S- OPS meeting	ISSUE	QUESTION/ANSWER	Answer
10--01	security	No provision for States to approve the carriage of munitions of war without being inaccessible to passengers. This would preclude the approval of carriage of weapons by armed guards. EASA IRs only provide an alleviation for the loading of sporting weapons in small helicopters i.e. no corresponding provision appears to have been made for aeroplanes. This appears to be an inadvertent omission by EASA**.	**Answer: EASA is currently discussing with the European Commission on how to align requirements stemming the soon to be revoked EU -OPS Regulation, which contained more wide-ranging security provisions than the Air OPS Regulation 965/2012. Regulation 300/2008 on aviation security is the EU's framework regulation on security in aviation, but at the moment does not include some of the provisions that used to be in the EU OPS REgulation, e.g. on in-flight security training. During the discussions with the European Commission, the Agency will also raise the point of weapons on board. In these discussions the relevant ICAO documents on aviation security, which include provisions on weapons carried on board will also be discussed.**
10--02	security	One additional question has 'popped up' during recent audits at AOC-holders and regards 'non-technical training', such as safety and security. Does this training require an ATO or can this still be done by 'third parties' where the AOC-holder is responsible?	**Answer: Security training does not require an ATO. ATO is only required for personnel training organisations, who train i.a.w. the Air Crew Regulation, e.g. pilot training, licencing etc.**
10--03	occurrence reporting, SMS & APFSP	1. Could EASA explain relationship between Basic Regulation Annex IV 8.a.5 provision "The operator must establish and maintain an accident prevention and safety programme, including an occurrence reporting programme, which must be used by the management system in order to contribute to the aim of continuous improvement of the safety of operations." and ORO.GEN.200 (3) especially considering that ICAO introduced requirement for the operator to establish an accident prevention and flight safety programme in Amendment 19 to Annex 6 and repealed the same requirement in the Amendment 30 to Annex 6 when introduced safety management provisions. Are the operators still obliged to introduce APFSP (Accident prevention flight safety programme) as a part of management system?	**Answer: Essential Requirements (ERs) are aligned with ICAO. At the time when the ERs where published in 2008, there was only APFSP. However, all APFSP elements are part of the SMS requirements in Part-ORO. The requirement to have an APSP is now superseded by the management system requirement. The former APFSP and quality system are now part of the management system.So basically, this requirement still exists but is integrated in the management system requirement.**
10--04	SMS	2. Could EASA explain relationship between ORO.GEN.200 and ORO.GEN.210 i.e. AMC1 ORO.GEN.200(a)(1) Management system (a) Safety manager and ORO.GEN.210 (b) or for the complex operators is the operator obliged to introduce Safety manager and links between safety manager and compliance monitoring considering that standard ORO.GEN 210 (b) explicitly states "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. Such person(s) shall be ultimately responsible to the accountable manager"	**Answer: The ORO.GEN.210(b) requirement is not directly linked to the safety manager (SM) and the compliance monitoring manager (CMM). ORO.GEN.210 is intended to be a general requirement applying to any operation in the scope of Part-ORO while ORO.AOC.135 only applies to CAT operators. The persons required under ORO.GEN.210(b) are responsible for ensuring the operator remains in compliance with the applicable requirements while the CMM is responsible to ensure that the activities of the operator are monitored for compliance with the applicable regulatory requirements. Therefore ORO.GEN.210(b) doesn't encompass the SM and CMM requirement.**

10--05	**Cabin crew training organisation vs. ATO**	3. According to ORO.AOC.120 an operator may provide cabin crew training and issue cabin crew attestation if meets requirements CC.TRA.215 and CC.TRA.220 and if approved by the Authority. This approval shall be entered on operator's OpsSpecs. In case that operator holds such an approval does it mean that the operator can provide the training only for its own staff or may provide training other personnel not employed by the operator? In case that operator holds the approval is the operator obliged to hold certificate ATO as per Part-CC?	**Answer: ORO.AOC.120(a) deals with training courses and only only relates to training of cabin crew (CC). CC training does not require ATO. The CC training organization may also provide training to other staff than the staff of their own operator.**
10--06	**Oversight cycle & SMS**	IN case of oversight cycle of one year is being used, what tools or benchmarks may the authority use to assess an operator's management system the relative risks related to the activity of each organisation in order to increase the frequency to 24 months?	**ANSWER: Part-ARO of Regulation 965/2012 (Air OPS) does not prescribe how the authority should use tools or benchmarks and what tools to use. Such detailed rules are also not foreseen in the future.**
10--07	**helicopter hoist operations**	My question relates to the correct understanding of the term "helicopter hoist" according to the "HHO flight" definition in conjunction with the Helicopter Hoist Operation (HHO) subject of the specific approval according to the PART-SPA. Does the HHO mean both operation of using specific hoist device, when the lifting and lowering of the cargo is carried out by means of changeable length of the cable when its movement is ensured by the electric motor of the hoist device/crane and as well as using the fixed rope (cable) coupled to the helicopter cargo hook when the lifting and lowering of the cargo is carried out by means of the climbing and descending of the helicopter ?	**Answer: HHO = Helicopter Hoist Operations, this means that such operations are carried out by means of a hoist/winch.** **"Fixed rope" operations are considered specialised operations, which fall under the HESLO requirement in Part-SPO (SPO.SPEC.HESLO) when involving cargo/animal operations only, and under HEC requirements of Part-SPO (SPO.SPEC.HEC) when involving humans. This is in line with the FAA philosophy as explained in Master AC 29-2C (under 29.865). The Agency considers that a person who is knowledgeable of the risks involved, and at some point is required to be outside of the rotorcraft in order to fulfil the mission, can do such mission under the SPO rules. E.g. a person is being lowered by hoist in a forest and then involved in attaching a sling load to the sling in logging operations, here both that person and the helicopter are involved in the mission.** **Whenever the helicopter is only the means of transportation and the person is dropped off by means of a hoist, as the helicopter may be unable to land, such operation is to be considered HHO. E.g. a sea-pilot transfer operation. A helicopter may not be able to land on a ship, and the helicopter is not involved in the mission of the passenger (i.e. piloting the ship into the harbour by the sea-pilot). In such case the helicopter is only the means of transportation.**

