



# Organisation requirements Part-OR

**OPS Workshop Austria**  
**16 June 2009**  
**Willy Sigl**  
**EASA**

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**European Aviation Safety Agency**

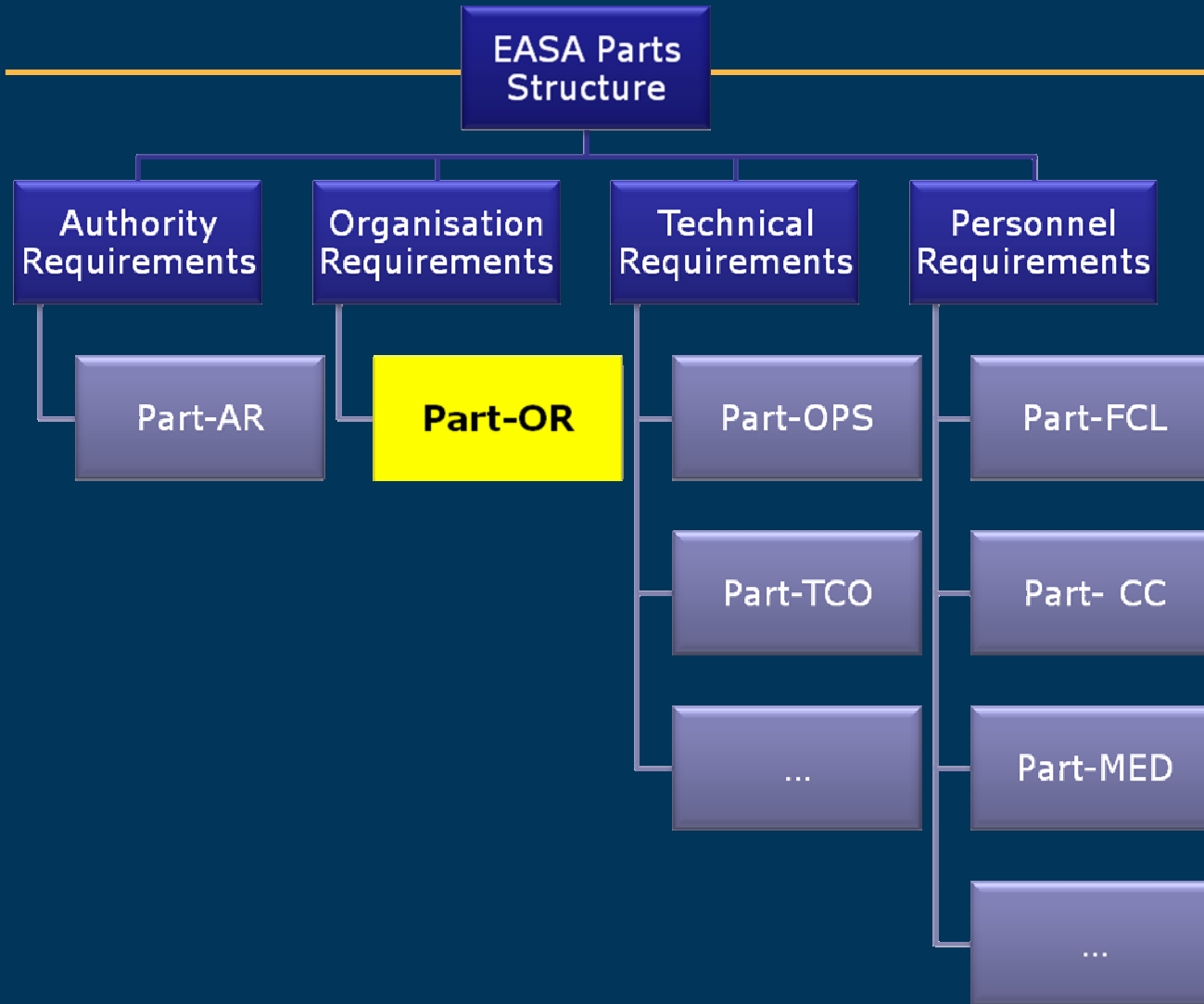
## **Outline**

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- ★ **Basic Regulation – Essential Requirements**
- ★ **Part-OR structure**
- ★ **Subparts**



