

Evaluation report

Administrative burden for small helicopter operators

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The views expressed in this evaluation report are those of the consultants and do not necessarily reflect those of the European Union Aviation Safety Agency (EASA) or the authorities of the Member States (MSs) concerned.

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1 Executive summary

1.1 Introduction

The EASA [Rotorcraft Safety Roadmap](#) (RSR)¹ was adopted in December 2018 and contains recommendations to significantly reduce the number of helicopter accidents and incidents in Europe. To meet this objective, the current evaluation report identifies and proposes ways of reducing the administrative burden and costs for helicopter operators, so that they can focus on safety-related tasks and improve their performance.

Based on the analysis of data and the feedback from the EASA Stakeholder Advisory Body (SAB) Rotorcraft Committee (R.COM), it was decided to limit the scope of this exercise to the lower end of the helicopter operators' market, i.e. helicopter operators that operate five or less helicopters.

To achieve this objective, this evaluation report identifies the unnecessary administrative burden and administrative costs for rotorcraft operators.

1.2 Methodology

The objective of this report is to identify the main rules that create administrative burden for helicopter operators, which stem from the following:

- Annex II (Part-ARO), Annex III (Part-ORO), Annex IV (Part-CAT), Annex V (Part-SPA), Annex VI (Part-NCC), Annex VII (Part-NCO), and Annex VIII (Part-SPO) to **Regulation (EU) No 965/2012** ('Air OPS Regulation')², which include requirements for helicopter operations;
- Annex VII (Part-ORA) to **Regulation (EU) No 1178/2011** ('Aircrew Regulation')³, which includes requirements for training organisations; and
- the related **Acceptable Means of Compliance (AMC)** and **Guidance Material (GM)** to the aforementioned regulations.

All requirements with an obligation to provide information in Part-ORA, Subpart GEN of the Aircrew Regulation, as well as in Parts ORO, CAT, SPA, SPO, NCC, and NCO of the Air OPS Regulation, were considered in the evaluation. To identify the administrative burden, the main rules were reviewed, resulting in 248 rules that potentially contain an obligation to provide information. To be able to

¹ <https://www.easa.europa.eu/download/Events/Rotorcraft%20Safety%20Roadmap%20-%20Final.pdf>

² Commission Regulation (EU) No 965/2012 of 5 October 2012 laying down technical requirements and administrative procedures related to air operations pursuant to Regulation (EC) No 216/2008 of the European Parliament and of the Council (OJ L 296 25.10.2012, p. 1) (<https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ%3AL%3A2012%3A296%3A0001%3A0148%3AEN%3APDF>).

³ Commission Regulation (EU) No 1178/2011 of 3 November 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 (OJ L 311, 25.11.2011, p. 1) (<https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX%3A32011R1178>).

collect data on the administrative burden from stakeholders, the rules were grouped into 26 categories (see Annex IX).

The identified data needs for the report were reflected in a survey questionnaire and interview guidelines. The survey has a total of 170 respondents from Europe and covers 22 countries. From the total number of respondents that filled in the survey beyond 'Part I: General information', 83 % are helicopter operators, while 10 % of the responses come from national aviation authorities (NAAs). Thirty interviews were carried out with 26 different operators from 15 EASA Member States (MSs), 3 NAAs, and the European Helicopter Association (EHA).

1.3 Assessment of administrative effort, Business as Usual, and administrative burden

Based on the results of the survey and the interviews, the following steps were taken for the assessment at the level of the 26 defined categories of rules:

- assessment of the administrative effort;
- assessment of the safety relevance of the requirements, resulting in Business as Usual (BaU); and
- assessment of the administrative burden; the latter is assessed by deducting the BaU from the administrative effort.

In Figure 1, the results of the administrative burden assessment are presented in a *Pareto* diagram. The requirements (measured in hours) are ranked from left to right in descending order of administrative burden (dark-blue column). The curves show the cumulative totals of the administrative effort and of the administrative burden respectively (in percentages):

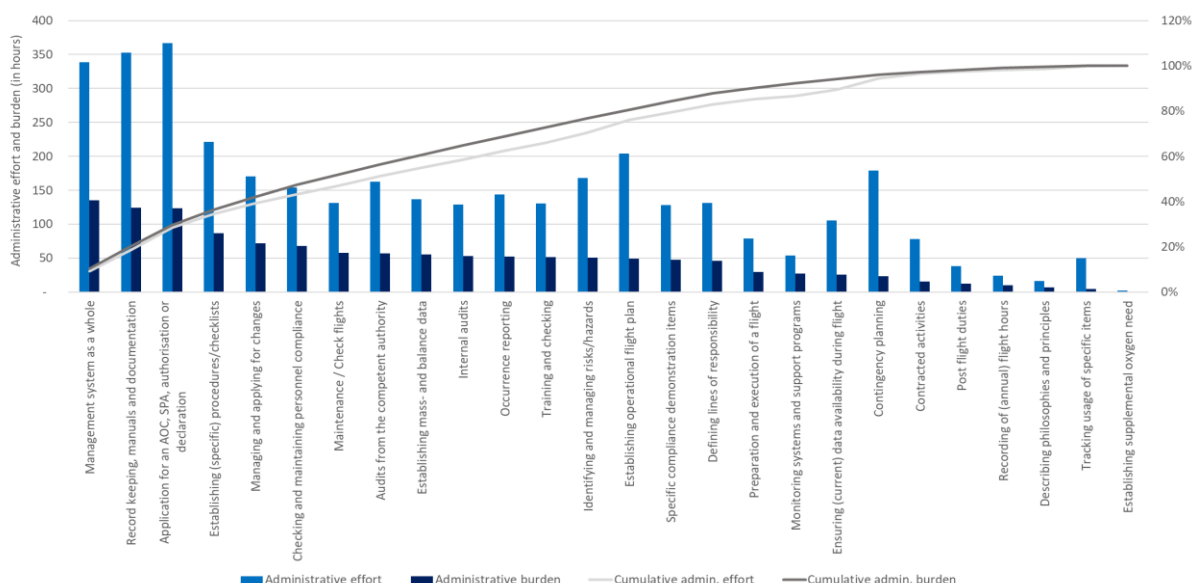


Figure 1 — Assessment of administrative effort and burden for all types of operations (measured in hours per year)

By examining the identified administrative effort and burden, it is shown that approximately 75 % of the total administrative burden stems from the first 12 most ‘burdensome’ categories of administrative requirements. They are listed in Table 1 below.

Table 1 — Most ‘burdensome’ administrative requirements

Section	Administrative requirement
5.6.1.	Management system as a whole
5.6.2.	Record-keeping, manuals, and documentation
5.6.3.	Application for an air operator certificate (AOC), specific approval (SPA), authorisation or declaration
5.6.4.	Establishing specific procedures/checklists
5.6.5.	Managing and applying for changes
5.6.6.	Checking and maintaining personnel compliance
5.6.7.	Maintenance flights/Check flights
5.6.8.	Audits by the competent authority
5.6.9.	Establishing mass-and-balance data
5.6.10.	Internal audits
5.6.11.	Occurrence reporting
5.6.12.	Training and checking

1.4 Recommendations

Based on the results of the assessment, the following recommendations are made for improving the rules:

- review the definition of ‘complex operator’ in AMC1 ORO.GEN.200(b) *Management system* by considering the variety of the operations and helicopter types that are operated by small helicopter operators; alternatively, define a new category of operators with a required intermediate level of safety management;
- introduce new GM to point ORO.GEN.130(b) that distinguishes ‘Minor’ from ‘Major’ changes, with the former not requiring prior approval from the competent authority;
- include a quantitative guideline in point (b) of AMC2 ARO.GEN.305(b) as to the annual number of audits for a given scale of operation;
- in line with point (d) of AMC2 ARO.GEN.305(b)(d), instruct, and/or coordinate with, the national competent authorities to streamline the audit process for small helicopter operators based on the organisational structure of such operators;
- introduce new GM on the structure, prioritisation, and frequency of recurrent audits;

- amend points ORA.GEN.150 *Findings* and ORO.GEN.150 *Findings* to require findings to be analysed for their safety significance as does point M.B.303(d) of Annex I (Part-M) to Regulation (EU) No 1321/2014⁴ ('Continuing Airworthiness (CAW) Regulation'), and to introduce GM on the role of root cause analysis;
- issue GM that is specific to small operators on the frequency and scope of internal audits, including on the associated documentation that is defined in point (4)(2) of AMC1 ORA.GEN.200(a)(6) *Management system*;
- while adhering to International Civil Aviation Organization (ICAO) standards, reconsider the frequency of operator proficiency checks and line checks, which is required by point ORO.FC.230 *Recurrent training and checking*; and
- consider including evidence-based training (EBT) and competency-based training (CBT) for small helicopter operators in rulemaking task (RMT).0599 *Evidence-based and competency-based training*.

In addition to the above, more general recommendations were made on:

- frequent changes in rules;
- long turn-around times on AOC applications;
- occurrence reporting; and
- training and checking activities.

The analyses and recommendations can be used by EASA to take informed decisions on what rules could be amended or removed.

⁴ Commission Regulation (EU) No 1321/2014 of 26 November 2014 on the continuing airworthiness of aircraft and aeronautical products, parts and appliances, and on the approval of organisations and personnel involved in these tasks (OJ L 362, 17.12.2014, p. 1)
(https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv%3AOJ.L_.2014.362.01.0001.01.ENG&toc=OJ%3AL%3A2014%3A362%3ATOC).

2 Introduction

2.1 Background

The EASA [Rotorcraft Safety Roadmap](#) (RSR)⁵ was adopted in December 2018 and contains recommendations to significantly reduce the number of helicopter accidents and incidents in Europe. To meet this objective, the current evaluation report identifies and proposes ways of reducing the administrative burden and costs for helicopter operators, so that they can focus on safety-related tasks and improve their performance.

Based on the analysis of data and the feedback from the EASA Stakeholder Advisory Body (SAB) Rotorcraft Committee (R.COM), it was decided to limit the scope of this exercise to the lower end of the helicopter operators' market, i.e. helicopter operators that operate five or less helicopters.

To achieve this objective, this evaluation report identifies the unnecessary administrative burden and administrative costs for rotorcraft operators.

2.2 Objective of the evaluation

The key objective of this evaluation is:

- to provide a structured and detailed overview of the specific administrative burden for small helicopter operators in the aforementioned rules;
- to assess the relevance and usefulness of their underlying tasks; and
- to translate these burdens into the actual costs for the operators.

Based on a prioritisation, this information can be used by EASA to take informed decisions on what rules could be amended or removed.

The specific objectives of this evaluation are to:

- identify the rules that impose administrative burden on small helicopter operators and assess the impact of that administrative burden; and
- based on the analysis, produce prioritised recommendations to reduce the administrative burden.

