

AMC and GM to Annex III ORGANISATION REQUIREMENTS FOR AIR OPERATIONS

(PART-ORO)

Subpart GEN – General requirements

SECTION I - GENERAL

AMC1 ORO.GEN.110(c) Operator responsibilities

OPERATIONAL CONTROL

The organisation and methods established to exercise operational control should be included in the operations manual and should cover at least a description of responsibilities concerning the initiation, continuation and termination or diversion of each flight.

GM1 ORO.GEN.110(c) Operator responsibilities

OPERATIONAL CONTROL

- (a) ORO.GEN.110(c) does not imply a requirement for licensed flight dispatchers or a full flight watch system.
- (b) If the operator employs flight operations officers in conjunction with a method of operational control, training for these personnel should be based on relevant parts of ICAO Doc 7192 Training Manual, Part D-3. This training should be described in the operations manual.

AMC1 ORO.GEN.110(f)(h) Operator responsibilities

ESTABLISHMENT OF PROCEDURES

- (a) An operator should establish procedures to be followed by cabin crew covering at least:
 - (1) arming and disarming of slides;
 - (2) operation of cabin lights, including emergency lighting;
 - (3) prevention and detection of cabin, oven and toilet fires;
 - (4) actions to be taken when turbulence is encountered; and
 - (5) actions to be taken in the event of an emergency and/or an evacuation.
- (b) When establishing procedures and a checklist system for cabin crew with respect to the aircraft cabin, the operator should take into account at least the following duties:

Duties	Pre-take off	In-flight	Pre-landing	Post-landing
(1) Briefing of cabin crew by the senior cabin crew member prior to commencement of a flight or series of flights	x			
(2) Check of safety and emergency equipment in accordance with operator's policies and procedures	x			
(3) Security checks as applicable	x			x
(4) Passenger embarkation and disembarkation	x			x
(5) Securing of passenger cabin (e.g. seat belts, cabin cargo/baggage)	x		x	
(6) Securing of galleys and stowage of equipment	x	if required	x	
(7) Arming of door/exit slides	x			
(8) Safety briefing / information to passengers	x	x	x	x
(9) 'Cabin secure' report to flight crew	x	if required	x	
(10) Operation of cabin lights	x	if required	x	x
(11) Cabin crew at assigned crew stations	x	if required	x	x
(12) Surveillance of passenger cabin	x	x	x	x
(13) Prevention and detection of fire in the cabin (including the combi-cargo area, crew rest areas, galleys, lavatories and any other cabin remote areas) and instructions for actions to be taken	x	x	x	x
(14) Actions to be taken when turbulence is encountered		x		
(15) Actions to be taken in case of in-flight incidents (e.g. medical emergency)		x		
(16) Actions to be taken in the event of emergency situations	x	x	x	x
(17) Disarming of door/exit slides				x
(18) Reporting of any deficiency and/or un-serviceability of equipment and/or any incident	x	x	x	x

- (c) The operator should specify the contents of safety briefings for all cabin crew members prior to the commencement of a flight or series of flights.

AMC1 ORO.GEN.120(a) Means of compliance

DEMONSTRATION OF COMPLIANCE

In order to demonstrate that the Implementing Rules are met, a risk assessment should be completed and documented. The result of this risk assessment should demonstrate that an equivalent level of safety to that established by the Acceptable Means of Compliance (AMC) adopted by the Agency is reached.

AMC1 ORO.GEN.125 Terms of approval and privileges of an operator

MANAGEMENT SYSTEM DOCUMENTATION

The management system documentation should contain the privileges and detailed scope of activities for which the operator is certified, as relevant to the applicable requirements. The scope of activities defined in the management system documentation should be consistent with the terms of approval.

AMC1 ORO.GEN.130 Changes

APPLICATION TIME FRAMES

- (a) The application for the amendment of an operator certificate should be submitted at least 30 days before the date of the intended changes.
- (b) In the case of a planned change of a nominated person, the operator should inform the competent authority at least 10 days before the date of the proposed change.
- (c) Unforeseen changes should be notified at the earliest opportunity, in order to enable the competent authority to determine continued compliance with the applicable requirements and to amend, if necessary, the operator certificate and related terms of approval.

GM1 ORO.GEN.130(a) Changes

GENERAL

- (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) and (b);
 - (8) the operator's documentation as required by this Annex, safety policy and procedures;
 - (9) the facilities.