# New Parts Structure - proposed





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## Subpart OR.OPS Content

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- ★ **Subpart OR.OPS contains additional and specific operator requirements for:**
    - Non-commercial operators of complex motor-powered aircraft
    - All commercial operators
  - ★ **They apply in addition to**
    - The common organisation requirements in OR.GEN
    - Chapter 8 of Annex IV of the BR Essential requirements for air operations
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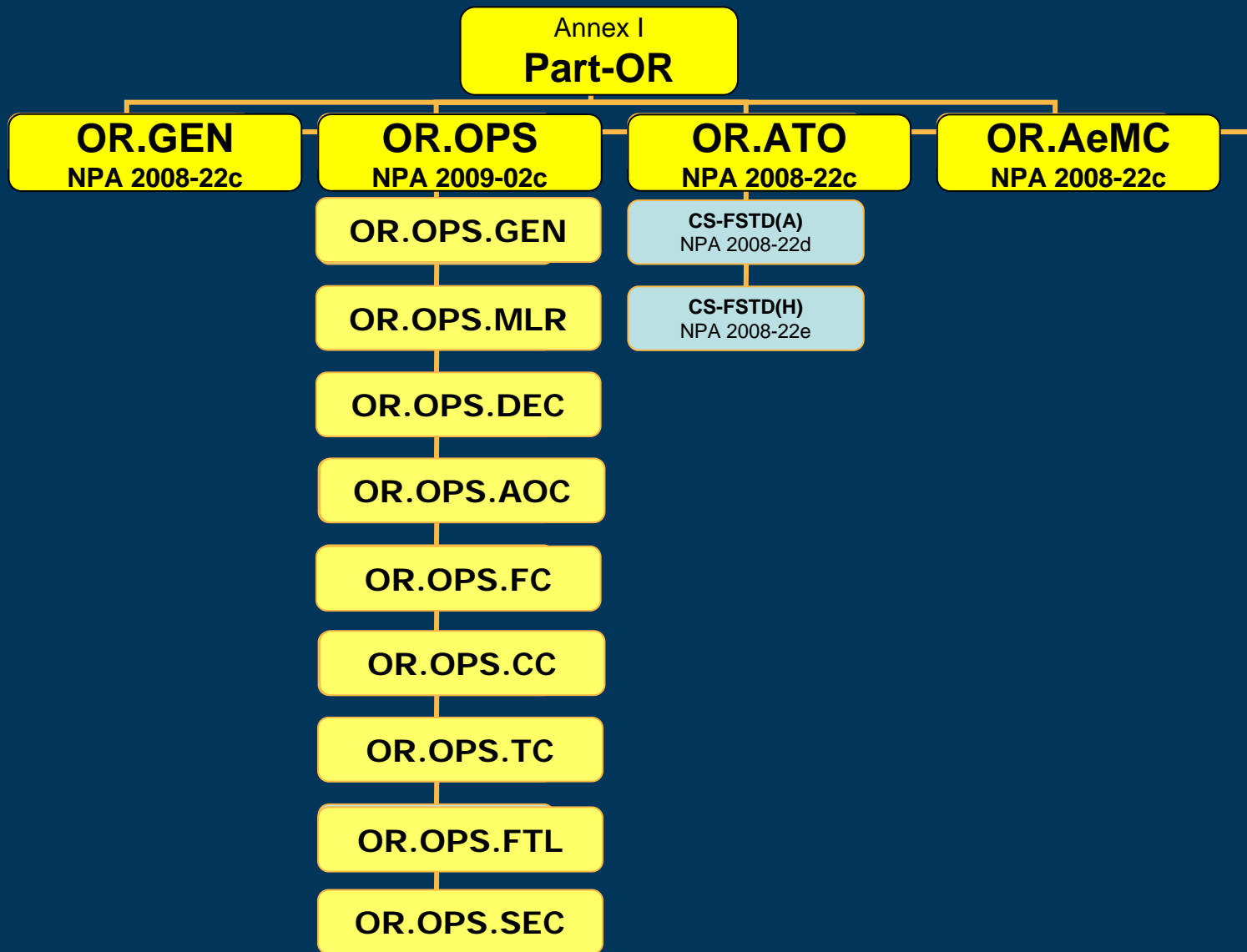
## Essential Requirements

