



**European Aviation Safety Agency**

**EXPLANATORY NOTE**

**EXECUTIVE SUMMARY**

This Explanatory Note introduces Agency Decision 2012/007/R defining AMCs and GM related to the Organisation Requirements applicable to Air Crew (Part-ORA), as set out in Annex VII to Regulation (EU) 1178/2011 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, as last amended with Regulation (EU) No 290/2012 of 30 March 2012.

This note 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 and legislative processes.

This Decision relates to organisation requirements covering ATOs, FSTD qualification certificate holders and AeMCs.

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

### **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 civil aviation aircrew<sup>2</sup>. Annex VII to this Regulation, Part-ORA contains the organisation requirements for aircrew.

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 VII to the Regulation on Aircrew 'Part-ORA', which contains four Subparts: GEN, ATO, FSTD and AeMC<sup>3</sup>.

#### **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-ORA 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>4</sup>.

The Executive Director Decision 2012/007/R adopts the initial issue of AMC and GM to Part-ORA: as an output of the following Agency rulemaking tasks:

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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) 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 (OJ L 311, 25.11.2011).

<sup>3</sup> GEN: general; ATO: approved training organisation; FSTD: flight simulation training device; AeMC: aero-medical centre.

<sup>4</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.

<b>Rulemaking Task No</b>	<b>TITLE</b>	<b>NPA/CRD No</b>
<b>FCL.001</b> <b>OPS.001</b>	<b>Acceptable Means of Compliance and Guidance Material on organisation requirements</b>	<b>2008-22c</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 15 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>5</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>6</sup>) and that is also available on the Agency's website.

CRD to NPA 2008-22c and 2009-02c covered the organisation requirements applicable to the areas of 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 civil aviation aircrew.

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, 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 Subpart 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-ORA, i.e. limited to civil aviation aircrew, amounts to 121. The table below indicates the distribution of these reactions for the different Subparts of Part-ORA.

<b>Part.Subpart</b>	<b>No. of reactions</b>
ORA.GEN	93
ORA.ATO / .FSTD	23
ORA.AeMC	5

Regarding ORA.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. Some of the reactions repeated NPA comments claiming that the EASA proposal on safety management systems (SMS) did not well align with the applicable ICAO provisions. Although different in wording, the proposed management system requirements and related AMCs as well as relevant essential requirements set at the level of the Basic Regulation are fully compliant with the ICAO framework<sup>7</sup>. Within Part-ORA these provisions are presented in a way that fits

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

<sup>6</sup> See Rulemaking Archive page: <http://www.easa.europa.eu/rulemaking/r-archives.php>.

<sup>7</sup> An updated version of the comparison table initially published with the CRD to NPAs 2008-22c and 2009-02d is included in the Annex.

various organisations, whatever their size, nature or complexity of the activities and whatever business model they wish to apply, thus ensuring their proportionate application.

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-ORA, some specific issues raised in those reactions will be dealt with through future rulemaking, as the changes proposed would require full stakeholder consultation. This will entail:

- a review of 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;
- a review of the AMC/GM in Part-ORA introduced in the CRD text or develop new AMC/GM for non-complex approved training organisations (ATOs), in order to provide more detailed information and guidance to these organisations.

Considering the relatively low number of reactions to the AMCs and GM it is important to note that a series of changes have 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.
- ii) AMCs and GM that were published with the CRDs but that are only applicable to air operations have been deleted. These will be included with the Decision on Part-ORO 'Organisation Requirements for Air Operations', to be published at a later stage.
- iii) AMCs and GM referring to 'declared organisations' (non-commercial operators of complex motor-powered aircraft) have been amended by removing these references, as the applicability of this Decision is limited to aircrew.
- iv) The references of all AMCs and GM have been aligned with the Agency's latest rule numbering convention, by adding the letter 'A' for aircrew after the Part identifier ('OR' replaced by 'ORA' in all references). As part of this alignment, any suffixes indicating the applicability, such as 'complex', 'non-complex' and 'ATO' have been moved from the AMC reference to the subheading of the relevant AMC or GM.
- v) The numbering of paragraphs and subparagraphs has been aligned with that used for the Implementing Rules.