10--08	**SMS**	when initially reviewing SMS what is the minimum evidence of a (working) SMS? Or is a 'development trajectory' sufficient? How to handle findings, which might be quite some the initial year? Is a tool used to evaluate SMS? Anyone familiar with SMS evaluation tool of SMICG? how is the publication of aletrnative AMC material by EASA performed? the rules only mention level 1 and 2 findings, what is done with observations not affecting safety?	**ANSWER: The SMICG contains many the elements for an operator and consequently for an authority to evaluate an SMS. Of course a trajectory approach is recommended. Information on Alternative AMC (AltMOC) will be published by the Agency, but will only contain basic explanation of the content of the AltMOC (i.e. only the area to which the AltMOC applies). This is done to protect confidential information. Information on the SMICG is widely available on the internet. The rules indeed only mention level 1 and level 2 findings as safety related findings. Only level1 and level 2 findings require follow-up actions, whereas observations do not. Therefore there is no AMC/GM on how authorities should deal with observations, since no follow-up on behalf of the operator is required under the rules.**
10--09	**Translation of AMC/GM**	Do you intend to publish a version of AMC/GM in French?	**Answer: translations to AMC/GM are not foreseen. We understand the concerns expressed by Member States for translations, but since this is not part of the Agency's requirements and due to the excessive costs due to translation into all EU official languages, the Agency is not planning to embark on translations of AMC/GM.**
10--10	**SMS/ integrated SMS**	Management system (ORO.GEN.200) Could EASA provide examples on how to develop a integrated management system for an organisation having multiple agreements (AOC, part 21, part M/G, part 145, part 147)? Many AOC holders also hold a Part 145 agreement and the regulation 2042/2003 still requires a quality system and not a management system. ORO.GEN.200(a)(6) and associated AMC/GM do not mention a "compliance monitoring management unit" whereas EU-OPS did allow, for AOC holders detaining also a part 145 agreement, the possibility of having two distinct "quality managers" and a coordination unit. Is it possible to keep this organization?	**ANSWER: Point (c) of AMC1 to ORO.GEN.200(a)(6) provides a clear answer on the role of the (one) Compliance Monitoring Manager (CMM). Operators wishing to go for something different may apply for an altMOC. The current rules do not prevent an operator to having a quality manager for part-145 and a CMM for the OPS part.** **In essence, there should ideally be a single person accountable to the Accountable Manager that gathers all information on compliance in the different areas, also to be able to better identify systemic issues and to ensure follow-up of corrective actions in a more efficient way. If there are distinct managers for distinct areas the accountable manager would have more than one channel to get feedback and ask for specific action, and this may not be efficient in terms of resources used and to ensure there is an overall view regarding compliance. To conclude: one CMM is recommended but in any case any organisation can establish a different organisational framework provided that the necessary coordination is ensured to allow efficient feedback and actions. The operator can opt for a fully integrated SMS. This would even be beneficial for effective safety risk management, but legally speaking the competent authority may not raise findings if it is not done. The Agency will embark on future rulemaking tasks looking at an integrated management system. The Agency's NPA 2013-01 proposed to add the following for Part-M/G and Part-145 (in the future also for Part-147): '(c) Where the organisation holds one or more additional organisation certificates within the scope of Regulation (EC) No 216/2008, the management system may be combined or integrated with that required**

			under the additional certificate(s) held.'
10--11	**SMS & ISO standards**	How can ISO 9001 or EN 9100 be included in the management system?	**Answer: AMC1 to ARO.GEN.305(b);(c) refers to industry standards, if those industry standards comply with certain conditions then the competent authority may take this into account when defining its oversight programme. Any industry accreditation/certification doesn't provide credit for the operator in the area of SMS for its initial certification.**
10--12	**Wet lease (TCO)**	ORO.AOC.100 c) as for wet-lease in operations, do EASA see another way to demonstrate that "the safety standards of the third country operator with regard to continuing airworthiness and air operations are equivalent to the applicable requirements established by Regulation (EC) No 2042/2003 and [Regulation 965/2012]" than an audit of the third country operator by the EU airline who wants to wet-lease it?	**ANSWER: The requirements of ORO.AOC.110 and the respective AMC do not refer to an audit as for Code-sharing. The operator has to demonstrate that the safety standards of the third-country operator with regards to continuing airworthiness and air operations are similar the applicable requirements. How the operator demonstrates this is not specified in the rule. AMC1 ORO.AOC.110(c) lists a number of minimum requirements, in case the TCO operator does not operate i.a.w. EU requirements for continuing airworthiness and air operations.**