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- **BR Annex IV Chapter 8 contains additional requirements for operation for commercial purposes and operation of complex motor-powered aircraft**
    - ✦ Organisation requirements and management system
    - ✦ Operator training
    - ✦ Minimum Equipment List (MEL)
    - ✦ Operations Manual
    - ✦ Security Programme
    - ✦ Flight Time Limitations and Rest Requirements
  - **The proposed IRs had to be based on these ERs**
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# Scope of requirements

	Commercial Operator		Non-commercial Operator	
	CAT	COM	CMPA	N-CMPA
OR.GEN	✓	✓	✓	
OR.OPS.GEN	✓	✓	✓	
OR.OPS.MLR	✓	✓	✓	
OR.OPS.DEC			✓	
OR.OPS.AOC	✓	✓		
OR.OPS.FC	✓	✓	✓	
OR.OPS.CC	✓		✓	
OR.OPS.TC	✓	✓	✓	
OR.OPS.FTL	✓	✓	✓	
OR.OPS.SEC	✓	✓	✓	



## Subpart OR.OPS Content

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- **Section I Operator requirements (OR.OPS.GEN)**
    - ★ **Scope (OR.OPS.005.GEN)**
    - ★ **Definitions (OR.OPS.010.GEN)**
    - ★ **Operator responsibilities (OR.OPS.100.GEN)**
      - ➔ e.g. operational control, establishment of procedures, properly equipped aircraft, trained staff
    - ★ **Aircraft used in commercial and non-commercial operations (OR.OPS.105.GEN)**
      - ➔ Endorsement for non-commercial operations and operations manual supplement with appropriate operating procedures
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## Subpart OR.OPS Content

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- **Section II Manuals, Logs and Records (OR.OPS.MLR)**
    - ✦ Operations Manual (OR.OPS.015.MLR)
    - ✦ Minimum Equipment List (OR.OPS.020.MLR)
    - ✦ Operational Flight Plan – CAT (OR.OPS.025.MLR)
    - ✦ Information retained on the ground – CAT (OR.OPS.030.MLR)
    - ✦ Record-keeping (OR.OPS.220.MLR)
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# Subpart OR.OPS Content

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- **Section II Manuals, Logs and Records (OR.OPS.MLR)  
(cont'd)**
    - ★ **Operations Manual (OR.OPS.015.MLR)  
Commercial operators**
      - ➔ Approval of the operations manual, when first presented to the competent authority
      - ➔ Certain amendments of the operations manual may be subject to an amendment procedure, to be agreed with the competent authority
      - ➔ An AMC to the operations manual lists those items that cannot be part of such an amendment procedure
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## Subpart OR.OPS Content

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- **Section II Manuals, Logs and Records (OR.OPS.MLR) (cont'd)**
    - ★ **Operations Manual (OR.OPS.015.MLR) (cont'd)**
      - ➔ Different AMCs including the OM table of contents
      - ➔ EU-OPS/JAR-OPS 3 table of contents harmonised – ordered following AFM (change for aeroplanes)
      - ➔ Except for update of references, OM compiled in accordance with EU-OPS do not need to be changed
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## Subpart OR.OPS Content

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- **Section II Manuals, Logs and Records (OR.OPS.MLR) (cont'd)**
    - ★ **Minimum Equipment List (MEL) (OR.OPS.020.MLR) MMEL/MEL – RIE**
      - ➔ One time extension of the RI B, C and D included in OR.OPS.020.MLR(f), if
        - ➔ Within limits of MMEL (MMEL has been designed taking into account the one time extension of RI); and
        - ➔ duration of extension is, as maximum, of the same duration as the RI specified in the MEL
    - ★ **JAR-MMEL/MEL.090 'Operations outside the scope of the MEL' > Art. 14 flexibility provision**
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## Subpart OR.OPS Content

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- **Section II Manuals, Logs and Records (OR.OPS.MLR) (cont'd)**
  - ✦ Operational Flight Plan - CAT (OR.OPS.025.MLR)
  - ✦ Information retained on the ground - CAT (OR.OPS.030.MLR)
    - Alleviations contained in Appendix 1 to EU-OPS 1.005(a) and Appendix 1 to JAR-OPS 3.005 (f) and (g) transposed



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## Subpart OR.OPS Content

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- **Section III Air operator declaration (OR.OPS.DEC)**
  - ✦ In addition to requirements in OR.GEN.040
  - ✦ Specification of responsibilities in case a management organisation manages the operation on behalf of the owner