2.3 Structure of the report

The structure of this report is as follows:

- **Chapter 1:** *Executive summary.*
- **Chapter 2:** *Introduction.*

⁵ <https://www.easa.europa.eu/download/Events/Rotorcraft%20Safety%20Roadmap%20-%20Final.pdf>

- **Chapter 3:** presentation of the methodology, scope, and limitations of the evaluation;
- **Chapter 4:** inventory, categorisation, and description of the rules for small helicopter operators, (Aircrew and Air OPS);
- **Chapter 5:** assessment of the administrative burden imposed by the rules as grouped for the evaluation, including:
 - an assessment at the level of the 26 identified categories of rules; and
 - a more in-depth assessment for the top 12 groups of administrative categories, to make an assessment at the level of individual rules; and
- **Chapter 6:** conclusions and recommendations.

More detailed information is included in the nine annexes:

- **Annex I:** overview of the interviewed stakeholders;
- **Annex II:** the interview guidelines;
- **Annex III:** the survey guidelines;
- **Annex IV:** the average score of administrative requirements;
- **Annex V:** the weighted average time and frequency of the groups of rules subject to the evaluation;
- **Annex VI:** the detailed administrative effort per group of rules and type of operations;
- **Annex VII:** the detailed Business as Usual (BaU) assessment;
- **Annex VIII:** the detailed administrative burden per group of rules and type of operations; and
- **Annex IX:** the requirements of the Air OPS and Aircrew Regulations.

3 Methodology

3.1 Scope of the evaluation

3.1.1 Rules

This objective of this report is to identify the main rules that create administrative burden for helicopter operators, which stem from the following:

- Part-ARO, Part-ORO, Part-CAT, Part-SPA, Part-NCC, Part-NCO, and Part-SPO to the **Air OPS Regulation**, which include requirements for helicopter operations;
- Part-ORA to the **Aircrew Regulation**, which includes requirements for training organisations; and
- the related **AMC** and **GM** to the aforementioned regulations.

All requirements with an obligation to provide information in Part-ORA, Subpart GEN of the Aircrew Regulation, as well as in Parts ORO, CAT, SPA, SPO, NCC, and NCO of the Air OPS Regulation, were considered in the evaluation.

3.1.2 Stakeholder focus

The evaluation focuses on helicopter operators in EASA MSs, who operate five or less helicopters. In 2019, these operators represented 90 % of all helicopter operators.⁶ In addition, competent authorities in EASA MSs are included in the evaluation as stakeholders.

3.1.3 Type of operations

The following type of helicopter operations are within the scope of this report:

- commercial air transport (CAT) operations, except helicopter emergency medical services (HEMS);
- specialised operations (SPO);
- non-commercial operations with complex motor-powered aircraft (NCC); and
- pilot training provided in NCO (non-commercial operations with non-complex motor-powered aircraft);

⁶ *Cirium* database (formerly known as *Ascend*).

3.2 Evaluation methods

3.2.1 Data needs

The data needs were established in two steps:

- First, to identify the administrative burden, the main rules were reviewed (as presented in Section 3.1), resulting in 248 rules that potentially contain an administrative obligation to provide information. To be able to collect data on the administrative burden from stakeholders, the rules were grouped into 26 categories (see Annex IX).
- Second, it was defined what kind of information is required in order to assess the administrative burden, particularly related to the total administrative costs and the BaU costs.⁷

The related data needs were reflected in a survey questionnaire and interview guidelines (see Annexes II and III).

3.2.2 Methods for data collection

Three methods for data collection were used for the evaluation, as indicated below.

3.2.2.1 Desk research

The conducted desk research concentrated on the revision of the rules that are mentioned in Section 3.1. This resulted in a list of administrative obligations to provide information, which are presented in Chapter 4 and listed in detail in Annex IX. In addition, the *Cirium* database (formerly known as *Ascend*) was used to identify the helicopter operators that fall within the scope of the requirements mentioned in Section 3.1.1.

3.2.2.2 Survey

3.2.2.2.1 General information

The survey was structured into three parts (see Annex III). In Part I, after introducing the evaluation and the objectives of the survey, the respondents were asked to provide some background information on the type of respondent (e.g. type of organisation, type of operations, number of helicopters, and country). In Part II, the respondents were requested to identify the perceived amount of administrative burden (on a scale ranging from '1' (minimal burden) to '10' (extremely burdensome)). Part III of the survey includes follow-up questions on the rules that were ranked with 6 or more. These follow-up questions are related to the administrative burden and the safety relevance of certain administrative activities.

⁷ See explanation in Section 3.2.3.1.

After establishing the survey structure, the survey was officially launched on 26 August 2020 and closed on 12 October 2020 (6.5 weeks online). The survey was disseminated via the following channels:

- Rotorcraft Committee (R.COM);
- Technical Advisory Body for Aircrew (Aircrew TeB);
- Technical Advisory Body for Air Operations (Air Ops TeB);
- helicopter expert group⁸;
- Technical Advisory Body for General Aviation (GA TeB);
- Technical Committee for Flight Standards (FS.TEC); and
- European Safety Promotion Network — Rotorcraft (ESPN-R).

3.2.2.2.2 General survey results

The 170 respondents come from 22 European countries, as shown in Figure 2.

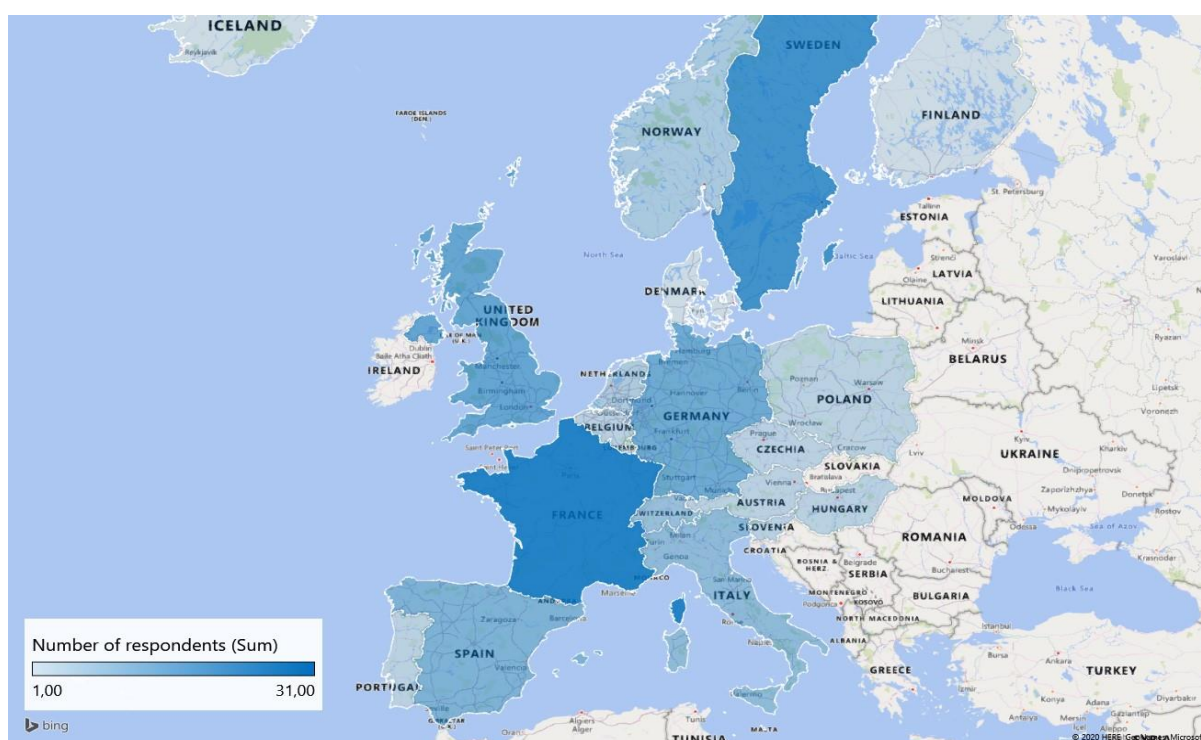


Figure 2 — Survey respondents per country

⁸ A subgroup of the Air Ops TeB and the Aircrew TeB, dedicated to helicopter operations.

Most of the respondents that filled in the survey beyond the general information section (83 %) were helicopter operators and 10 % of them were NAA representatives, as shown in Figure 3. The ‘other respondents’ category includes responses from European and national associations and insurers.

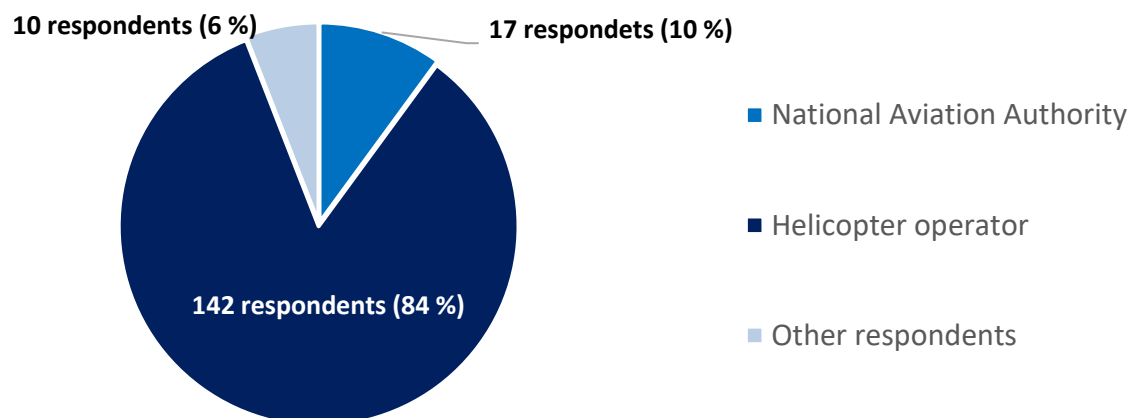


Figure 3 — Type of respondents (number and percentage of respondents)

The types of operations are presented in Figure 4⁹, which shows that most of the survey respondents are active in Specialised Operations (SPO) and Commercial Air Transport (CAT).

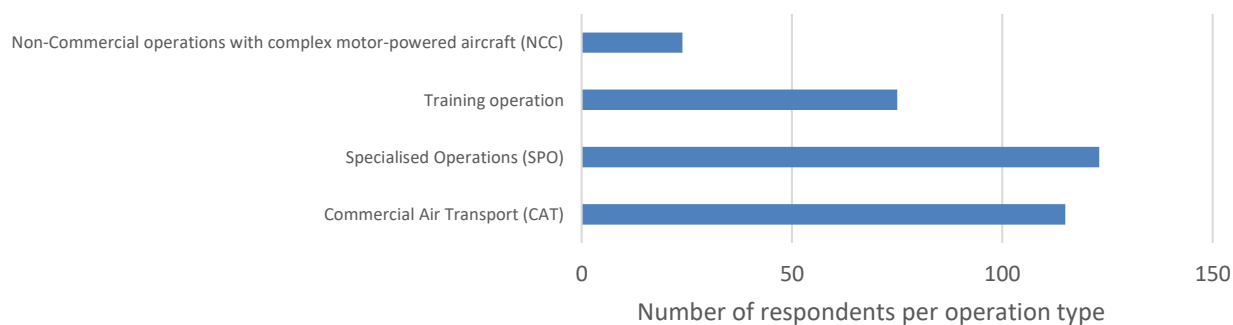


Figure 4 — Number of respondents per type of operations

3.2.2.3 Interviews

For this evaluation, EASA provided information on the names and countries of registration of helicopter operators from the *Cirium* database. EASA prepared a letter on the initiation of the evaluation and sent out an invitation to cooperate with the evaluation team by participating in the

⁹ Note: a helicopter operator can perform multiple types of operation.

interviews and survey. The European Helicopter Association (EHA) informed its members and invited them to participate.

