



**European Aviation Safety Agency**

**EXPLANATORY NOTE**

***Regulation Air Operations  
Acceptable Means of Compliance (AMC)  
and Guidance Material (GM)  
to  
Annex III – Part-ORO***

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## **EXECUTIVE SUMMARY**

This Explanatory Note introduces Agency Decision 2012/017/R defining AMCs and GM related to the Organisation Requirements applicable to Air Operations (Part-ORO) in the area of commercial air transport, as set out in Annex III to Regulation (EU) No 965/2012 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.

It provides an overview of changes made since the AMCs and GM had been published with CRD 2008-22c/2009-02c. These changes have been made to address CRD reactions, whenever justified. They also reflect the decision to postpone the adoption of a horizontal rule structure. Other changes have been made to align with changes made at the level of the corresponding implementing rules during the comitology process.

This Decision is applicable to commercial air transport operations with aeroplanes and helicopters.

## **Acceptable Means of Compliance and Guidance Material to Part-ORO**

### **1. General**

#### **Background**

On 8 April 2008 Regulation (EC) No 216/2008 of 20 February 2008<sup>1</sup> (the 'Basic Regulation') entered into force. In addition, the Commission has adopted the necessary rules ('Commission Regulations') for the implementation of the Basic Regulation for the technical requirements and administrative procedures related to air operations<sup>2</sup>. Annex III to this Regulation, Part-ORO, contains the authority requirements for air operations.

Pursuant to Article 18 of the Basic Regulation the European Aviation Safety Agency (the 'Agency') shall, where appropriate, issue Acceptable Means of Compliance (AMC), as well as Guidance Material (GM) for the application of the Basic Regulation and its Implementing Rules.

#### **Agency measures**

AMC illustrate a means, but not the only means, by which a requirement of an implementing rule can be met. Satisfactory demonstration of compliance using published AMC shall provide for presumption of compliance with the related requirement; it is a way to facilitate certification tasks for the applicant and the competent authority.

GM is issued by the Agency to assist in the understanding of the Basic Regulation, its Implementing Rules and Certification Specifications (CSs).

#### **General structure and format**

This document is related to Annex III to the Regulation on air operations 'Part-ORO', which contains seven Subparts (GEN, AOC, MLR, SEC, FC, CC and TC).

The following rule numbering convention was applied to AMCs:

AMC<n> <RULE><§>

Explanation:

AMC: Identifier;

<n>--: Number, starting with 1, incremented by 1, to be used in all cases, also when only one AMC exists for a given IR paragraph or subparagraph;

<RULE >: IR reference;

<§>: Reference of the IR subparagraph(s), where relevant; for AMCs addressing only one or more subparagraph(s) within a rule, the AMC reference includes an identification of the IR subparagraph; if more than one subparagraph is covered, all of them are listed; in the absence of such indication, the AMC covers the IR as a whole.

Where more than one AMC exists, AMCs are numbered by adding '.1', '.2', etc, to the AMC number.

Example:

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<sup>1</sup> Regulation (EC) No 216/2008 of the European Parliament and of 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, 19.03.2008, p. 1). Regulation as last amended by Regulation (EC) No 1108/2009 of the European Parliament and of the Council of 21 October 2009 (OJ L 309, 24.11.2009, p. 51).

<sup>2</sup> Commission Regulation (EC) xxx/xxxx [air operations]

AMC1 CAT.OP.MPA.145(a) Establishment of minimum flight altitudes

The other AMC number would be:

AMC1.1 CAT.OP.MPA.145(a) Establishment of minimum flight altitudes.

The following rule numbering convention was applied to GM:

GM<n> <RULE ><§>

The same explanation as provided for AMC applies.

## Publication

The full text of these AMC as well as GM is available on the Agency's [website](#).

For more information, contact the Agency at: [RPS@easa.europa.eu](mailto:RPS@easa.europa.eu).

## 2. Consultation on draft proposals

The AMC and GM to Part-ORO are developed by the Agency, following a structured process as required by Article 52(1) of the Basic Regulation. Such a process has been adopted by the Agency's Management Board and is referred to as 'The Rulemaking Procedure'<sup>3</sup>.

The Executive Director Decision 2011/017/R adopts the initial issue of AMC and GM to Part-ORO: as an output of the following Agency rulemaking task:

<b>Rulemaking Task No</b>	<b>TITLE</b>	<b>NPA/CRD No</b>
<b>FCL.001</b>	<b>Acceptable Means of Compliance and Guidance Material on authority requirements</b>	<b>2008-22c</b>
<b>OPS.001</b>		<b>2009-02c</b>

The Notice of Proposed Amendment (NPA) and subsequent Comment Response Document (CRD) have been subject to consultation in accordance with Article 52 of the Basic Regulation and Article 6 of the Rulemaking Procedure established by the Management Board. For detailed information on the proposed changes and their justification, consult NPAs 2008-22c and 2009-02c<sup>4</sup>, which are available on the Agency's website.

The Agency has addressed and responded to the comments received on the NPA. The responses are contained in a Comment Response Document (CRD) that has been produced for NPAs 2008-22c and 2009-02c (cf. CRD to NPA 2008-22c and 2009-02c 'Organisation Requirements'<sup>5</sup>) and that is also available on the Agency's website.

CRD to NPA 2008-22c and 2009-02c covered the authority requirements applicable in the area of civil aviation aircrew and air operations. In accordance with the rule structure adopted for the Regulations on civil aviation aircrew and on air operations, this Decision only covers AMCs and GM for commercial air transport operations with aeroplanes and helicopters.

In response to the CRD to NPA 2008-22c and 2009-02c the Agency received a total number of 1 020 reactions from over 70 commentators, including aviation authorities from Austria,

<sup>3</sup> 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 08-2007, 13.6.2007.

<sup>4</sup> See Rulemaking Archive page: <http://www.easa.europa.eu/rulemaking/r-archives.php>.

<sup>5</sup> See Rulemaking Archive page: <http://www.easa.europa.eu/rulemaking/r-archives.php>.

Belgium, Germany, France, Finland, Italy, Ireland, The Netherlands, Norway, Spain, Sweden, Switzerland, United Kingdom, as well as professional organisations, non-profit organisations, private companies and a few individuals. The US Federal Aviation Administration (FAA) also reviewed the CRDs and had no comments. Of all reactions received, 530 related to Part-AR and 490 to Part-OR, all of them covering aircrew and air operations. The majority of reactions were made to Subparts GEN. Around 20 % of the 1 020 reactions were made on the AMCs and GM to Part-AR and Part-OR.

