CCA.115 on 'Privileges for additional a/c/ types') would still be needed for enhanced clarity.		
(a1) a training course to acquire the adequate covering at least the aircraft type-specific training programme specified inOR.OPS.CC.125(b); and	No comments	Text has been amended to ensure consistency with the changes made under the other segments	OPS 1.1010(a)	ICAO Doc 7192- AN/857, Part E-1, Para 1.2.3.5 + Table 1-1
(b2) the associated checking covering all training subjects elements of the programme to demonstrate they have attained the required level of knowledge and proficiency.	No comments	Editorial changes for clarity purposes	OPS 1.1025(a)	ICAO Doc 7192- AN/857, Part E-1, Para 2.1.4 + 1.2.4
(b) The programme of the training course shall:	No comments	Please refer to the responses above to several comments asking a/c type training to be transferred to OR.OPS.CC	х	х

A: Rule	B: Summary of comments	C: Reason for change, remarks	D: Source ref. and compliance	A: Rule
(1) be based on the specific data provided for the relevant aircraft type in accordance with the applicable requirements of Part-21;	IA (comment confirmed by indiv. members): re-phrase as in EU-OPS; operator has no influence on Part 21	Type-specific elements will be defined by the manufacturers iaw Part-21. This will be subject to final outcome of NPA OSD and amended accordingly. Text has been transferred to OR.OPS.CC as requested by comments under other segments	x	x
(2) include training and practice on either a representative training device or on the actual aircraft; and	No comments	See above responses	OPS 1.1010(d)(3)	ICAO Doc 7192- AN/857, Part E-1, Para 2.1.2.7+ 2.1.2.8 + 2.1.2.9
(3) cover those elements that are aircraft type-specific for at least the following training subjects:	No comments	See above responses	Appendix 1 to OPS 1.1010	ICAO Doc 7192- AN/857, Part E-1, Table 1-1
(i) aircraft general description;	No comments	See above responses	х	ICAO Doc 7192- AN/857, Part E-1, Para 3.1+ 3.4
(ii) all safety equipment and systems installed;	No comments	See above responses	Appendix 1 to OPS 1.1010(h)	ICAO Doc 7192- AN/857, Part E-1, Para 5.3 + 5.6
(iii) normal and emergency procedures;	No comments	See above responses	Appendix 1 to OPS 1.1010(a)(2)	ICAO Doc 7192- AN/857, Part E-1, Para 5.2
(iv) actual operation and opening by each cabin crew member of each type or variant of normal and emergency doors and exits in the normal and emergency modes, and demonstration of the operation of the other exits;	No comments	See above responses	Appendix 1 to OPS 1.1010 (c)(1)	ICAO Doc 7192- AN/857, Part E-1, Para 5.3.2(7)+ 5.1.3
(v) fire and smoke training;	MS: to be included in operator's a/c type training	Text has been transferred to OR.OPS.CC	Appendix 1 to OPS 1.1010 (b)	ICAO Doc 7192- AN/857, Part E-1, Para 5.4+ 5.5
(vi) evacuation procedures including slide training where fitted;	No comments	See above responses	Appendix 1 to OPS 1.1010 (d) (e)	ICAO Doc 7192- AN/857, Part E-1, Para 5.8+ 5.9
(vii) pilot incapacitation; and	No comments	See above responses	Appendix 1 to OPS 1.1010 (g)	
(viii) crew resource management (CRM).	No comments	See above responses	Appendix 1 to OPS 1.1010 (k)	ICAO Doc 7192- AN/857, Part E-1, Chapter 7