#### b) Specific changes Subpart ORA.GEN 'General Requirements'

- i) A new **GM1 ORA.GEN.005** has been added to list all acronyms used throughout the Decision.
- ii) The titles of **AMC1 ORA.GEN.130** and of **GM1 ORA.GEN.130(a)** have been amended to read 'Changes to organisations' in line with changes made at Implementing Rule level following Comitology.
- iii) A new **AMC1 ORA.GEN.150(b)** has been added in response to CRD reactions made at Implementing Rule level requesting to further clarify 'corrective action plan'. **GM1 ORA.GEN.150** 'Findings' has been amended in response to CRD reactions indicating

the need to review the definitions. The amended definition for corrective action is based on ISO<sup>8</sup> 9001:2005.

- iv) **GM2 OR.GEN.150** has been deleted to reflect changes made to ARA.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.
- v) In **AMC1 ORA.GEN.160** 'Occurrence reporting' the reference to OPS has been removed to make it applicable also to aircrew.
- vi) **AMC1 ORA.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.
- vii) A new **GM1 ORA.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.
- viii) **GM1 ORA.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.
- ix) **GM1 ORA.GEN.200(a)(3)** 'Internal occurrence reporting scheme' has been amended in response to a CRD reaction to clarify the intent of point (d).
- x) **AMC1 ORA.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';
- xi) As suggested by stakeholders a new **GM1 ORA.GEN.200(a)(4)** has been added to specify different means of providing safety training.
- xii) **GM1 ORA.GEN.200(a)(5)** 'Organisation management system documentation' has been amended by adding a new point (b) as suggested in a CRD reaction to clarify the status of organisation procedures within the organisation's management system documentation.
- xiii) Some minor editorial changes have been made to **AMC1 ORA.GEN.200(a)(5)** in response to CRD reactions.
- xiv) In response to CRD reactions, **AMC1 ORA.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, 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.

It should be noted in this context that no specific qualification requirements are provided in IEM No 1 to JAR-FCL 1.055 for quality managers or auditors

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<sup>8</sup> International Organization for Standardization.

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. Point (c)(4) has been amended accordingly.

- (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.
- xv) A new **GM1 ORA.GEN.200(a)(6)** has been added to clarify the independence of the audit function and to specify that the compliance monitoring manager does not necessarily perform all audits and inspections him/herself. Point (c)(1) of AMC1 ORA.GEN.200(a)(6) has been amended accordingly.
- xvi) In GM1, now as **GM2 ORA.GEN.200(a)(6)** 'Complex organisations - compliance monitoring programme for ATOs' in response to a CRD reaction a reference to 'audits' has been added to clarify compliance monitoring can entail both audits and inspections. In line with this change a new **GM3 ORA.GEN.200(a)(6)** has been added to define these terms. 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. Deletion of the definitions from the draft Regulation had been suggested during the special AGNA meeting on cooperative oversight.
- xvii) In **AMC1 ORA.GEN.200(b)** an editorial error has been corrected by removing the text 'commercial operators of other-than-complex motor-powered aircraft performing local operations' from subparagraph (c). Following those changes the AMC text has been further amended in line with legal drafting principles to improve clarity and readability. One CRD reaction suggested that this AMC should be moved to Part-ARA, as the assessment of complexity should be made by the competent authority. This suggestion has not be retained at this stage; it will be assessed during the first review of management system provisions through RMT.0388, 0389. As part of this review, the criteria for establishing whether an organisation is to be considered complex or non-complex may be further refined.
- xviii) The title of **AMC1 ORA.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 paragraph has been deleted in response to reactions. A new **GM2 ORA.GEN.205** has been added to clarify the organisation's responsibility when contracting activities.
- xix) **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-ARA in response to CRD reactions.

**c) Specific changes Subpart ORA.ATO 'Approved Training Organisations'**

- i) A new **GM** has been developed to **ORA.ATO.110** 'Scope': Section I contains all the requirements applicable to ATOs providing training for pilot licences and the associated ratings or certificates. This means Section I is applicable for ATOs providing training for the LAPL, PPL, SPL and BPL and the associated ratings and certificates, as well as for the CPL, MPL and ATPL and the associated ratings and certificates.
- ii) **AMC1 ORA.ATO.135** 'Training aircraft and FSTDs' has been amended based on a reaction received and as discussed with the experts. The amendment concerns the primary flight controls that are accessible by both the student and the instructor. Apart from the use of training aircraft equipped with dual flight controls, the use of

training aircraft equipped only with a centre control stick can also be accepted for providing dual flight training. The text was also amended to make clear that this requirement is not applicable to a single-seat training aircraft.