- (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.
- (c) Changes requiring prior approval may only be implemented upon receipt of formal approval by the competent authority.

GM2 ORO.GEN.130(a) Changes

CHANGE OF NAME

A change of name requires the operator to submit a new application as a matter of urgency.

Where this is the only change to report, the new application can be accompanied by a copy of the documentation previously submitted to the competent authority under the previous name, as a means of demonstrating how the operator complies with the applicable requirements.

GM3 ORO.GEN.130(b) Changes

CHANGES REQUIRING PRIOR APPROVAL

For commercial operations, the following GM is a non-exhaustive checklist, in alphabetical order, of items that require prior approval from the competent authority as specified in the applicable Implementing Rules:

- (a) alternative means of compliance;
- (b) procedures regarding items to be notified to the competent authority;
- (c) cabin crew:
 - (1) evacuation procedures with a reduced number of required cabin crew during ground operations or in unforeseen circumstances;
 - (2) for commercial air transport (CAT) operators, conduct of the training, examination and checking required by Annex V (Part-CC) to Regulation (EU) No 290/2012¹ and issue of cabin crew attestations;
 - (3) procedures for cabin crew to operate on four aircraft types;
 - (4) training programmes, including syllabi;
- (d) leasing agreements;
- (e) non-commercial operations by air operator certificate (AOC) holders;
- (f) specific approvals in accordance with Annex V (Part-SPA);
- (g) dangerous goods training programmes;
- (h) flight crew:
 - (1) alternative training and qualification programmes (ATQPs);
 - (2) procedures for flight crew to operate on more than one type or variant;

¹ Commission Regulation (EU) No 290/2012 of 30 March 2012 amending Regulation (EU) No 1178/2011 laying down technical requirements and administrative procedures related to civil aviation aircrew pursuant to Regulation (EC) No 216/2008 of the European Parliament and of the Council.

- (3) training and checking programmes, including syllabi and use of flight simulation training devices (FSTDs);
- (i) fuel policy;
- (j) helicopter operations:
 - (1) airborne radar approaches;
 - (2) over a hostile environment located outside a congested area, unless the operator holds an approval to operate according to Subpart J of Annex V (SPA.HEMS);
 - (3) procedures for selecting off-shore alternates;
 - (4) to/from a public interest site;
 - (5) without an assured safe forced landing capability;
- (k) mass and balance:
 - (1) standard masses for load items other than standard masses for passengers and checked baggage;
 - (2) use of on-board mass and balance computer systems;
- (l) minimum equipment list (MEL):
 - (1) MEL;
 - (2) operating other than in accordance with the MEL, but within the constraints of the master minimum equipment list (MMEL);
 - (3) rectification interval extension (RIE) procedures;
- (m) minimum flight altitudes:
 - (1) the method for establishing minimum flight altitudes;
 - (2) descent procedures to fly below specified minimum altitudes;
- (n) performance:
 - (1) increased bank angles at take-off (for performance class A aeroplanes);
 - (2) short landing operations (for performance class A and B aeroplanes);
 - (3) steep approach operations (for performance class A and B aeroplanes);
- (o) isolated aerodrome: using an isolated aerodrome as destination aerodrome for operations with aeroplanes;
- (p) approach flight technique:
 - (1) all approaches not flown as stabilised approaches for a particular approach to a particular runway;
 - (2) non-precision approaches not flown with the continuous descent final approach (CDFA) technique for each particular approach/runway combination;
- (q) maximum distance from an adequate aerodrome for two-engined aeroplanes without an extended range operations with two-engined aeroplanes (ETOPS) approval:
 - (1) air operations with two-engined performance class A aeroplanes with a maximum operational passenger seating configuration (MOPSC) of 19 or less and a maximum take-off mass less than 45 360 kg, over a route that contains a point further than 120 minutes from an adequate aerodrome, under standard conditions in still air;
- (r) aircraft categories:

- (1) Applying a lower landing mass than the maximum certified landing mass for determining the indicated airspeed at threshold (VAT).

AMC1 ORO.GEN.150(b) Findings

GENERAL

The corrective action plan defined by the operator should address the effects of the non-compliance, as well as its root-cause.