A: Rule	B: Summary of comments	C: Reason for change, remarks	D: Source ref. and compliance	A: Rule
(b) To exercise their privileges on an aircraft type, cabin crew members shall in addition to the training required in (b) exercising undergo the related operator's aircraft type training in accordance with the applicable requirements specified in Part-OR.	No comments	The text has been moved to CC.GEN.025(b)(1) for consistency		Annex 6, Part-II, Para 3.12.4
GC.TRA.135 Recurrent training and checking	IND: Move under OR.OPS.135.CC IND: specify that recurrent training is only appropriate when performed in relation to a specific operator IND: DG to be included – intervals not exceeding 24 months	Comments partially accepted: Conditions for maintaining the validity of the CCA are covered by CC.CCA.105, and Recurrent training requirements are specified in OR.OPS.CC. With these changes, this rule is now a repetition and not anymore needed here. This is covered as DG training is required to be completed iaw ICAO Technical Instructions	BR Annex IV (7)(b)(i) OPS 1.1015 (a) OPS 1.1025 (a)	Annex 6, Part-I, Para 12.4 Annex 6, Part-II, Para 3.12.4 ICAO Doc 7192- AN/857, Part E-1, Para 1.1.2 +1.1.4; 1.2.3.4 + 2.1.4+ Chapter 9
(a) Cabin crew members shall undergo every 12 calendar months:	No comments	See above response	Appendix 1 to OPS 1.1015(c) BR Article 8(5)(e)	Annex 6, Part-I, Para 12.4 + ICAO Doc 7192- AN/857, Part E-1, Para 1.1.2 + 1.2.3.4 + 9.1.2
(1) a recurrent training course to maintain the adequate proficiency to perform all cabin crew duties and responsibilities; and	No comments	See above response	IEM OPS 1.1015	Annex 6, Part-I, Para 12.4 ICAO Doc 7192- AN/857, Part E-1, Para 1.1.2 + 1.2.3.4 + 9.1.2 + 9.3 + Table 1-1
(2) the associated checking covering all subjects of the training programme to demonstrate they maintain the required level of proficiency.	IND: clarify whether this is a requirement of a line check or an examination	This is not specified by EU-OPS. TO and OP are responsible to specify the type of checking for each training element as relevant. Please refer to OR.OPS.CC	OPS 1.1025	ICAO Doc 7192- AN/857, Part E-1, Para 2.1.4 + Para 1.2.4
(b) The programme of a recurrent training course shall cover:	No comments	The training programme has been transferred to OR.OPS.CC	Appendix 1, 2 (CRM) and 3 (Med & FA)to OPS 1.1015	ICAO Doc 7192- AN/857, Part E-1, Table 1-1Para 9.3
(1) every 12 calendar months,	No comments	Please refer to OR.OPS.CC and above response	Appendix 1 to OPS 1.1015	ICAO Doc 7192- AN/857, Part E-1, Para 9.1.2

PART-CC - CRST

A: Rule	B: Summary of comments	C: Reason for change, remarks	D: Source ref. and compliance	A: Rule
				+ Para 1.2.3.4
(i) review and update as relevant of aviation regulations, crew resource management, incident and accident review, effects of surface contamination; and	IA (comment confirmed by indiv. members): delete (not in EU-OPS)	Please refer to OR.OPS.CC	Appendix 1 to OPS 1.1015 (b)(8)(9)(10)	Refer to section (b)
(ii) for each aircraft type or variant to be operated, the type-specific emergency and evacuation procedures and individual touch-drills by each cabin crew member for opening each type or variant of normal and emergency doors and exits for passenger evacuation.	No comments	Please refer to OR.OPS.CC	Appendix 1 to OPS 1.1015 (b)(3) & (1) & (2)	Refer to section (b)
(2) in addition to (1), within intervals not exceeding 3 years, each cabin crew member shall complete for each aircraft type or variant to be operated:	IND + INDIV: fire / smoke / safety equip. incl. donning missing	This has been corrected. Please refer to OR.OPS.CC	Appendix 1 to OPS 1.1015 (c)	
(i) actual operation and opening in a representative training device or in the actual aircraft of each type or variant of normal and emergency exits in the normal and emergency modes; and	IA (comment confirmed by indiv. members) to be completed every 12 months, 03-years intervals insufficient; move section (2) to (b)(1)	This training item cannot be changes as transposed from EU-OPS. Please refer to OR.OPS.CC	Appendix 1 to OPS 1.1015 (c)(1)	ICAO Doc 7192- AN/857, Part E-1, Para 9.3(6) + 2.1.2.7 + 2.1.2.8
	IND: clarify; contradiction to AMC OR.OPS.135.CC where door operation falls into annual requirement	This item has been clarified. Please refer to OR.OPS.CC		+ 2.1.2.9
(ii) training on the use of equipment and systems relevant to pilot incapacitation.	No comments	Please refer to OR.OPS.CC	Appendix 1 to OPS 1.1015 (c)(6)	

A: Rule	B: Summary of comments	C: Reason for change, remarks	D: Source ref. and compliance	A: Rule
Draft Decision - AMC and GM to Part-Cabin Crew (Part-CC)			х	х
Subpart GEN - GENERAL REQUIREMENTS				
AMC1-CC.GEN.025(b)Privileges and conditions CONDITIONS To make their attestation and the list of aircraft type(s) they are qualified to operate on available for inspection by a competent authority, holders should carry those documents when exercising the privileges granted therein. If holders have omitted to carry them, any such document(s) shall be presented without undue delay upon request by a representative of a competent authority.		This new AMC has been developed to reflect the changes made to the rule in order to provide the flexibility requested by comments, whilst still ensuring that attestation holders are aware that they must be able to show compliance with the applicable rules, if so requested (CCA recognised across all EU)		
Subpart TRA - TRAINING REQUIREMENTS FOR THE CABIN CREW ATTESTATION				
AMC CC.TRA.115 Conduct of training courses, examination and checking EXAMINATION AND CHECKING	No comments	AMC has been transferred to AMC1-OR.OPS. CC.115 as transposed from JAR-OPS. Please see changes and response under related Drafting Document	BR Annex IV (7)(b)(i) AMC OPS 1.1025	Annex 6, Part-II, Para 3.12.4 Annex 6, Part-I, Para 12.4 ICAO Doc 7192- AN/857, Part E-1, Para 1.2.4 + 2.1.4
Elements of training which require individual practical participation may be combined with practical checks.	No comments	See above response	AMC OPS 1.1025 (1)	Refer to the above box
 Examination and checking required for each training course should be accomplished by the method appropriate to the type of training including: practical demonstration; computer based assessment; in-flight checks; and oral or written tests. 	IA (comment confirmed by indiv. members): add "and/or" between points; does the operator decide which point is most appropriate?	The text has been realigned with EU-OPS: please refer to OR.OPS.CC	AMC OPS 1.1025 (2)	Refer to the above box
AMC1-CC.TRA.+220(b) Initial safety training course and examination	No comments	The text has been aligned for consistency with CC.TRA.220: please refer to related response		Annex 6, Part-I, Para 12.4 Annex 6, Part-II, Para 3.12.4