- iii) **ORA.ATO Section II:** The title of this section has been amended to align with that used in the rule itself. The chief ground instructor (CGI) was renamed to chief theoretical knowledge instructor (CTKI) in order to align with the term used in the rule.
- iv) **AMC1 ORA.ATO.210** 'Personnel requirements' concerning the integrated courses has been amended based on some CRDS reactions received stating that the full-time employment of an HT, a CFI and a CTKI for non-complex ATOs should not be required.

As the AMC already allows having part-time personnel and a certain combination of duties in the case of modular courses, the amended text will allow the ATOs to have part-time personnel for the HT, the CFI and the CTKI also in the case of integrated courses, depending upon the scope of training offered.

- v) **AMC2 ORA.ATO.210** 'Personnel requirements' concerning the qualification of the CFI has been amended based on some reactions received on the rule itself and this AMC. The qualification of the CFI 'to hold the highest professional pilot licence and associated ratings or certificates' has been moved from the AMC to the rule. The new text gives the possibility for the CFI to delegate certain tasks concerning standardisation and supervision to the flight instructors. In all cases it is the CFI who is ultimately responsible for ensuring quality and standards.

**d) Specific changes Subpart ORA.FSTD 'Requirements for organisations operating FSTDs and the qualification of FSTDs'**

- i) **GM3 ORA.FSTD.100** 'General – Guidance for organisations operating FSTDs to prepare for a competent authority evaluation': based on comments received some additional information was provided to improve clarity.
- ii) The AMC and GM addressing 'Interim FSTD qualification – New aircraft FFS/FTD qualification - additional information' have been moved to Part-ARA, and are now included as **AMC1 ARA.FSTD.115** and **GM1 ARA.FSTD.115** since they apply to the competent authority and not to an organisation.
- iii) The former AMCs to OR.ATO.310(a) 'General' and 'Examples of major modifications' have been amended by extracting the examples of what may constitute a major modification as a separate GM and merging the remaining elements into one single AMC. The material is now included as **AMC1 ORA.FSTD.110** and **GM1 ORA.FSTD.110**.

**e) Specific changes Subpart ORA.AeMC 'Requirements related to aero-medical centres'**

- i) Only editorial corrections and minor clarifications have been made to the AMC and GM for ORA.AeMC.

## Annex I to the Explanatory Note

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

ICAO Standard	Requirement	AMC
<p><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><b><u>ORA.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><b><u>ORA.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><b><u>ORA.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><b><u>ORA.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><b><u>ORA.GEN.200(a)(6)</u></b></p> <p>a function to monitor compliance of the organisation with the relevant requirements. Compliance monitoring shall include a feedback</p>	<p><b><u>AMC1-ORA.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-ORA and other applicable Parts.</p> <p><b><u>AMC1 ORA.GEN.200(a)(3) § d [*]</u></b></p> <p>Safety performance monitoring and measurement.</p> <p>(1) Safety performance monitoring and</p>



ICAO Standard	Requirement	AMC
	<p>system of findings to the accountable manager to ensure effective implementation of corrective actions as necessary</p>	<p>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> 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> <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,</p>	

ICAO Standard	Requirement	AMC
	<p>and aim for continuous improvement of this system</p> <p><b><u>ER for pilot licensing 4.c.1(ii)</u></b></p> <p>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></p> <p>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>ORA.GEN.200(a)(1)</u></b></p> <p>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>ORA.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-ORA.GEN.200(b)</u></b></p> <p>(a) An organisation 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>9</sup> and its Implementing Rules. i</p> <p>(b) Without prejudice to the size of the organisation, in terms of complexity, the extent and scope of contracted activities subject to the approval should also be assessed.</p> <p>(c) Without prejudice to the criteria above, the following risk criteria should also be assessed:</p> <ol style="list-style-type: none"> <li>(1) use of 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 dangerous goods (DG);</li> <li>(2) different types of aircraft used;</li> <li>(3) the environment (offshore, mountainous area etc.);</li> </ol> <p>(d) Notwithstanding the above criteria, the following organisations should be considered as non-complex:</p> <ol style="list-style-type: none"> <li>(1) Approved Training Organisations (ATOs) only providing training for the light aircraft pilot licence (LAPL), private pilot licence (PPL), sailplane pilot licence (SPL)</li> </ol>