GM1 ORO.GEN.150 Findings

GENERAL

- (a) Preventive action is the action to eliminate the cause of a potential non-compliance or other undesirable potential situation.
- (b) Corrective action is the action to eliminate or mitigate the root cause(s) and prevent recurrence of an existing detected non-compliance or other undesirable condition or situation. Proper determination of the root cause is crucial for defining effective corrective actions to prevent reoccurrence.
- (c) Correction is the action to eliminate a detected non-compliance.

AMC1 ORO.GEN.160 Occurrence reporting

GENERAL

- (a) The operator should report all occurrences defined in AMC 20-8, and as required by the applicable national rules implementing Directive 2003/43/EC² on occurrence reporting in civil aviation.
- (b) In addition to the reports required by AMC 20-8 and Directive 2003/43/EC, the operator should report volcanic ash clouds encountered during flight.

SECTION II –MANAGEMENT

AMC1 ORO.GEN.200(a)(1);(2);(3);(5) Management system

NON-COMPLEX OPERATORS - GENERAL

- (a) Safety risk management may be performed using hazard checklists or similar risk management tools or processes, which are integrated into the activities of the operator.
- (b) The operator should manage safety risks related to a change. The management of change should be a documented process to identify external and internal change that may have an adverse effect on safety. It should make use of the operator's existing hazard identification, risk assessment and mitigation processes.

² Directive 2003/42/EC of the European Parliament and of the Council of 13 June 2003 on occurrence reporting in civil aviation *OJ L 167*, 4.7.2003, p. 23–36.

- (c) The operator should identify a person who fulfils the role of safety manager and who is responsible for coordinating the safety management system. This person may be the accountable manager or a person with an operational role within the operator.
- (d) Within the operator, responsibilities should be identified for hazard identification, risk assessment and mitigation.
- (e) The safety policy should include a commitment to improve towards the highest safety standards, comply with all applicable legal requirements, meet all applicable standards, consider best practices and provide appropriate resources.
- (f) The operator should, in cooperation with other stakeholders, develop, coordinate and maintain an emergency response plan (ERP) that ensures orderly and safe transition from normal to emergency operations and return to normal operations. The ERP should provide the actions to be taken by the operator or specified individuals in an emergency and reflect the size, nature and complexity of the activities performed by the operator.

AMC1 ORO.GEN.200(a)(1) Management system

COMPLEX OPERATORS - ORGANISATION AND ACCOUNTABILITIES

The management system of an operator should encompass safety by including a safety manager and a safety review board in the organisational structure.

(a) Safety manager

- (1) The safety manager should act as the focal point and be responsible for the development, administration and maintenance of an effective safety management system.
- (2) The functions of the safety manager should be to:
 - (i) facilitate hazard identification, risk analysis and management;
 - (ii) monitor the implementation of actions taken to mitigate risks, as listed in the safety action plan;
 - (iii) provide periodic reports on safety performance;
 - (iv) ensure maintenance of safety management documentation;
 - (v) ensure that there is safety management training available and that it meets acceptable standards;
 - (vi) provide advice on safety matters; and
 - (vii) ensure initiation and follow-up of internal occurrence / accident investigations.

(b) Safety review board

- (1) The Safety review board should be a high level committee that considers matters of strategic safety in support of the accountable manager's safety accountability.
- (2) The board should be chaired by the accountable manager and be composed of heads of functional areas.
- (3) The safety review board should monitor:
 - (i) safety performance against the safety policy and objectives;
 - (ii) that any safety action is taken in a timely manner; and
 - (iii) the effectiveness of the operator's safety management processes.

- (c) The safety review board should ensure that appropriate resources are allocated to achieve the established safety performance.
- (d) The safety manager or any other relevant person may attend, as appropriate, safety review board meetings. He/she may communicate to the accountable manager all information, as necessary, to allow decision making based on safety data.

GM1 ORO.GEN.200(a)(1) Management system

SAFETY MANAGER

- (a) Depending on the size of the operator and the nature and complexity of its activities, the safety manager may be assisted by additional safety personnel for the performance of all safety management related tasks.
- (b) Regardless of the organisational set-up it is important that the safety manager remains the unique focal point as regards the development, administration and maintenance of the operator's safety management system.

