



**EASA**  
European Aviation Safety Agency

## **New business models**

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# **New business models**



## New business models

- **Rules should not prevent business evolution and efficiency.**
- **However, rules should prevent:**
  - Dilution of responsibilities and liabilities
  - Flags of convenience
  - Business/financial engineering detrimental to aviation safety



## Hypothetical case

Several EU operators from different Member States  
(maybe belonging to the same business group)  
would like to share/interchange aeroplanes, pool the  
crews, pool engineering services, etc.



# New business models

## ➤ **Some aspects to take into account:**

- How the initiative fits in the AirOPS and Continuing Airworthiness rules.
- How the initiative affects the operators, including their procedures and approvals).
- How the initiative affects the corresponding NAAs and, in particular, their own divisions (OPS, Airworthiness, Fees, etc)



# New business models

## **In order to achieve mutual interoperability:**

Which may include the transfer of the aircraft to another operator with a very short notice (« instant transfer »).

This could be seen as an extreme case of « dry lease » (could even have a very short duration, maybe even a few days or hours).

- **The different operators (AOC/CAMO holders) decide to implement the same procedures (same OPS manual, same CAME ...).**
- **These procedures clearly define who is the operator at each particular moment (not only during a flight but also when the aircraft is on ground)**
- **These procedures ensure the continuity of the continuing airworthiness management process. In order to do so, they decide to use the same engineering services.**
  - Is it possible for the AOC holders to contract a single CAMO?
  - Do they have to hold their own CAMO approval and subcontract a common service provider?



## New business models

- **Each NAA has to approve its corresponding AOC/CAMO holder. However, each NAA has to be satisfied with the approval granted by the other NAAs.**
- **The NAAs may decide to mutually cooperate, with each NAA reviewing a part of the « OPS manual / CAME ». Formally speaking this means each NAA is allocating tasks to other entities (the other NAAs).**
  - How are these functions allocated?
  - Under the concept of « qualified entities »?
  - Do they have to establish a contract?
  - How do they audit/monitor the contracted tasks?
  - Can they do it by having a team of pooled inspectors from the different NAAs?
  - Under which procedures do they work if the procedures are not aligned
    - **between the different NAAs, and/or**
    - **between the different divisions of each NAA (OPS, CAW)**  
(facilitated if the Authority Requirements are aligned)



## New business models

- **This mutual cooperation between NAA (and associated questions) apply not only to the approval of the OPS manual/CAME but also to the initial audits of the organisations and to the continued oversight.**





# New business models

## **CONCLUSION:**

- **Solutions could be found within the current regulations.**
- **However, this requires:**
  - A full re-evaluation of procedures and processes, both for the organisations and competent authorities.
  - Mutual alignment between operators.
  - Mutual cooperation between competent authorities and between the different divisions of each competent authority. This affects not only technical aspects, but also contractual and legal aspects.
- **In addition, this could be further facilitated by regulation changes in the following areas:**
  - Contracting of a CAMO by an AOC holder.
  - Introduction of Safety Management requirements.
  - Alignment of Authority Requirements.

**All these aspects are currently being considered as part of the task RMT.0251 (SMS) and RMT.0209 (Contracting of CAMOs by AOC holders)**



## **Other examples**



## New business models

➤ **Electronic Maintenance Records.**

➤ ...

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