<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
		<p>or balloon pilot licence (BPL) and the associated ratings and certificates;</p> <p>(2) Aero-Medical Centres (AeMCs).</p>
<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>ORA.GEN.200(a)(2)</u></b></p> <p>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>ORA.GEN.200(a)(6)</u></b></p> <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><b><u>AMC1-ORA.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> <li>(2) provide necessary human and financial resources for its implementation; and</li> <li>(3) establish safety objectives and performance standards.</li> </ol>

ICAO Standard	Requirement	AMC
		<p><b><u>AMC1-ORA.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>ORA.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>ORA.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>ORA.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-ORA.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-ORA.GEN.200(a)(1)(2)(3)(5) § (d)</u></b></p> <p>Within the organisation, responsibilities should be identified for hazard identification, risk assessment and mitigation.</p>
<p>*1.3 Appointment of key safety personnel</p> <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><b><u>ORA.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>AMC1-ORA.GEN.200(a)(1) § (a)(1)- [*]</u></b></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>

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		<p><b><u>AMC1-ORA.GEN.200(a)(1)(2)(3)(5) § (c)</u></b></p> <p>The organisation 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>ORA.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-ORA.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 organisation 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) co-ordination with the emergency response plans of other organisations, where appropriate.</li> </ul> <p><b><u>AMC1-ORA.GEN.200(a)(1)(2)(3)(5) § (f)</u></b></p> <p>The organisation should, in co-operation with other stakeholders, establish, coordinate and maintain an emergency response plan (ERP) that ensures orderly and safe transition from normal to emergency operations, and return to normal operations.</p> <p>The ERP should provide the actions to be taken by the organisation or specified individuals in an emergency and reflects the size, nature and complexity of the activities performed by the</p>

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<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>ORA.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>organisation</p> <p><b><u>AMC1-ORA.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 organisation. 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 safety responsibilities); and</li> <li>(12) safety promotion.</li> </ol> <p>(c) The SMM may be a contained in (one of) the manual(s) of the organisation.</p>
<p>*2.1 Hazard identification</p>	<p><b><u>ORA.GEN.200(a)(3)</u></b></p>	<p><b><u>AMC1-ORA.GEN.200(a)(3) § (a)(1) - [*]</u></b></p>

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<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>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>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 organisation.</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>ORA.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-ORA.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 probability and severity of occurrence), assessment (in terms of tolerability) and control (in terms of mitigation) of risks to an acceptable level.</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>ORA.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-ORA.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 organisation is verified in comparison to the safety policy and objectives.</p>
<p>*3.2 The management of change</p> <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><u>ORA.GEN.200(a)(3)</u></b> <b>the identification of aviation safety hazards</b> entailed by <b>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><b><u>AMC1-ORA.GEN.200(a)(3) § (e) - [*]</u></b></p> <p>The management of change. The organisation 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 organisation's existing hazard identification, risk assessment and mitigation processes.</p>



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		<p><b><u>AMC1-ORA.GEN.200(a)(1)(2)(3)(5) § (b)</u></b></p> <p>The organisation 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 organisation'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>ORA.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><b><u>ORA.GEN.200(a)(6)</u></b></p> <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><b><u>AMC1 ORA.GEN.200(a)(3) § (f) - [*]</u></b></p> <p>Continuous improvement.</p> <p>The organisation should continuously seek to improve its safety performance. Continuous improvement should be achieved through:</p> <ul 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> </ul>
<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>ORA.GEN.200(a)(4)</u></b></p> <p>maintaining personnel trained and competent to perform their tasks;</p>	<p><b><u>AMC1-ORA.GEN.200(a)(4)- § (a)</u></b></p> <p>Training.</p> <ul style="list-style-type: none"> <li>(1) All personnel should receive safety training as appropriate for their safety responsibilities.</li> <li>(2) Adequate records of all safety training provided should be kept.</li> </ul>

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<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>ORA.GEN.200(a)(4)</u></b></p> <p>maintaining personnel trained and competent to perform their tasks;</p> <p><b><u>ORA.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-ORA.GEN.200(a)(4)- § (b)</u></b></p> <p>Communication.</p> <p>(1) The organisation should establish communication about safety matters that:</p> <ul style="list-style-type: none"> <li>(i) ensures that all personnel are aware of the safety management activities as appropriate for their safety responsibilities;</li> <li>(ii) conveys safety critical information, especially relating to assessed risks and analysed hazards;</li> <li>(iii) explains why particular actions are taken; and</li> <li>(iv) explains why safety procedures are introduced or changed.</li> </ul> <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 organisations.