GM2 ORO.GEN.200(a)(1) Management system

COMPLEX OPERATORS - SAFETY ACTION GROUP

- (a) A safety action group may be established as a standing group or as an ad-hoc group to assist or act on behalf of the safety review board.
- (b) More than one safety action group may be established depending on the scope of the task and specific expertise required.
- (c) The safety action group should report to and take strategic direction from the safety review board and should be comprised of managers, supervisors and personnel from operational areas.
- (d) The safety action group should:
 - (1) monitor operational safety;
 - (2) resolve identified risks;
 - (3) assess the impact on safety of operational changes; and
 - (4) ensure that safety actions are implemented within agreed timescales.
- (e) The safety action group should review the effectiveness of previous safety recommendations and safety promotion.

AMC1 ORO.GEN.200(a)(2) Management system

COMPLEX OPERATORS - SAFETY POLICY

- (a) The safety policy should:
 - (1) be endorsed by the accountable manager;
 - (2) reflect organisational commitments regarding safety and its proactive and systematic management;
 - (3) be communicated, with visible endorsement, throughout the operator; and
 - (4) include safety reporting principles.
- (b) The safety policy should include a commitment:
 - (1) to improve towards the highest safety standards;

- (2) to comply with all applicable legislation, meet all applicable standards and consider best practices;
 - (3) to provide appropriate resources;
 - (4) to enforce safety as one primary responsibility of all managers; and
 - (5) not to blame someone for reporting something which would not have been otherwise detected.
- (c) Senior management should:
- (1) continually promote the safety policy to all personnel and demonstrate their commitment to it;
 - (2) provide necessary human and financial resources for its implementation; and
 - (3) establish safety objectives and performance standards.

GM1 ORO.GEN.200(a)(2) Management system

SAFETY POLICY

The safety policy is the means whereby the operator states its intention to maintain and, where practicable, improve safety levels in all its activities and to minimise its contribution to the risk of an aircraft accident as far as is reasonably practicable.

The safety policy should state that the purpose of safety reporting and internal investigations is to improve safety, not to apportion blame to individuals.

AMC1 ORO.GEN.200(a)(3) Management system

COMPLEX OPERATORS - SAFETY RISK MANAGEMENT

- (a) Hazard identification processes
 - (1) Reactive and proactive schemes for hazard identification should be the formal means of collecting, recording, analysing, acting on and generating feedback about hazards and the associated risks that affect the safety of the operational activities of the operator.
 - (2) All reporting systems, including confidential reporting schemes, should include an effective feedback process.
- (b) Risk assessment and mitigation processes
 - (1) A formal risk management process should be developed and maintained that ensures analysis (in terms of likelihood and severity of occurrence), assessment (in terms of tolerability) and control (in terms of mitigation) of risks to an acceptable level.
 - (2) The levels of management who have the authority to make decisions regarding the tolerability of safety risks, in accordance with (b)(1), should be specified.
- (c) Internal safety investigation
 - (1) The scope of internal safety investigations should extend beyond the scope of occurrences required to be reported to the competent authority.
- (d) Safety performance monitoring and measurement
 - (1) Safety performance monitoring and measurement should be the process by which the safety performance of the operator is verified in comparison to the safety policy and objectives.
 - (2) This process should include:

- (i) safety reporting, addressing also the status of compliance with the applicable requirements;
- (ii) safety studies, that is, rather large analyses encompassing broad safety concerns;
- (iii) safety reviews including trends reviews, which would be conducted during introduction and deployment of new technologies, change or implementation of procedures, or in situations of structural change in operations;
- (iv) safety audits focussing on the integrity of the operator's management system, and periodically assessing the status of safety risk controls; and
- (v) safety surveys, examining particular elements or procedures of a specific operation, such as problem areas or bottlenecks in daily operations, perceptions and opinions of operational personnel and areas of dissent or confusion.

(e) The management of change

The operator should manage safety risks related to a change. The management of change should be a documented process to identify external and internal change that may have an adverse effect on safety. It should make use of the operator's existing hazard identification, risk assessment and mitigation processes.

(f) Continuous improvement

The operator should continuously seek to improve its safety performance. Continuous improvement should be achieved through:

- (1) proactive and reactive evaluations of facilities, equipment, documentation and procedures through safety audits and surveys;
- (2) proactive evaluation of individuals' performance to verify the fulfilment of their safety responsibilities; and
- (3) reactive evaluations in order to verify the effectiveness of the system for control and mitigation of risk.