Based on a desktop analysis, considering the size of the operation, the type of activity, and the geographical distribution, invitations for interviews were sent by email to 25 operators. Those who replied positively were contacted by phone to arrange for the interviews. For various practical reasons, some of the operators that initially responded positively to the invitation could not be interviewed. Additional operators were therefore contacted by email and telephone. Priority was given to operators from MSs that were not yet represented. Due to the nature of the business, it was often difficult to contact, and make an appointment with, the persons that EASA wished to interview. Many of them also performed flight duties, often on an ad hoc basis. Several persons declined the invitation for an interview because they did not feel fully proficient in expressing themselves on the topic in English.

The evaluation team engaged with three MSs' authorities to analyse how civil aviation authorities (CAAs) deal with the rules. The team interviewed the CAA from an MS with many helicopter operators (France), the CAA from a Member State with a much smaller helicopter sector (Estonia), and a third MS (Poland) that is considered representative of Eastern European MSs. Operators from the same MSs were also approached to enable a direct comparison of findings. In addition, the Polish CAA contacted several Polish operators and shared with the evaluation team a summary of its findings during the interviews.¹⁰

All interviews were conducted by telephone or via *Skype/TEAMS* in a structured manner, following specific interview guidelines (see Annex II).

Thirty interviews were carried out with 26 different operators from 15 EASA MSs, 3 NAAs, and EHA (see Annex I). The following is a breakdown of the interviews that took place before the suspension of activities in spring 2020 and after their resumption in September and October 2020:

- the total number of interviews before spring 2020 was 11 (i.e. 10 helicopter operators and 1 CAA); EHA was also interviewed; and
- the total number of interviews after resumption of the activities is 18 (i.e. 16 helicopter operators and 2 CAAs).

The geographical distribution of the interviewees and the type of operations are shown in Figure 5 and Figure 6 respectively.¹¹ Figure 6 shows that most of the survey respondents are active in CAT and SPO.

¹⁰ As the evaluation team did not directly invite these small helicopter operators, they are not included in Annex I.

¹¹ Note: a helicopter operator can perform multiple types of operation.

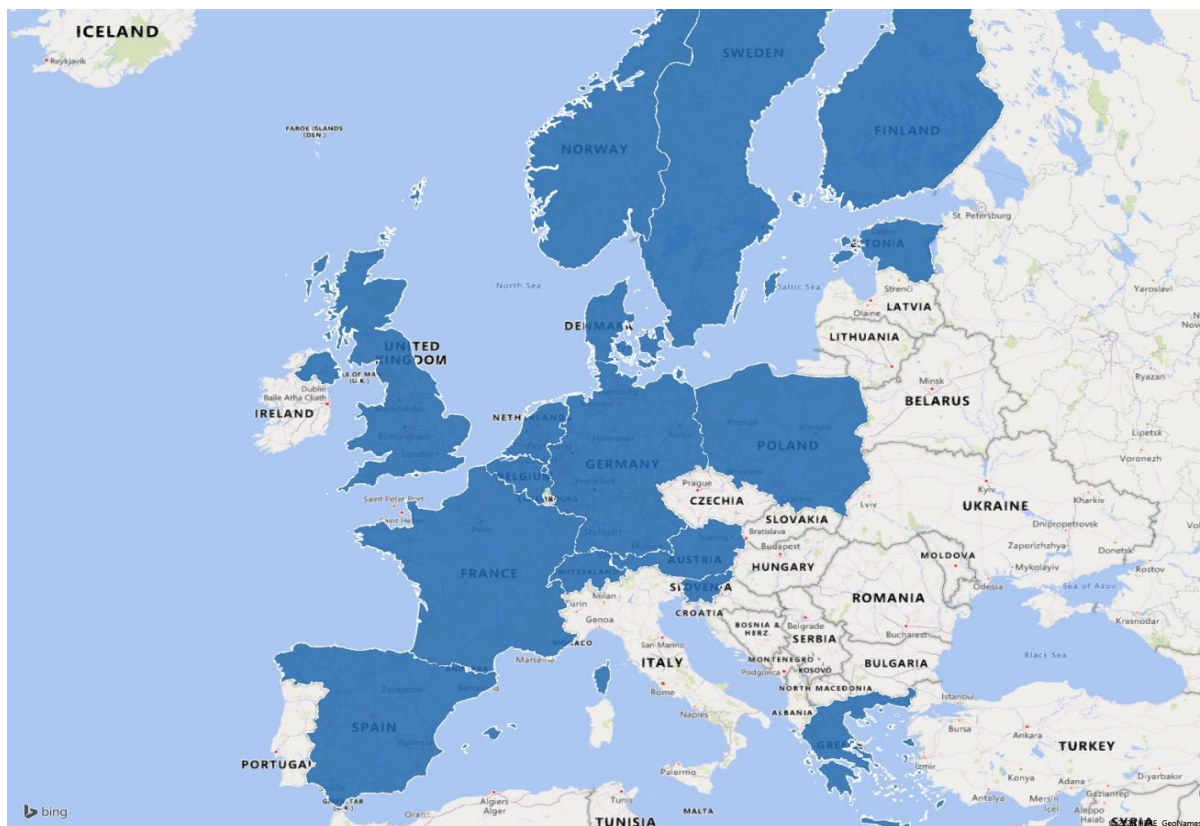


Figure 5 — Geographical distribution of interviewees

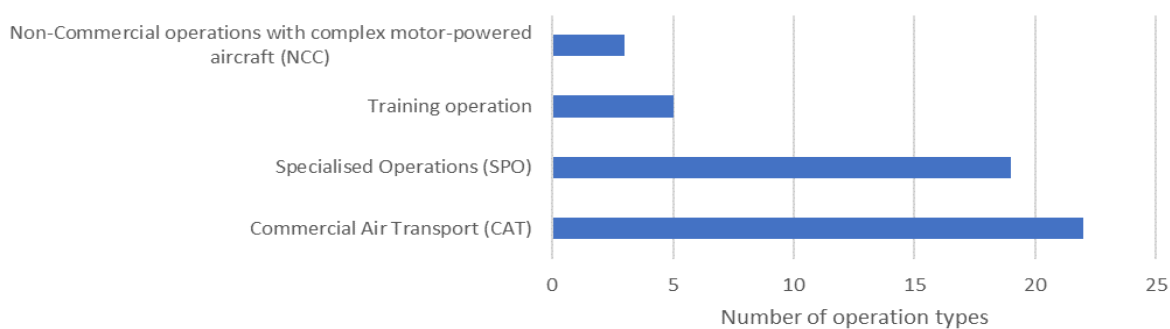


Figure 6 — Number of interviewees per type of operation

The interview results were used to complement and triangulate the survey results, to provide input to the analysis, and to produce the recommendations. For all interviews, minutes were prepared, which had been previously approved by the interviewees (see Annex I).

3.2.3 Methods for data analysis

3.2.3.1 Estimation of the administrative burden using a Standard Cost Model

3.2.3.1.1 Administrative burden definition

The European Commission's [Better Regulation Tool #60](#)¹² indicates that the administrative costs consist of the following two cost components:

- (i) **the Business as Usual (BaU) costs;** and
- (ii) **the administrative burden.**

While the BaU costs result from the collection and processing of information that an entity would do even in the absence of regulatory requirements, the administrative burden stems from the part of the process that is performed only due to a legal obligation.

3.2.3.1.2 Steps followed to assess the administrative burden

To assess the administrative burden, a two-step approach was used:

- Assessment at the level of the 26 defined categories, resulting in an overview of administrative burden at category level.
- The assessment at category level allows for a prioritisation of the categories where the administrative burden is the greatest. As roughly 75 % of the total administrative burden is imposed by the first twelve (12) administrative requirements (see Figure 8), the focus shifted to the first twelve (12) administrative categories. For these categories, the registered administrative burden was linked to individual rules, considering the responses to open questions in the survey and the feedback provided by stakeholders in the interviews.

For the assessment at the level of the 26 defined categories, the following steps were taken:

- (i) estimation of the administrative effort;
- (ii) assessment of the safety relevance of the requirements, resulting in BaU; and
- (iii) estimation of the administrative burden; the latter is estimated by deducting the BaU from the administrative effort, as presented in Table 2¹³:

¹² TOOL #60. THE STANDARD COST MODEL FOR ESTIMATING ADMINISTRATIVE COSTS
(https://ec.europa.eu/info/sites/info/files/file_import/better-regulation-toolbox-60_en_0.pdf).

¹³ Table 2 reflects a simplified approach to assessing the administrative burden, as it concentrates on the time spent per activity and on the frequency of the activities, and is thus expressed in hours. The cost element is left out, as it does not help to identify where administrative burden manifests itself.

Table 2 — Approach to estimating the total administrative costs and the administrative burden

Name of the legal requirement or provision (grouped)	Target group (CAT, SPO, and NCC operators, training organisations)	Weighted average duration of activity (in hours per year)	Weighted average frequency of activity (in hours per year)	Administrative effort (in hours per year)	Business as Usual (BaU) (in %)	Administrative burden (in hours per year)
		(2)	(3)	(4) = (2)*(3)	(5)	(6) = (4)*(100 % - 5)

3.2.3.1.3 Estimation of the administrative effort

The assessment of the administrative effort is based on the feedback that was received from the survey: on the time that was used to perform the activities as well as on the frequency of the activities that were carried out. Based on the survey, a breakdown was prepared at the level of type of operators (CAT, SPO, and NCC operators, training organisations). The following formula was used to estimate the administrative effort:

$$\text{Administrative effort}_T = \sum_{i=1}^{26} \frac{F_i * D_i}{Q_i}, \text{ where}$$

- **T** stands for the type of operations (i.e. CAT, SPO, NCC, and training-related);
- **F** stands for the annual frequency of the administrative category within a type of operation;
- **D** stands for the (average) duration to comply with the administrative category within a type of operation; and
- **Q** stands for the number of operators that responded to the administrative category within a type of operation.

The following step was to estimate the BaU.

3.2.3.1.4 Estimation of the safety relevance of the requirements, resulting in Business as Usual

In the second step, the interviews' and survey's results indicated how the respondents would alternatively meet the administrative requirements in the absence of regulatory requirements. More precisely, the respondents to the survey were asked the following question: could the administrative requirement be met in a less burdensome way without compromising the safety performance of the operations? The responses to this question were used to estimate the BaU level, by taking the following three steps:

- Step 1 — Determine the percentage of the 'yes' score

There are three different possible answers to the question if the requirement could be met in a less burdensome way without compromising the safety performance of the operation: 'yes', 'no', and 'I do not know'. The highest and lowest 'yes' scores (in relation to the total score) were used to determine the minimum (equal to low safety relevance) and maximum values (equal to high safety relevance) respectively.

