



EASA
European Aviation Safety Agency

The basics of compliance monitoring

Bas van der Weide
Air Operations Standardisation Team Leader
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- The two-tiered approach
- The first tier
- The second tier
- Examples



➤ *The two-tiered approach*

➤ The first tier

➤ The second tier

➤ Examples



The two-tiered approach

➤ Organisations compliance monitoring

➤ It is a two-tiered approach

➤ First tier

- Establishment of procedures to ensure standards are transposed into the organisations

➤ Second tier

- Ensure those procedures are followed, through
 - ▶ day-to-day supervision by 'line management'
 - ▶ independent audits/inspections



- The two-tiered approach

- ***The first tier***

- The second tier

- Examples



The first tier

- Transposing standards (legal requirements, etc.) into procedures

- Those procedures should:
 - **NOT** be a copy of the standard, but
 - DESCRIBE THE WAY YOU WANT YOUR STAFF TO PERFORM THEIR TASKS
 - be established by the person responsible for the process



The first tier

➤ Output of the first tier

➤ Procedures

- providing clarity to your staff on how they are expected to work

➤ Compliance checklist (cross reference table)

- demonstrating that all the applicable requirements have been addressed by (transposed into) appropriate procedures



The first tier

- Compliance checklist is the tool for:
 - Demonstrating compliance in the 'certification' process
 - Identification on which procedures to 'change' when standards are 'amended'



- The two-tiered approach

- The first tier

- ***The second tier***

- Examples



The second tier

- Ensuring that procedures are being followed
 - Firstly the responsibility of the day-to-day managers/supervisors
 - Secondly, subject to an independent 'internal' verification by means of audits/inspections



The second tier

➤ Independent verification

➤ starts with the compliance checklist

➤ referring to the applicable 'standards' that were transposed, such that it can be determined which procedures are subject to the scope of the audit

➤ verifies that the procedures are followed

➤ not by referring to the standard, but by referring to details that describe how and what to check to ensure that procedures are or have been followed



➤ The two-tiered approach

➤ The first tier

➤ The second tier

➤ ***Examples***



Examples

- Legal requirements state often:
'An operator/organisation shall ensure that...'.
 - The intent of the legislator in such cases is that it requires the organisation/operator to establish a process/procedure.



Examples

- Transport of sporting weapons
 - ‘The operator shall take all reasonable measures to ensure that any sporting weapons intended to be carried by air are reported to the operator.’
- We have seen Operations Manuals that state:
 - ‘EASA Airlines will take all reasonable measures to ensure that any sporting weapons intended to be carried by air are reported to EASA Airlines.’
 - This statement in the operations manual or ground handling instructions is meaningless.

The operator should define which measures it has taken such that passenger report those sporting weapons to their staff, and what a staff member needs to do when passengers report those weapons to them.



Examples

➤ MMEL

- 'May be unserviceable, provided alternative procedures are established and used.'
- This provision cannot be transposed in the MEL verbatim; these alternative procedures are either established and then the item may be unserviceable provided the established procedures are used, or these procedure are not established in which case the item must be serviceable.



Examples

- In-flight fuel monitoring
 - '... at regular intervals.'
- Here the organisation/operator is required to define those intervals in its procedures, depending on the type of operation being conducted (i.e. it is envisaged by the regulator that a one-size fits all cannot be applied).
- The original intent of the rule is to ensure that the crew can detect and take appropriate action in case of a fuel leak (or similar problems), relevant to the type of operation. Such policy decision cannot be left to the commander, as the operator is responsible for doing the risk assessment with regard to the risks involved in his operation.



Examples

Requirement	Documented	Implemented
CAT.OP.MPA.280 In-flight fuel management — aeroplanes	<input type="checkbox"/>	<input type="checkbox"/>

➤ not fit-for-purpose in the second tier

➤ Inefficient

- For every verification the 'auditor' needs to examine the documentation to establish where the requirement is being addressed. This is inefficient use of resources, as such verification should be done only once, to assist in the change management process.

➤ Ineffective

- When ticking the boxes it cannot be verified whether the assessor has determined that the rule was appropriately customised for the type of operation. The same applies to the implementation box. What has been verified is not traceable.



Examples

Requirement	Documented
<p>CAT.OP.MPA.280 In-flight fuel management — aeroplanes</p> <p>The operator shall establish a procedure to ensure that in-flight fuel checks and fuel management are carried out according to the following criteria.</p> <p>(a) In-flight fuel checks</p> <p>(1) The commander shall ensure that fuel checks are carried out in-flight at regular intervals. The usable remaining fuel shall be recorded and evaluated to:</p> <p>(i) compare actual consumption with planned consumption;</p> <p>(ii) check that the usable remaining fuel is sufficient to complete the flight, in accordance with (b); and</p> <p>(iii) determine the expected usable fuel remaining on arrival at the destination aerodrome.</p> <p>(2) The relevant fuel data shall be recorded.</p>	<p>OM-A 8.1.10</p> <p>OM-A 8.3.7</p>

➤ fit-for-purpose for the first tier

➤ OM-A 8.1.10 – Use of Operational Flight Plan

- This procedure will have to include the obligation from the operator to the commander to record the outcome of the in-flight fuel monitoring check on the OFP.

➤ OM-A 8.3.7 – In-flight fuel management

- This procedure should define the regular intervals the operator has set.



Examples

Requirements	Documented	Topic	Questions and Evidences	Implemented
CAT.OP.MPA.150 Fuel policy	OM-A 8.1.7 OM-A 8.1.10 OM-A 8.3.7	Fuel policy and in-flight fuel management	Sample flight preparation documents and check: <ul style="list-style-type: none">- fuel policy, including accountability for depressurisation;- Preparation / actualisation OFP;- Contents of the Operational Flight Plan.	<input type="checkbox"/> Satisfactory <input type="checkbox"/> Not satisfactory
CAT.OP.MPA.175 Flight preparation				
CAT.OP.MPA.280 In-flight fuel management — aeroplanes			Sample minimum of two post flight documentation (verify existence and markings on OFP of in-flight fuel checks)	

➤ This is a combination of the two-tiered system, which is believed to be the most efficient way of documenting the whole process, as it combines in one table both tier-one and tier-two.

The above are only examples, to illustrate the principles. An organisation is free to develop its own documents to ensure verification of compliance can be effectively achieved.



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End slide

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