## Subpart OR.OPS Content

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- **Section III Air operator declaration (OR.OPS.DEC)  
(cont'd)**
    - ★ **Content and template of the declaration**
      - ➔ Operator and CAMO contact details
      - ➔ Starting date of operation / applicability date of change
      - ➔ Type of operation / aircraft
      - ➔ Specific approvals
      - ➔ Description of management system
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## Subpart OR.OPS Content

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- **Section III Air operator declaration (OR.OPS.DEC)  
(cont'd)**
    - ✦ **Content and template of the declaration (cont'd)**
      - ➔ Declaration that
        - ➔ The OM complies with the rules
        - ➔ All aircraft hold a valid CofA
        - ➔ All crews are trained
        - ➔ Use of industry standard
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## Subpart OR.OPS Content

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### ➤ Section IV Air operator certification (OR.OPS.AOC)

#### ★ General

- ➔ Requirements for certificate holders
  - ➔ Process of AOC application and changes (in addition to OR.GEN requirements)
  - ➔ One certificate for all commercial operations = AOC
  - ➔ Operations Specifications and privileges granted make the difference!
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## Subpart OR.OPS Content

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- **Section IV Air operator certification (OR.OPS.AOC) (cont'd)**
    - ✦ Flight Data Monitoring – Aeroplanes (OR.OPS.201.AOC)
    - ✦ Additional personnel requirements (OR.OPS.210.AOC)
    - ✦ Facility requirements (OR.OPS.215.AOC)
    - ✦ Documentation requirements (OR.OPS.300.AOC)
    - ✦ Certificate of Airworthiness (CoA)
      - ➔ Aircraft need to have a CoA i.a.w. Part-21
      - ➔ Compared to EU-OPS, notion “standard” has been removed
      - ➔ OR.OPS.015.AOC (c)(2)
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## Subpart OR.OPS Content

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- Section IV Air operator certification (OR.OPS.AOC) (cont'd)

- ★ Leasing (OR.OPS.030.AOC)

- Aligned with Regulation 1008/2008, same definitions used
      - Any lease-in of third country aircraft needs prior authorisation of the competent authority
      - Specific requirements for wet lease-in of an aircraft from a TCO
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## Subpart OR.OPS Content

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- **Section IV Air operator certification (OR.OPS.AOC) (cont'd)**

- ★ **Third country operator (TCO)**

- Required to hold a third country operator authorisation in accordance with Part-TCO;
  - Required to comply with specified requirements in Part-OPS as well as Part OR-OPS related to training, manuals, logs and record-keeping, FTL schemes and security;
  - Not obliged to use the related AMC of Part-OPS; may use SOP as contained in its OM as long as IR compliant
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## Subpart OR.OPS Content

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- **Section IV Air operator certification (OR.OPS.AOC) (cont'd)**
    - ★ **Code share arrangements (OR.OPS.035.AOC)**
      - ➔ Prior authorisation of the competent authority
      - ➔ TCO required to hold a authorisation in accordance with Part-TCO
      - ➔ EU operator has to ensure compliance of the code share partner with ER and appropriate safety standards (at least ICAO compliant)
      - ➔ EU operator is required to implement an audit programme (independent third party provider and audit pooling system may be used (AMC))
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## Subpart OR.OPS Content

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### ➤ Section V Flight crew (OR.OPS.FC)

#### ★ Sources

- Subpart N of EU-OPS and JAR-OPS 3
  - Some material transferred to Part-FCL, e.g.
    - Zero flight time training  
(Parts of EU-OPS 1.945 -> FCL.730.A)
    - Limitation to the privileges of a CPL license  
(EU-OPS/JAR-OPS 1/3.960 -> FCL.305.A / .H)
    - Recent experience  
(EU-OPS 1.970 -> FCL.060)
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# Subpart OR.OPS Content

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## ➤ Section V Flight crew (OR.OPS.FC) (cont'd)

### ★ Changes

- ➔ Commander -> Pilot in Command
  - ➔ ERs follow ICAO Annex 6 terminology
  - ➔ IRs cannot give to "commander" safety functions attributed to the pilot-in-command
  - ➔ Clarification when a pilot acting as PiC is relieved in flight of his/her duties; transfer of the related responsibilities for the safe conduct of the flight (OR.OPS.115.FC (b))
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# Subpart OR.OPS Content

