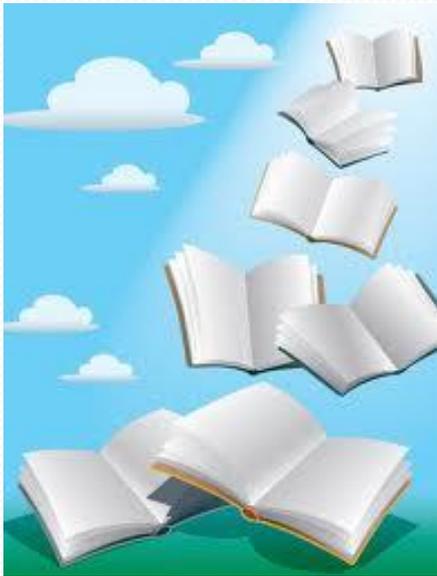


# Workshop on implementation of the Air OPS Regulation (EU) No 965/2012



Flight Ops Section  
Flight Standards Division  
HCAA

Athens, 14 April 2014



# Part A

## Regulations A short introduction...



# Regulation (EC) 216/2008

in force 8 April 2008

Amendments:

-(EC) 690/2009

-(EC) 1108/2009

-(EU) 6/2013



The BR is part of the EU air transport regulatory framework.

# Basic regulation (BR)

Reg 1008/2008 Operation of air services	Reg 785/2004 Insurance	Dir 2002/30/EC Noise at airports	Reg 96/67/EC Ground handling	Dir 2009/12/EC Airport charges
Reg 95/1993 Slot allocation	Reg 261/2004 Denied boarding	Dir 92/14/EEC Limitation of operation of aeroplanes	Reg 549- 552/2004 SES	Dir 2004/36/EC 3 <sup>rd</sup> country aircraft
Reg 889/2008 Air carrier liability	Reg 1107/2006 Disabled persons	Reg 2111/2005 Black list	Reg 219/2007 SESAR	Reg 216/2008 Aviation safety
Reg 300/2008 Security	Security IRs	Dir 2003/42/EC Occurrence reporting	Reg 996/2010 Accident investigation	etc.



# Territorial scope of the BR

## Validity of the BR



28  
EU states



4  
EFTA  
states



## BR covers:

- **Airworthiness and environmental protection of aircraft**
- **Air Crew**
- **Air operations**
- **Aerodromes**
- **ATM/ANS and Air Traffic personnel**



## Principal Objective

To establish and maintain a  
high uniform level of  
aviation safety in Europe



## Additional Objectives

- To ensure a high uniform level of environmental protection
- To facilitate the free movement of goods, persons and services
- To promote cost-efficiency in the regulatory and certification processes and to avoid duplication at national European level



## Additional Objectives (cont.)

- To assist MS in fulfilling their obligations under Chicago Convention, by providing a basis for a common interpretation and uniform implementation of its provisions
- To promote Community views regarding civil aviation safety standards and rules throughout the world by establishing appropriate cooperation with third countries and international organisations
- To provide a level playing field for all actors in the internal aviation market