A: Rule	B: Summary of comments	C: Reason for change, remarks	D: Source ref. and compliance	A: Rule
TRAINING PROGRAMME The training programme of an-the initial safety-training course should include at least the following elements:	No comments	The text has been aligned for consistency with CC.TRA.220	х	ICAO Doc 7192- AN/857, Part E-1, Para 1.2.3.2 + Table 1-1
General theoretical knowledge relevant to cabin crew duties and responsibilities, covering at least :	No comments	Title clarified	Appendix 1 to OPS 1.1005(g)(1)(3)	ICAO Doc 7192- AN/857, Part E-1, Table 1-1 + Para 3.1.1 + 3.2 + 4.1.1 + 4.1.2
1.1a. general knowledge of relevant-aviation terminology, theory of flight, passenger distribution, areas of operation; meteorology and effects of aircraft surface contamination;	No comments	This was already in the title and has been deleted to avoid repetitions. 'Aircraft' has been added for clarity purposes as requested by a comment entered under another segment.	Appendix 1 to OPS 1.1005(g)(4)& (g)(9)	ICAO Doc 7192- AN/857, Part E-1, Para 3.1 + 3.3 + 3.4 + 4.2.2(10) + 4.3.2(17)
1.2b. aviation regulations relevant to cabin crew and the role of the competent authority;	IA (comment confirmed by indiv. members) re-phrase "an awareness of aviation regulations" (as per EU-OPS)	The title has been clarified to reflect the comment and for consistency with CC.TRA.120 and does not need to be repeated (i.e. 'general knowledge' is synonym to 'awareness'	Appendix 1 to OPS 1.1005(g)(3)	ICAO Doc 7192- AN/857, Part E-1, Para 3.2
1.3c. duties and responsibilities of cabin crew during operations and the need to respond promptly and effectively to emergency situations;	No comments		Appendix 1 to OPS 1.1005(g)(8)	Annex 6, Part-I, Para 12.4(a) ICAO Doc 7192- AN/857, Part E-1, Para 1.1.2(a) + Chapter 4
for aspects relating regardsto flight and duty time limitations and rest requirements, to operate as a cabin crew member and to exercise the privileges granted by the applicable cabin crew attestation;	MS:re-phrase txt "continuing fitness & competence to operate as a CCM including as regards flight time limitations & rest requirements, in order to continue to exercise the privileges of the CCA."	Partially accepted: the text amended	Appendix 1 to OPS 1.1005(g)(2)	Annex 6, Part-I, Para 12.5
1.5e. the importance of ensuring that relevant documents and manuals are kept up-to-date, with amendments provided by the operator as applicable;	No comments		Appendix 1 to OPS 1.1005(g)(6)	ICAO Doc 7192- AN/857, Part E-1, Para 4.2.2(3)
1.6f. the importance of cabin crew performing their duties in accordance with the operations manual of the operator;	No comments		Appendix 1 to OPS 1.1005(g)(1)	