The total number of reactions received for the AMCs and GM relevant to Part-ORO, i.e. limited to air operations amounts to **113**. The table below indicates the distribution of these reactions for the different Subparts of Part-ORO.

<b>Part.Subpart</b>	<b>Nb of reactions</b>
ORO.GEN	93
ORO.AOC	12
ORO.MLR	3
ORO.SEC	(no AMCs / GM)
ORO.FC	2
ORO.CC	3
ORO.TC	0

Regarding ORO.GEN, a majority of reactions (87 out of 93) were made to Section II 'Management system', which reflects the volume of AMCs and GM provided in this Section. While all reactions received after the publication of the CRDs were taken into consideration for the drafting of the present AMCs and GM to Part-ORO, some specific issues raised in those reactions will be dealt with through future rulemaking, as the changes proposed would require full stakeholder consultation. A new rulemaking task will be programmed to this effect (Rulemaking Task RMT.0517):

- Review all management system requirements and AMC/GM in line with latest developments at ICAO level, in particular as regards the development of a new Annex 19 'Safety Management' and the next edition of ICAO Doc. 9859 Safety Management Manual.

Considering this relatively low number of reactions to the AMCs and GM on Subparts other than GEN it is important to note that a series of changes has been made to the AMCs and GM in response to CRD reactions on the corresponding Implementing Rules.

### **3. Summary of changes**

#### **a) General changes**

- i) Changes have been made to specific AMCs and GM to align with any changes at the level of the corresponding Implementing Rules following the adoption process. This includes changes requested during the comitology process and additional changes resulting from the legislative process. In particular, references to 'organisation' have been replaced by 'operator', whenever reference is made to the commercial air transport operator to whom Part-ORO applies.

- ii) AMCs and GM that were published with the CRDs but that are only applicable to aircrew have been deleted. These have been published with Decision 2012/007/R on Part-ORA 'Organisation Requirements for Aircrew'<sup>6</sup>.
- iii) AMCs and GM referring to 'declaration' or 'declared organisations' addressing non-commercial operators of complex motor-powered aircraft have been deleted. These will be published at a later stage, following adoption of the amending Regulation introducing Part-NCC.
- iv) The references of all AMCs and GM have been aligned with the Agency's latest rule numbering convention, by adding the letter 'O' for air operations after the Part identifier ('OR' replaced by 'ORO' in all references). As part of this alignment, any suffixes indicating the applicability, such as 'complex', 'non-complex' or 'OPS', have been moved from the AMC reference to the subheading of the relevant AMC or GM.
- v) Any references to 'operational suitability data' have been changed to 'data' to align with the changes in the Implementing Rules. The words 'operational suitability' will be reintroduced once the OSD Regulation is adopted.
- vi) The numbering of paragraphs and subparagraphs has been aligned with that used for the Implementing Rules.

**b) Specific changes Subpart ORO.GEN 'General Requirements'**

- i) The AMC and GM previously included in Subpart OR.OPS Section GEN have been moved to Subpart GEN. They are now referenced:
  - **AMC1 ORO.GEN.110** 'Operator responsibilities - OPERATIONAL CONTROL' and
  - **GM1 ORO.GEN.110(c)** 'Operator responsibilities - OPERATIONAL CONTROL'.The AMC and GM to ORO.GEN.110 have been amended in response to reactions received to the associated CRD. Editorial corrections and clarifications have been made throughout.
- ii) **AMC1 ORO.GEN.100(f)(h)** has been complemented to fully reflect JAR-OPS 1 Section 2 material (TGL44) relating to JAR-OPS 1.210(a) 'Establishment of procedures'. Editorial corrections and clarifications have been made where necessary and to ensure consistency with other implementing rules and AMC/GM (e.g. with Subpart CC). The order of subparagraphs has been modified taking into account reactions received.
- iii) The title of **AMC1 ORO.GEN.125** has been amended in line with changes made at Implementing Rule level following comitology; it now reads 'Terms of approval and privileges of an operator'.
- iv) The titles of **AMCs and GM to ORO.GEN.130** have been amended in line with changes made at Implementing Rule level following comitology: they now read 'Changes' instead of 'Changes to organisations subject to certification', to reflect the applicability to CAT operators, subject to certification by default.
- v) **GM1 ORO.GEN.130(a)** has been amended to add 'change in legal entity', in response to stakeholder reactions.
- vi) In **GM3 ORO.GEN.130** the list of items requiring prior approval has been updated to include additional items defined in Part-CAT (i.e. CAT.OP.MPA and CAT.POL) and

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<sup>6</sup> Decision No 2012/007/Directorate R of the Executive Director of the Agency of 19th April 2012 on Acceptable Means of Compliance and Guidance Material to Commission Regulation (EU) no 1178/2011 of 3 November 2011 laying down technical requirements and administrative procedures related to civil aviation aircrew pursuant to Regulation (EC) No 216/2008 of the European Parliament and of the Council. See under: <http://easa.europa.eu/agency-measures/agency-decisions.php>.

to remove the approval item 'local area', as this is now specified in the operations manual. The order of items has been reviewed.