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- **Section V Flight crew (OR.OPS.FC)  
(cont'd)**
  - ★ **Changes (cont'd)**
    - ➔ Harmonisation of requirements for (A) and (H)
    - ➔ However, in some areas differences still remain
    - ➔ EU-OPS 1.978 alternative training and qualification programmes (ATQP) not transposed – to be reviewed





## Subpart OR.OPS Content

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### ➤ Section V Flight crew (OR.OPS.FC) (cont'd)

#### ★ FC Training

##### ➔ Part-FCL and Part-OR

➔ Part-FCL: class/type rating related training requirements

➔ Part-OR: operator specific training requirements

##### ➔ Part OR | OR.ATO

➔ OR.ATO establishes the requirements for ATO to provide FC training

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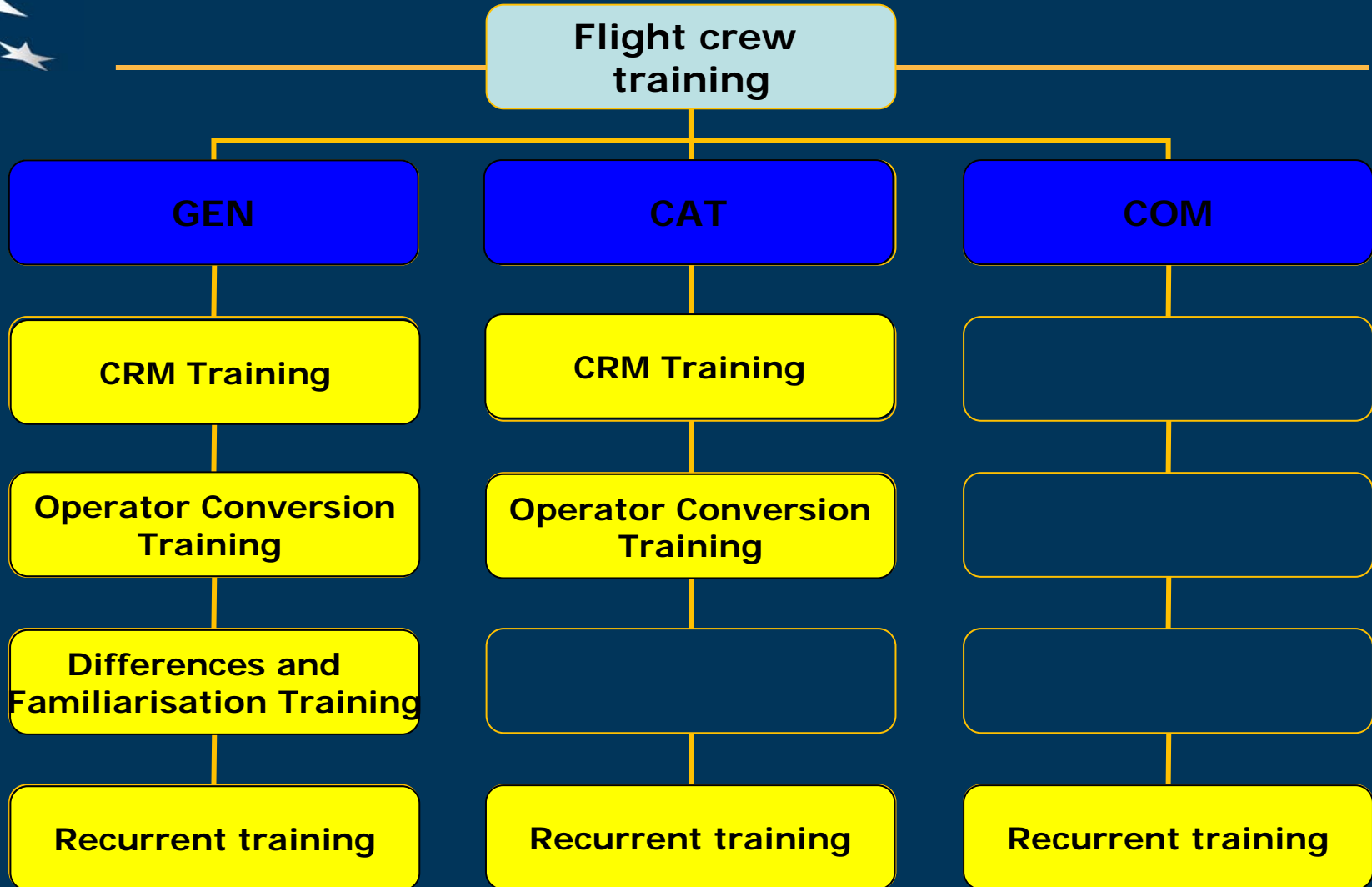
## Subpart OR.OPS Content