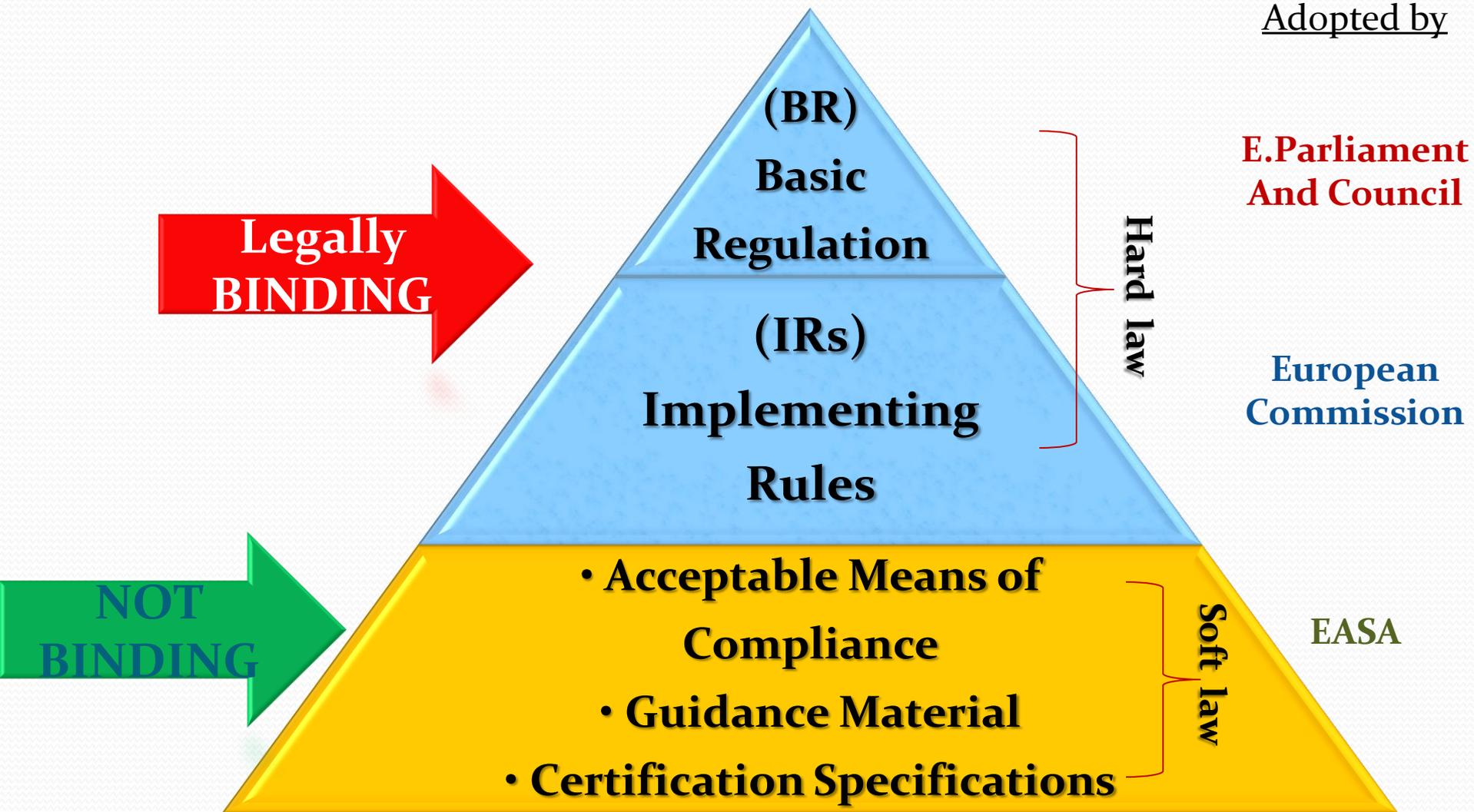
**BR is not enough!**

**We need Implementing Rules  
(IRs)**

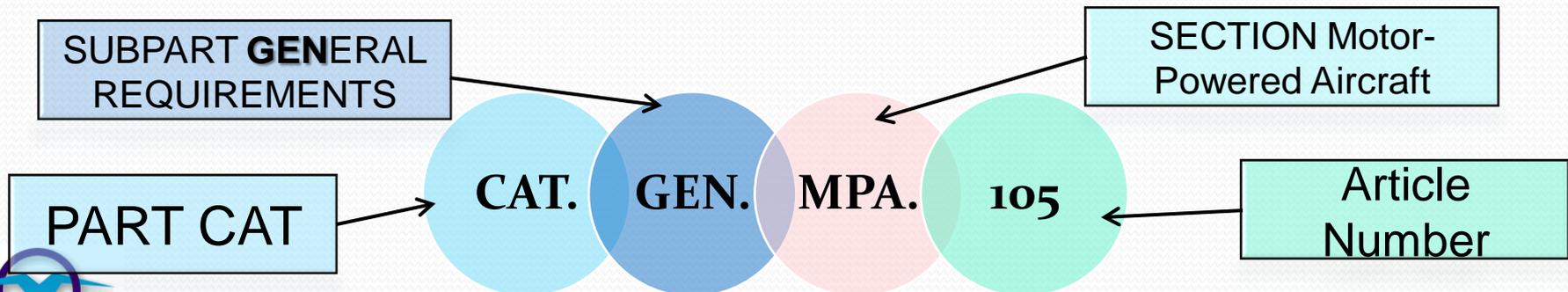
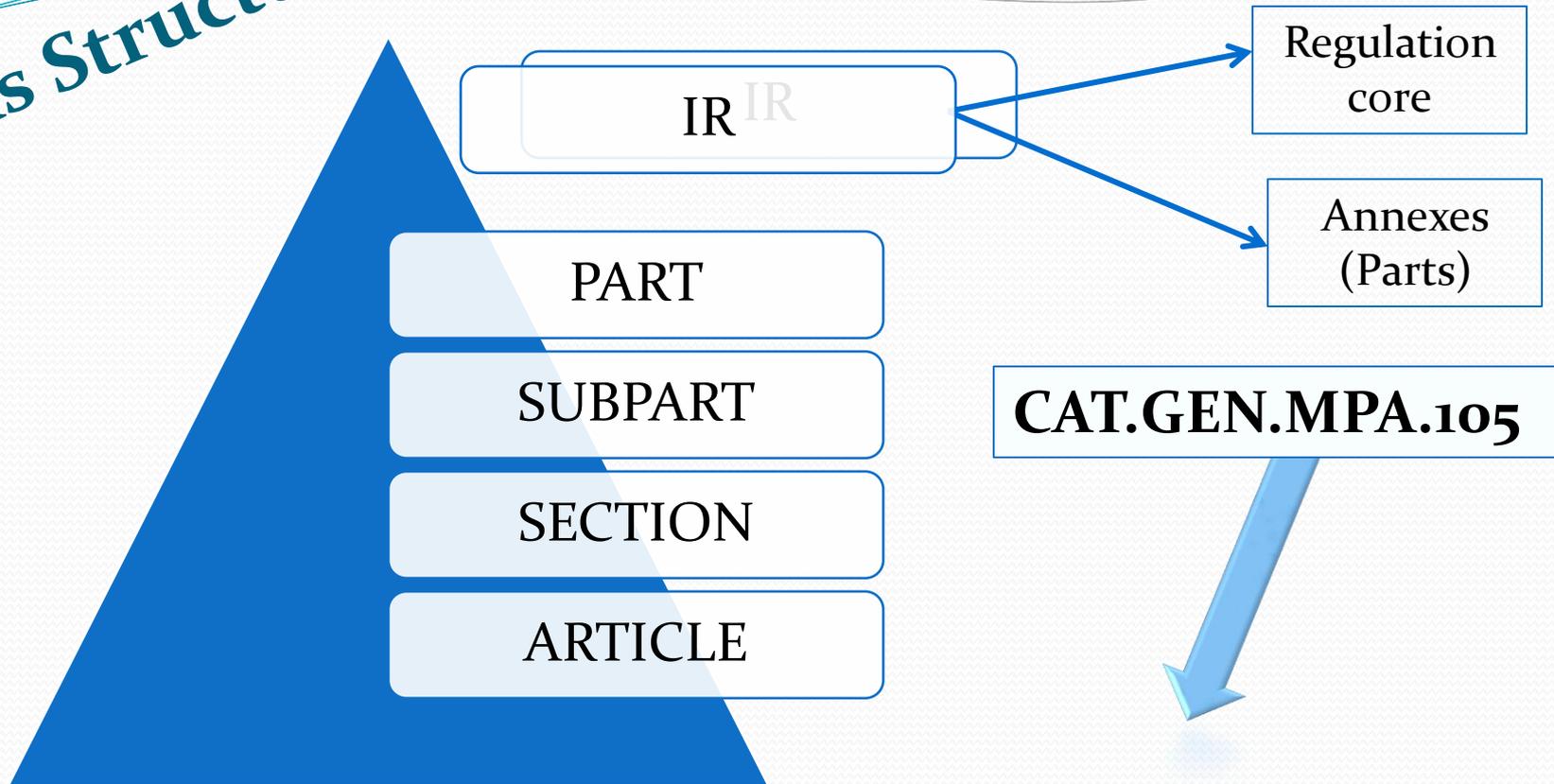
**And other means to help us  
implement the implementing  
rules.... !!!**



# Legal Framework



# IRs Structure



# Regulations Structure

## REGULATIONS

## ANNEXES

- I
- II
- III
- IV
- V
- VI
- VII

## FULL TITLES

Commission Regulation (EU) No 748/2012 of 03/08/2012 laying down implementing rules for the airworthiness and environmental certification of aircraft and related products, parts and appliances, as well as for the certification of design and production organisations

Commission Regulation (EC) No 2042/2003 on the continuing airworthiness of aircraft and aeronautical products, parts and appliances, and on the approval of organisations and personnel involved in these

Commission Regulation (E 1178/2011 of November 20 down technical requirements; administrative procedures related to Regulation (EC) No 216/2008 of the European Parliament and of the Council

## Air Operations

DEF

Part-ARO

Part-ORO

Part-CAT

Part-SPA

Part-NCC

Part-NCO

Each Part to each implementing regulation has its own Acceptable Means of Compliance and Guidance Material (AMC/GM). These AMC and GM are amended along with the amendments of the regulations. These AMC/GM are so-called 'soft law' (non-binding rules), and put down in form of EASA Decisions. A comprehensive explanation on AMC in form of questions and answers can be found on the FAQ section of the EASA website..

Furthermore, Certification Specifications are also related to the implementing regulations, respectively their parts. Like AMC/GM they are put down as Decisions and are non-binding.

ATM/ANS  
safety oversight

ATCO  
Licensing

Airspace  
usage req.

SERA

Aerodromes

Part-ACAS

Rules of the  
air (RoA)

DEF

Part-ADR.AR

Part-ADR.OR

Part-ADR.OPS

Commission Implementing Regulation (EU) No 1034/2011 of 17 October 2011 on safety oversight in air traffic management and air navigation services

Commission Regulation (EU) No 805/2011 for air traffic controllers' licences and certain certificates pursuant to Regulation (EC) No 216/2008

Commission Implementing Regulation (EU) No 1332/2011 of 16 December 2011 laying down common airspace usage requirements and operating procedures for airborne collision avoidance

Commission Implementing Regulation (EU) No 923/2012 of 26/09/2011 laying down the common rules of the air and operational provisions regarding services and procedures in air navigation

Commission Implementing Regulation (EU) No 139/2014 of 12/02/2014 laying down requirements and administrative procedures related to aerodromes pursuant to Regulation (EC) No 216/2008 of the European Parliament and of the Council



**(EU) No 965/2012** (opt-out till 28 October 2014)

Amended by:

**(EU) No 800/2013** (Part-NCC & Part-NCO)  
opt-out till 25 August 2016

**(EU) No 71/2014** (introducing OSD)

**(EU) No 83/2014** (adding Subpart-FTL to Part-ORO)  
Date of application: 18 February 2016



# (EU) No 83/2014

- **Date of application: 18 February 2016**
- **opt-out concerning the provisions for “in-flight rest” up to the maximum of 3 years until 17 February 2017**
- **The FTL Regulation does not foresee an earlier application date.**

(However, under the provisions of Article 8.3 of the EU-OPS Regulation and completely independent from the new EU FTL, a Member State may derogate from Subpart Q by applying earlier the new EU FTL rules as ‘other means to achieve an equivalent level of safety to that attained by the common technical requirements and administrative procedures set out in Annex III’.)