- vii) A new **AMC1 ORO.GEN.150(b)** has been added in response to reactions made at Implementing Rule level to further clarify 'corrective action plan'. **GM1 ORO.GEN.150** 'Findings' has been amended in response to reactions indicating the need to review the definitions. The amended definitions are based on ISO 9000:2005<sup>7</sup>.
- viii) **GM2 ORO.GEN.150** has been deleted to reflect changes made to ARO.GEN.350 following the dedicated AGNA meeting on cooperative oversight (February 2011). Based on the amended provisions, as only the authority that issued the certificate can raise a finding, the GM is obsolete.
- ix) **AMC1 ORO.GEN.200(a)(1)** has been amended in response to reactions:
  - (1) the meaning of safety action plan has been clarified (it contains the actions taken to mitigate risks);
  - (2) it has been clarified that the safety manager will need to ensure initiation and follow-up of internal investigations, which does not imply he/she has to personally perform all such investigations, which may not be feasible in larger organisations;
  - (3) a new point (d) has been added to define the involvement of the safety manager in safety review board meetings.
- x) A new **GM1 ORO.GEN.200(a)(1)** 'Safety manager' has been added in response to a CRD reaction requesting further clarification on the organisational set-up and the role of the safety manager with regards to safety management related tasks.
- xi) **GM1 ORO.GEN.200(a)(2)** 'Safety policy' has been amended in response to a CRD reaction by stating that the purpose of safety reporting and internal investigations is to improve safety, not to apportion blame to individuals.
- xii) **GM1 ORO.GEN.200(a)(3)** 'Internal occurrence reporting scheme' has been amended in response to a CRD reaction to clarify the intent of point (d).
- xiii) In **AMC1 ORO.GEN.200(a)(3)** 'Complex operators – Safety Risk management' point (d)(2) has been amended in response to stakeholder reactions to clarify that compliance is one element of safety performance.
- xiv) **AMC1 ORO.GEN.200(a)(4)** 'Training and communication on safety' has been amended as suggested in CRD reactions to clarify that records should be kept of safety training and that awareness of safety management activities for all personnel must be 'as appropriate for their safety responsibilities'.
- xv) As suggested by stakeholders a new **GM1 ORO.GEN.200(a)(4)** has been added to specify different ways of providing safety training.
- xvi) Some minor editorial changes have been made to **AMC1** and **AMC2** to **ORO.GEN.200(a)(5)** in response to CRD reactions.
- xvii) **GM1 ORO.GEN.200(a)(5)** 'Management system documentation - general' has been amended by adding a new point (b) as suggested in a CRD reaction to clarify the status of organisation procedures within the operator's management system documentation.
- xviii) In response to CRD reactions, **AMC1 ORO.GEN.200(a)(6)** 'Compliance monitoring' has been amended:
  - (1) A new point (c)(3)(iii) has been included to define that the compliance monitoring manager needs to be able to demonstrate relevant knowledge,

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<sup>7</sup> International Organization for Standardization 'Quality management systems; Fundamentals and vocabulary; (ISO 9000:2005)'.

background and appropriate experience related to the activities of the organisation, including knowledge and experience in compliance monitoring. The CRD reactions suggested that within the remit of current EASA rules competence requirements for quality managers were not consistently applied within EASA Member States. Point (c)(4) has been amended accordingly.

It should be noted in this context that no specific qualification requirements are provided in AMC OPS 1.035 (JAR-OPS 1/OPS 3 Section 2) for quality managers or auditors beyond the need to have relevant training and experience. Therefore the amendment to the AMC is limited to specifying competency to be demonstrated, without including any specific type of training or qualifications required.

- (2) Two new points (c)(5) and (c)(6) have been added to address the case where the same person acts as safety manager and compliance monitoring manager, by defining additional aspects to be considered in terms of resource allocation and independence of the compliance monitoring function.
- xix) A new **GM1 ORO.GEN.200(a)(6)** has been added to clarify the provisions on independence of the audit function and to specify that the compliance monitoring manager does not necessarily need to perform all audits and inspections him/herself. Point (c)(1) of AMC1 ORO.GEN.200(a)(6) has been amended accordingly.
- xx) In GM1, now as **GM2 ORO.GEN.200(a)(6)** 'Complex operators - compliance monitoring programme' a reference to 'audits' has been added in response to a CRD reaction to clarify that compliance monitoring can entail both audits and inspections. Based on this reaction, further editorial changes have been made.
- xxi) AMC2 ORO.GEN.200(a)(6) 'Non-complex operators - compliance monitoring programme' is now included as **GM3 ORO.GEN.200(a)(6)** to allow operators to opt for different ways to document and report compliance monitoring without having to apply for an alternative means of compliance. Terms used have been amended in response to CRD reactions. The management evaluation form has been deleted, as 'management evaluation' is currently not defined in Part-ORO.
- xxii) A new **GM4 ORO.GEN.200(a)(6)** has been added to clarify the meanings of the terms 'audit' and 'inspection'. The definitions are those that were included in the draft Cover Regulation to Part-AR published with the CRD to NPAs 2008-22b and 2009-02d. These definitions had been deleted from Part-ARO as a result of the special AGNA meeting on cooperative oversight, but CRD reactions indicated the need to maintain them.
- xxiii) In **AMC1 ORO.GEN.200(b)** items only relevant to the Air crew Regulation have been deleted and the text amended in line with legal drafting principles. The reference to commercial operators of other than complex-motor powered aircraft performing local operations has been deleted taking into account the discussions at EASA Committee level. The issue will be considered as part of the Agency Decision that will address CAT A to A flights. One CRD reaction suggested that this AMC should be moved to Part-ARO, as the assessment of complexity should be made by the competent authority. This suggestion has not been retained at this stage; it will be assessed during the first review of management system provisions through future rulemaking. As part of this review, the criteria for establishing whether an organisation is to be considered complex or non-complex may be further refined.
- xxiv) The title of **AMC1 ORO.GEN.205** has been changed from 'Contracting and purchasing' to 'Contracted activities' to reflect changes made to the title of the corresponding Implementing Rule. In point (c) a reference to 'safety management' has been added in response to CRD reactions, to clarify that hazard identification and safety risk management must consider all contracted activities. The last point has been deleted in response to reactions. A new **GM2 ORO.GEN.205** has been added to clarify the organisation's responsibility when contracting activities.

- xxv) **AMC1 ORA.GEN.220(b)** 'Record keeping' has been amended by including a new point (a) to align with changes made to the corresponding AMC in Part-ARO in response to CRD reactions.