A: F	Rule	B: Summary of comments	C: Reason for change, remarks	D: Source ref. and compliance	A: Rule
	1.7g. the importance of the pre-flight briefing of the cabin crew and the provision of necessary safety information with regards to their specific duties; and	No comments		Appendix 1 to OPS 1.1005(g)(5)	ICAO Doc 7192- AN/857, Part E-1, Para 4.2.2(1)
	1.8h. the importance of identifying when cabin crew members have the authority and responsibility to initiate an evacuation and other emergency procedures.	No comments		Appendix 1 to OPS 1.1005(g)(7)	ICAO Doc 7192- AN/857, Part E-1, Para 5.1.1 + 5.1.2
2.	Communication During tTraining should place emphasis should be placed on the importance of effective communication between cabin crew and flight crew and should includeing technique, common language and terminology.	No comments	Editorial changes for clarity	Appendix 1 to OPS 1.1005(f)	
3.	Introductory course to on human factors (HF) and crew resource management (CRM): The All training items elements should be covered in depth in accordance with the applicable programme specified in the CRM training Table 1 in AMC CC.TRA.120, CC.TRA.125 and CC.TRA.135 and the course should include ing at least the following:	No comments	The changes included result from the transfer of other training programmes to OR.OPS.CC	ACJ OPS 1.1005/1.1010/1.101 5 (2.6) & (3.1) Appendix 1 to OPS 1.1005(h)(ii)	Annex 6, Part-II, Para 3.12.4.2 Annex 6, Part-I, Para 12.4(f) ICAO Doc 7192- AN/857, Part E-1, Chapter 7
	3.1a. General principles: Human factors in aviation, general instructions on CRM principles and objectives, human performance and limitations;	No comments	Editorial change for clarity	Appendix 2 to OPS 1.1005/1.1010/1.101 5 Table 1 (General Principles)	Refer to section (3) above
	3.2b. Relevant to the individual cabin crew member: personality awareness, human error and reliability, attitudes and behaviours, self-assessment; stress and stress management; fatigue and vigilance; assertiveness; situation awareness, information acquisition and processing.	No comments		Appendix 2 to OPS 1.1005/1.1010/1.101 5 Table 1 (From the perspective of the individual CCM)	Refer to section (3) above
4.	Passenger handling and cabin surveillance:	No comments		Appendix 1 to OPS 1.1005(e)	ICAO Doc 7192- AN/857, Part E-1, Chapter 4
	4.1a. the importance of correct seat allocation with reference to aeroplane-aircraft mass and balance, the special categories of passengers and the necessity of seating able- bodied passengers adjacent to unsupervised exits;	No comments	Editorial	Appendix 1 to OPS 1.1005(e)(4)	ICAO Doc 7192- AN/857, Part E-1, Para 4.2.2(9)(10)
	4.2b. rules covering the safe stowage of cabin baggage and cabin service items and the risk of it-these becoming a hazard to occupants of the cabin or otherwise causing obstruction or damaging emergency equipment or aeroplane aircraft exits;	No comments	Editorial	Appendix 1 to OPS 1.1005(e)(3)	ICAO Doc 7192- AN/857, Part E-1, Para 4.2.2(19)
	4.3c. advice on the recognition and management of passengers who are, or become, intoxicated with alcohol, or are under the influence of drugs or are aggressive;	No comments	Editorial	Appendix 1 to OPS 1.1005(e)(1)	ICAO Doc 7192- AN/857, Part E-1, Para 4.2.2(17) + Para 4.3.2(8)

A: R	ule	B: Summary of comments	C: Reason for change, remarks	D: Source ref. and compliance	A: Rule
	4.4d. precautions to be taken when live animals are carried in the cabin;	No comments		Appendix 1 to OPS 1.1005(e)(6)	
	4.5e. duties to be undertaken in the event of turbulence, including securing the cabin; and	IA: consider the problem of turbulence to be a rule making task or study	Proposal noted for future consideration	Appendix 1 to OPS 1.1005(e)(5)	ICAO Doc 7192- AN/857, Part E-1, Para 4.3.2(11)(13) (14)(15)
	4.6f. methods used to motivate passengers and the crowd control necessary to expedite an aeroplane aircraft evacuation.	MS: include subject of "common language"	This proposal has been considered as a possible future rulemaking task deriving from an accident investigation recommendation received in 2009 and added in the Agency's Inventory of rulemaking tasks as RM task OPS.076(a) and (b) 'Cabin crew language skills for safety-related communications with passengers'	IEM to Appendix 1 to JAR-OPS 1.1005/1.1010/1.101 5/1.1020	ICAO Doc 7192- AN/857, Part E-1, Para 5.8.2(9)
5.	Aero-medical aspects and first aid:	No comments		Appendix 1 to OPS 1.1005(d)	ICAO Doc 7192- AN/857, Part E-1, Chapter 8
					+ Table 1-1
	5.1a. general instruction on aero-medical aspects and survival;	No comments		Appendix 1 to OPS 1.1005(d)(1) & (2)	ICAO Doc 7192- AN/857, Part E-1, Para 8.1
					+ Para 8.3 (a)(b)(c)(d)(e)(f)
	5.2b. the physiological effects of flying with particular emphasis on hypoxia- and ,oxygen requirements, Eustachian tubal function and barotraumas;	IND: extend subject "flying incl. gastro-intestinal disturbances and with particular emphasis"	This comment has been addressed under point c. below	Appendix 1 to OPS 1.1005(d)(3)	Annex 6, Part-I, Para 12.4(c)+ 8.3(g)(6) + 3.5
		AME IA: extend subject "emphasis on hypoxia & oxygen requirements, Eustachian tubal function and barotraumas."	Comment accepted: the text has been amended accordingly		
	5.3c. basic first aid including care of:	MS: include subject "gastro-intestinal disturbances"- in 5.3	Comment accepted: the text has been amended accordingly	Appendix 3 to OPS 1.1005/1.1010/1.101	ICAO Doc 7192- AN/857, Part E-1,
	ai. air sickness and gastro-intestinal disturbances;	or 5.4		5	Para 8.3(g)
	b ii. hyperventilation;			(2)(ix)(x)	(2)(22)
	eiii. burns;			(4)(i)(ii)(iii)(iv)	(27)
	div. wounds;				(7)

