



Terms of Reference

for rulemaking task RMT.0721

RAMP Deregulation

ISSUE 1

Issue/rationale

The European Plan for Aviation Safety (2018-2022) foresees a regular update of the air operational rules (RMT.0392) to ensure efficiency and proportionality of the regulatory framework of Regulation (EU) No 965/2012 ('Air OPS regulation').

This RMT.0721 proposes to amend only the European Aviation Safety Agency (EASA) Decision applicable to acceptable means of compliance and guidance material (AMC & GM) to Annex II (Part-ARO) of the Air OPS Regulation. It does not propose any amendment to the respective implementing rules (IRs) of Part-ARO.

This RMT aims to remove most of the AMC & GM pertaining to ramp inspections and to transpose those into a RAMP Inspection Manual, to be published by EASA. When doing so, the individual AMC & GM provisions will also be reviewed in order to modernise and clarify them, and significantly reduce the level of prescriptive AMC & GM.

This proposal will take into account the following identified implementation issues concerning ramp inspections:

- alignment with newly developed ICAO Standards And Recommended Practices (SARPs)
- required changes following amendment of the EU regulatory framework
- required changes following the adoption of the New Basic Regulation
- feedback from standardisation visits of competent authorities
- feedback from stakeholders during stakeholder consultations
- introduction of the system-wide coordination and of the manufacturers' data projects
- correction of any editorial issues.

Action area:	Regular updates/review of rules		
Affected rules:	AMC & GM to Annex II (Part-ARO) of Commission Regulation (EU) No 965/2012		
Affected stakeholders:	National aviation authorities (NAAs) and operators (commercial and non-commercial)		
Driver:	Efficiency / proportionality	Rulemaking group:	No
Impact assessment:	None	Rulemaking Procedure:	Accelerated

● EASA special rulemaking procedure milestones



1. Why we need to change the AMC/GM to the rules — issue/rationale

AMC & GM to air operational rules in the field of ramp inspections need to be state-of-the-art and clear enough to ensure that competent authorities can effectively plan and conduct ramp inspections on the basis of risks. In addition, AMC & GM should not go beyond the requirements of the IRs: on the contrary, AMC specify the acceptable means of compliance which may be used to establish compliance with the IRs. GM should be limited to the areas where doubts may arise in relation to the interpretation of the regulation; thus, by explaining the meaning of the IR and related AMC, GM can offer a real added value to competent authorities.

There are no alternative means of compliance (AltMOC) relevant to this RMT.

2. What we want to achieve — objective

An update and simplification of the AMC & GM of the Air OPS rules in the field of ramp inspections is necessary to ensure that competent authorities are provided with a clear interpretation of the European air operational rules, thereby fully taking into account the principles of proportionality and risk-based performance.

This RMT aims to improve consistently the quality of the AMC & GM to the Air OPS rules. In detail, the objectives are the following:

- to have state-of-the-art and clear AMC & GM pertaining to ramp inspections, taking into account identified implementation issues and feedback from standardization and industry/NAA stakeholders;
- to introduce the system-wide coordination project, which foresees an Agency-coordinated calculation and distribution of ramp inspections, thus achieving the objectives of risk-based approach and cooperative oversight;
- to introduce the manufacturers' data project, which sets up a matrix for basic risk assessment to give practical guidance for inspectors;
- to ensure alignment with ICAO SARPs;
- to ensure alignment with the amended EU regulatory framework;
- to consider the changes which will be introduced by the new Basic Regulation;
- to correct any editorial issues;
- to address any regulatory feedback stemming from standardisation visits of competent authorities;
- to address any issues stemming from stakeholder feedback;
- to offer effective support to NAAs in the practical implementation of cooperative oversight; and
- to allow the competent authorities to make better use of their resources.

3. How we want to achieve it

It is proposed to simplify the AMC & GM accompanying ARO.RAMP by means of:

- restructuring the AMC & GM material to ensure a clear interpretation of the rules;
- removing unnecessary details contained in the AMC & GM that are either outdated or considered too prescriptive and/or disproportionate;
- amending the AMC & GM to introduce more flexibility, in particular, for the training requirements for inspectors;



- introducing in the AMC & GM the system-wide coordination concept;
- developing an EASA Ramp Inspection Manual in ‘plain language’, which includes guidance and detailed training requirements; and
- relocating the training syllabi.

4. What are the deliverables

The following deliverables may be issued:

- ED Decision with draft AMC & GM; and
- an EASA Ramp Inspection Manual, including training syllabi.

5. How we consult

In the framework of the accelerated rulemaking procedure of Article 16 of MB Decision No 18-2015, we will conduct:

- a focused consultation sharing the draft AMC & GM and other relevant documents via email with the SAFA National Coordinators, and in parallel
- a written Advisory Bodies consultation (OPS TeB and FS.TEC).

6. Reference documents

6.1. Affected regulation

N/a.

6.2. Affected decisions

- Decision 2014/025/R of the Executive Director of the Agency of 28 July 2014 adopting Acceptable Means of Compliance and Guidance Material to Part-ARO of Regulation (EU) No 965/2012 and repealing Decision 2014/014/R of the Executive Director of the Agency of 24 April 2014 (‘AMC and GM to Part-ARO — Issue 3’)

6.3. Reference documents

N/a.