# (EU) No .../2014 -Part SPO

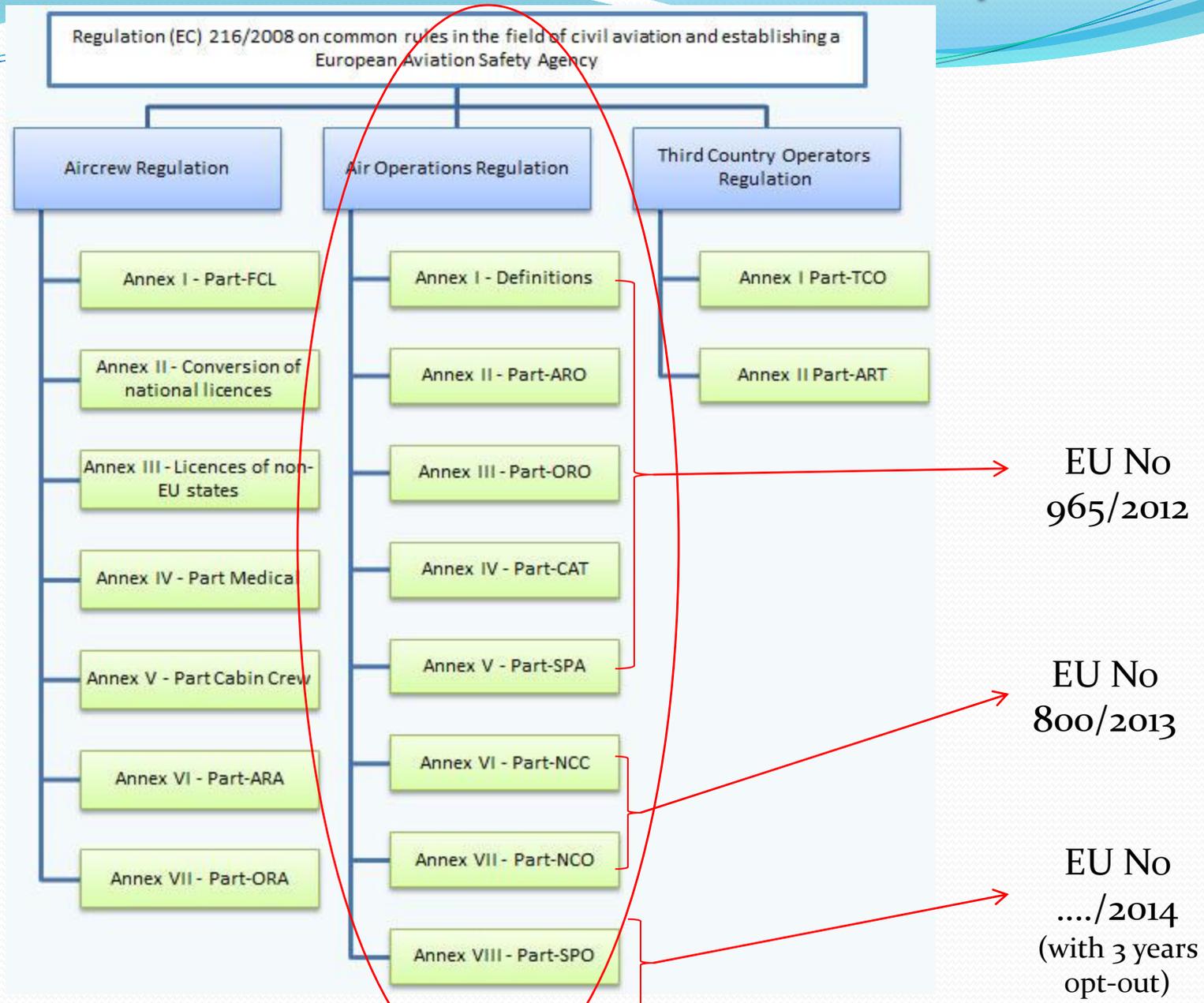
Concerning

- ✓ Specialised Operations (Part-SPO),
- ✓ CAT operations with sailplanes and balloons (CAT S and B) and
- ✓ CAT operations starting and ending at the same airfield(CAT A-A)

- **entry into force: later in 2014**

- **opt-out up to the maximum of 3 years**





# Part B

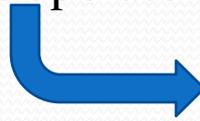
# Operations Manual (OM)



## **ORO.MLR.100 Operations manual**

### **ORO.MLR.101**

The operator shall establish an operations manual.

 The main structure shall be Part A, B, C and D

 **AMC<sub>3</sub> ORO.MLR.100** specifies the minimum content of each part, with a recommended structure

## **ORO.AOC.100 Application for an AOC**

A copy of the OM shall be submitted with the application

 **AMC<sub>1</sub> ARO.GEN.310(a)** The competent authority should review the review the OM upon receipt of an application



**The role of the Operations Manual in  
the context of issuance of new AOCs  
and continuous oversight of  
Operators by HCAA**



OM is the “*backbone*” of:

- Operator’s safe operations
- HCAA’s oversight of the operator

- ❑ OM is the “mirror” of the operator
- ❑ OM has to observe human factors principles
- ❑ OM must be consistent with the AOC and the peripheral legal documents such as AFM, Rules of the Air, Part-ACAS, Aircrew (FCL, CC)
- ❑ OM is a living document



## Key points from the Basic Regulation

- ✚ The OM must contain all necessary instructions, information and procedures for all aircraft operated and for operations personnel to perform their duties.
- ✚ The OM and its revisions must be compliant with the approved flight manual (AFM) and be amended as necessary



- The OM shall not contravene the conditions contained in the operations specifications and the list of specific approvals.
  
- The OM shall be kept up-to-date:
  - ❑ *amendments requiring prior approval must be applied after receiving the approval*
  - ❑ *amendments to be notified shall be managed according to the approved procedure*
  - ❑ *amendments required in the interest of safety may be published and applied immediately*
  
- All personnel shall be made aware of the changes that are relevant to their duties.



The operator shall ensure that information taken from approved documents is correctly reflected in the OM.

- ✓ *Performance data, limitations, emergency procedures and, in the future, OSD*
- ✓ *Use of manufacturer's FCOM – FCTM – FAM as supplementing documents*

The content of the OM shall be presented in a form that can be used without difficulty and observes human factors principles.

- ✓ *Users must clearly understand what they can and cannot do (avoiding to “chase” the information)*
- ✓ *Guidance material on ICAO Doc. 9683*



The operator is responsible for the OM.

Expectations for the OM:

- ✓ Operator's compliance with the all applicable requirements (not a “copy and paste” of rules)
- ✓ Relevancy to the operator's intended operations training and policies (no superfluous info)
- ✓ Accurate and unambiguous information
- ✓ Ability for users to easily access the OM and find information
- ✓ Procedures in place for its update and notification



EASA inspects Member States to monitor the application of rules; in this framework, operators can be visited.

The OM is a key element of scrutiny.

*Procedures for a thorough and regular review of the OM by the oversight authority*



# The ART of changing...



## CHANGES WHICH NEED **APPROVAL**

### **ORO.GEN.130 Changes**

(a) Any change affecting:

- (1) the scope of the certificate or the operations specifications of an operator; or
- (2) any of the elements of the operator's management system as required in ORO.GEN.200(a)(1) and (a)(2),

shall require prior approval by the competent authority.



# CHANGES WHICH NEED APPROVAL

## GM1 ORO.GEN.130(a) Changes

(a) Typical examples of changes that may affect the certificate or the operations specifications or the operator's management system as required in ORO.GEN.200 (a)(1) and (a)(2) are listed below:

- (1) the name of the operator;
- (2) a change of legal entity;
- (3) the operator's principal place of business;
- (4) the operator's scope of activities;
- (5) additional locations of the operator;
- (6) the accountable manager;
- (7) any of the persons referred to in ORO.GEN.210(a)&(b);
- (8) the operator's documentation as required by this Annex, safety policy and procedures;
- (9) the facilities.



## CHANGES WHICH **DO NOT** NEED APPROVAL

### **ARO.GEN.310 Initial certification procedure — organisations**

(c) To enable an organisation to implement changes without prior competent authority approval in accordance with ORO.GEN.130, the competent authority shall approve the procedure submitted by the organisation defining the scope of such changes and describing how such changes will be managed and notified.

### **ORO.GEN.130 Changes**

(c) All changes not requiring prior approval shall be managed and notified to the competent authority as defined in the procedure approved by the competent authority in accordance with ARO.GEN.310(c).

### **GM1 ORO.GEN.130(a) Changes**

(b) Prior approval by the competent authority is required for any changes to the operator's procedure describing how changes not requiring prior approval will be managed and notified to the competent authority.



# Management of OM changes



## Types of Revisions

Depending on the situation, the revisions may be carried out as:

- **Standard revision:**

Regularly and permanently performed changes on specific subjects.