**c) Specific changes Subpart ORO.AOC 'Air operator certification'**

- i) Point (c) of **AMC1 ORO.AOC.110** 'Leasing agreements' has been modified to clarify that the certificate of airworthiness of a leased-in aircraft should be issued in accordance with ICAO Annex 8. In response to the reactions, points (e) and (f) (previously 5 and 6) have been merged. The merged point specifies furthermore that in addition to the information in points (a) to (e) (previously 1 to 5), the operator should also provide a copy of the AOC of the third country operator and the areas of operation in case of a wet lease-in agreement. Furthermore all the elements already addressed in AMC1 ORO.AOC.110(c) 'Leasing agreement' have been deleted. Following comments from the OPS Review Group the scope of AMC1 ORO.AOC.110 has been extended to EU operators.
- ii) New points (e) and (f) have been added to **AMC1 ORO.AOC.110(c)** 'Leasing agreement' to clarify for which continuous airworthiness requirements of Regulation (EC) No 2042/2003 equivalent standards should be demonstrated in case of wet lease-in of a third country operator. Point (e) covers continuing airworthiness management and point (f) addresses the use of maintenance organisations by the third country operator.
- iii) **AMC2 ORO.AOC.110(c)** 'Leasing agreement' has been introduced to ensure that the operator maintains a record of occasions when lessors are used. **GM1 ORO.AOC.110(c)** has been added to clarify that the operator could enter into a framework leasing agreement with more than one third country operator; thereby allowing the competent authority to approve several third country operators in anticipation of an urgent operational need. This GM has been aligned with GM1 ARO.OPS.110 and Article 13(3) of Regulation (EC) No 1008/2008.
- iv) **AMC1 ORO.AOC.115(b)** 'Code-share agreements' has been deleted due to the changes made to ORO.AOC.115 following comitology.
- v) The new **AMC1 ORO.AOC.115(a)(1)** 'Code-share agreements' lists the applicable ICOA standards against which the third country code-share operator should be assessed and the relevant areas of the assessment.
- vi) The reference in **AMC2 ORO.AOC.115(b)** point (b) to a recognised standardisation authority has been deleted. As an alternative AMC2 ORO.AOC.115(b) has been developed containing conditions to be met by third party providers when performing audits on third country code-share operators on behalf of the EU operator.
- vii) The last sentences of points (d) and (e) of **AMC1 ORO.AOC.130** 'Flight data monitoring aeroplanes' have been downgraded to **GM1 ORO.AOC.130**, respectively **GM2 ORO.AOC.130**.
- viii) The last sentence of paragraph (d) and the last two sentences of paragraph (e) of **AMC1 ORO.AOC.130** have been moved to **GM1 ORO.AOC.130**.
- ix) A new **GM1 ORO.AOC.130** has been added: it is based on the content of Chapter 16.3 of ICAO Document 9859 (version 1), 'Safety Management Manual', where this chapter 16.3 is deleted from the second edition of ICAO Document 9859. It was also not transposed to another document either. The following changes were made to the original wording of chapter 16.3:
- (1) 'FDA' becomes 'FDM';
  - (2) 'Company' becomes 'Operator';
  - (3) 'Aircrew' becomes 'flight crew';

- (4) 'advanced training programme' becomes 'alternative training and qualification programme';
  - (5) All occurrences of 'shall', 'must', 'should', 'have to', 'require', 'required' have been screened and if necessary, provisions have been reworded to make them consistent with the intent of guidance material;
  - (6) Some provisions were deleted, because:
    - (i) they are redundant or anecdotal;
    - (ii) they are not applicable to all operators (e.g. obviously intended for large companies with a lot of staff);
    - (iii) they are more restrictive or demanding than what is proposed in AMC1-ORO.AOC.130;
    - (iv) they refer to an already obsolete technology,
    - (v) they were written to promote the safety benefit of an FDM programme, but do not really contain useful guidance on how to set up an FDM programme;
    - (vi) they are ICAO-specific.
- x) Point 6 of **AMC1 ORO.AOC.135(a)** 'Personnel requirements' has been deleted as it is covered in AMC1 ORO.GEN.200(a)(6).

**d) Specific changes Subpart ORO.MLR 'Manuals, logs and records'**

- i) The AMC and GM for ORO.MLR has been amended in response to reactions received to the associated comment response document. Editorial corrections and clarifications have been made throughout.
- ii) The **operations manual (OM) table of contents** numbering has been aligned with the numbering of the equivalent table of contents in EU-OPS (Appendix 1 to OPS 1.1045) to limit the need for operators to renumber their operations manuals (OMs)..
- iii) A definition for 'series of flights' has been added to **AMC1 ORO.MLR.110** 'Journey log', in response to comments received from stakeholders.
- iv) In **AMC3 ORO.MLR.100**, in 8.7 in Part A of the OM, the list for procedures and limitations for non-revenue flights is not an exhaustive list and, therefore, should not imply a definition for non-revenue flights. This has been clarified by the addition of 'for example'.
- v) **GM1 ORO.MLR.105(a)** 'Minimum equipment list (MEL)' has been added. The rationale behind the GM for non-safety related equipment is as follows:
  - Within the frame of EASA rulemaking task RMT.0104 (former 21.039 (c)) CS-MMEL, comments were received from stakeholders regarding non-safety related items.
  - In the JAR-MMEL/MEL framework, non-safety related items did not need to be listed in the MMEL/MEL. However, the operator may choose to list a non-safety related item in its MEL, even if not listed in the MMEL by the aircraft manufacturer. Although 2.a.3.(i) and (iii) in Annex IV of the Basic Regulation do not prevent this, the affected stakeholders asked for clarification in Part-ORO, as 8.a.3.(iii) in Annex IV of the Basic Regulation ['the MEL must be based on the Master Minimum Equipment List (MMEL), if available, and must not be less restrictive than the MMEL'] could be misinterpreted to the extent that it could impair current practises. Consequently, this new GM has been added for clarification.

vi) **AMC1 ORO.MLR.105(j)** and **GM1 ORO.MLR.105(j)** 'Minimum equipment list (MEL)' has been added to address operations of aircraft outside the constraints of the MEL but within the constraints of the MMEL. The rationale behind this is as follows:

- The provisions in **ORO.MLR.105(j)** support what is required by CAT.IDE.A.105 Minimum equipment for the flight:

[ 'A flight shall not be commenced when any of the aeroplane's instruments, items of equipment or functions required for the intended flight are inoperative or missing, unless:

- (a) the aeroplane is operated in accordance with the operator's MEL; or
- (b) the operator is approved by the competent authority to operate the aeroplane within the constraints of the master minimum equipment list (MMEL). ']

The associated new **AMC and GM to ORO.MLR.105(j)** provide details on how to comply with this. It is important to note that this kind of approval is not meant to be used systematically by operators, but only in proven exceptional circumstances, on a case-by-case basis and in a controlled operational and procedural environment.

**e) Specific changes Subpart ORO.SEC 'Security'**

- i) No AMCs /GM are included for this Subpart.

**f) Specific changes Subpart ORO.FC 'Flight crew'**

- i) A new **AMC1 ORO.FC.100(c)** on operational multi pilot limitation has been inserted following the discussions during comitology on Part-MED. The EASA Committee felt it was necessary to introduce an AMC specifying for the operator how to address such limitations.
- ii) Following a CRD reaction, **AMC1 ORO.FC.145(d)** on FSTDs has been changed to apply to full flight simulators only. The AMC needs to be complemented at a later stage to include flight training devices (FTD) and flight and navigation procedures trainer (FNPT).
- iii) **AMC2** and **GM1 to ORO.FC.240** addressing operator differences tables are transferred for further review to the rulemaking task RMT.0105 developing CS-FCD. Both AMC and GM require further revision to accommodate the operational suitability data provided by TC/STC holders in compliance with the future CS-FCD. Stakeholders will have the possibility to comment on the amended AMC and GM during the CS-FCD rulemaking process.