(g) The emergency response plan (ERP)

- (1) An ERP should be established that provides the actions to be taken by the operator or specified individuals in an emergency. The ERP should reflect the size, nature and complexity of the activities performed by the operator.
- (2) The ERP should ensure:
 - (i) an orderly and safe transition from normal to emergency operations;
 - (ii) safe continuation of operations or return to normal operations as soon as practicable; and
 - (iii) coordination with the emergency response plans of other organisations, where appropriate.

GM1 ORO.GEN.200(a)(3) Management system

INTERNAL OCCURRENCE REPORTING SCHEME

- (a) The overall purpose of the scheme is to use reported information to improve the level of safety performance of the operator and not to attribute blame.

- (b) The objectives of the scheme are to:
 - (1) enable an assessment to be made of the safety implications of each relevant incident and accident, including previous similar occurrences, so that any necessary action can be initiated; and
 - (2) ensure that knowledge of relevant incidents and accidents is disseminated, so that other persons and operators may learn from them.
- (c) The scheme is an essential part of the overall monitoring function and it is complementary to the normal day-to-day procedures and 'control' systems and is not intended to duplicate or supersede any of them. The scheme is a tool to identify those instances where routine procedures have failed.
- (d) All occurrence reports judged reportable by the person submitting the report should be retained as the significance of such reports may only become obvious at a later date.

AMC1 ORO.GEN.200(a)(4) Management system

TRAINING AND COMMUNICATION ON SAFETY

- (a) Training
 - (1) All personnel should receive safety training as appropriate for their safety responsibilities.
 - (2) Adequate records of all safety training provided should be kept.
- (b) Communication
 - (1) The operator should establish communication about safety matters that:
 - (i) ensures that all personnel are aware of the safety management activities as appropriate for their safety responsibilities;
 - (ii) conveys safety critical information, especially relating to assessed risks and analysed hazards;
 - (iii) explains why particular actions are taken; and
 - (iv) explains why safety procedures are introduced or changed.
 - (2) Regular meetings with personnel where information, actions and procedures are discussed may be used to communicate safety matters.

GM1 ORO.GEN.200(a)(4) Management system

TRAINING AND COMMUNICATION ON SAFETY

The safety training programme may consist of self-instruction via the media (newsletters, flight safety magazines), class-room training, e-learning or similar training provided by training service providers.

AMC1 ORO.GEN.200(a)(5) Management system

MANAGEMENT SYSTEM DOCUMENTATION - GENERAL

- (a) The operator's management system documentation should at least include the following information:
 - (1) a statement signed by the accountable manager to confirm that the operator will continuously work in accordance with the applicable requirements and the operator's documentation as required by this Annex;

- (2) the operator's scope of activities;
 - (3) the titles and names of persons referred to in ORO.GEN.210 (a) and (b);
 - (4) an operator chart showing the lines of responsibility between the persons referred to in ORO.GEN.210;
 - (5) a general description and location of the facilities referred to in ORO.GEN.215;
 - (6) procedures specifying how the operator ensures compliance with the applicable requirements;
 - (7) the amendment procedure for the operator's management system documentation.
- (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.

AMC2 ORO.GEN.200(a)(5) Management system

COMPLEX OPERATORS – 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.
- (b) The contents of the safety management manual should include all of the following:
 - (1) scope of the safety management system;
 - (2) safety policy and objectives;
 - (3) safety accountability of the accountable manager;
 - (4) safety responsibilities of key safety personnel;
 - (5) documentation control procedures;
 - (6) hazard identification and risk management schemes;
 - (7) safety action planning;
 - (8) safety performance monitoring;
 - (9) incident investigation and reporting;
 - (10) emergency response planning;
 - (11) management of change (including organisational changes with regard to safety responsibilities);
 - (12) safety promotion.
- (c) The SMM may be contained in (one of) the manual(s) of the operator.

GM1 ORO.GEN.200(a)(5) Management system

MANAGEMENT SYSTEM DOCUMENTATION - GENERAL

- (a) It is not required to duplicate information in several manuals. The information may be contained in any of the operator manuals (e.g. operations manual, training manual), which may also be combined.
- (b) The operator may also choose to document some of the information required to be documented in separate documents (e.g. procedures). In this case, it should ensure that manuals contain adequate references to any document kept separately. Any such

documents are then to be considered an integral part of the operator's management system documentation.