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- **Section V Flight crew (OR.OPS.FC) (cont'd)**
  - ✦ **FC Training (cont'd)**
    - ➔ Part-21 | OSC
      - ➔ OSC approval is the basis for the type related training programmes developed by operators



# Subpart OR.OPS Content





## Subpart OR.OPS Content + CC/MED

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### ➤ Section VI Cabin crew (OR.OPS.CC) + Part-CC/Part-MED

#### ★ EU-OPS

- ➔ Competence of CC depends on operator
- ➔ Initial safety training attestation is an evidence of training

#### ★ Proposed cabin crew attestation

- ➔ Result of a certification process under the responsibility of the competent authority
  - ➔ Proof of compliance of CC member with requirements
  - ➔ Shall be maintained valid: checking of competence & medical fitness to be assessed
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## Subpart OR.OPS Content + CC/MED

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- **Section VI Cabin crew (OR.OPS.CC) + Part-CC/Part-MED (cont'd)**
    - ★ **Training programmes distributed between**
      - ➔ Part-CC for those related to attestation of cabin crew
      - ➔ Part-OR.OPS.CC for operators
    - ★ **Training programmes reallocated by differentiating training subjects that are**
      - ➔ aircraft type specific and common to a certain type
      - ➔ operator specific
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## Subpart OR.OPS Content + CC/MED

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- **Section VI Cabin crew (OR.OPS.CC) + Part-CC/Part-MED (cont'd)**

- ★ **EU-OPS**

- ➔ Requires CC to be medically fit to perform their duties, but does not specify
      - ➔ Under which conditions medical fitness should be assessed
      - ➔ medical criteria
      - ➔ frequency of medical checks



## Subpart OR.OPS Content + CC/MED

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### ➤ Section VI Cabin crew (OR.OPS.CC) + Part-CC/Part-MED (cont'd)

#### ★ Proposed IRs

- ➔ Medical requirements based on a medical analysis of medical conditions
  - ➔ Medical assessment by AME
  - ➔ No medical certificate: cases of suspected unfitness and of unfit assessment to be reported to competent authority thus ensuring that action can be taken as appropriate as regards the CC attestation
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## Subpart OR.OPS Content

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### ➤ Section VII Technical crew (OR.OPS.TC)

#### ★ Scope

➔ Training requirements for the following operations

➔ HEMS

➔ HOIST

➔ NVIS





## Subpart OR.OPS Content

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### ➤ Section VII Technical crew (OR.OPS.TC) (cont'd)

#### ★ Source

➔ Subpart O of JAR-OPS 3

➔ Training for technical crew

➔ The word “technical” was added

➔ What was not transposed:

➔ Definition of task specialist of draft JAR-OPS 4

➔ Considered to be passengers requiring a specialised briefing, as e.g., medical passenger in HEMS operations



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## Subpart OR.OPS Content

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### ➤ Section VIII FTL (OR.OPS.FTL)

- ✦ Process of Certification Specifications (CS) and individual schemes described in Art. 22 BR
  - ✦ Based on ICAO Annex 6
  - ✦ Taking into account ICAO Fatigue Risk Management System (FRMS) concept
  - ✦ FTL study on EU-OPS subject to separate EASA rulemaking task
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## Subpart OR.OPS Content

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### ➤ Section VIII FTL (OR.OPS.FTL)(cont'd)

#### ★ Non-commercial operators

- ➔ FTL limitations part of OM
  - ➔ sectors, time zones, night hours, positioning, cumulative duty time, ...
- ➔ Option to use CS or individual FTL scheme
- ➔ Corresponding fatigue risk management system