— Step 2 — Set the BaU boundaries

If an administrative requirement has as high safety relevance (i.e. the maximum value of ‘yes’ answers) according to the respondents, the level of BaU is set at 90 % of the administrative effort. The respondents indicated that there is always an amount of administrative burden, even if the requirement is exclusively safety-related. Based on those findings, the following hypothesis was made: the operators would meet the administrative requirement in 90 % of the time in the absence of a regulatory requirement.

The level of BaU is set at 50 % for requirements with low safety relevance (i.e. the lowest score of ‘yes’ answers in relation to the total). This assumption was strengthened by qualitative answers that were given in the survey and interviews. Therefore, the following hypothesis was made: the operators would meet the administrative requirement in 50 % of the time in the absence of a regulatory requirement.

— Step 3 — Interpolate the BaU

After having set the BaU boundaries within an integral overview of the various administrative categories, the level of BaU was interpolated between 50 % and 90 % based on the percentage of answers to the safety relevance of the requirements. The results of this method are presented in Annex VII.

3.2.3.1.5 Estimation of the administrative burden

The assessment of the administrative burden was based on the previous steps (administrative effort and BaU) and was broken down into the different types of operations (CAT, SPO, NCC, and training). The following formula was used to estimate the administrative effort:

$$\text{Administrative burden} = \sum_{i=1}^{26} \text{Administrative effort}_i * (100 \% - BaU_i)$$

3.3 Limitations of the evaluation

3.3.1 Geographical bias

It proved complex to receive responses from Central and Eastern European helicopter operators. This is reflected in both the survey (see Figure 2) and the interviews (see Figure 5). Considerable effort was made to increase the involvement of operators from Central and Eastern Europe by directly approaching them to participate in the survey or in an interview. This resulted in more survey respondents and interviewees from Central and Eastern Europe, such as Estonia (2), Hungary (2), Poland (1), and Slovenia (1).

3.3.2 Number of rules: categorisation and de-categorisation

The sheer number of identified rules (248) that include a potential administrative obligation to provide information (as identified in Annex IX) makes it very difficult to receive feedback at the level of all individual rules. To be able to collect and analyse data on the administrative costs of small helicopter

operators, the 248 rules were grouped into 26 categories. The survey questionnaire was structured at the level of those 26 categories. To obtain information at the level of the individual rules, open-question results from the survey and results from interviews were used.

3.3.3 Interviews

In general, the interviews were conducted within two time frames. Right before the outbreak of the COVID-19 pandemic in Europe (January–March 2020) and considerably after the outbreak (September–October). In theory, this could have affected the perception of helicopter operators of their general as well as of their administrative activities. The following barriers were encountered when conducting the interviews:

- reluctance to participate in an interview (the operator did not want to provide information on this matter; personnel did not have time for an interview);
- limited access to the respondent (no suitable personnel was present to respond to the request for participation; the helicopter operator did not answer the phone);
- language barriers (the personnel did not speak English); and
- helicopter operators that fall out of the scope of this evaluation (e.g. fixed-wing operators, with more than five helicopters, etc.).

3.3.4 Reliability of the data

The number of responses is in some cases (i.e. NCC operations) too low to obtain statistical results. In addition, some respondents incorrectly judged certain aspects in the survey as administrative burden (i.e. ‘defining lines of responsibility’). However, the indicated burden is considered to be covered by other administrative requirements (i.e. ‘Management system as a whole’).

Notwithstanding the above-mentioned limitations, the reliability of the data is considered high based on the high response rate and the quality of the interviews conducted.

4 Rules for small helicopter operators

Section 4.1 of this Chapter briefly discusses the rules that are subject to the evaluation, Section 4.2 explains how these rules were identified and selected, whereas Section 4.3 contains the groups of categorised rules that were subject to the analysis.

4.1 Typical profile of a small helicopter operator in Europe

Based on the survey respondents, an analysis of a typical small helicopter operator was performed. The rationale behind it was to provide a better understanding of the evaluation and of the impact on the typical operator. The typical operator profiles are distilled from the survey by grouping respondents by their unique combination of operations. This yields the distribution that is depicted in Figure 7, from which the following three typical operator profiles are derived:

- SPO only;
- SPO and CAT; and
- SPO, CAT, and training.

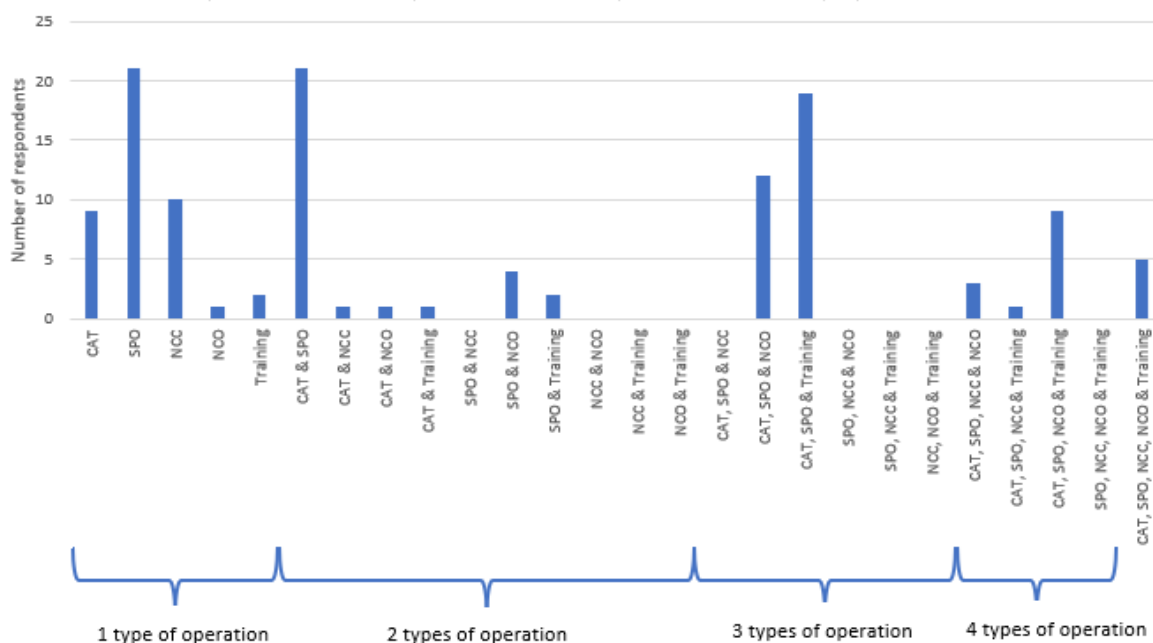


Figure 7 — Unique combinations of type of operations (survey results)

The versatility of specialised operations (SPO) reflects the versatility of helicopters and their operational possibilities; in addition, SPO are the main type of operations that are performed by small helicopter operators, i.e. specialised activities such as agriculture, construction, photography, surveying, observation, and patrol, as well as aerial advertisement.

An equal number of operators combines SPO with commercial air transport (CAT) operations (transporting passengers, cargo, or mail for remuneration, etc).

A third group combines both SPO and CAT operations with training activities. Such training activities can be performed by those operators as either an approved training organisation (ATO) or a declared training organisation (DTO). Due to insufficient data available, it was impossible to further subdivide this group.

For these three combinations of operations, the derived profiles are presented in Table 3 (the numbers provided are fictive estimates).

Table 3 — Typical profile of a small helicopter operator in Europe

Generic information		Typical operator 1	Typical operator 2	Typical operator 3
	CAT		50 %	25 %
	SPO	100 %	50 %	25 %
	Training			50 %
Total number of helicopters ¹⁴		2–3	2–3	2–3
Total full-time equivalent (FTE)		5–8	5–8	7–10

4.2 Identification and selection of the rules

Rules (regulations, AMC, GM, certification specifications (CSs)) are a strong element of the EU civil aviation system. The objective of the rules is to establish the conditions for the safe operation of aircraft. The following rules are within the scope of this evaluation:

- Parts ORO, CAT, NCC, NCO, and SPO of the Air OPS Regulation, stipulating requirements for helicopter operations;
- Part-ORA of the Aircrew Regulation, stipulating requirements for training organisations; and
- AMC and GM to the above rules.

All requirements with an administrative implication in Part-ORA, Subpart GEN of the Air OPS Regulation, as well as in Parts ORO, CAT, SPA, SPO, NCC, and NCO of the Air OPS Regulation, were considered in the evaluation.

Rules include implementing rules (IRs) as well as AMC and GM.

¹⁴ These average data resulted from the survey; however, to provide a typical profile of a small helicopter operator, these results are provided within an acceptable bandwidth.

4.2.1 The Aircrew Regulation

Part-ORA includes organisation requirements for aircrew. Its Subpart GEN contains general requirements on the following:

- application for an organisation certificate;
- activities after receipt of notification of findings from the competent authority;
- occurrence reporting; and
- the management system.

The Aircrew Regulation counts approximately 322 pages¹⁵.

4.2.2 The Air OPS Regulation

Part-ORO includes requirements to be followed by air operators that conduct:

- CAT operations;
- SPO operations;
- NCC operations; and
- NCO operations.

Part-ORO, Subpart GEN contains general requirements on the following:

- application for an organisation certificate;
- activities after receipt of notification of findings from the competent authority;
- occurrence reporting; and
- the management system.

For each of the types of operations, separate subparts contain specific requirements to be followed by the air operators.

Depending on the type of operations that the organisation is licensed to perform, additional rules are applicable to the operations. The Air OPS Regulation distinguishes the following types of operations: commercial air transport (CAT) operations, specialised operations (SPO), operations requiring specific approvals (SPA), and non-commercial operations (NCC and NCO). The Air OPS Regulation counts 379 pages.¹⁶

¹⁵ Consolidated unofficial pdf version on EUR-lex
(<https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:02012R0965-20190925&from=EN>).

¹⁶ Consolidated unofficial pdf version on EUR-lex
(<https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:02011R1178-20191221&from=EN>).

Part-CAT contains requirements for CAT, i.e. operations to transport passengers, cargo, or mail for remuneration.

Part-SPO contains requirements for specialised operations. A wide variety of activities fall under SPO, typical of the versatility of the helicopter. Examples include operations with sling loads, power line inspection, aerial photography, and cattle herding.

Part-SPA contains requirements for operations that need specific approvals, such as operations using performance-based navigation (PBN), operations with night vision imaging systems (NVISs) or helicopter hoist operations (HHOs).

Parts NCC and NCO contain requirements for non-commercial operations; Part-NCC is for operations with complex helicopters, whereas Part-NCO for operations with non-complex helicopters.