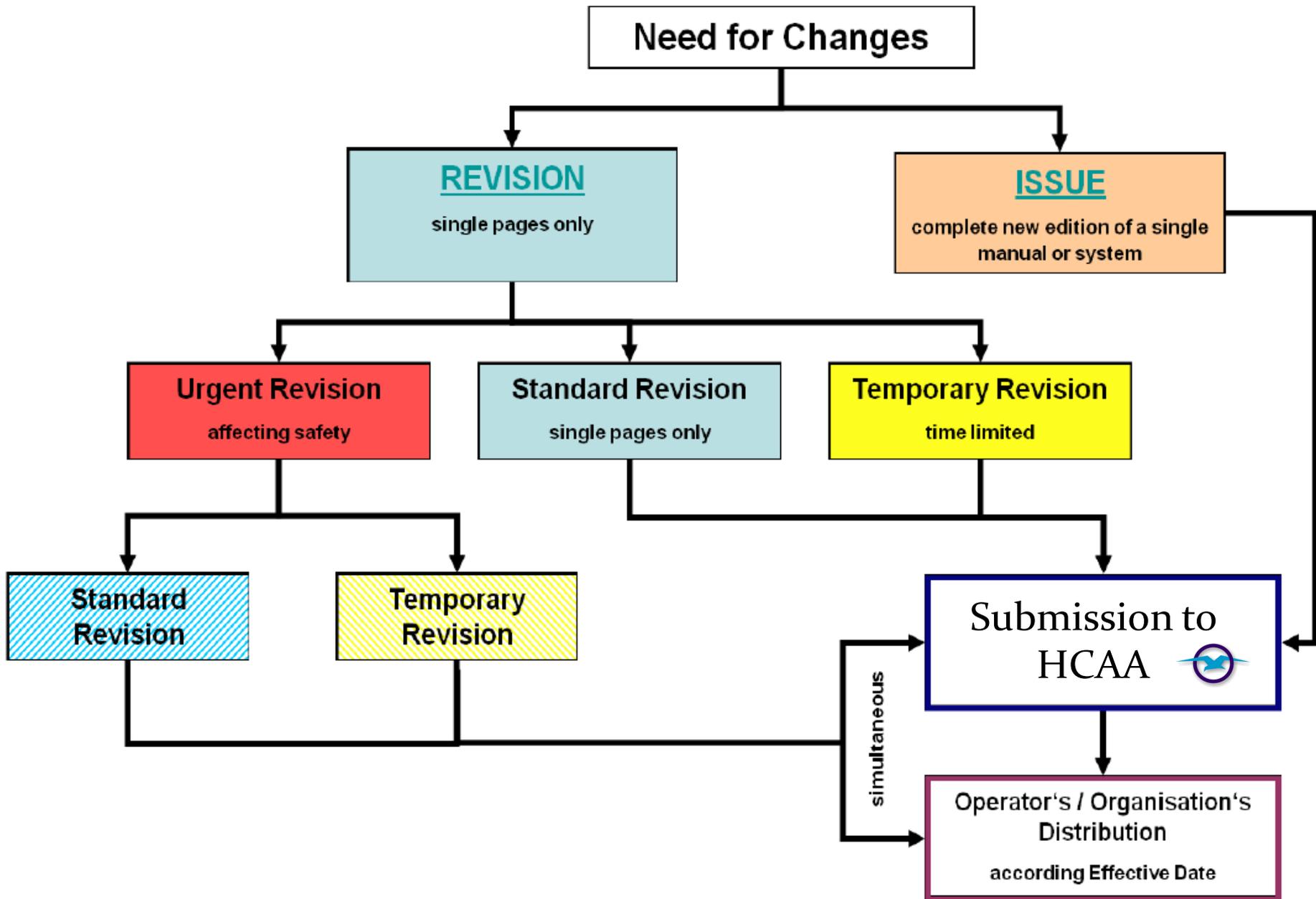
- **Temporary Revision**

Time limited changes, published additionally to the revision in effect. Temporary Revisions are to be cancelled after expiration or if no longer valid, appropriate or applicable.

- **Urgent Revision**

When immediate amendments or revisions are required in the interest of safety, they may be published and implemented immediately, provided that any required approval has been applied for and HCAA is supplied with the intended revision. Immediate revisions may be published time limited as Temporary Revision or Standard Revision.





## Example of Record of Revisions

- Record of Issue / Revisions:

<b>Issue No</b>	<b>Revision No</b>	<b>Effective Date</b>	<b>Entered by</b>	<b>Date</b>
1	0	dd.mm.yy	abc	dd.mm.yy
1	1	dd.mm.yy	abc	dd.mm.yy
1	2	dd.mm.yy	abc	dd.mm.yy
1	3	dd.mm.yy	abc	dd.mm.yy
...				

- Record of Temporary Revision:

<b>Temporary Revision Number</b>	<b>Effective Date</b>	<b>Entered by</b>	<b>Date</b>	<b>Validity</b>	<b>Cancellation</b>	<b>Removed by</b>	<b>Date</b>
01	dd.mm.yy	bcd	dd.mm.yy	dd.mm.yy			
...							

- List of effective Chapters

<b>Chapter</b>	<b>Issue No</b>	<b>Revision No</b>	<b>Effective Date</b>
1.1	1	0	dd.mm.yy
1.1.1	1	2	dd.mm.yy
1.2	1	1	dd.mm.yy
...			



# Example of Page Annotation:

- Header

*Title of Document / Manual Part*

*Company Identification*

**Organisation Management Manual (OMM)**

**Chapter 2.3 "System of Amendment and Revision"**

**Example Organisation Ltd**

*Chapter, Chapter-Number and Title of Chapter*

- Footer

**OMM**

**01 / 02**

**Page 5 of 21**

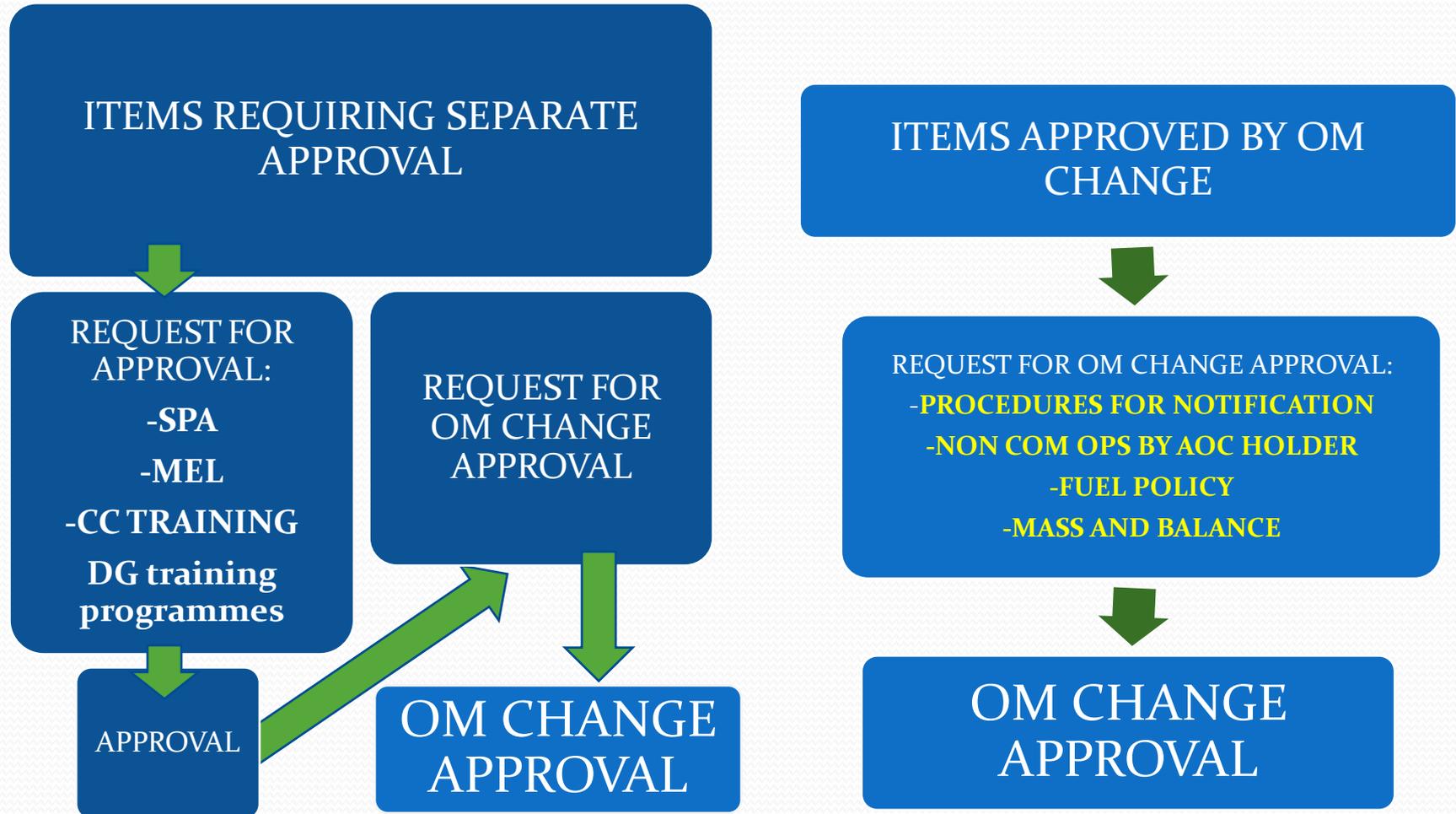
*Abbreviation of Document*

*Document Status: Number of Edition/  
Revision Status of Page*

*Page Number and Number of Total  
Pages of the concerned Chapter*



# OM Changes REQUIRED TO BE APPROVED BY HCAA



# Changes REQUIRED TO BE NOTIFIED TO THE HCAA

**NOTIFICATION to HCAA (via APPLICATION)**  
(before effective date)(\*) - ORO.MLR.100 (g)(1)

**RECEIPT by HCAA**  
(protocol number) AMC1.ARO.GEN.330 (c)

**ASSESSMENT by HCAA**  
(within 30 days of reception) ARO.GEN.330 (c)

**Change IN COMPLIANCE**

**NO ACTION**  
(incorporate changes to HCAA copy)

**Change NOT COMPLIANT**

**NOTIFY the Operator AND REQUEST further CHANGES**  
ARO.GEN.330(c)(1)

**RAISE FINDINGS**  
ARO.GEN.330(c)(2)

(\*) Effective date has to do with distribution within the Organisation



ORO.MLR.100 (h)

when immediate amendments or revisions are required in the interest of safety, they may be published and applied immediately, provided that any approval required has been applied for.

*HCAA will review the amendment in due time and may request further changes to it ...*

ORO.MLR.100 (i)

The operator shall incorporate all amendments and revisions required by the competent authority.