## Subpart OR.OPS Content

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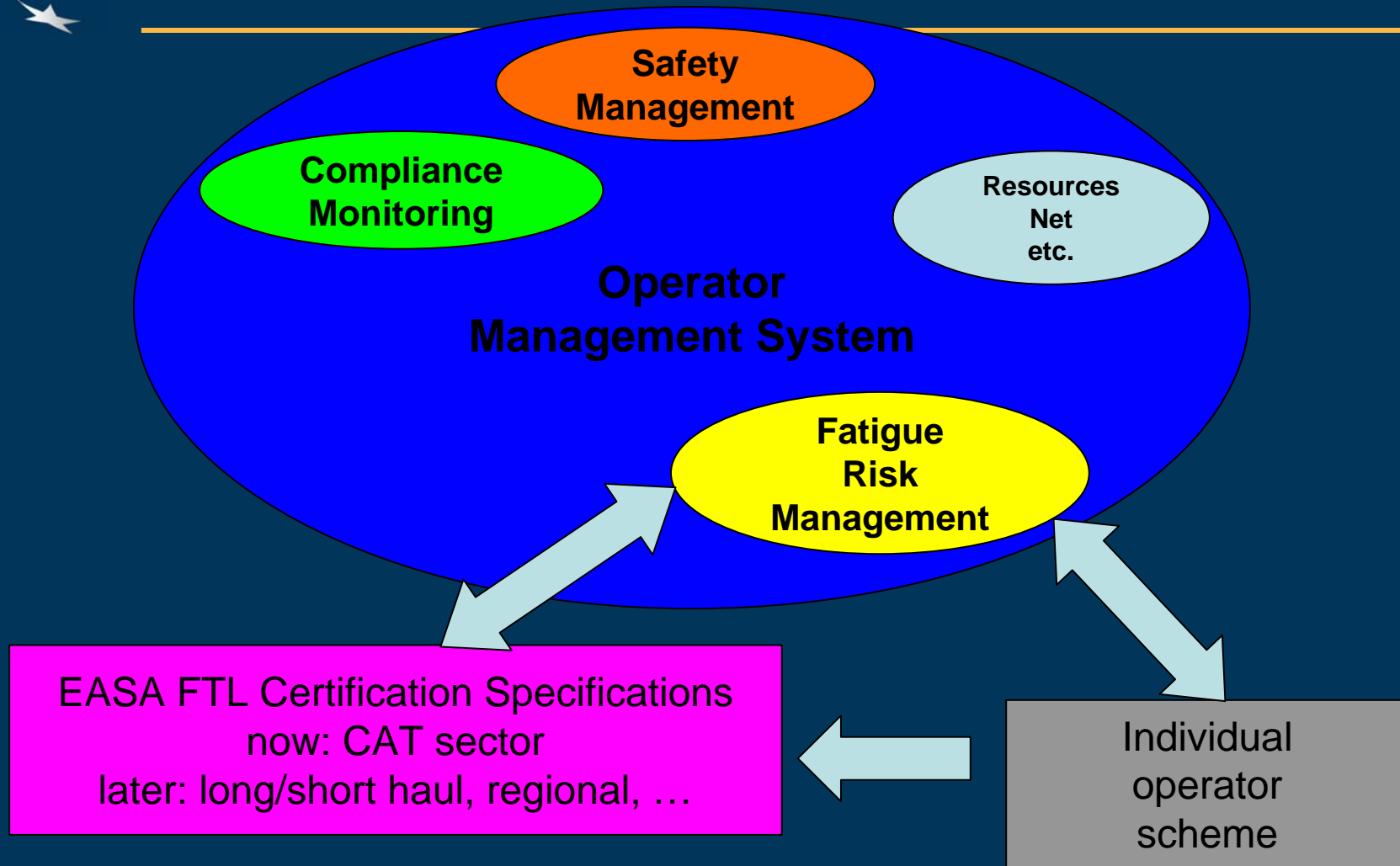
### ➤ Section VIII FTL (OR.OPS.FTL) (cont'd)