AMC1 ORO.GEN.200(a)(6) Management system

COMPLIANCE MONITORING - GENERAL

(a) Compliance monitoring

The implementation and use of a compliance monitoring function should enable the operator to monitor compliance with the relevant requirements of this Annex and other applicable Annexes.

- (1) The operator should specify the basic structure of the compliance monitoring function applicable to the activities conducted.
- (2) The compliance monitoring function should be structured according to the size of the operator and the complexity of the activities to be monitored.

(b) Organisations should monitor compliance with the procedures they have designed to ensure safe activities. In doing so, they should as a minimum, and where appropriate, monitor compliance with:

- (1) privileges of the operator;
- (2) manuals, logs, and records;
- (3) training standards;
- (4) management system procedures and manuals.

(c) Organisational set up

- (1) To ensure that the operator continues to meet the requirements of this Part and other applicable Parts, the accountable manager should designate a compliance monitoring manager. The role of the compliance monitoring manager is to ensure that the activities of the operator are monitored for compliance with the applicable regulatory requirements, and any additional requirements as established by the operator, and that these activities are being carried out properly under the supervision of the relevant head of functional area.
- (2) The compliance monitoring manager should be responsible for ensuring that the compliance monitoring programme is properly implemented, maintained and continually reviewed and improved.
- (3) The compliance monitoring manager should:
 - (i) have direct access to the accountable manager;
 - (ii) not be one of the other persons referred to in ORO.GEN.210 (b);
 - (iii) be able to demonstrate relevant knowledge, background and appropriate experience related to the activities of the operator, including knowledge and experience in compliance monitoring; and
 - (iv) have access to all parts of the operator, and as necessary, any contracted operator.
- (4) In the case of a non-complex operator, this task may be exercised by the accountable manager provided he/she has demonstrated having the related competence as defined in (c)(3)(iii).
- (5) In the case the same person acts as compliance monitoring manager and as safety manager, the accountable manager, with regards to his/her direct accountability for safety, should ensure that sufficient resources are allocated to

both functions, taking into account the size of the operator and the nature and complexity of its activities.

- (6) The independence of the compliance monitoring function should be established by ensuring that audits and inspections are carried out by personnel not responsible for the function, procedure or products being audited.

(d) Compliance monitoring documentation

- (1) Relevant documentation should include the relevant part(s) of the operator's management system documentation.
- (2) In addition, relevant documentation should also include the following:
 - (i) terminology;
 - (ii) specified activity standards;
 - (iii) a description of the operator;
 - (iv) the allocation of duties and responsibilities;
 - (v) procedures to ensure regulatory compliance;
 - (vi) the compliance monitoring programme, reflecting:
 - (A) schedule of the monitoring programme;
 - (B) audit procedures;
 - (C) reporting procedures;
 - (D) follow-up and corrective action procedures; and
 - (E) recording system.
 - (vii) the training syllabus referred to in (e)(2);
 - (viii) document control.

(e) Training

- (1) Correct and thorough training is essential to optimise compliance in every operator. In order to achieve significant outcomes of such training, the operator should ensure that all personnel understand the objectives as laid down in the operator's management system documentation.
- (2) Those responsible for managing the compliance monitoring function should receive training on this task. Such training should cover the requirements of compliance monitoring, manuals and procedures related to the task, audit techniques, reporting and recording.
- (3) Time should be provided to train all personnel involved in compliance management and for briefing the remainder of the personnel.
- (4) The allocation of time and resources should be governed by the volume and complexity of the activities concerned.

GM1 ORO.GEN.200(a)(6) Management system

COMPLIANCE MONITORING - GENERAL

- (a) The organisational set-up of the compliance monitoring function should reflect the size of the operator and the nature and complexity of its activities. The compliance monitoring manager may perform all audits and inspections himself/herself or appoint one or more auditors by choosing personnel having the related competence as defined in AMC1 ORO.GEN.200(a)(6) point (c)(3)(iii), either from within or outside the operator.
- (b) Regardless of the option chosen it must be ensured that the independence of the audit function is not affected, in particular in cases where those performing the audit or inspection are also responsible for other functions for the operator.
- (c) In case external personnel are used to perform compliance audits or inspections:
 - (1) any such audits or inspections are performed under the responsibility of the compliance monitoring manager; and
 - (2) the operator remains responsible to ensure that the external personnel has relevant knowledge, background and experience as appropriate to the activities being audited or inspected; including knowledge and experience in compliance monitoring.
- (d) The operator retains the ultimate responsibility for the effectiveness of the compliance monitoring function in particular for the effective implementation and follow-up of all corrective actions.