Some consistency amendments were made to AMC1 ORO.FC.A.245 Alternative training and qualification programme to better link the text with the one on Flight Data Monitoring Programme stipulated in AMC1 ORO.AOC.130.

**g) Specific changes Subpart ORO.CC 'Cabin crew'**

- i) **GM1 ORO.CC.100** has been amended to align with the wording used in the Implementing Rules and to further clarify the reference to the minimum cabin crew established by the certification process for the aircraft initial type certificate (TC) and/or for cabin configurations other than the maximum passenger seating capacity (MPSC) of the aircraft type at the time of initial type certification. This was considered necessary during the related discussions of the EASA Committee on the Implementing Rule ORO.CC.100 'Number and composition of cabin crew'.

- ii) Taking into account the reactions to the CRD as well as the feedback from the on-going discussions on the certification specifications for cabin crew (CS-CC), the reference to 'operational suitability data' has been amended in the paragraph TRAINING PROGRAMMES contained in **former AMC1-OR.OPS.CC.115** 'Conduct of training courses and associated checking' of the CRD. Also, as suggested by other reactions, the paragraph has been relocated under a separate **new AMC1 ORO.CC.125(b) & ORO.CC.130(c)**. This makes the link clearer with aircraft type specific training and differences training. Should further clarification be considered necessary by stakeholders, additional AMC or GM may still be proposed during the on-going rulemaking process for CS-CC.
- iii) In **AMC1 ORO.CC.125(c) and AMC1 ORO.CC.125(d)**, some training elements under 'Aircraft description' (e.g. passenger seats, flight crew compartment security door, galleys) and under 'Safety and emergency equipment' (i.e. slides/slide-rafts) were repeated in the two training programmes. This has been addressed and clarified as relevant to each type of training.
- iv) Former subparagraph (3) renumbered **(c) of AMC1 ORO.CC.125(c)** has been amended for consistency to clarify that the training on the operation of the flight crew compartment security door should be completed during aircraft type-specific training as during recurrent training (ORO.CC.140(c)(2)(ii)) and refresher training (ORO.CC.145(b)(3)).
- v) Several reactions to the CRD requested the Agency to develop a format for the list of aircraft type/variant qualifications that must be provided to each cabin crew attestation holder. A **new GM1 ORO.CC.215(b)(2)** has been developed for this purpose. It contains a format that may be used by operators and also indicates those elements that should be shown if using another format. To show the validity of each aircraft type/variant for which a cabin crew member is qualified, as required by ORO.CC.215(b)(2), at least the date of last issue of such a list and the date until when each aircraft type/variant qualification is valid need to be indicated. These two dates may be complemented by the dates of completion of the related required training as relevant to the cabin crew member concerned.
- vi) (renumbered) **AMC1 ORO.CC.250(b)** 'Operations on more than one aircraft type or variant': as data established in accordance with Regulation (EC) No 1702/2003 may not be available for all aircraft, a new subparagraph (c) on similarity of doors/exits has been added as a transposition from the corresponding provision in TGL44 (ACJ OPS 1.1030(1)) for the determination of types or variants. This complements the two other already transposed provisions on similarity of portable safety equipment and on type-specific emergency procedures.

#### **h) Specific changes Subpart ORO.TC 'Technical crew'**

- i) No reactions were received and no content changes have been made to Subpart ORO.TC.

## Annex I to the Explanatory Note

### Organisation Requirements and related AMCs Comparison between ICAO standards (based on Annex 6) and Part-ORO / Basic Regulation (ERs)

ICAO Standard	Requirement	AMC
<p style="text-align: center;"><b>Safety Management Standards</b></p> <p>States shall require, as part of their State safety programme, that an [organisation] implement a safety management system acceptable to the State that, as a minimum:</p>	<p style="text-align: center;"><b><u>ORO.GEN.200(a)</u></b></p> <p>The organisation shall establish, implement and maintain a management system that includes:</p>	
<p>a) identifies safety hazards;</p>	<p style="text-align: center;"><b><u>ORO.GEN.200(a)(3)</u></b></p> <p><b>the identification of aviation safety hazards</b> entailed by the activities of the organisation, their evaluation and the management of associated risks, including taking actions to mitigate the risk and verify their effectiveness;</p>	
<p>b) ensures the implementation of remedial action necessary to maintain agreed safety performance;</p>	<p style="text-align: center;"><b><u>ORO.GEN.200(a)(3)</u></b></p> <p>the identification of aviation safety hazards entailed by the activities of the organisation, their evaluation and the <b>management of associated risks, including taking actions to mitigate the risk and verify their effectiveness;</b></p>	
<p>c) provides for continuous monitoring and regular assessment of the safety performance; and</p>	<p style="text-align: center;"><b><u>ORO.GEN.200(a)(3)</u></b></p> <p>the identification of aviation safety hazards entailed by the activities of the organisation, their evaluation and the management of associated risks, including taking <b>actions</b> to mitigate the risk and verify their effectiveness;</p> <p style="text-align: center;"><b><u>ORO.GEN.200(a)(6)</u></b></p>	<p style="text-align: center;"><b><u>AMC1-ORO.GEN.200(a)(6)-§ a</u></b></p> <p>The implementation and use of a Compliance Monitoring function should enable the organisation to monitor compliance with relevant requirements of Part-ORO and other applicable Parts.</p> <p style="text-align: center;"><b><u>AMC1 ORO.GEN.200(a)(3) § d [*]</u></b></p>

ICAO Standard	Requirement	AMC
	<p>a function to monitor compliance of the organisation with the relevant requirements. Compliance monitoring shall include a feedback system of findings to the accountable manager to ensure effective implementation of corrective actions as necessary</p>	<p>Safety performance monitoring and measurement.</p> <p>(1) Safety performance monitoring and measurement should be the process by which the safety performance of the organisation is verified in comparison to the safety policy and objectives.</p> <p>(2) This process should include:</p> <ul style="list-style-type: none"> <li>(i) safety reporting</li> <li>(ii) safety studies, which are rather large analyses encompassing broad safety concerns;</li> <li>(iii) safety reviews including trends reviews, which are conducted during introduction and deployment of new technologies, change or implementation of procedures, or in situations of structural change in operations;</li> <li>(iv) safety audits focussing on the integrity of the organisation's management system, and periodically assessing the status of safety risk controls and</li> <li>(v) safety surveys, which examine particular elements or procedures of a specific operation, such as problem areas or bottlenecks in daily operations, perceptions and opinions of operational personnel and areas of dissent or confusion.</li> </ul>
<p>d) aims at a continuous improvement of the overall performance of the safety management system.</p>	<p><b><u>ER for airworthiness 3.a.2.</u></b></p> <p>the organisation must implement and maintain a management system to ensure compliance with these essential requirements for airworthiness, and aim for continuous improvement of this system;</p>	