#### ★ Commercial operators

- ➔ FTL scheme part of OM
    - ➔ CS, individual FTL scheme
  - ➔ Requirements for the development of an individual FTL scheme
    - ➔ elements
    - ➔ safety objective, assessment
  - ➔ Corresponding fatigue risk management system
  - ➔ CS CAT aeroplane based on EU-OPS Subpart Q
  - ➔ Further CS to be developed through separate EASA RM task
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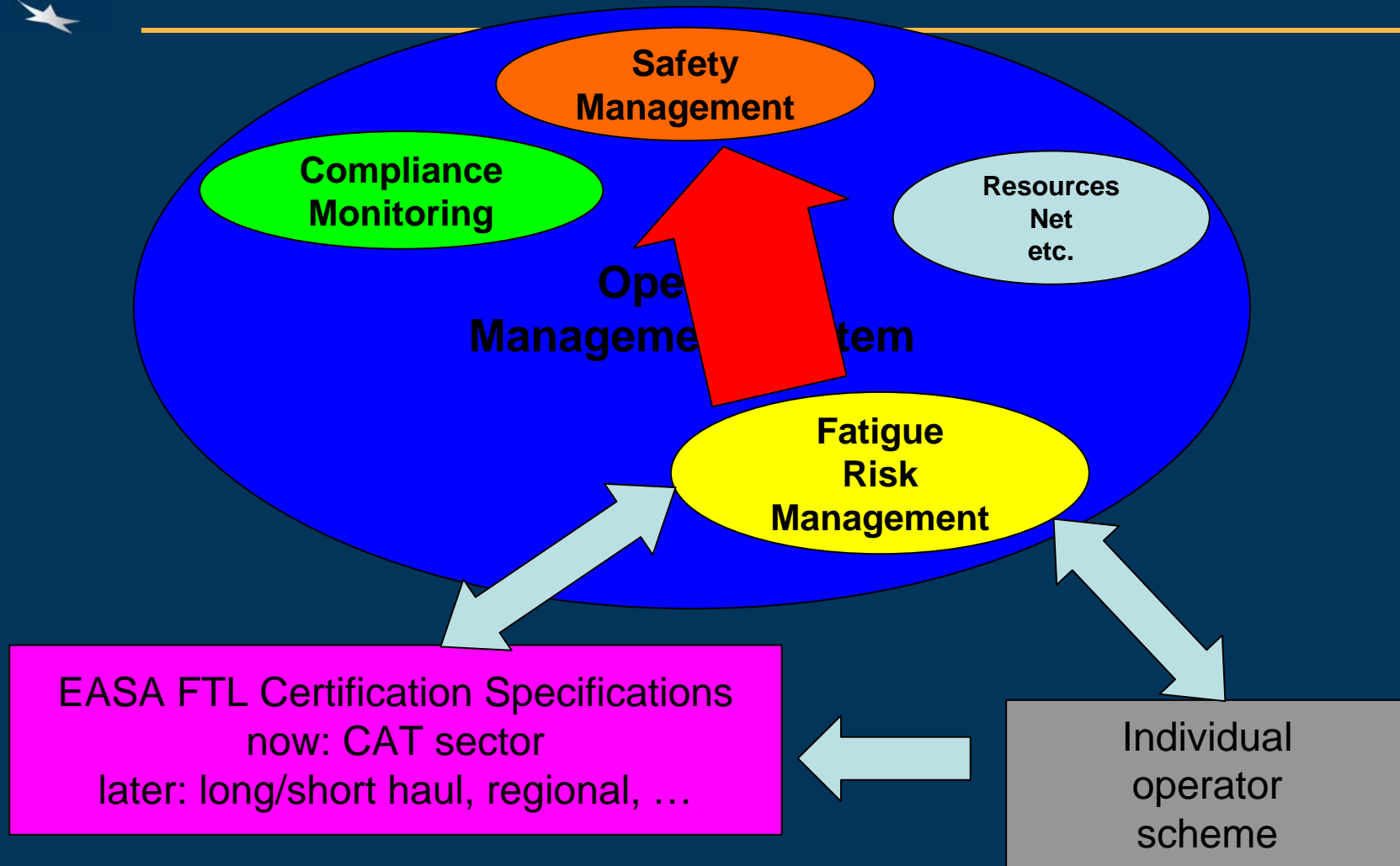


# The EASA FTL System





# The EASA FTL System





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## Subpart OR.OPS Content

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- **Section IX Security (OR.OPS.SEC)**
  - ✦ Based on Subpart S of EU-OPS / JAR-OPS 3
  - ✦ Harmonised with Regulation 300/2008



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## Subpart OR.OPS Content

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### ➤ Section IX Security (OR.OPS.SEC) (cont'd)

#### ★ Content

- ➔ Disruptive passenger behaviour
  - ➔ Security programme
  - ➔ Security training
  - ➔ Aircraft search procedure checklist
  - ➔ Cockpit security (Aeroplanes)
  - ➔ Cockpit security (Helicopters)
  - ➔ Reporting acts of unlawful interference
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**Thank you  
for your attention**

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