Hellenic Civil Aviation Authority  
Flight Standards Division  
Flight Operations Section

## OPERATIONS MANUAL CHANGES (AMENDMENT/REVISION) APPLICATION FORM

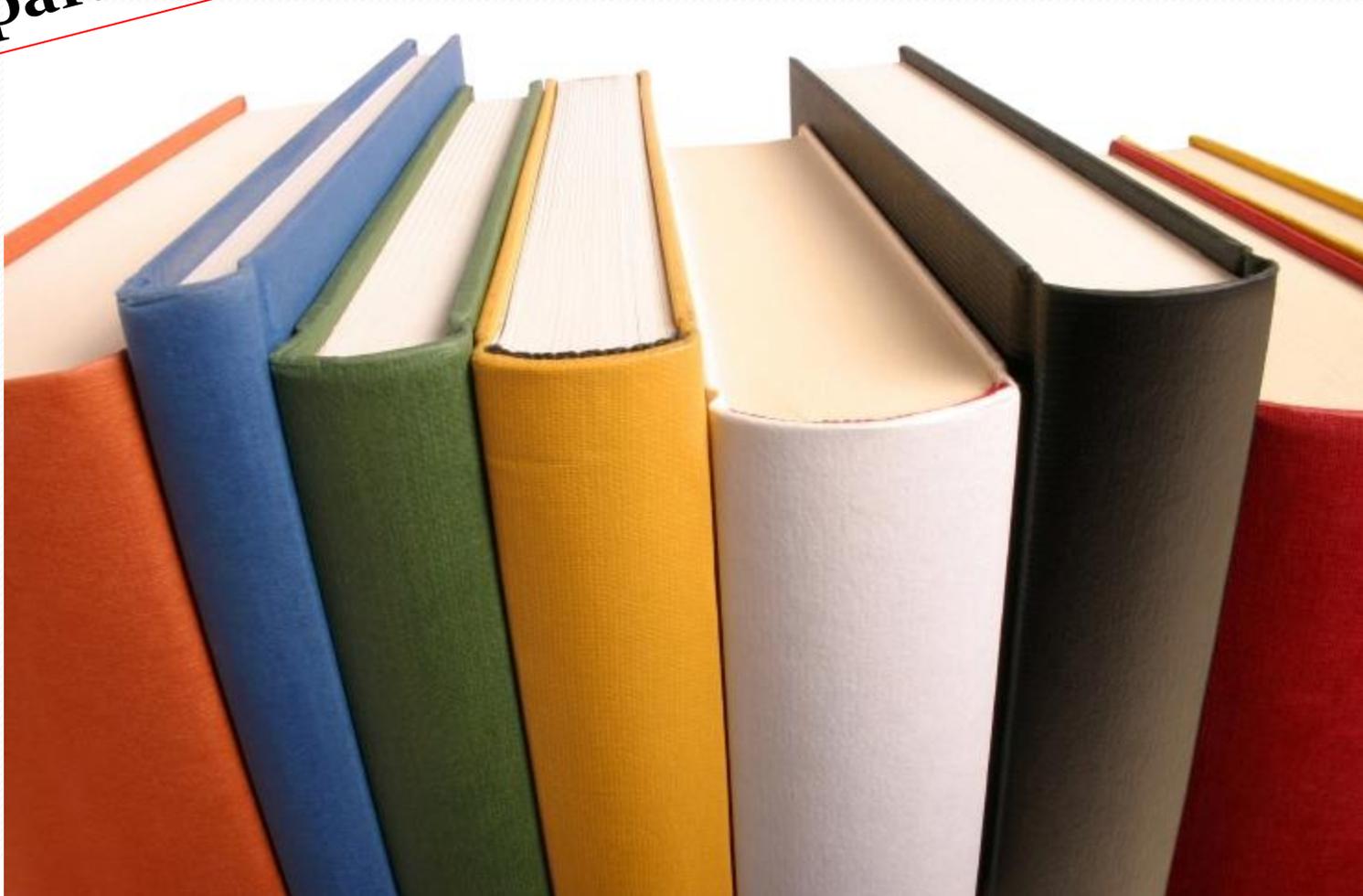
Operator / OM revision No / Date	
Operator's authorised person(s) to approve OM changes	
Details (name, phone, e-mail) of operator's person(s) responsible for the administration of the Operations documentation	

### LIST OF CHANGED ITEMS

No	Annex III (Part-ORO); Annex IV (Part-CAT); Annex V (Part-SPA) reference <sup>1</sup>	OM reference <sup>2</sup>	Prior approval item according to ORO.GEN.130 (b) <sup>3</sup>	Notification item according to ORO.GEN.115 (b) and ORO.GEN.130 (c) <sup>4</sup>	Reason of Change <sup>5</sup>
1					
2					
3					
4					
5					
6					



**Separate manuals or combined one?**



# Operations Manual

## Other manuals

security

CAME

ATO

...

Part A

Part B

Part C

Part D

Additional parts?

Part E: EFB

Part F: Forms

Chapter 0

....

Chapter 7

...

Chapter 9

....

Chapter 12

Chapter 0

Chapter 1

...

Chapter 3

....

Chapter 8

....

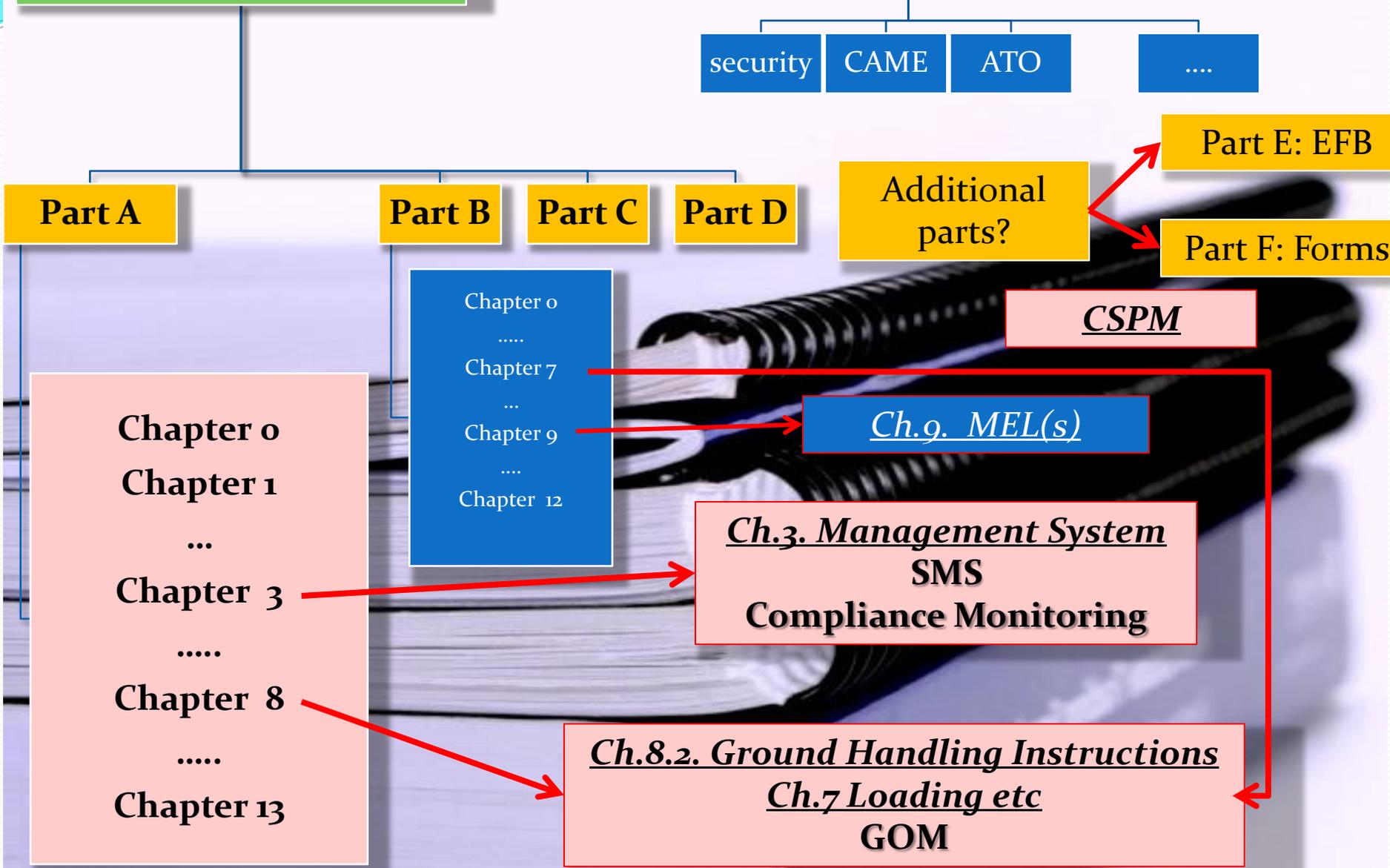
Chapter 13

CSPM

Ch.9. MEL(s)