GM2 ORO.GEN.200(a)(6) Management system

COMPLEX OPERATORS - COMPLIANCE MONITORING PROGRAMME

- (a) Typical subject areas for compliance monitoring audits and inspections for operators should be, as applicable:
 - (1) actual flight operations;
 - (2) ground de-icing/anti-icing;
 - (3) flight support services;
 - (4) load control;
 - (5) technical standards.
- (b) Operators should monitor compliance with the operational procedures they have designed to ensure safe operations, airworthy aircraft and the serviceability of both operational and safety equipment. In doing so, they should, where appropriate, additionally monitor the following:
 - (1) operational procedures;
 - (2) flight safety procedures;
 - (3) operational control and supervision;
 - (4) aircraft performance;
 - (5) all weather operations;
 - (6) communications and navigational equipment and practices;
 - (7) mass, balance and aircraft loading;
 - (8) instruments and safety equipment;

- (9) ground operations;
- (10) flight and duty time limitations, rest requirements, and scheduling;
- (11) aircraft maintenance/operations interface;
- (12) use of the MEL;
- (13) flight crew;
- (14) cabin crew;
- (15) dangerous goods;
- (16) security.

GM3 ORO.GEN.200(a)(6) Management system

NON-COMPLEX OPERATORS - COMPLIANCE MONITORING

- (a) Compliance monitoring audits and inspections may be documented on a 'Compliance Monitoring Checklist', and any findings recorded in a 'Non-compliance Report'. The following documents may be used for this purpose.

COMPLIANCE MONITORING CHECKLIST			
Year:			
Subject	Date checked	Checked by	Comments / Non-compliance Report No.
Flight Operations			
Aircraft checklists checked for accuracy and validity			
Minimum five flight plans checked and verified for proper and correct information			
Flight planning facilities checked for updated manuals, documents and access to relevant flight information			
Incident reports evaluated and reported to the appropriate competent authority			
Ground Handling			
Contracts with ground handling organisations established and valid, if applicable			
Instructions regarding fuelling and de-icing issued, if applicable			
Instructions regarding dangerous goods issued and known by all relevant personnel, if applicable			
Mass & Balance			
Min. five load sheets checked and verified for proper and correct information, if applicable			
Aircraft fleet checked for valid weight check, if applicable			
Minimum one check per aircraft of correct loading and distribution, if applicable			
Training			
Training records updated and accurate			
All pilot licenses checked for currency, correct ratings and valid medical check			
All pilots received recurrent training			
Training facilities & Instructors approved			
All pilots received daily inspection (DI) training			

Documentation			
All issues of operations manual (OM) checked for correct amendment status			
AOC checked for validity and appropriate operations specifications			
Aviation requirements applicable and updated			
Crew flight and duty time record updated, if applicable			
Flight documents record checked and updated			
Compliance monitoring records checked and updated			

- NON-COMPLIANCE REPORT - No:		
To Compliance Monitoring Manager	Reported by:	Date:
Category Flight Operations <input type="checkbox"/> Training <input type="checkbox"/>	Ground Handling <input type="checkbox"/> Documentation <input type="checkbox"/>	Mass & Balance <input type="checkbox"/> Other <input type="checkbox"/>
Description:	Reference:	
Level of finding:		
Root-cause of non-compliance:		
Suggested correction:		
Compliance Monitoring Manager: <input type="checkbox"/> Corrective action required <input type="checkbox"/> Corrective action not required		
Responsible Person:	Time limitation:	
Corrective action:	Reference:	
Signature Responsible Person:	Date:	
Compliance Monitoring Manager <input type="checkbox"/> Correction and corrective action verified <input type="checkbox"/> Report Closed		
Signature Compliance Monitoring Manager:	Date:	

GM4 ORO.GEN.200(a)(6) Management system

AUDIT AND INSPECTION

- (a) 'Audit' means a systematic, independent and documented process for obtaining evidence and evaluating it objectively to determine the extent to which requirements are complied with.
- (b) 'Inspection' means an independent documented conformity evaluation by observation and judgement accompanied as appropriate by measurement, testing or gauging, in order to verify compliance with applicable requirements.