ICAO Standard	Requirement	AMC
	<p><b><u>ER for pilot licensing 3.a.1(ii)</u></b>            implement and maintain a management system relating to safety and the standard of training, and aim for continuous improvement of this system</p> <p><b><u>ER for pilot licensing 4.c.1(ii)</u></b>            implement and maintain a management system relating to safety and the standard of medical assessment, and aim for continuous improvement of this system</p> <p><b><u>ER for air operations 8.a.4</u></b>            the operator must implement and maintain a management system to ensure compliance with these essential requirements for operations and aim for continuous improvement of this system</p>	
<p>A safety management system shall clearly define lines of safety accountability throughout the [organization], including a direct accountability for safety on the part of senior management.</p>	<p><b><u>ORO.GEN.200(a)(1)</u></b>            clearly defined lines of responsibility and accountability throughout the organisation, including a direct safety accountability of the accountable manager;</p>	

ICAO Standard	Requirement	AMC
<p><b>*APPENDIX.-FRAMEWORK FOR SAFETY MANAGEMENT SYSTEMS (SMS)</b></p> <p>This appendix specifies the framework for the implementation and maintenance of a safety management system (SMS) by [organization]. An SMS is a management tool for the management of safety by an organization. The framework includes four components and twelve elements representing the minimum requirements from SMS implementation. The implementation of the framework shall be commensurate with the size of the organization and the complexity of the services provided. This appendix also includes a brief description of each element of the framework.</p>	<p><b><u>ORO.GEN.200(b)</u></b></p> <p>The management system shall correspond to the size of the organisation and the nature and complexity of its activities, taking into account the hazards and associated risks inherent in these activities.</p>	<p><b><u>AMC1-ORO.GEN.200(b)</u></b></p> <p>(a) An operator should be considered as complex when it has a workforce of more than 20 full time equivalents (FTEs) involved in the activity subject to Regulation (EC) No 216/2008<sup>8</sup> and its Implementing Rules.</p> <p>(b) Operators with up to 20 FTEs involved in the activity subject to Regulation (EC) No 216/2008<sup>9</sup> and its Implementing Rules may also be considered complex based on an assessment of the following factors:</p> <ol style="list-style-type: none"> <li>(1) in terms of complexity, the extent and scope of contracted activities subject to the approval;</li> <li>(2) in terms of risk criteria, whether any of the following are present:             <ol style="list-style-type: none"> <li>(i) operations requiring the following specific approvals: performance-based navigation (PBN), low visibility operation (LVO), extended range operations with two-engined aeroplanes (ETOPS), helicopter hoist operation (HHO), helicopter emergency medical service (HEMS), night vision imaging system (NVIS) and</li> </ol> </li> </ol>

<sup>8</sup> Regulation (EC) No 216/2008 of the European Parliament and of 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.

<sup>9</sup> Regulation (EC) No 216/2008 of the European Parliament and of 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.

ICAO Standard	Requirement	AMC
		dangerous goods (DG); (ii) different types of aircraft used; (iii) the environment (offshore, mountainous area etc.).
<p>*1.1 Management commitment and responsibility</p> <p>The [organization] shall define the organization's safety policy which shall be in accordance with international and national requirements, and which shall be signed by the accountable executive of the organization. The safety policy shall reflect organizational commitments regarding safety; shall include a clear statement about the provision of the necessary resources for the implementation of the safety policy; and shall be communicated, with visible endorsement, throughout the organization. The safety policy shall include the safety reporting procedures; shall clearly indicate which types of operational behaviours are unacceptable; and shall include the conditions under which exemption from disciplinary action would be applicable. The safety policy shall be periodically reviewed to ensure it remains relevant and appropriate to the organization.</p>	<p><b><u>ORO.GEN.200(a)(2)</u></b>                      a description of the overall philosophies and principles of the organisation with regard to safety referred to as the safety policy;</p> <p><b><u>ORO.GEN.200(a)(6)</u></b>                      a function to monitor compliance of the organisation with the relevant requirements. Compliance monitoring shall include a feedback system of findings to the accountable manager to ensure effective implementation of corrective actions as necessary.</p>	<p><b><u>AMC1-ORO.GEN.200(a)(2) - [*]</u></b></p> <p>(a) The safety policy should:</p> <ol style="list-style-type: none"> <li>(1) be endorsed by the accountable manager;</li> <li>(2) reflect organisational commitments regarding safety and its proactive and systematic management;</li> <li>(3) be communicated, with visible endorsement, throughout the organisation; and</li> <li>(4) include safety reporting principles.</li> </ol> <p>(b) The safety policy should include a commitment:</p> <ol style="list-style-type: none"> <li>(1) to improve towards the highest safety standards;</li> <li>(2) to comply with all applicable legislation, meet all applicable standards, consider best practices;</li> <li>(3) to provide appropriate resources;</li> <li>(4) to enforce safety as one primary responsibility of all managers; and</li> <li>(5) not to blame someone for reporting something which would not have been detected otherwise.</li> </ol> <p>(c) Senior management should:</p> <ol style="list-style-type: none"> <li>(1) continually promote the safety policy to all personnel and demonstrate their commitment to it;</li> </ol>