A: Rule	B: Summary of comments	C: Reason for charemarks	ange, D: Source ref. and compliance	A: Rule
ev. the unconscious; and				(11)
fvi. fractures and soft tissue injuries.				(9)
				(10)
5.4d. in-flight medical emergencies and associated first aid covering at least:			Appendix 3 to OPS 1.1005/1.1010/1.101 5	ICAO Doc 7192- AN/857, Part E-1, Para 8.3(g)
a i. asthma;			(2)(i)(ii)(iii)(iv)(v)(vi)	(4)
bii. stress and allergic reactions;			(vii)(viii)(xii)	(4)
eiii. shock;				(34)
div. diabetes;				(17)
e v . choking;				(14)
fvi. epilepsy;				(15)
g vii . childbirth;				(5)
hviii. stroke; and				(36)
ix. heart attack;				(23)
5.5e. the use of appropriate equipment including first aid oxygen, first-aid kits and emergency medical kits and their contents;	No comments		Appendix 3 to OPS 1.1005/1.1010/1.101 5 (6)	ICAO Doc 7192- AN/857, Part E-1, Para 8.3(i) & (h)(3)
5.6f. practical cardio-pulmonary resuscitation training by each cabin crew member using a specifically designed dummy and taking account of the characteristics of an aircraft environment; and	No comments		Appendix 3 to OPS 1.1005/1.1010/1.101 5 (3)	ICAO Doc 7192- AN/857, Part E-1, Para 8.3(g)(13) & (h)(2)
5.7g. travel health and hygiene including:	MS + IND re-phrase	This was transposed from E		ICAO Doc 7192-
ai. hygiene on board;	disinfection with "disinsection"	OPS and is now corrected	1.1005/1.1010/1.101 5(5)(i)(ii)(iii)(iv)(v)(vi	AN/857, Part E-1,
bii. risk of contact with infectious diseases and means to reduce such risks;)	Para 8.3(b)(c)(d)(e)(f)
eiii. handling of clinical waste;				0.0(2)(0)(0)(0)(1)
d iv. aircraft disin s fection;				
ev. handling of death on board; and				Para 8.3(g)(16)
fvi. alertness management, physiological effects of fatigue, sleep physiology, circadian rhythm and time zone changes.				(3)()
6. Dangerous goods in accordance with the applicable ICAO Technical Instructions	MS (confirmed several times)	Comments partially accepted		Annex 6, Part-I, Para
6.1 general principles;	+ IND: re-phrase txt in 6.1 "Aspects of transport of DG by	the text has been amended accordingly	1.1005(e)(7)	12.4(e)
6.2 importance of procedures and reporting; and	air with which the ICAO	accordingry		ICAO Doc 7192- AN/857, Part E-1,
6.3 applicable packaging and limitations.	Technical instructions state they should be familiar"			Para 1.1.2(e)

A: F	Rule	B: Summary of comments	C: Reason for change, remarks	D: Source ref. and compliance	A: Rule
		Realign points 6.2/6.3 with ICAO Tech. instructions:			+ 6.3 + Table 1-1
		*recognition of undeclared DG			Chapt. 4, Table 1-4.
		*provisions for pax and crew			
		*emergency procedures			
7.	Security aspects in aviation in accordance with Regulation (EC) No 300/2008	MS: define scope	This is subject to Reg. 300/2009. The text must remain very general	Appendix to OPS 1.1005(8)	Annex 6, Part-I, Para 13.4 EC 300/2008, Annex 10.2
8.	 8.1a. emphasis on the responsibility of cabin crew to deal promptly with emergencies involving fire and smoke and, in particular, emphasis on the importance of identifying the actual source of the fire; 8.2b. the importance of informing the flight crew immediately, as well as the specific actions necessary for coordination and assistance, when fire or smoke is discovered; 8.3c. the necessity for frequent checking of potential fire-risk areas including toiletslavatories, and the associated smoke detectors; 8.4d. the classification of fires and the appropriate type of extinguishing agents and procedures for particular fire situations; e. the techniques of application of extinguishing agents, the consequences of misapplication, and of use in a confined space including practical training in firefighting and in the donning and use of smoke protection equipment used in aviation; and 8.5f. the general procedures of ground-based emergency services at aerodromes. 	No comments	Resulting from the positive response to comments received on CC.TRA.125 (renumbered 215), fire and smoke training programme has been moved to Part-OR (OR.OPS.CC.125), point e. has been amended to require basic practical training to ensure that new trainees acquire a first experience of fire and smoke training during initial course,	Appendix 1 to OPS 1.1005(a)(1)(2)(3)(4)(5)	ICAO Doc 7192- AN/857, Part E-1, Para 5.4 + Para 5.5 + Table 1-1 + Para 5.1.3 + Para 2.1.2.9
9.	 Survival training 9.1a. principles of sSurvival training on the ground should include in hostile environment (e.g. polar, desert, or jungle, sea); and. 9.2b. \text{W} water survival training, which should include the actual donning and use of personal flotation equipment in water and use of slidelife-rafts or similar equipment, as well as actual practice in water. 	IA (comment confirmed by indiv. members) amend "jungle or sea" – as per EU-OPS IND+ INDIV: clarify if all regions to be covered or only those relevant to operation MS: re-consider term "slide raft" iso life raft	Partially accepted - 'Sea' is added as Initial training is common to all and needs to cover all situations. More in depth training relevant to the type of operation should be covered by the operator training as necessary. Accepted: the text has been amended accordingly	Appendix 1 to OPS 1.1005(b) & (c)	ICAO Doc 7192- AN/857, Part E-1, Para 5.8.2(18)(19) + Para 5.9.2 (6)(7)(8)(9)(10) + Para 5.1.3 + Para 2.1.2.7 + Para 2.1.2.8 + Para 2.1.2.9