10--13	**Code/share**	We recall that these paragraphs were first written with references to TCO, then all mention of TCO was deleted. Now that part-TCO has been fully developed and should be adopted soon, will EASA regulatory department look again at the articulation between TCO and articles about code-share and leasing in the IR-OPS? Will the text of these articles be modified to refer to the TCO authorisation? Some clarification and articulation between the three Parts might be needed in our opinion. What would happen to the TCO authorisation of a third party operator if a EU MS refused to allow one of the airline under its regulatory oversight to enter into a code-share agreement with this TCO holder ? Our guess is that EASA would need to be notified by the EU MS of the refusal and the reasons that led to it, but what should happen next if EASA considers that the TCO is still valid? Would the EU MS have to approve the code-share?	**ANSWER: Code-share agreements do not require an approval from the authority. Under ARO.OPS.105 the authority should 'satisfy itself' that the operator complies with ORO.ACO.115 and that the TCO complies with ICAO standards. The authority will assess whether the EU operator wishing to enter into a code-share agreement with a TCO is in compliance with the operator requirements regarding code share. To clarify the link between code-share and TCO, the Agency states that a TCO authorisation is no substitute for the EU (French) operator's requirements to assess its code-share partner. Holding an Agency TCO authorisation is not enough to comply with the code-share requirements of Regulation (EU) NO 965/2012 [ORO.AOC.115/ARO.OPS.105] and related AMC. Likewise, if an authority refuses a code-share agreement, this could happen on the basis of an insufficient auditing program of the EU operator and does not necessarily affect the Agency's TCO authorisation of the third country operator. This means that the code-share provisions for EU operators apply in addition to the requirements of Part-TCO. A code sharing TCO will be subject to the requirements of [ORO.AOC.115/ARO.OPS.105] and related AMC and will be obliged to undergo comprehensive audits for the initial verification of compliance and continuous compliance with the applicable ICAO standards [AMC1 ORO.AOC.115(a)(1)]. These audits can be performed either by the EU operator itself or a third party provider ([AMC2 ORO.AOC.115(b)] which refers to the possibility of using industry standards such as IOSA). The audit will focus on the operational, management and control systems of the TCO [AMC1 ORO.AOC.115(a)(1)]. Continuous compliance of the code sharing TCO with the applicable ICAO standards will be performed on the basis of a code-share audit programme [AMC1 ORO.AOC.115(b)].**
10--14	**Manuals Logs and Records**	Can a "personal copy" be an "electronic personal copy"? In that case, would a password-protected access to the operator's Intranet/Extranet be acceptable?	**ANSWER: The intent is to ensure that the crew has the possibility to consult its personnal OM when not flying. An electronic copy could achieve the safety objective of the Implementing Rule.. The Agency has not drafted any AMC, so basically the authority would need to propose an AMC to this rule or the operator would and would then have the AltMOC approved by its competent authority.**
10--15	**composition of flight crew**	Does ORO.FC.100(e) apply to a flight crew member working full-time for an operator and exercising as examiner (but not for line checks) in another operator?	**tbd**

10--16	part-time flight crew	2/ If an operator A engages the services on part-time basis of a flight crew member operating on another aircraft type in another operator, is operator A required to obtain the approbation mentioned in ORO.FC.154(c) "operations on more than one type or variant"?	**ANSWER: Additional explanations to answer this question are needed. ORO.FC.145(b) states that : (b) When establishing the training programmes and syllabi, the operator shall include the mandatory elements for the relevant type as defined in the data established in accordance with Regulation (EC) No 1702/2003. When engaging the services of a flight crew member also flying for another operator, the operator must obtain the relevant information to ensure that it complies with ORO.FC.**
10--17	flight crew & SMS	ORO.GEN.200(a)(3) states that the operator shall establish, implement and maintain a management system that includes:<...> (3)the identification of aviation safety hazards entailed by the activities of the operator, their evaluation and the management of associated risks, including taking actions to mitigate the risk and verify their effectiveness; Application of this requirement to the flight crew implies implementation of an assessment method of individual safety performance of pilots which may be difficult to achieve owing to the anonymous background of ORO.AOC 130 on flight data monitoring. The French DGAC would like EASA to give some cues what is expected from airlines to this regard.	**ANSWER: For flight crew the AIR CREW rules, as well as the Air OPS rules require a number of training and checks during the pilot's flying career. There is opportunity during those assessments to verify, if pilots fly according to the safety requirements of the operator.**