Ch.3. Management System  
SMS  
Compliance Monitoring

Ch.8.2. Ground Handling Instructions  
Ch.7 Loading etc  
GOM



OM

**Part A**

Management System

CMM

SMS

GOM

**Part B**

MELs

**Part C**

**Part D**





## EASA Operations Manual Template for Aeroplanes

**Note:** The references given are for guidance only and are not exhaustive.

<b>PART A</b>		
<b>GENERAL/BASIC</b>		
<b>0</b>	<b>ADMINISTRATION AND CONTROL OF OPERATIONS MANUAL</b>	
0.1	Introduction: (a) A statement that the manual complies with all applicable regulations and with the terms and conditions of the certificate of approval. (u) A description of the distribution system for the manuals, amendments and revisions.	ORO.MLR.100 AMC1-4 ORO.MLR.100
0.3	Management of notification to HCAA Operations Manual amendments: a) Amendments requiring prior approval, and b) Amendments not requiring previous amendments	ORO.MLR.100(g) ARO.GEN.330(c) ORO.GEN.115(b) ORO.GEN.130(c)
<b>1</b>	<b>ORGANISATION AND RESPONSIBILITIES</b>	
1.1	Organisational structure. A description of the	ORO.GEN.200

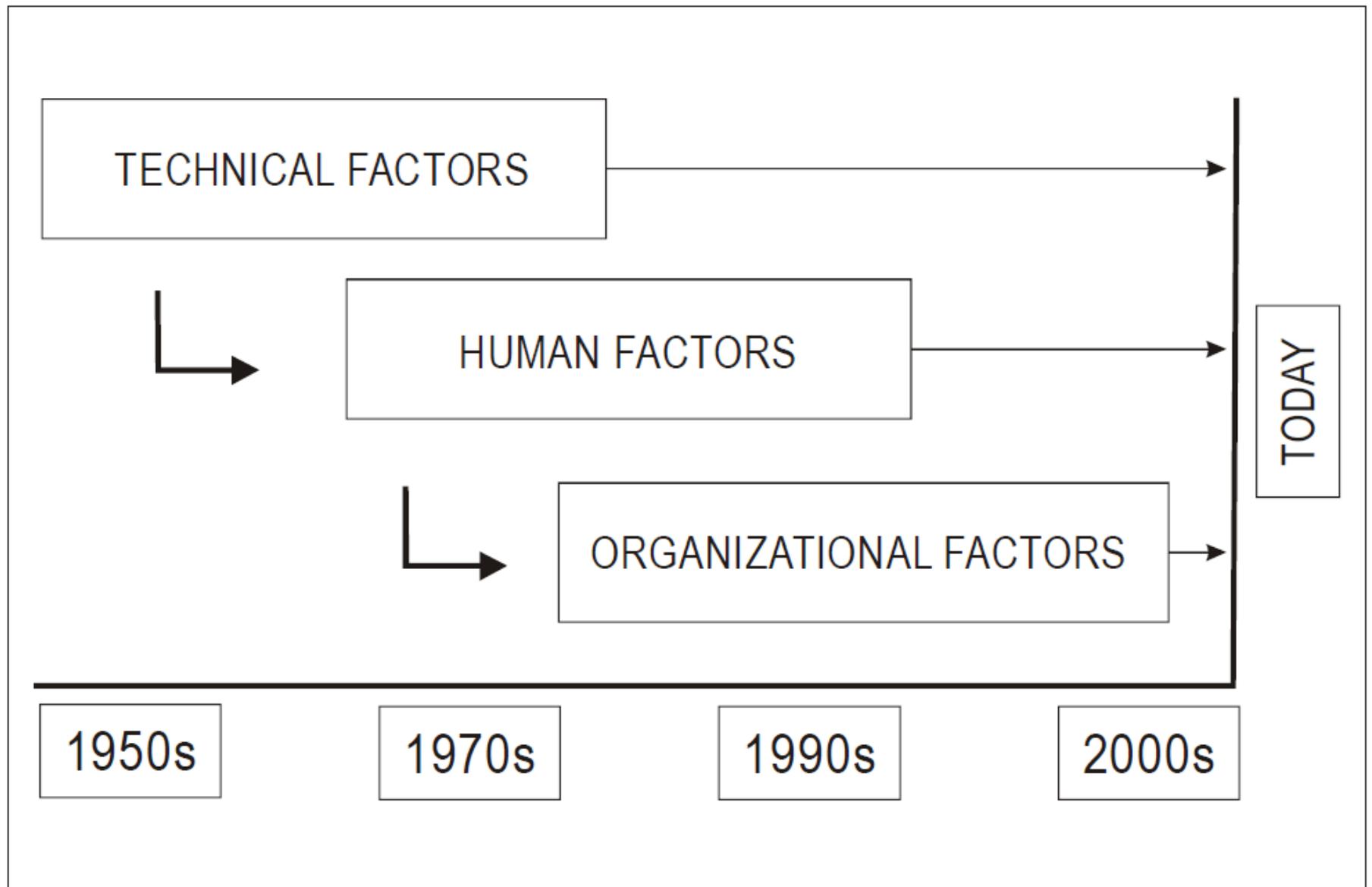
(b) A record of amendments and revisions with insertion dates and effective dates.

(c) A statement that handwritten amendments

# Part C

# Management System





## **ORO.GEN.200 Management system**

The operator shall establish, implement and maintain a management system

➔ Similar management system requirements for ATOs in Regulation (EU) No 1178/2011 (end of opt-out 08/04/2014)

➔ Management system requirements not yet transposed in Part-M(Regulation No 2042/2003) (RMT MDM.055 being processed)

## **ORO.GEN.210 Personnel requirement**

The accountable manager is responsible for establishing an effective management system.



## ORO.GEN.200 Management system

a management system shall include:

- ❖ clearly defined lines of responsibility and accountability throughout the operator
- ❖ a safety policy
- ❖ the identification of aviation safety hazards, their evaluation and the management of associated risks,
- ❖ a function to monitor compliance of the operator with the relevant requirements
- ❖ documentation of all management key processes, including a process of making personnel aware of their responsibilities and the procedure of amending this documentation.



## ORO.GEN.200 Management system

### AMC<sub>1</sub> ORO.GEN.200(a)(5)

The operator shall document all management system key processes



AMC<sub>1</sub> ORO.GEN.200(a)(5) specifies the minimum content of the management system documentation, which might be included in an existing manual (Part A)



(b) The Operator's Management System Documentation may be included in a separate manual or in (one of) the manual(s) as required by the applicable subpart(s). A cross-reference should be included.





**Hellenic Civil Aviation Authority**  
**EASA Operations Manual Template for Aeroplanes**

		ORO.GEN.140 CAT.GEN.MPA190
<b>3</b>	<b>MANAGEMENT SYSTEM</b>	
	<p>A description of the management system, including at least the following:</p> <ul style="list-style-type: none"><li>(a) safety policy;</li><li>(b) the process for identifying safety hazards and for evaluating and managing the associated risks;</li><li>(c) compliance monitoring system;</li><li>(d) allocation of duties and responsibilities;</li><li>(e) documentation of all key management system processes.</li></ul>	ORO.GEN.200 AMC1 ORO.GEN.200(a)(1):(2):(3) & (5) AMC1 & GM1-2 ORO.GEN.200(a)(1) AMC1 & GM1 ORO.GEN 200(a)(2) AMC1 & GM1 ORO.GEN.200(a)(3) AMC1 & GM1 ORO.GEN.200(a)(4) AMC1-2 & GM1 ORO.GEN.200(a)(5) AMC1 & GM1-4 ORO.GEN.200(a)(6) AMC1 ORO.GEN.200(b)
<b>4</b>	<b>CREW COMPOSITION</b>	
4.1	Crew composition. An explanation of the method for determining crew compositions, taking account of the	





# SAFETY MANAGEMENT



## What is a Safety Management System?

- ⊕ It's a management decision making tool
- ⊕ Identifies safety issues (hazards)
- ⊕ Assesses the risks
- ⊕ Takes action to minimise the risk
- ⊕ Assigns ownership of actions and the risk
- ⊕ Checks that the actions taken are working as expected

**It's not a document... it's what you do!**



## AMC<sub>2</sub> ORO.GEN.200(a)(5) Management system SAFETY MANAGEMENT MANUAL

- (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.
- (a) The contents of the safety management manual should include all of the following:
- (1).... (12)
- (c) The SMM may be contained in (one of) the manual(s) of the operator.



# EHEST SAFETY MANAGEMENT TOOLKIT

## SAFETY MANAGEMENT MANUAL

Version for Complex Operators  
2nd Edition, 2013



**Doc. 9859**  
3<sup>rd</sup> edition

**Annex 19**  
1<sup>st</sup> edition  
Nov. 2013



HCAA will form audit teams to assess Management System of all Operators endorsing a two phases approach:

**Phase 1: Assessment against the ICAO framework /EASA Management System requirements.**

**Are all the building blocks in place?**

From the day of submission of the MSM till end of July

**Phase 2: Assessing the effectiveness of the SMS**

Looking for **compliance + performance of your SMS**  
*It will involve more interactions with different people in your organisation*

From the day of AOC is granted and onwards



## Planning the assessment

- Establishing the team
- Review the documentation
- Previous assessments
- Last Safety Review Board Report
- The Safety Management Manual
- The organisation's completed evaluation tool
- Any Mandatory Occurrence Reporting data, sector risk information or other intelligence
- Availability of key managers in the organisation and access to operational staff.