ICAO Standard	Requirement	AMC
		<p>(2) provide necessary human and financial resources for its implementation; and</p> <p>(3) establish safety objectives and performance standards.</p> <p><b><u>AMC1-ORO.GEN.200(a)(1)(2)(3)(5) § (e)</u></b></p> <p>The safety policy should include a commitment to improve towards the highest safety standards, comply with all applicable legal requirements, meet all applicable standards, consider best practices and provide appropriate resources.</p>
<p>*1.2 Safety accountabilities</p> <p>The [organization] shall identify the accountable executive who, irrespective of other functions, shall have ultimate responsibility and accountability, on behalf of the [organization], for the implementation and maintenance of the SMS. The [organization] shall also identify the accountabilities of all members of management, irrespective of other functions, as well as of employees, with respect to the safety performance of the SMS. Safety responsibilities, accountabilities and authorities shall be documented and communicated throughout the organization, and shall include a definition of the levels of management with authority to make decisions regarding safety risks tolerability.</p>	<p><b><u>ORO.GEN.210(a)</u></b></p> <p>The organisation shall appoint an accountable manager, who has the authority for ensuring that all activities can be financed and carried out in accordance with the applicable requirements. The accountable manager shall be responsible for establishing and maintaining an effective management system.</p> <p><b><u>ORO.GEN.210(b)</u></b></p> <p>A person or group of persons shall be nominated by the organisation, with the responsibility of ensuring that the organisation remains in compliance with the applicable requirements. Such person(s) shall be ultimately responsible to the accountable manager.</p> <p><b><u>ORO.GEN.200(a)(5)</u></b></p> <p>documentation of all management system key processes, including a process for making personnel aware of their responsibilities and the procedure for amending this documentation;</p>	<p><b><u>AMC1-ORO.GEN.200(a)(3) § (b)(2) - [*]</u></b></p> <p>The levels of management who have the authority to make decisions regarding the tolerability of safety risks, in accordance with (b)(1) above, should be specified.</p> <p><b><u>AMC1-ORO.GEN.200(a)(1)(2)(3)(5) § (d)</u></b></p> <p>Within the operator, responsibilities should be identified for hazard identification, risk assessment and mitigation.</p>
<p>*1.3 Appointment of key safety personnel</p>	<p><b><u>ORO.GEN.210(b)</u></b></p> <p>A person or group of persons shall be nominated</p>	<p><b><u>AMC1-ORO.GEN.200(a)(1) § (a)(1)- [*]</u></b></p>

ICAO Standard	Requirement	AMC
<p>The [organization] shall identify a safety manager to be the responsible individual and focal point for the implementation and maintenance of an effective SMS.</p>	<p>by the organisation, with the responsibility of ensuring that the organisation remains in compliance with the applicable requirements. Such person(s) shall be ultimately responsible to the accountable manager.</p>	<p>The safety manager should act as the focal point and be responsible for the development, administration and maintenance of an effective safety management system.</p> <p><b><u>AMC1-ORO.GEN.200(a)(1)(2)(3)(5) § (c)</u></b></p> <p>The operator should identify a person that fulfils the role of safety manager and who is responsible for co-ordinating the safety management system. This person may be the accountable manager or a person with an operational role in the organisation.</p>
<p>*1.4 Coordination of emergency response planning</p> <p>The [organization] shall ensure that an emergency response plan that provides for the orderly and efficient transition from normal to emergency operations and the return to normal operations, is properly coordinated with the emergency response plans of those organizations it must interface with during the provision of its services.</p>	<p><b><u>ORO.GEN.200(a)(3)</u></b></p> <p>the identification of aviation safety hazards entailed by the activities of the organisation, their evaluation and the management of associated risks, including taking actions to mitigate the risk and verify their effectiveness;</p>	<p><b><u>AMC1-ORO.GEN.200(a)(3) § (g) - [*]</u></b></p> <p>The Emergency Response Plan.</p> <p>(1) An Emergency Response Plan (ERP) should be established that provides the actions to be taken by the operator or specified individuals in an emergency. The ERP should reflect the size, nature and complexity of the activities performed by the organisation.</p> <p>(2) The Emergency Response Plan should ensure:</p> <ul style="list-style-type: none"> <li>(i) an orderly and safe transition from normal to emergency operations;</li> <li>(ii) safe continuation of operations or return to normal operations as soon as practicable; and</li> <li>(iii) coordination with the emergency response plans of other organisations, where appropriate.</li> </ul> <p><b><u>AMC1-ORO.GEN.200(a)(1)(2)(3)(5) § (f)</u></b></p> <p>The operator should, in co-operation with other stakeholders, develop, coordinate and maintain an emergency response plan (ERP) that ensures orderly</p>

ICAO Standard	Requirement	AMC
		and safe transition from normal to emergency operations, and return to normal operations. The ERP should provide the actions to be taken by the operator or specified individuals in an emergency and reflects the size, nature and complexity of the activities performed by the operator
<p>*1.5 SMS documentation</p> <p>The [organization] shall develop an SMS implementation plan, endorsed by senior management of the organization, that defines the organization's approach to the management of safety in a manner that meets the organization's safety objectives, and maintain SMS documentation to describe the safety policy and objectives, the SMS requirements, the SMS processes and procedures, the accountabilities, responsibilities and authorities for processes and procedures, and the SMS outputs. Also as part of the SMS documentation, the [organization] shall develop and maintain a safety management systems manual (SMSM), to communicate its approach to the management of safety throughout the organization.</p>	<p><b><u>ORO.GEN.200(a)(5)</u></b></p> <p>documentation of all management system key processes, including a process for making personnel aware of their responsibilities and the procedure for amending this documentation;</p>	<p><b><u>AMC1-ORO.GEN.200(a)(5) § (a) [*]</u></b></p> <p>(a) The safety management manual (SMM) should be the key instrument for communicating the approach to safety for the whole of the operator. The SMM should document all aspects of safety management, including the safety policy, objectives, procedures and individual safety responsibilities.</p> <p>(b) The contents of the safety management manual should include:</p> <ol style="list-style-type: none"> <li>(1) scope of the safety management system;</li> <li>(2) safety policy and objectives;</li> <li>(3) safety accountability of the accountable manager;</li> <li>(4) safety responsibilities of key safety personnel;</li> <li>(5) documentation control procedures;</li> <li>(6) hazard identification and risk management schemes;</li> <li>(7) safety action planning;</li> <li>(8) safety performance monitoring;</li> <li>(9) incident investigation and reporting;</li> <li>(10) emergency response planning;</li> <li>(11) management of change (including organisational changes with regard to</li> </ol>