A: Rule				B: Summary of comments	C: Reason for change, remarks	D: Source ref. and compliance	A: Rule	
AMC-GM1-CC.TRA.+220 (b), CC.TRA.+125 e examination, Aircraft type-specific and re				No comments	Change result from the transfer, as requested by comments received, of all training programme, except INITIAL ² , to OR.OPS.CC.			
CREW RESOURCE MANAGEMENT TRAINING The CRM Training —Table 1—recapitulates the a that should be covered during the initial trapplicable and showings the level to be attained.	all relevant elem aining course i	ents of CRM , ind		IA (comment confirmed by indiv. members) restore note from Appendix 2 to EU-OPSTable 1 CRM training :	Omission corrected: please refer to OR.OPS.CC CRM training table	Appendix 2 to OPS 1.1005/1.1010/1.101 5, Table 1	Annex 6, Part–I, Para 12.4(f) ICAO Doc 7192- AN/857, Part E-1, Chapter 7 + Table 1- 1	
				INTENTIONALLY BLANKFOR FOR	RMATTING PURPOSES			
CRM TRAINING— TABLE—1 Training Elements Training Elements	Introductory course to HF and CRM -Course	Aircraft Type- Specific GRM Training	Annual Recurrent GRM Training	"Note: In column (d), if relevant aeroplane type specific case based studies are not available, then case based	See response above	Refer to the box above (CRM Training)	х	
Gener	al Principles			studies relevant to the scale				
Human factors in aviation; General instructions on CRM principles and objectives; Human performance and limitations.	In depth	Not required	Not required	and scope of the operation shall be considered."	CRM table is now limited to the			
Relevant to the indi	vidual cabin crew	member			introductory course as all other			
Personality awareness, human error and reliability, attitudes and behaviours, self-assessment; Stress and stress management; Fatigue and vigilance; Assertiveness; situation awareness, information acquisition and processing.	In depth	Not required	Overview (3 year cycle)	training programmes have been transferred to OR.OPS.CC, as requested by comments	transferred to OR.OPS.CC, as requested by comments	training programmes have been transferred to OR.OPS.CC, as		
Relevant to the whole	aeroplane entire ai	rcraft crew						
Error prevention and detection; Shared situation awareness, information acquisition & processing; Workload management; Effective communication and coordination between all crew members including the flight crew as well as inexperienced cabin crew members, cultural differences; Leadership, cooperation, synergy, decision-making, delegation; Individual and team responsibilities, decision making, and actions; Identification and management of the passenger human factors: crowd control, passenger stress, conflict management, medical factors. Specifics related to aeroplane aircraft types (narrow / stick be discounted by flight types (narrow / stick b	Not required	Relevant to the type(s)	Overview (3 year cycle)					
wide bodies, single / multi deck), flight crew and cabin crew composition and number of passengers		In depth						