Parts CAT, SPA, SPO, NCC, and NCO are basically structured similarly, and many requirements within the different parts are similar. Most elements of the requirements apply to operations with all types of aircraft (i.e. fixed wing and helicopters) but there are also elements that only apply to helicopter operations. Those typical elements are normally included in the following:

- a subpart with general requirements;
- a subpart on operational procedures;
- a subpart on performance and operating limitations;
- a subpart on instruments, data, and equipment; and
- a section of a subpart with specific requirements.

4.3 Identification of groups of rules subject to analysis

From the exploratory interviews, it became clear that managers and nominated persons at small helicopter operators typically combine operational, managerial, and administrative duties. They typically do not record the amount of time spent on administrative tasks, which also varies depending on the time needed for the other functions. Managers and nominated persons of small helicopter operators typically consider the regulatory system to be complex, and they perform their daily activities according to company procedures. Although these company procedures comply with the requirements, the managers and nominated persons are not familiar with the details of the underlying requirements.

For this reason, the rules (requirements, AMC, GM) were grouped into categories. In each category, rules on particular topics were combined. These topics (thematic areas) better match the daily activities of the small helicopter operators than the individual rules, and therefore allow managers and nominated persons to better estimate the associated administrative burdens and safety benefits.

5 Assessment of the administrative burden related to the categories of rules subject to the evaluation

Chapter 5 analyses the identified categories of rules that provide for administrative activities for small helicopter operators. The results of analysing both the administrative effort and burden are presented therein.

5.1 Introduction

This Chapter is divided into two distinct levels of analysis. The first level of analysis (Sections 5.2–5.5) assesses the administrative effort, as well as the safety relevance of the requirements and their administrative burden, in order to prioritise the requirements.

On the second level of analysis (Section 5.6), the specific rules (IRs, AMC, and GM) are assessed, as deducted from the prioritisation of the requirements, and a relation is established between those rules and the findings from the stakeholder consultation.

The final Section (Section 5.7) of this Chapter analyses the administrative burden of any additional administrative requirements.

5.2 Assessment of the administrative effort

On the first level of analysis, the total administrative effort of each category of rules is defined based on the interview and survey results. Especially the survey results provide an important input into the quantitative analysis of the administrative effort. A complete overview of the related (average) scores is presented in Annex IV. The remainder of this Section provides clarifications on the follow-up questions to determine the administrative effort and burden.

The administrative effort of each helicopter operator can be derived from assessing the time needed per activity and the frequency of the performed activity per respondent.¹⁷

An assessment on the overall time needed per activity shows that small helicopter operators spend on average roughly 3 hours per administrative requirement. However, assuming a standard deviation of almost 3 hours, some activities are considered time-consuming, whereas other activities (to meet other administrative requirements) may take only several minutes.

The same applies to the assessment of the average frequency of administrative activities, which is equal to approximately 150 times per year. The large deviation from the standard (100 times) again shows that some administrative activities are performed daily, while others are only performed

¹⁷ Table 2 reflects a simplified approach to assessing the administrative burden, as it concentrates on the time spent per activity and on the frequency of the activities, and is thus expressed in hours. The cost element is left out, as it does not help to identify where administrative burden manifests itself. A more detailed explanation of the approach to calculating the administrative effort is provided in Section 3.2. *Evaluation methods*.

several times per year. Example 1 below provides an explanation of the high deviation from the standard:

Example 1 — Assessment of average time ‘Internal audits v. flight preparation and execution’

Internal audits

Several small helicopter operators indicated that in the context of internal audits, they sometimes spend several days trying to find and resolve the findings. According to the statements provided in the survey, helicopter operators spend 1 to 2 days per audit (8 to 16 hours). However, the frequency of those activities ranges from 1 to 4 times per month.

Flight preparation and execution

Ten small helicopter operators indicated the average time (30 minutes, ranging from 0-15 minutes to 1-2 hours) that it takes to perform administrative activities related to the preparation and execution of a flight. These administrative activities are however performed with every flight. Often, the frequency of those activities is 1 to 10 times per day.

The administrative effort that is required to comply with the rules that are subject to this evaluation was calculated per respondent and per administrative category. The weighted duration and frequency of the administrative effort that is required for the administrative categories that are subject to the evaluation are presented in Annex V. The assessment of the administrative effort is explained based on the following Example 2:

Example 2 — Assessment of administrative effort ‘Identifying and managing risks/hazards’

In total, 11 small helicopter operators (with a fleet of 5 or less helicopters) provided both a frequency and a time indication for the administrative activities they perform to comply with the requirement to identify and manage risks/hazards. The weighted frequency based on the survey results is approximately 63 times per year. The average time that the operators need to perform those administrative activities is 2 hours and 40 minutes.

To calculate the administrative effort that is needed to meet the requirement (total duration per year), the frequency and time estimations that had been provided by every respondent were multiplied. The result was an annual average administrative effort of **170 hours per helicopter operator**.

The results are substantiated among the different types of operation. The following overall findings for small European helicopter operators are based on the survey (see Table 4):

- operators that conduct CAT operations need on average 2,1 FTEs per year to comply with the administrative requirements;

- operators that conduct SPO need on average 1,9 FTEs per year to perform the required administrative activities; and
- operators that conduct training operations spend the most time of all on administrative activities per year (2,6 FTEs).

Table 4 — Assessment of administrative effort per year and per type of operation — key findings

Type of operations	Total (in hours)	Total (in FTEs)
Commercial air transport (CAT) operations	4 014	2,08
Specialised operations (SPO)	3 662	1,90
Non-commercial operations with complex motor-powered aircraft (NCC)	N/a*	N/a*
Training operations	4 933	2,56

*** The number of responses on NCC operations was too low to derive representative statistical results**

Section 4.1. of this report shows that an operator often conducts multiple types of operations (e.g. CAT & SPO or CAT, SPO, and training). Table 4 indicates the administrative effort of small European helicopter operators that conduct a certain type of operations. At the same time, those operators can conduct other types of operations. Therefore, the administrative effort of three typical small European helicopter operators was also calculated (see Table 5):

Table 5 — Assessment of administrative effort of three typical small European helicopter operators

Generic information		Typical operator 1	Typical operator 2	Typical operator 3
	CAT	N/a	50 %	25 %
	SPO	100 %	50 %	25 %
	Training	N/a	N/a	50 %
Administrative effort (measured in FTEs)	CAT	N/a	1,04	0,52
	SPO	1,90	0,95	0,47
	Training	N/a	N/a	1,28
	Total	1,90	1,99	2,27

The average size of a typical small helicopter business (with 5 helicopters or less) is estimated to have 5 to 10 permanent employees. Often those permanent employees are supported (dependent on the

workload) by freelancing pilots. Assuming a small helicopter business has 7 permanent employees, 27 %-32 % of the time is spent on administrative activities (see Table 3).¹⁸

Figure 8 shows the administrative effort per identified category for all types of operations in a *Pareto* diagram. The vertical axis shows the total administrative effort (measured in hours per year), displayed in bars. The horizontal axis shows the cumulative share of administrative effort per activity, displayed by the curved grey line. Annex VI contains the *Pareto* diagrams for the different types of operations (CAT, SPO, NCC, and training).

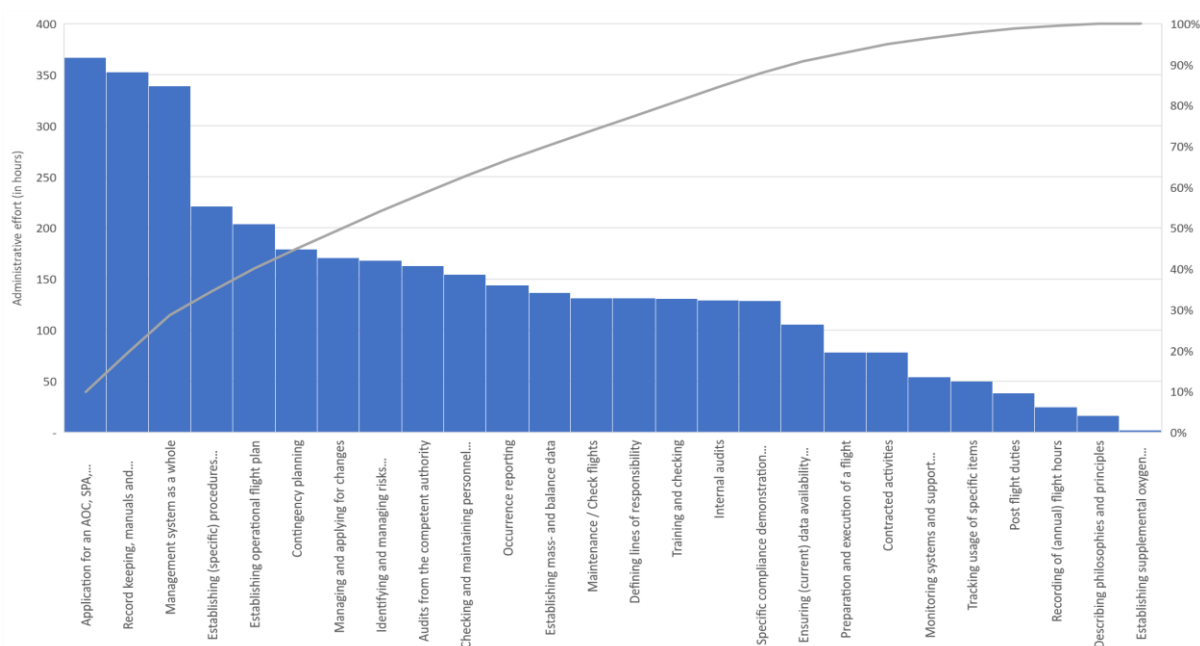


Figure 8 — Assessment of the administrative effort for all types of operations (measured in hours per year)

Figure 8 shows that approximately 70 % of the total administrative effort is due to the first 12 administrative requirements (ranked from high to low). The cumulative share of administrative effort shows a sharp increase within the first 10 categories, after which the additional administrative effort decreases quite rapidly.

The total administrative effort has two different components: Business as Usual (BaU) and administrative burden. To assess the administrative burden, the BaU needs first to be defined. The BaU corresponds to the time spent (and the associated costs) due to the administrative activities that

¹⁸ Typical small European helicopter operators need on average 1,90 to 2,3 FTEs to perform their administrative activities. If such operators have on average 7 permanent employees, 27 % (1,90 out of 7 FTEs) to 32 % (2,27 out of 7 FTEs) of the total time is spent on administrative activities.

are normally performed by an entity even in the absence of regulatory requirements. The following Section 5.3. shows the safety relevance of the administrative requirements.

5.3 Assessment of the safety relevance of the administrative requirements

The safety relevance of the administrative requirements is directly related to the BaU assessment. The BaU assessment has two sources:

- evidence obtained from the respondents who indicated that (and to what extent) the requirements could be met in a less burdensome way without compromising the safety performance of the operations; and
- the size of the BaU based on the responses to open questions of the survey.

As a result, the boundaries of the BaU ('low BaU' and 'high BaU') are determined.