## Organisational Assessment

- SMS requires interactions with different people in different roles in an organisation
- Talking to Managers and Staff provides intelligence on the SMS and the safety culture
- Remember it's more than a manual... it's what they do that is being assessed and everyone is part of the SMS
- Opportunity to record the good and the bad



Compliance

Monitoring



# AMC<sub>1</sub> ORO.GEN.200(a)(6) Management system COMPLIANCE MONITORING - GENERAL

- (a) Compliance monitoring
- (b) Organisations should monitor compliance ...
- (c) ... the accountable manager should designate a compliance monitoring manager
- (d) Compliance monitoring documentation



**Separate manuals or combined  
Management System Manual?**



## Example of Safety Management Organization



Does Compliance Monitoring cover  
**Maintenance** as well as **Operations**?

**YES**



# Part D

## Alternative Means of Compliance (AltMOC)



## **ARO.GEN.120 Means of compliance**

(a) The Agency shall develop Acceptable Means of Compliance.



When the AMC are complied with, the related requirements of the Implementing Rules are met.

Acceptable means of compliance provide

- Legal certainty
- Contribution to uniform implementation
- Presumption of compliance with the rules

(b) Alternative means of compliance may be used



Defined by an organisation or by the competent authority



The competent authority shall evaluate the AltMOC and notify the Agency if the AltMOC is in accordance with the IR.



## **Alternative means of compliance (AltMOC)**

- ✓ those means that propose an alternative to an existing acceptable means of compliance or
- ✓ those that propose new means to establish compliance with Regulation (EC) No 216/2008 and its Implementing Rules for which no associated AMC have been adopted by the Agency
- ✓ **DO NOT presume compliance with the rules, hence the need for the evaluation by the Competent Authority**



When an operator wishes to use an AltMOC to the AMC adopted by the Agency it shall provide the HCAA with a full description of the AltMOC

The description shall include:

- any revisions to manuals or procedures that may be relevant

as well as

- an assessment demonstrating that the Implementing Rules are met

The operator **may implement these AltMOC** subject to **prior approval by HCAA** and upon receipt of the approval notification



# Part E

# Code-share Agreements



## **ARO.OPS.105 Code-share agreements.**

Authority shall satisfy itself that third country code-share operator complies with applicable ICAO standards (following the verification of the operator).



**AMC<sub>1</sub> ARO.OPS.105** operator has established a code-share audit programme for monitoring continuous compliance of the third country operator with the applicable ICAO standards.



## **ORO.AOC.115 Code-share agreements.**

Operator monitors and regularly assesses third country operator's compliance with applicable ICAO standards.



AMC<sub>1</sub> ORO.AOC.115 lists elements that should be included in codeshare audit programme & audit intervals.



AMC<sub>2</sub> ORO.AOC.115(b) Third party provider for code-share audit may be used, if the third party provider complies with a number of detailed requirements, e.g. independence of the third party provider, qualified staff etc.





What all  
these mean  
in practice?



Code-share with a  
**Community Operator**



No Approval



notification of  
Operations to HCAA



## Code-share with a TCO operator

**HCAA Notification**  
By sending the “Compliance statement”

– TCO authorisation if needed (\*)

1. SAFA results

2. State of the operator : “Safety list” and consultations in the framework of EU reg.2111/2005

3. Greek operator Code-share audit programme

4. TCO audit

5. “Compliance statement” from Greek Operator, endorsed by AM or CMM

TCO authorisation required for code-sharing within/ from/to European territories, not if the codeshared operations take place outside these territories

## TCO audit

- Full audit report  
(*audit should include a flight observation*)
- Corrective actions taken by TCO and their assessment by Greek operator
- Study of the audit/corrective actions
- Acceptability of third-party provider, if any

**Is IOSA an acceptable third-party provider?**



# Part F

## Existing AOC holders



# Operators holding an AOC in accordance with EU-OPS

Shall provide to HCAA the following:

- ✓ A copy of the Operations Manual
- ✓ A Compliance Report which shows in detail that the applicant complies with all applicable requirements, and
- ✓ A statement (signed by the AM or CMM) that all documentation (OM) sent have been verified by the applicant and found in compliance with applicable requirements

## Existing AOCs

✓ Specific Approvals will not be reissued, providing that they comply with (EC) 216/2008 and its IRs.



✓ All other needed approvals will be issued by HCAA (most probably) in a single Letter.



✓ Already Nominated persons will continue to perform their duties without further requirements by the HCAA



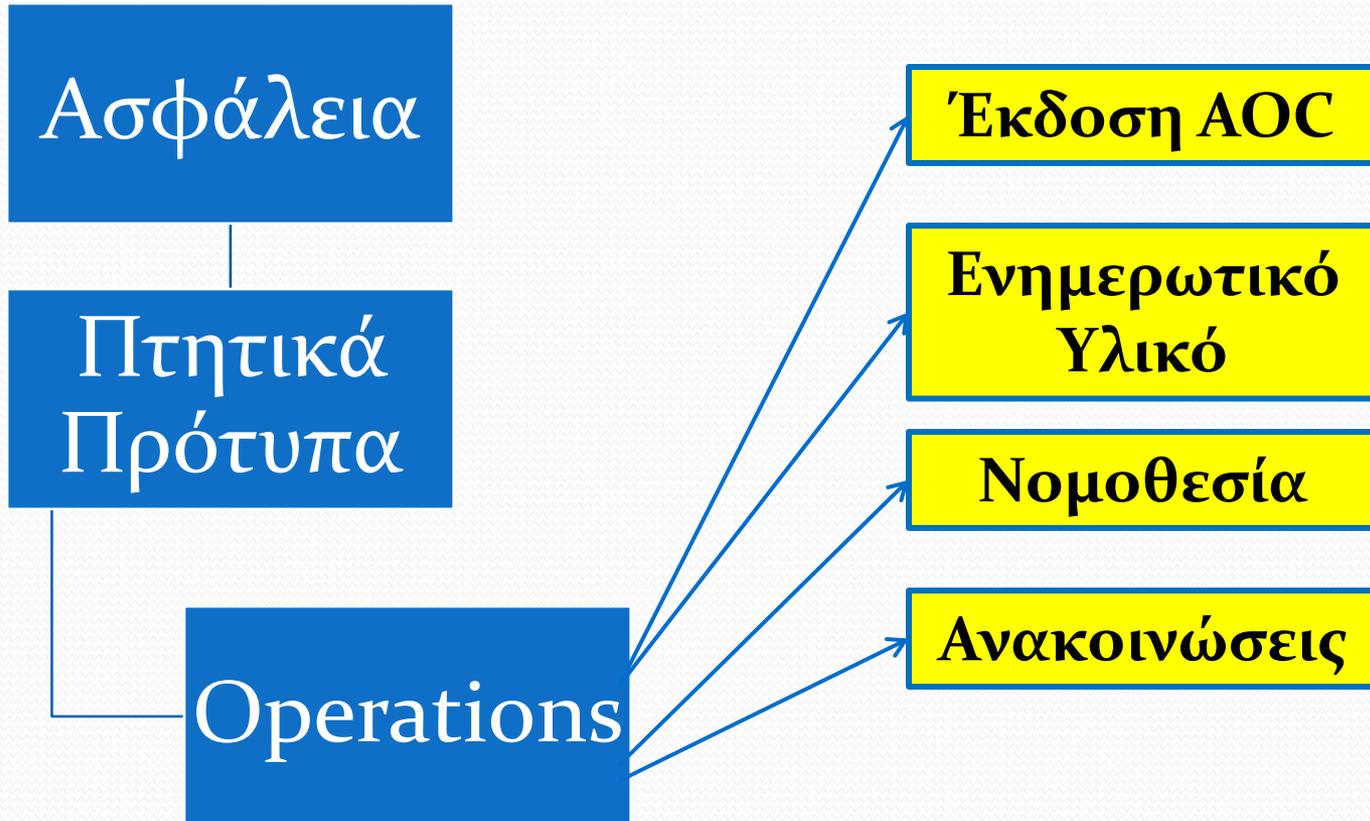
# Part G

Information available...