ICAO Standard	Requirement	AMC
		<p>safety responsibilities); and            (12) safety promotion.            (c) The SMM may be contained in (one of) the manual(s) of the operator.</p>
<p>*2.1 Hazard identification</p> <p>The [organization] shall develop and maintain a formal process that ensures that hazards in operations are identified. Hazard identification shall be based on a combination of reactive, proactive and predictive methods of safety data collection.</p>	<p><b><u>ORO.GEN.200(a)(3)</u></b>  <b>the identification of aviation safety hazards</b> entailed by the activities of the organisation, their evaluation and the management of associated risks, including taking actions to mitigate the risk and verify their effectiveness;</p>	<p><b><u>AMC1-ORO.GEN.200(a)(3) § (a)(1) - [*]</u></b></p> <p>Reactive and proactive schemes for hazard identification should be the formal means of collecting, recording, analysing, acting on and generating feedback about hazards and the associated risks that affect the safety of the operational activities of the operator.</p>
<p>*2.2 Safety risk assessment and mitigation</p> <p>The [organization] shall develop and maintain a formal process that ensures analysis, assessment and control of the safety risks in [Annex-specific] operations.</p>	<p><b><u>ORO.GEN.200(a)(3)</u></b>            the identification of aviation safety hazards entailed by the activities of the organisation, their evaluation and the <b>management of associated risks</b>, including taking actions to mitigate the risk and verify their effectiveness;</p>	<p><b><u>AMC1-ORO.GEN.200(a)(3) § (b)(1) - [*]</u></b></p> <p>A formal risk management process should be developed and maintained that ensures analysis (in terms of likelihood and severity of occurrence), assessment (in terms of tolerability) and control (in terms of mitigation) of risks to an acceptable level.</p>
<p>Add SMS component</p>		
<p>*3.1 Safety performance monitoring and measurement</p> <p>The [organization] shall develop and maintain the means to verify the safety performance of the organization and to validate the effectiveness of safety risks controls. The safety performance of the organization shall be verified in reference to the safety performance indicators and safety performance targets of the SMS.</p>	<p><b><u>ORO.GEN.200(a)(3)</u></b>            the identification of aviation safety hazards entailed by the activities of the organisation, their evaluation and the <b>management of associated risks, including taking actions to mitigate the risk and verify their effectiveness;</b></p>	<p><b><u>AMC1-ORO.GEN.200(a)(3) § (d)(1) - [*]</u></b></p> <p>Safety performance monitoring and measurement should be the process by which the safety performance of the operator is verified in comparison to the safety policy and objectives.</p>
<p>*3.2 The management of change</p>	<p><b><u>ORO.GEN.200(a)(3)</u></b></p>	<p><b><u>AMC1-ORO.GEN.200(a)(3) § (e) - [*]</u></b></p>

ICAO Standard	Requirement	AMC
<p>The [organization] shall develop and maintain a formal process to identify changes within the organization which may affect established processes and services; to describe the arrangements to ensure safety performance before implementing changes; and to eliminate or modify safety risk controls that are no longer needed or effective due to changes in the operational environment.</p>	<p><b>the identification of aviation safety hazards entailed by the activities of the organisation, their evaluation and the management of associated risks, including taking actions to mitigate the risk and verify their effectiveness;</b></p>	<p>The management of change.                      The operator should manage safety risks related to a change. The management of change should be a documented process to identify external and internal change that may have an adverse effect on safety. It should make use of the operator’s existing hazard identification, risk assessment and mitigation processes.</p> <p><b><u>AMC1-ORO.GEN.200(a)(1)(2)(3)(5) § (b)</u></b>                      The operator should manage safety risks related to a change. The management of change should be a documented process to identify external and internal change that may have an adverse effect on safety. It should make use of the operator’s existing hazard identification, risk assessment and mitigation processes.</p>
<p>*3.3 Continuous improvement of the SMS</p> <p>The [organization] shall develop and maintain a formal process to identify the causes of sub-standard performance of the SMS, determine the implications of sub-standard performance of the SMS in operations, and eliminate or mitigate such causes.</p>	<p><b><u>ORO.GEN.200(a)(3)</u></b>                      the identification of aviation safety hazards entailed by the activities of the organisation, their evaluation and the management of associated risks, including taking <b>actions</b> to mitigate the risk and verify their effectiveness;</p> <p><b><u>ORO.GEN.200(a)(6)</u></b>                      a function to monitor compliance of the organisation with the relevant requirements. Compliance monitoring shall include a feedback system of findings to the accountable manager to ensure effective implementation of corrective actions as necessary.</p>	<p><b><u>AMC1 ORO.GEN.200(a)(3) § (f) - [*]</u></b>                      Continuous improvement.                      The operator should continuously seek to improve its safety performance. Continuous improvement should be achieved through:</p> <ol style="list-style-type: none"> <li>(1) proactive and reactive evaluations of facilities, equipment, documentation and procedures through safety audits and surveys;</li> <li>(2) proactive evaluation of individuals’ performance to verify the fulfilment of their safety responsibilities; and</li> <li>(3) reactive evaluations in order to verify the effectiveness of the system for control and mitigation of risk.</li> </ol>

ICAO Standard	Requirement	AMC
<p>*4.1 Training and education</p> <p>The [organization] shall develop and maintain a safety training programme that ensures that personnel are trained and competent to perform the SMS duties. The scope of the safety training shall be appropriate to each individual's involvement in the SMS.</p>	<p><b><u>ORO.GEN.200(a)(4)</u></b></p> <p>maintaining personnel trained and competent to perform their tasks;</p>	<p><b><u>AMC1-ORO.GEN.200(a)(4)- § (a)</u></b></p> <p>Training.</p> <p>(1) All personnel should receive safety training as appropriate for their safety responsibilities.</p> <p>(2) Adequate records of all safety training provided should be kept.</p>
<p>*4.2 Safety communication</p> <p>The [organization] shall develop and maintain formal means for safety communication, that ensures that all personnel are fully aware of the SMS, conveys safety critical information, and explains why particular safety actions are taken and why safety procedures are introduced or changed.</p>	<p><b><u>ORO.GEN.200(a)(4)</u></b></p> <p>maintaining personnel trained and competent to perform their tasks;</p> <p><b><u>ORO.GEN.200(a)(5)</u></b></p> <p>[...] including a process for making personnel aware of their responsibilities, and the procedure for amending this documentation.</p>	<p><b><u>AMC1-ORO.GEN.200(a)(4)- § (b)</u></b></p> <p>Communication.</p> <p>(1) The operator should establish communication about safety matters that:</p> <p>(i) ensures that all personnel are aware of the safety management activities as appropriate for their safety responsibilities;</p> <p>(ii) conveys safety critical information, especially relating to assessed risks and analysed hazards;</p> <p>(iii) explains why particular actions are taken; and</p> <p>(iv) explains why safety procedures are introduced or changed.</p> <p>(2) Regular meetings with personnel where information, actions and procedures are discussed may be used to communicate safety matters.</p>

Note: The AMCs/GM identified with [\*] are defined for complex operators in the sense of AMC1 to ORO.GEN.200(b).