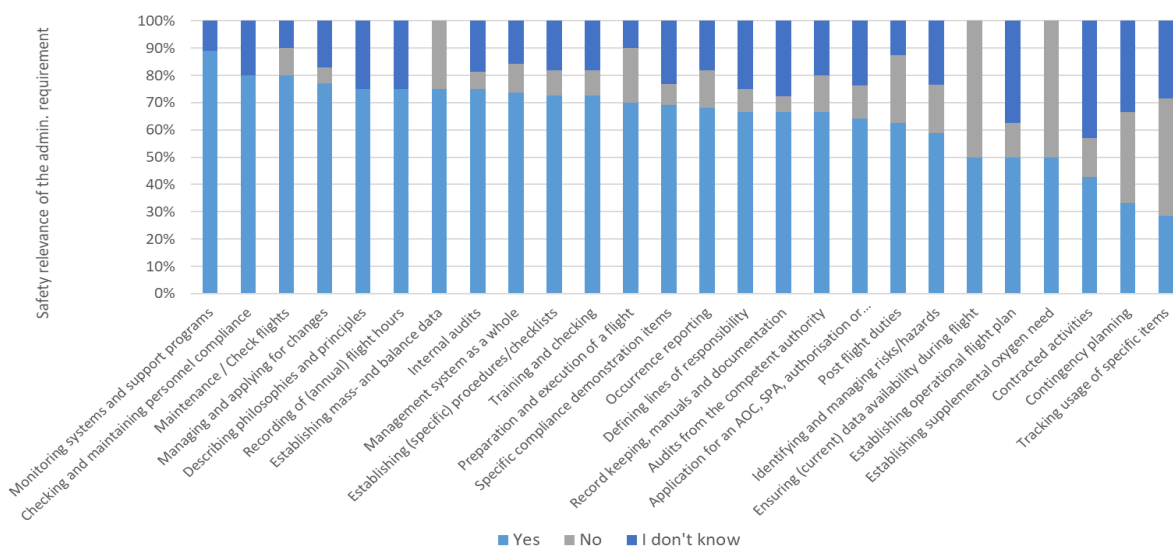


Figure 9 — Results from the survey question 'Could the requirement be met in a less burdensome way without compromising the safety performance of the operation?'

Figure 9 reflects the results from the survey question 'Could the requirement be met in a less burdensome way without compromising the safety performance of the operation?'. The rationale behind the BaU assessment is explained through examples; Annex VII shows the results in detail. This BaU rationale is based upon the positive answers ('Yes'). Some respondents considered that the requirement(s) could not be met in a less burdensome way without compromising the safety performance of the operation(s) or did not know whether the requirement(s) could be met otherwise. Annex VII also includes those results ('No' and 'I do not know' answers).

Example 3 — Assessment of the administrative categories and of the associated safety relevance

Looking at the answers under all 26 administrative categories, the higher the number of respondents to claim that one category of requirements could be met in a less burdensome way, the lower the BaU. Therefore, if, for instance, the percentage of respondents that actually met the requirement(s) in a less burdensome way was 90 %, then there is a strong indication that a relatively low percentage of the performed administrative activities is seen as BaU. The other way around: if, for instance only 30 % of the respondents indicated that a less burdensome approach is possible, a relatively high percentage of the performed administrative activities is seen as BaU.

Overall, 65 % of the helicopter operators consider that administrative requirements can be met in a less burdensome way without compromising the safety performance of the operation(s). Fifteen per cent of the respondents indicated that the administrative requirements cannot be met in a less burdensome way without compromising the safety performance. Finally, 20 % indicated that they do not know exactly how the requirement(s) could be met otherwise.

However, what an operator would ‘normally’ do may be open to interpretation. To fully perceive the safety relevance of the requirements, the results from Figure 9 are used to determine the extremes of BaU, namely as ‘lowest-percentage BaU’ and ‘highest-percentage BaU’. In the following Section 5.3.1, the BaU methodology is further explained.

5.3.1 Highest-percentage Business as Usual

A requirement that is classified as ‘high-percentage BaU’ cannot often be performed in a less burdensome way without compromising the safety performance of the operation.

As there is always some room for simplifying or reducing the administrative effort, the following hypothesis on the high BaU is made: in the absence of regulatory requirements, operators would meet the administrative requirement in **90 %** of the time. This means that only a small portion of the administrative effort can be reduced (10 %) without compromising the safety performance of the operation.

Example 4 — Highest-percentage BaU ‘Tracking usage of specific items’

The administrative category ‘Tracking usage of specific items’ received the lowest percentage of ‘yes’ answers to the question: ‘Could the administrative requirement be met in a less burdensome way without compromising the safety performance of the operation? This means that this category cannot easily be met otherwise without compromising the safety performance of the operation (see Figure 9).

Only 29 % of the respondents indicated that the administrative requirement for ‘Tracking usage of specific items’ could be met in a less burdensome way. This administrative category is therefore equal to the highest-percentage BaU (90 %).

5.3.2 Lowest-percentage Business as Usual

A requirement that is classified as ‘low-percentage BaU’ can (very) often be met in a less burdensome way without compromising the safety performance of the operation. Therefore, in the absence of regulatory requirements, the operators would meet such an administrative requirement otherwise (see Example 5).

Therefore, the following hypothesis is made: in the absence of regulatory requirements, the operators would reduce the time spent on this requirement by **50 %**. In other words, this low-percentage BaU relates to the category with the highest percentage of respondents that indicate that the requirement can be met in a less burdensome way (equal to a 50-% reduction of the administrative effort).

Example 5 — Lowest-percentage BaU ‘Monitoring systems and supporting programmes’

The administrative category ‘Monitoring systems and supporting programmes’ received the highest percentage of ‘yes’ answers to the question: ‘Could the requirement be met in a less burdensome way without compromising the safety performance of the operation?’ (see Figure 9). This means that this category can be met otherwise without compromising the safety performance of the operation (see Example 4).

Eighty-nine per cent of the small helicopter operators indicated in the survey that the required activity ‘Monitoring systems and supporting programmes’ could be performed in a less burdensome way without compromising the safety performance of the operation. For instance, a respondent mentioned that the requirement can be met by using online tools. This administrative category is therefore equal to the lowest-percentage BaU (50 %).

5.3.3 Business as Usual assessment

After having assessed the BaU extremes (lowest-percentage and highest-percentage BaU), the survey results (answers of respondents) that indicate that the requirements could be met in a less burdensome way without compromising the safety performance of the operation(s) are used for interpolation of the overall results. Annex VII presents a complete overview of the administrative requirements and the BaU assessment. The approach is visualised in Figure 10 below:

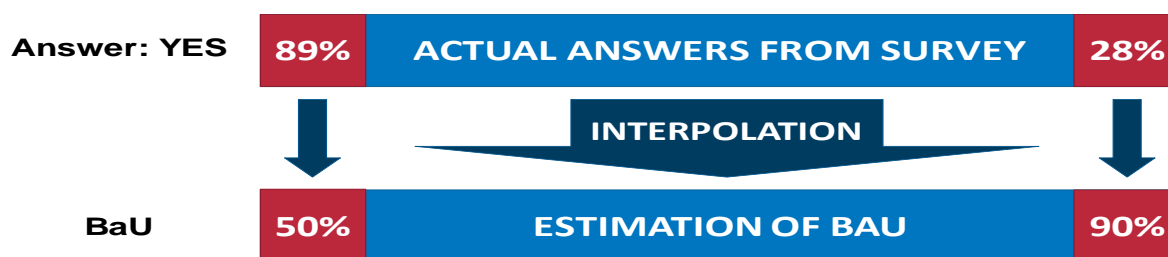


Figure 10 — Approach to estimating BaU

5.4 Assessment of the administrative burden

Based on the analysis of the two previous Sections 5.2 and 5.3 on the assessment of the administrative effort and of the safety relevance of the requirements respectively, in this Section 5.4, the total administrative effort of each defined category was assessed. The administrative effort of each helicopter operator was derived by assessing the overall time needed per activity and the frequency of the performed activity.

The administrative burden assessment is explained through the following Example 6:

Example 6 — Assessment of administrative burden ‘Checking and maintaining personnel compliance’

Step 1 — Assessment of administrative effort

Ten small helicopter operators (with a fleet of 5 or less helicopters) provided both a frequency and a time indication for the administrative category ‘Checking and maintaining personnel compliance’. They indicated that due to this requirement, they perform activities 63 times per year (on average). The time needed by one operator to perform once such an administrative activity is 2 hours and 25 minutes. This results in an annual administrative effort of 154 hours per helicopter operator (on average).

Step 2 — Assessment of BaU

Eighty per cent of the respondents indicated that the requirement(s) can be met otherwise, while maintaining the safety performance of the operation. The results for this administrative category were interpolated by setting the low-percentage (Hypothesis 1) and high-percentage (Hypothesis 2) BaU boundaries in Section 5.3. This gave an estimated BaU of 56 % (i.e. a 44-% reduction of the time spent on this administrative requirement).

Step 3 — Assessment of administrative burden

The results from Step 1 (154 hours) and Step 2 (44-% time reduction) were multiplied to assess the administrative burden. This yields an estimated annual administrative burden of 68 hours for a small helicopter operator.

- In line with Example 6, the administrative burden was calculated per respondent and per administrative category. Breaking down the resulting administrative burdens per type of operations shows the following for small European helicopter operators (see also

Table 6):

- operators that conduct CAT operations have an estimated annual administrative burden of almost 1 400 hours (0,7 FTE);
- operators that conduct SPO have an estimated annual administrative burden of approximately 1 300 hours (0,7 FTE); and

- operators that conduct training operations have an estimated annual administrative burden of approximately 1 700 hours (0,9 FTE).

Table 6 — Assessment of administrative burden per year and per type of operations — key findings

Type of operations	Total (in hours)	Total (in FTEs)
Commercial air transport (CAT) operations	1 394	0,72
Specialised operations (SPO)	1 290	0,67
Non-commercial operations with complex motor-powered aircraft (NCC)	N/a*	N/a*
Training operations	1 716	0,89

*** The number of responses on NCC operations was too low to derive representative statistical results**

However, small European helicopter operators often perform multiple types of operation (e.g. CAT and SPO or CAT, SPO, and training) (see Figure 7).

Table 6 indicates the annual administrative burden of small European helicopter operators that conduct a certain type of operations. At the same time, those operators can conduct other types of operations. Therefore, the administrative burden of three typical small European helicopter operators was also calculated (see Table 7).

Table 7 — Assessment of administrative burden of three typical small European helicopter operators

Generic information		Typical operator 1	Typical operator 2	Typical operator 3
	CAT	N/a	50 %	25 %
	SPO	100 %	50 %	25 %
	Training	N/a	N/a	50 %
		N/a	N/a	N/a
Administrative burden (measured in FTEs)	CAT	N/a	0,36	0,18
	SPO	0,67	0,33	0,17
	Training	N/a	N/a	0,44
	Total	0,67	0,70	0,79

A typical small helicopter business (with 5 helicopters or less) is estimated to have 5 to 10 permanent employees. The average administrative burden of a typical small helicopter business is approximately 10 %–11 %.¹⁹

Table 8 presents the results of the administrative burden assessment per category of rules and per type of operations.