# HCAA Official Site

[www.hcaa.gr](http://www.hcaa.gr)



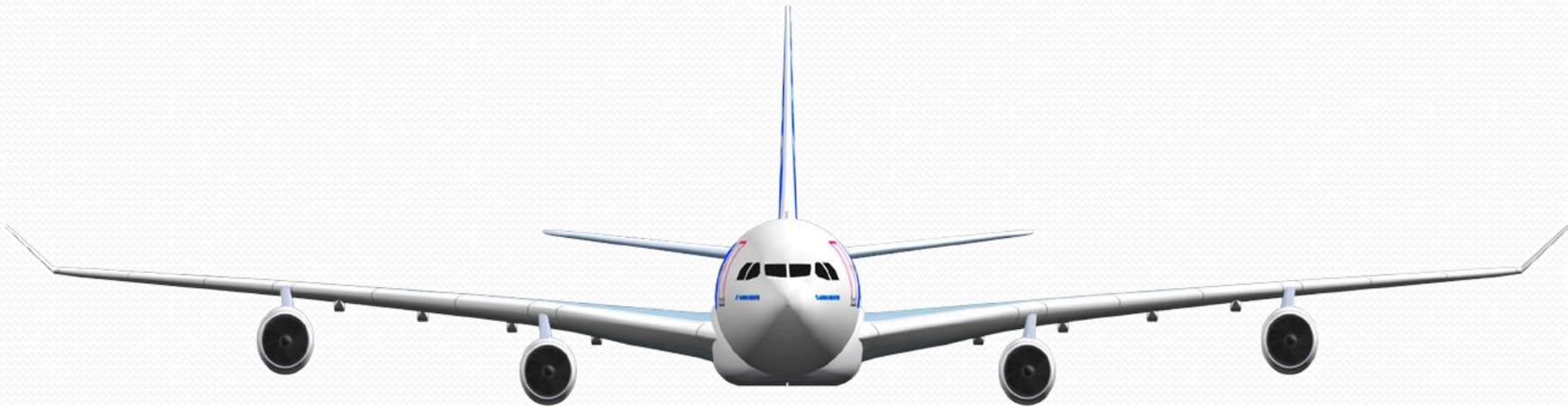


# Useful web-links (easa.europa.eu)

- ▶ **Flight Standards mini-website:**
  - ▶ <http://easa.europa.eu/flightstandards/>
- ▶ **Implementing rules – link on EASA website:**
  - ▶ <http://easa.europa.eu/regulations/regulations-structure.php>
- ▶ **AMC/GM (Agency Decisions):**
  - ▶ <http://easa.europa.eu/agency-measures/acceptable-means-of-compliance-and-guidance-material.php>
  - ▶ The file with the title *Supplementary document to ED Decision...*



# Questions ?



Taking into account GM2 ORO.GEN.205(b), which is the HCAA position for the operator's surveillance on the contracted org. when the contractor itself is certified to carry out the contracted activities?  
Is a pre-assessment check before signing the agreement enough?

### **GM2 ORO.GEN.205(b)**

*(b) When the contracted organisation is itself certified to carry out the contracted activities, the operator's compliance monitoring should at least check that the approval effectively covers the contracted activities and that it is still valid.*

If the contracted organisation is certified/approved according to (EU) or approved by “internationally recognized states” then certainly: *checking that the approval effectively covers the contracted activities and that it is still valid, should be enough.*

In the case of certification by other ICAO contracted States or in the case of the organisation is NOT certified/approved, then: *a compliance assessment should be carried out, so that the Operator satisfies itself that equivalent safety standards are met by the contracted operator (ICAO standards).*

*In any case, the safety-related activities should be included in the operator's Safety Management programme.*



ερώτηση	απάντηση
<p>If the NAA has implemented more conservative/restrictive rules (via T.O.'s, letters to operators or regulations and circulars) with respect to Regulation (EU) No 965/2012, these remain valid for the operators or not?</p> <p>If yes, how Standardization throughout Europe can be established taking into account Article 2 of 216/2008 (“this Regulation and the Implementing Rules ensure a ‘level playing field in the internal (EU) aviation market” / “Regulations should be uniformly implemented by the national authorities”)?</p>	<ul style="list-style-type: none"><li>• <i>All TOs etc issued today by the HCAA are valid till 27<sup>th</sup> of October 2014.</i></li><li>• <i>New ones may follow according to (EU) 965/2012.</i></li><li>• <i>NAA's have the right to issue more restrictive orders etc ... and also in the context of AMCs, to issue AltMoC . (in this case means that it informs EASA etc.)</i></li></ul>



ερώτηση	απάντηση
<p>According to AMC<sub>1</sub> ORO.FC.220 LTC is nominated by the operator.</p> <p>HCAA has issued a letter to operators (ref 12621/12-11-12/HCAA/D<sub>2</sub>/C) imposing certain criteria (which couldn't be found in other European operators) for the acceptance of the proposed LTC's.</p> <p><u>Question</u> Are all these HCAA T.O's / letters to Operators still valid or not?</p>	<ul style="list-style-type: none"><li>• <i>All TOs etc issued today by the HCAA are valid till 27<sup>th</sup> of October 2014.</i></li><li>• <i>New ones may follow according to (EU) 965/2012.</i></li></ul>



Who of the senior management personnel

(ACCOUNTABLE MANAGER)

**ORO.AOC.135**

**Personnel requirements**

(a) In accordance with ORO.GEN.210(b), the operator shall nominate persons responsible for the management and supervision of the following areas:

- (1) flight operations;
- (2) crew training;
- (3) ground operations;
- and
- (4) continuing airworthiness in accordance with Regulation (EC) No 2042/2003.

**ORO.GEN.130 Changes**

(a) Any change affecting:

- (1) the scope of the certificate or the operations specifications of an operator; or
- (2) any of the elements of the operator's management system as required in ORO.GEN.200(a)(1) and (a)(2), shall require prior approval by the competent authority.

**GM1 ORO.GEN.130(a) Changes**

(a) Typical examples of changes that may affect the certificate or the operations specifications or the operator's management system as required in ORO.GEN.200 (a)(1) and (a)(2) are listed below:

- ... (6) the accountable manager;
- (7) any of the persons referred to in ORO.GEN.210 (a) and (b); ....

**ORO.GEN.210 Personnel requirements**

(a) The operator shall appoint an accountable manager, who .....

(b) A person or group of persons shall be nominated by the operator, with the responsibility of ensuring that the operator remains in compliance with the applicable requirements.



**ερώτηση**

Can the operators strictly follow OM contents as shown in AMC<sub>3</sub> ORO.MLR.100 or there are any other additional requirements by NAA?

**απάντηση**

- HCAA issued “EASA Operations Manual Template for Aeroplanes-Rev.3” which is in accordance with AMC<sub>3</sub> ORO.MLR.100
- But...this Template deals also with issues which one cannot find in AMC<sub>3</sub> ORO.MLR.100;, like SAFA and EFB.

**ερώτηση**

As long as the NAA's acceptance for the manuals is not required any more, which way will be introduced for the acceptance or not of the submitted manuals?

**απάντηση**

- Till October 27<sup>th</sup> , Manuals will come and go between HCAA and Operators. When HCAA is satisfied about the content etc ... .. the AOC will be issued. This is the “acceptance” required.
- By then also all necessary approvals will be issued.
- After that the “art of changing” will be followed as approved by the HCAA.



## ερώτηση

In the «Operations Manual Compliance Report» there are items which are not mentioned in the OM but in other controlled manuals (AFM etc) in this case how do we fill in the appropriate reference columns?

## απάντηση

In case this info/item cannot be transferred to OM then the Operator should add a note in the column NA.

We will soon revise the «Operations Manual Compliance Report» accordingly.

*HCAA- Operation Manuals Compliance Report* *Version 2/April.2014*

OPS Reference	Requirement	OM Reference					NA	Ap proval Required
		A	B	C	D	Paragraph		
<b>ANNEX III ORGANISATION REQUIREMENTS FOR AIR OPERATIONS [PART-ORO]</b>								
<b>SUBPART GEN GENERAL REQUIREMENTS</b>								
ORO.GEN.005	Scope							
<b>SECTION I GENERAL</b>								
ORO.GEN.105	Competent authority							
ORO.GEN.110	<b>Operator responsibilities</b>							
	(a) The operator is responsible for the operation of the aircraft in accordance with Annex IV to Regulation (EC) No 216/2008, the relevant requirements of this Annex and its certificate.							
	(b) Every flight shall be conducted in accordance with the provisions of the operations manual.							
	(c) The operator shall establish and maintain a system for exercising operational control over any flight operated under the terms of its certificate.							



**ερώτηση**

Today the Operator has one “Quality Manual” for all its activities. Under 965/2008 certification do we continue to have one “Compliance Monitoring Manual”?

**απάντηση**

One manual:  
named “Quality/Compliance Monitoring Manual”

**ερώτηση**

Today the Operator has one “Quality Manager” for all its activities. Under 965/2008 certification do we continue to have one “Compliance Monitoring Manager”?

**απάντηση**

One person can act as both “Quality Manager” and “Compliance Monitoring Manager” as long as fulfills all requirements of both HCAA/D<sub>2</sub>/C and HCAA/D<sub>2</sub>/A.



## ερώτηση

What is the relation between “SMM”, “Compliance Monitoring Manual” and “Quality Manual”?

## απάντηση