A: Rule				B: Summary of comments	C: Reason for chan remarks	ge, D: Source ref. and compliance	A: Rule
Relevant to the operator and the or	ganisatio	on (principles)					
Company safety culture, standard operating procedures (SOPs), organisational factors, factors linked to the type of operations; Effective communication and coordination with other operational personnel and ground services; Participation in cabin safety incident and accident reporting. Case based-studies		Relevant to the type(s)	Overview (3 year cycle) Required				
AMC CC.TRA.125 Aircraft type-specific training at	nd chec	eking			The entire AMC has been transferred to OR.OPS. CC, a a result of the changes to the rule as requested by commer Detailed responses will be for under the related segments under OR.OPS.CC	e nts	Annex 6, Part I, Para 12.4 Annex6, Part-II, Para 3.12.4 ICAO Doc 7192- AN/857, Part E-1, Para 1.1.2
				IA: exclude from initial training & CCA IND: move type training to CC.OR.OPS/TRA	Part-CC cannot be limited to Initial training only as BR Art 8 (5)5e) requires conditions be specified for maintaining tattestation.	to	+ 1.2.3.5 + 2.1.4 + 1.2.4 + Table 1-1
					However, it is accepted to me the training programme under Part-OR (OPS) Section VI on Cabin crew, so that all a/c ty related training programmes are found under the same Pa	pe	
				<u>INDIV:</u> – amend title "a/c type specific <i>conversion</i> training and checking"	Partially accepted: Please ref to OR.OPS.CC	er	
TRAINING PROGRAMME				No comments		X	Х
The following subjects should be covered as relevant t	o the ai	rcraft type:		NO COMMENTS		^	^
 1. Aircraft description 1.1 Type of aeroplane; principal dimensions; narrow 1.2 Typical max take-off weight/typical engines/specific 		· ·	or double deck;		Please refer to Part-OR to see the detailed changes made to the text of this segment		ICAO Doc 7192- AN/857, Part E-1, Para 3.1
 1.3 Typical passenger seating capacity (certified cand 1.4 Typical flight crew number and typical minimum determined in accordance with Part 21; 1.5 Cabin doors location and sill height; 1.6 Un-pressurised areas/cargo/gears/fuel tanks/flight 	n numb	er of required cab	in crew as	MS: standardize terminology "aircraft-aeroplane" IA (comment confirmed by indiv. members) delete the entire part MS + IND + IA (comment confirmed by indiv. members) delete point 1. 2 or retain only	The text has been amended accordingly Text maintained as general knowledge of the aircraft is required (see OR.OPS.CC) Accepted – text amended accordingly		+ Para 3.4

A: Rule	B: Summary of comments	C: Reason for change, remarks	D: Source ref. and compliance	A: Rule
	"speed/altitude/range"			
1.7 Aeroplane systems – general: APU/Aeroplane electrical power/Air conditioning and				
pressurisation;	IA (comment confirmed by	Partially accepted - Text		
1.8 Cockpit presentation- general: pilot seats and their mechanism; cockpit exits; storage;	indiv. members) delete point 1.4	simplified		
1.9 Typical cabin crew stations;	MS + IS (comment confirmed			
1.10 Passenger seats-general presentation;	by indiv. members) delete	Partially accepted – text revised		
1.11 Flight deck security-general: door components and use;	point 1.6			
1.12 Access to avionic bays;				
1.13 Lavatories- general: doors; systems; emergency equipments, calls and signs;	MS + IA (comment confirmed by indiv. members) delete	Declined: the items listed are relevant to CC duties and		
1.14 Galleys- general: appliances; water and waste; control panels; calls and signs; 1.15 Least risk bomb location.	point 1.7 or retain only "Aeroplane systems – general"	operating environment		
	MS + IND: standardize terminology " flight deck – cockpit" under 1. 8 and 1.11	Accepted – text standardised		
	IA (comment confirmed by indiv. members): delete point 1.12	Partially accepted, text has been clarified and 'where relevant' has been added		
2. Safety equipment and systems installed	MS: + IND: delete 2.1 & 2.2 &	The entire programme has been	Appendix 1 to OPS	ICAO Doc 7192-
Each cabin crew member should receive realistic training on, and demonstration of, the location and use of all type-specific safety equipment including the following:	2.3 or move to AMC OR.OPS.CC.125	transferred to OR.OPS.CC, as requested by comments	1.1010 (h)(1)(2)(4)(9)(13)	AN/857, Part E-1, Para 5.3 + 5.9
2.1 slides, and where non-self-supporting slides are carried, the use of any associated ropes;				
2.2 life-rafts and slide-raft, including the equipment attached to, and/or carried in, the raft;				
2.3 dropout oxygen system;				
2.4 communication equipment; and				
2.5 other cabin equipment and systems installed relevant to cabin crew duties.				
3. Normal and emergency procedures	No comments			ICAO Doc 7192-
3.1 Passenger management and cabin surveillance.			Appendix 1 to OPS	AN/857, Part E-1, Para 5.2 + 5.7
Training specific to the aircraft type should be provided on the practical aspects of passenger management and cabin surveillance in preparation to normal and emergency procedures as			1.1010(i)	+ Para 4.3.2
applicable; and				(11)(13)(14)(15)
3.2 Type-specific elements or conditions relating to severe air turbulence, sudden			Ammandia 4 to ODO	+ 4.2 + 4.3
decompression or other in-flight emergencies should also be covered.			Appendix 1 to OPS 1.1010(e)(2)(ii)(iii)(iv)	
4. Operation of doors and exits	MS: 4.1 – amend txt	The text has been realigned	Appendix 1 to OPS	ICAO Doc 7192-
4.1 This training should be conducted in a representative training device or in the actual	"evacuation slides and actual opening of each type or variant of normal and emergency exit	with EU-OPS and transferred to OR.OPS.CC. However, distribution between rule and		AN/857, Part E-1, Para 2.1.2.9
aircraft and should include failure of power assist systems where fitted and the action and forces required to operate and deploy evacuation slides; and				+ 5.1.3 + 5.3.2(7)
4.2 The demonstration of the operation of the other exits should include flight deck windows.	in the normal and emergency	AMC has been partly maintained		