¹⁹ Typical small European helicopter operators need on average 0,67 to 0,79 FTEs to perform their administrative activities. If such operators have (on average) 7 permanent employees, 10 % (0,67 out of 7 FTEs) to 11 % (0,79 out of 7 FTEs) of the total time is spent on administrative activities.

Table 8 — Administrative burden assessment per category of rules and type of operations

Administrative requirement	Targeted group (per type of operations)	Weighted average duration per activity (in hours per operator) (2)	Weighted average frequency (in time per year per operator) (3)	Admin effort (in hours per operator) (4) = (2)*(3)	Business as Usual (in percentage) (5)	Administrative burden (in hours per operator) (6) = (4)*(100 % – 5)
Application for an air operator certificate (AOC), specific approval (SPA) authorisation or declaration	CAT	2,02	208	420	66 %	141
	SPO	2,12	171	361	66 %	122
	NCC	3,00	127	381	66 %	128
	Training	2,35	188	443	66 %	149
Managing and applying for changes	CAT	1,91	128	245	58 %	103
	SPO	2,11	93	197	58 %	83
	NCC	3,00	35	104	58 %	44
	Training	2,68	71	189	58 %	80
Specific compliance demonstration items	CAT	2,25	66	148	63 %	55
	SPO	3,31	19	64	63 %	24
	NCC	2,55	10	26	63 %	10
	Training	4,50	22	100	63 %	37
Defining lines of responsibility	CAT	3,00	50	150	65 %	53
	SPO	4,25	23	98	65 %	35
	NCC	N/a*	N/a*	N/a*	65 %	N/a*
	Training	0,75	261	196	65 %	69

Administrative requirement	Targeted group (per type of operations)	Weighted average duration per activity (in hours per operator) (2)	Weighted average frequency (in time per year per operator) (3)	Admin effort (in hours per operator) (4) = (2)*(3)	Business as Usual (in percentage) (5)	Administrative burden (in hours per operator) (6) = (4)*(100 % – 5)
Describing philosophies and principles	CAT	1,13	13	15	59 %	6
	SPO	2,25	7	16	59 %	6
	NCC	N/a*	N/a*	N/a*	59 %	N/a*
	Training	N/a**	N/a**	N/a**	59 %	N/a**
Identifying and managing risks/hazards	CAT	3,09	35	107	70 %	32
	SPO	3,28	62	204	70 %	61
	NCC	2,04	29	59	70 %	18
	Training	2,25	16	36	70 %	11
Occurrence reporting	CAT	2,01	63	128	64 %	46
	SPO	1,96	82	162	64 %	59
	NCC	2,75	27	75	64 %	27
	Training	1,44	143	206	64 %	75
Record-keeping, manuals, and documentation	CAT	3,03	134	407	65 %	143
	SPO	3,17	70	221	65 %	78
	NCC	4,33	12	52	65 %	18
	Training	N/a**	N/a**	N/a**	65 %	N/a**
	CAT	2,06	126	260	61 %	102

Administrative requirement	Targeted group (per type of operations)	Weighted average duration per activity (in hours per operator) (2)	Weighted average frequency (in time per year per operator) (3)	Admin effort (in hours per operator) (4) = (2)*(3)	Business as Usual (in percentage) (5)	Administrative burden (in hours per operator) (6) = (4)*(100 % – 5)
Establishing specific procedures/checklists	SPO	3,41	79	268	61 %	105
	NCC	N/a*	N/a*	N/a*	61 %	N/a*
	Training	2,25	168	378	61 %	148
Management system as a whole	CAT	2,47	173	426	60 %	170
	SPO	2,23	182	405	60 %	162
	NCC	1,88	34	63	60 %	25
	Training	2,28	131	299	60 %	119
Preparation and execution of a flight	CAT	0,79	119	94	63 %	35
	SPO	0,54	132	71	63 %	27
	NCC	0,75	60	45	63 %	17
	Training	0,13	87	11	63 %	4
Post-flight duties	CAT	1,63	26	43	68 %	14
	SPO	1,69	9	16	68 %	5
	NCC	N/a*	N/a*	N/a*	68 %	N/a*
	Training	0,38	87	33	68 %	11
Training and checking	CAT	5,08	14	73	61 %	29
	SPO	7,90	18	146	61 %	57

Administrative requirement	Targeted group (per type of operations)	Weighted average duration per activity (in hours per operator) (2)	Weighted average frequency (in time per year per operator) (3)	Admin effort (in hours per operator) (4) = (2)*(3)	Business as Usual (in percentage) (5)	Administrative burden (in hours per operator) (6) = (4)*(100 % – 5)
	NCC	N/a*	N/a*	N/a*	61 %	N/a*
	Training	7,75	9	66	61 %	26
Recording of (annual) flight hours	CAT	1,30	19	25	59 %	10
	SPO	1,42	10	14	59 %	6
	NCC	0,13	12	2	59 %	1
	Training	2,13	18	39	59 %	16
Checking and maintaining personnel compliance	CAT	2,66	29	76	56 %	33
	SPO	2,82	61	171	56 %	75
	NCC	N/a*	N/a*	N/a*	56 %	N/a*
	Training	1,31	40	53	56 %	23
Ensuring (current) data availability during flight	CAT	1,78	67	120	76 %	29
	SPO	1,72	17	29	76 %	7
	NCC	3,00	12	36	76 %	9
	Training	0,25	696	174	76 %	42
Establishing an operational flight plan	CAT	0,80	324	260	76 %	63
	SPO	0,68	344	232	76 %	56
	NCC	0,54	491	266	76 %	64

Administrative requirement	Targeted group (per type of operations)	Weighted average duration per activity (in hours per operator) (2)	Weighted average frequency (in time per year per operator) (3)	Admin effort (in hours per operator) (4) = (2)*(3)	Business as Usual (in percentage) (5)	Administrative burden (in hours per operator) (6) = (4)*(100 % – 5)
	Training	0,63	408	255	76 %	62
Establishing a supplemental oxygen need	CAT	0,38	6	2	76 %	1
	SPO	0,38	6	2	76 %	1
	NCC	N/a*	N/a*	N/a*	76 %	N/a*
	Training	0,38	12	5	76 %	1
Establishing mass-and-balance data	CAT	0,50	274	137	59 %	56
	SPO	0,38	383	144	59 %	59
	NCC	N/a*	N/a*	N/a*	59 %	N/a*
	Training	0,38	365	137	59 %	56
Contingency planning	CAT	0,88	205	179	87 %	24
	SPO	0,56	270	152	87 %	20
	NCC	N/a*	N/a*	N/a*	87 %	N/a*
	Training	0,75	144	108	87 %	14
Audits by the competent authority	CAT	9,81	22	216	65 %	76
	SPO	10,42	17	173	65 %	61
	NCC	6,00	1	6	65 %	2
	Training	6,04	52	312	65 %	110

Administrative requirement	Targeted group (per type of operations)	Weighted average duration per activity (in hours per operator) (2)	Weighted average frequency (in time per year per operator) (3)	Admin effort (in hours per operator) (4) = (2)*(3)	Business as Usual (in percentage) (5)	Administrative burden (in hours per operator) (6) = (4)*(100 % – 5)
Internal audits	CAT	8,75	16	139	59 %	57
	SPO	20,00	9	176	59 %	72
	NCC	N/a*	N/a*	N/a*	59 %	N/a*
	Training	4,38	13	58	59 %	24
Contracted activities	CAT	5,50	14	79	81 %	15
	SPO	7,17	14	102	81 %	20
	NCC	N/a*	N/a*	N/a*	81 %	N/a*
	Training	1,50	67	100	81 %	20
Monitoring systems and supporting programmes	CAT	3,08	18	54	50 %	27
	SPO	2,96	12	36	50 %	18
	NCC	3,17	14	46	50 %	23
	Training	1,75	43	75	50 %	38
Tracking usage of specific items	CAT	1,63	38	61	90 %	6
	SPO	1,38	36	50	90 %	5
	NCC	N/a*	N/a*	N/a*	90 %	N/a*
	Training	1,69	27	46	90 %	5
	CAT	3,30	46	152	56 %	67

Administrative requirement	Targeted group (per type of operations)	Weighted average duration per activity (in hours per operator) (2)	Weighted average frequency (in time per year per operator) (3)	Admin effort (in hours per operator) (4) = (2)*(3)	Business as Usual (in percentage) (5)	Administrative burden (in hours per operator) (6) = (4)*(100 % – 5)
Maintenance flights/ Check flights	SPO	7,98	19	154	56 %	68
	NCC	8,00	48	384	56 %	169
	Training	1,78	50	89	56 %	39

* The number of responses on NCC operations was too low to derive representative statistical results.

** The number of responses on training operations was too low to derive representative statistical results.

5.5 Prioritisation of the requirements based on their administrative burden

In the previous Sections (5.2–5.4), the administrative effort, the safety relevance of the requirements, and the administrative burden were assessed. Combining the findings from those three different Sections, the administrative requirements were prioritised based upon their administrative burden.

The results of the administrative burden assessment are presented in a *Pareto* diagram (see

Figure 11). The requirements (measured in hours) are ranked from left to right in descending order of administrative burden (dark-blue column). The curves show the cumulative totals of the administrative effort and of the administrative burden respectively (in percentages):

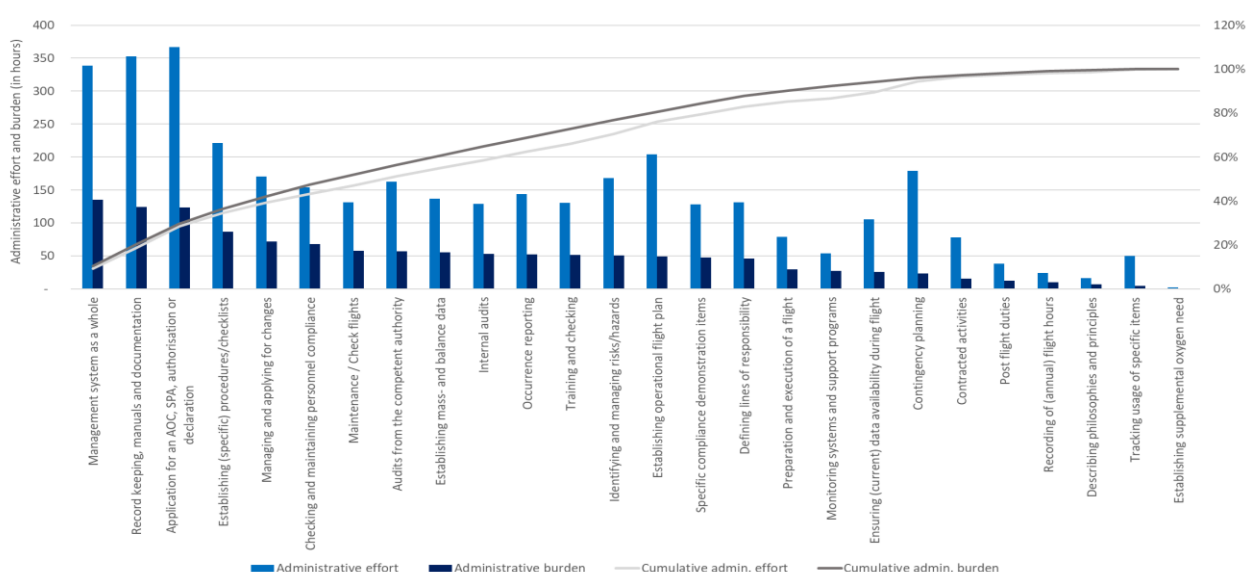


Figure 11 — Assessment of administrative burden for all types of operations (measured in hours per year)

By examining the identified administrative effort and burden, it is shown that approximately 75 % of the total administrative burden stems from the first 12 most ‘burdensome’ administrative requirements (

Figure 11).