AMC1 ORO.GEN.200(b) Management system

SIZE, NATURE AND COMPLEXITY OF THE ACTIVITY

- (a) An operator should be considered as complex when it has a workforce of more than 20 full time equivalents (FTEs) involved in the activity subject to Regulation (EC) No 216/2008³ and its Implementing Rules.
- (b) Operators with up to 20 FTEs involved in the activity subject to Regulation (EC) No 216/2008⁴ and its Implementing Rules may also be considered complex based on an assessment of the following factors:
 - (1) in terms of complexity, the extent and scope of contracted activities subject to the approval;
 - (2) in terms of risk criteria, whether any of the following are present:
 - (i) operations requiring the following specific approvals: performance-based navigation (PBN), low visibility operation (LVO), extended range operations with two-engined aeroplanes (ETOPS), helicopter hoist operation (HHO), helicopter emergency medical service (HEMS), night vision imaging system (NVIS) and dangerous goods (DG);
 - (ii) different types of aircraft used;
 - (iii) the environment (offshore, mountainous area etc.).

AMC1 ORO.GEN.205 Contracted activities

RESPONSIBILITY WHEN CONTRACTING ACTIVITIES.

- (a) The operator may decide to contract certain activities to external organisations.
- (b) A written agreement should exist between the operator and the contracted organisation clearly defining the contracted activities and the applicable requirements.
- (c) The contracted safety related activities relevant to the agreement should be included in the operator's safety management and compliance monitoring programmes.

³ Regulation (EC) No 216/2008 of the European Parliament and of the Council of 20 February 2008 on common rules in the field of civil aviation and establishing a European Aviation Safety Agency, and repealing Council Directive 91/670/EEC, Regulation (EC) No 1592/2002 and Directive 2004/36/EC. *OJ L 79*, 19.3.2008, p. 1.

⁴ Regulation (EC) No 216/2008 of the European Parliament and of the Council of 20 February 2008 on common rules in the field of civil aviation and establishing a European Aviation Safety Agency, and repealing Council Directive 91/670/EEC, Regulation (EC) No 1592/2002 and Directive 2004/36/EC. *OJ L 79*, 19.3.2008, p. 1.

- (d) The operator should ensure that the contracted organisation has the necessary authorisation or approval when required, and commands the resources and competence to undertake the task.

GM1 ORO.GEN.205 Contracted activities

CONTRACTING - GENERAL

- (a) Operators may decide to contract certain activities to external organisations for the provision of services related to areas such as:
 - (1) ground de-icing/anti-icing;
 - (2) ground handling;
 - (3) flight support (including performance calculations, flight planning, navigation database and dispatch);
 - (4) training; and
 - (5) manual preparation.
- (b) The ultimate responsibility for the product or service provided by external organisations should always remain with the operator.

GM2 ORO.GEN.205 Contracted activities

RESPONSIBILITY WHEN CONTRACTING ACTIVITIES

- (a) Regardless of the approval status of the contracted organisation, the contracting operator is responsible to ensure that all contracted activities are subject to hazard identification and risk management as required by ORO.GEN.200 (a)(3) and to compliance monitoring as required by ORO.GEN.200 (a)(6).
- (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.

AMC1 ORO.GEN.220(b) Record-keeping

GENERAL

- (a) The record-keeping system should ensure that all records are accessible whenever needed within a reasonable time. These records should be organised in a way that ensures traceability and retrievability throughout the required retention period.
- (b) Records should be kept in paper form or in electronic format or a combination of both. Records stored on microfilm or optical disc format are also acceptable. The records should remain legible throughout the required retention period. The retention period starts when the record has been created or last amended.
- (c) Paper systems should use robust material which can withstand normal handling and filing. Computer systems should have at least one backup system which should be updated within 24 hours of any new entry. Computer systems should include safeguards against the ability of unauthorised personnel to alter the data.
- (d) All computer hardware used to ensure data backup should be stored in a different location from that containing the working data and in an environment that ensures they remain in good condition. When hardware or software changes take place, special care should be taken that all necessary data continues to be accessible at least

through the full period specified in the relevant Subpart. In the absence of such indication, all records should be kept for a minimum period of 5 years.

GM1 ORO.GEN.220(b) Record-keeping

RECORDS

Microfilming or optical storage of records may be carried out at any time. The records should be as legible as the original record and remain so for the required retention period.