A: Rule	B: Summary of comments	C: Reason for change, remarks	D: Source ref. and compliance	A: Rule
	modes"	as in other parts.		
5. Fire and smoke training Each cabin crew member should be trained in extinguishing a fire representative of an in-flight fire in a smoke-filled environmentas relevant to the aircraft type, with particular emphasis on identifying the actual source of fire and smoke, and on the use of smoke protection equipment used in aviation.	MS: + IND + INDIV: delete, or clarify "in a smoke filled environment" MS: clarify txt – refer to C713/pg.189	The text has been clarified iaw EU-OPS. Please refer to OR.OPS.CC where the training programme has been transferred as requested by comments.	Appendix 1 to OPS 1.1010(b)(1)(i)(ii) & (e)(2)	Annex 6, Part-I, Para 12.4(b) + ICAO Doc 7192- AN/857, Part E-1, Para 1.1.2(b) + 2.1.2.9 + 5.1.3 + 5.4 + 5.5 + 5.3.2(2)(3)(4)
 6. Evacuation procedures 6.1. Training should include the recognition of planned or unplanned evacuations on land or water; the recognition of when exits are unusable or when evacuation equipment is unserviceable; and 6.2. Evacuation slide training: a. Each cabin crew member should descend an evacuation slide from a height representative of the aircraft main deck sill height; b. The slide is fitted to a representative training device or to the actual aircraft; and c. A further descent should be made when the cabin crew member qualifies on an aircraft type in which the main deck exit sill height differs significantly from any aircraft type previously operated. 	No comments		Appendix 1 to OPS.1010(d)(1)(2)(3) & (e)(1)	ICAO Doc 7192- AN/857, Part E-1, Para 5.8 + Para 5.9 + Para 5.1.3 + Para 2.1.2.9
7. Pilot incapacitation The training should cover any type-specific elements or conditions relevant to cabin crew actions to be taken in case of pilot incapacitation.	No comments		Appendix 1 to OPS 1.1010(g)	
8. Crew resource management Training on CRM should cover the applicable programme specified in the CRM training Table 1 in AMC CC.TRA.120, CC.TRA.125 and CC.TRA.135.	No comments		Appendix 1 to OPS 1.1010(k) + Appendix 2 to OPS 1.1005/1.1010/1.101 5, Table 1	Annex 6, Part-I, Para 12.4(f) Annex 6, Part-II, Para 3.12.4.2 ICAO Doc 7192- AN/857, Part E-1, Chapter 7

A: Rule	B: Summary of comments	C: Reason for change, remarks	D: Source ref. and compliance	A: Rule
AMC CC.TRA.135 Recurrent training and checking TRAINING PROGRAMME AND VALIDITY		AMC has been deleted as not relevant anymore in Part CC taking into account the transfer of Recurrent training requirements into OR.OPS.CC	Refer to respective boxes	Annex 6, Part-I, Para 12.4 ICAO Doc 7192- AN/857, Part E-1, Para 1.1.2 + 1.1.4 + 2.1.4
	IND: include DG training – as per ICAO Tech. instructions	Partially accepted: ICAO T Instr. are referred to where needed.		+ Chapter 9 + Table 1-1
1. Crew resource management The CRM training should satisfy the following:	No comments		x	Annex 6, Part-I, Para 12.4(f) + Part-II, Para 3.12.4.2 ICAO Doc 7192- AN/857, Part E-1, Chpter 7 + Table 1-1
1.1 The definition and implementation of this training should cover the applicable programme specified in the CRM training Table 1 in AMC CC.TRA.120, CC.TRA.125 and CC.TRA.135 and be managed by a cabin crew CRM instructor;	No comments		Appendix 2 to OPS 1.1005/1.1010/1.101 5 + Table 1	
 1.2 When CRM training is provided by stand-alone modules, it should be conducted by at least one cabin crew CRM instructor; 1.3 Case based studies as relevant to the aircraft type should be completed every year. 			+ Appendix 1 to OPS 1.1015(10)(iii)	
2. Operation of doors and exits within intervals not exceeding 3 years This training should be conducted in a representative training device or in the actual aircraft and should include failure of power assist systems where fitted and the action and forces required to operate and deploy evacuation slides.	IA: delete – door training should be a part of type/variant training every 12 months	Declined: The text is transposed from EU-OPS which requires touch-drills every year and actual operation every 3 years	Appendix 1 to OPS 1.1015(c)(1)	ICAO Doc 7192- AN/857, Part E-1, Para 9.3(6) + 2.1.2.7-8-9
3. Validity The period of validity of the annual recurrent training and associated checking should be 12 calendar months in addition to the remainder of the month of completion.	IND: realign with EU-OPS	This has been realigned with EU-OPS as requested. Please refer to OR.OPS.CC	OPS 1.1015(c)	Annex 6, Part-I, Para 12.4