Table 8 displays the specific results of those categories. Table 9 presents the aggregated results of the different types of operations, as well as the total administrative burden. Based on these results, Annex VIII contains *Pareto* diagrams of the different types of operations (CAT, SPO, NCC, and training), as well as a table with the ranked administrative requirements per type of operations.

Table 9 — Selected administrative requirements (based upon their administrative burden)

Section	Administrative requirements	Administrative burden (in hours)				
		CAT	SPO	NCC	Training	Total
5.6.1	Management system as a whole	170	162	25	119	135

5.6.2	Record-keeping, manuals, and documentation	143	78	18	N/a**	124
5.6.3	Application for an air operator certificate (AOC), specific approval (SPA) authorisation or declaration	141	122	128	149	123
5.6.4	Establishing specific procedures/checklists	102	105	N/a*	148	87
5.6.5	Managing and applying for changes	103	83	44	80	72
5.6.6	Checking and maintaining personnel compliance	33	75	N/A*	23	68
5.6.7	Maintenance flights/Check flights	67	68	169	39	58
5.6.8	Audits by the competent authority	76	61	N/a*	110	57
5.6.9	Establishing mass-and-balance data	56	59	N/a*	56	56
5.6.10	Internal audits	57	72	N/a*	24	53
5.6.11	Occurrence reporting	46	59	27	75	52
5.6.12	Training and checking	29	57	N/a*	26	51

* The number of responses on NCC operations was too low to derive representative statistical results.

** The number of responses on training operations was too low to derive representative statistical results.

As indicated above, approximately 75 % of the total administrative burden stems from the first 12 most ‘burdensome’ categories of administrative requirements. To specify where the burden is located within the defined categories, those 12 categories are analysed in depth on the second level of analysis. The administrative burden is explained from the perspective of a small helicopter operator; it is therefore based on findings from the stakeholder survey, combined with expert knowledge of the rules that are subject to the evaluation.

5.6 Assessment of the administrative burden of rules subject to the evaluation

On the second level of the analysis, the regulatory requirements of the prioritised categories are presented, followed by an explanation of the administrative burden from the perspective of a small helicopter operator. Finally, where possible, specific recommendations are made on the rules within the defined categories, based on findings from the stakeholder survey. Other recommendations (e.g. related to implementation) are grouped in Section 5.7.

5.6.1 Administrative requirement ‘Management system as a whole’

The administrative activities and burden stem from the following regulatory requirements (see Table 10):

Table 10 — Regulatory requirements for the category ‘Management system as a whole’

#	Part	Subpart	Number	Title
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1	ORO	GEN	200	Management system
2	ORA	GEN	200	Management system

5.6.1.1 Explanation of the administrative burden

Many operators expressed the opinion, either in the interview or in the survey, that especially the requirements for a safety management system (SMS) are suited to large operators of fixed-wing aircraft. Having the same requirements for small helicopter operators results in a disproportional number of administrative activities. Some operators stated that they spend so much time on management system documentation that safety-related operational tasks are in tribulation. Additionally, certain small helicopter operators pointed out that the national competent authority spends a significant part of the inspection audits on checking the paperwork that is related to the management system. The operators fear that in this way the national competent authorities lose sight of the fact that the actual operations involve real risks.

Remark: points CAT.GEN.MPA.100 *Crew responsibilities* and SPO.GEN.105 *Crew responsibilities* determine the crew responsibilities. The administrative component in said rules is limited to delegating those responsibilities. However, the comments from the survey focus on the administrative tasks that stem from the crew responsibilities to be delegated (notably those in the context of the management system, see point ORO.GEN.200 (a)), not from the delegation as such. An exception to this is that very small organisations also struggle with defining lines of responsibility that are acceptable to the national competent authority. However, this is attributed to the difficulty of finding and/or training crew that meets the requirements for such positions, rather than to the associated administrative tasks.

5.6.1.2 Recommendations

It is recommended to review the definition of ‘complex operator’ in AMC1 ORO.GEN.200(b) *Management system* by considering the variety of the operations and helicopter types that are operated by small helicopter operators. The risk criteria of points (b)(2)(iii) and (b)(2)(iv) that are related to different types of aircraft and operations in challenging environments are the reason why many small operators are classified as complex operators. However, those small operators do not have the personnel that is required for other complex operators (for example, those established under point (b) of AMC1 ORO.GEN.200(b)). By comparison, similar small fixed-wing aircraft operators may operate a large fleet of aircraft of the same class without qualifying as a complex operator.

An arguably more complex alternative is to define a new operator category with a required intermediate level of safety management. In that case, the related rules should be drafted in consultation with existing operators to take advantage of their practical experience in the application of the current rules.

5.6.2 Administrative requirement ‘Record-keeping, manuals, and documentation’

The administrative activities and burden stem from the following regulatory requirements (see Table 11):

Table 11 — Regulatory requirements for the category ‘Record-keeping, manuals, and documentation’

#	Part	Subpart	Number	Title
1	ORO	GEN	110	Operator responsibilities
2	ORO	GEN	210	Personnel requirements
3	ORO	GEN	220	Record-keeping
4	ORO	GEN	310	Use of aircraft listed on an AOC for non-commercial operations and specialised operations
5	ORO	AOC	125	Non-commercial operations of an AOC holder with aircraft listed on its AOC
6	ORO	AOC	135	Personnel requirements
7	ORO	SPO	100	Common requirements for commercial specialised operators
8	ORO	MLR	100	Operations manual — general
9	ORO	MLR	101	Operations manual — structure for commercial air transport
10	ORO	MLR	105	Minimum equipment list
11	CAT	GEN.MPA	195	Handling of flight recorder recordings: preservation, production, protection and use
12	CAT	OP.MPA	107	Adequate aerodrome
13	SPA	GEN	110	Privileges of an operator holding a specific approval
14	SPA	LVO	130	Minimum equipment
15	SPA	DG	110	Dangerous goods information and documentation
16	SPA	NVIS	140	Information and documentation
17	SPA	HHO	110	Equipment requirements for HHO
18	SPA	HHO	140	Information and documentation
19	SPA	HEMS	140	Information and documentation
20	SPA	HOFO	110	Operating procedures
21	SPA	HOFO	115	Use of offshore locations
22	NCC	GEN	145	Handling of flight recorder recordings: Preservation, production, protection and use
23	NCC	OP	100	Use of aerodromes and operating sites
24	NCO	GEN	155	Minimum equipment list
25	SPO	GEN	145	Handling of flight recorder recordings: preservation, production, protection and use
26	ORA	GEN	125	Terms of approval and privileges of an organisation
27	ORA	GEN	220	Record-keeping

5.6.2.1 Explanation of the administrative burden

Regular revisions of rules require frequent changes and updates of the operations manuals (OMs). One operator stated that in the past three years, the OMs were revised 32 times. Even small changes in rules can entail significant administrative effort due to secondary effects, e.g. associated with renumbering and/or cross-referencing in the OM. Some operators also indicated that they have difficulty in drafting the required sections of the OMs and suggested that EASA provides templates or examples.

A specific comment was related to the maintenance of a mandatory paper backup (and the associated administrative burden) when operating with an electronic flight bag (EFB). An operational approval to operate without paper backup may be granted by the national aviation authority (NAA) if the EFB system has been demonstrated to be sufficiently robust. It is unclear whether the operator in question is unaware of this possibility, or if such a demonstration is not feasible for a small operator.

5.6.2.2 Recommendations

There are no specific recommendations on the related rules.

5.6.3 Administrative requirement ‘Application for an AOC, SPA, authorisation or declaration’

The administrative activities and burden stem from the following regulatory requirements (see Table 12).

Table 12 — Regulatory requirements for the category ‘Application for an AOC, SPA, authorisation or declaration’

#	Part	Subpart	Number	Title
1	ORO	GEN	115	Application for an AOC
2	ORO	AOC	100	Application for an air operator certificate
3	ORO	DEC	100	Declaration
4	ORO	SPO	110	Authorisation of high risk commercial specialised operations
5	CAT	GEN.MPA	155	Carriage of weapons of war and munitions of war
6	CAT	POL.H	420	Helicopter operations over a hostile environment located outside a congested area
7	SPA	GEN	105	Application for a specific approval
8	SPO	SPEC.HESLO	110	Transportation of dangerous goods
9	SPA	DG	105	Approval to transport dangerous goods
10	ORA	GEN	115	Application for an organisation certificate
11	ORA	GEN	120	Means of compliance

5.6.3.1 Explanation of the administrative burden

An application for an AOC is a one-time activity, but the associated administrative burden is quite heavy. Typically, an applicant spends one full year to complete all the paperwork. Some of the respondents

indicated that the administrative burden that is associated with obtaining an AOC prevented them from initiating the approval process, and that they have resorted to alternatives, such as operating under the AOC of another organisation.

5.6.3.2 Recommendations

There are no specific recommendations on the related rules.

5.6.4 Administrative requirement ‘Establishing (specific) procedures/checklists’

The administrative activities and burden stem from the following regulatory requirements (see Table 13):

Table 13 — Regulatory requirements for the category ‘Establishing specific procedures/checklists’

#	Part	Subpart	Number	Title
1	CAT	GEN.MPA	124	Taxiing of aircraft
2	CAT	GEN.MPA	161	Carriage of sporting weapons and ammunition — alleviations
3	CAT	GEN.MPA	200	Transport of dangerous goods
4	CAT	OP.MPA	105	Use of aerodromes and operating sites
5	CAT	OP.MPA	110	Aerodrome operating minima
6	CAT	OP.MPA	126	Performance-based navigation
7	CAT	OP.MPA	131	Noise abatement procedures — helicopters
8	CAT	OP.MPA	137	Routes and areas of operation — helicopters
9	CAT	OP.MPA	145	Establishment of minimum flight altitudes
10	CAT	OP.MPA	155	Carriage of special categories of passengers (SCPs)
11	CAT	OP.MPA	160	Stowage of baggage and cargo
12	CAT	OP.MPA	165	Passenger seating
13	CAT	OP.MPA	195	Refuelling/defuelling with passengers embarking, on board or disembarking
14	CAT	OP.MPA	200	Refuelling/defuelling with wide-cut fuel
15	CAT	OP.MPA	220	Assisting means for emergency evacuation
16	CAT	OP.MPA	230	Securing of passenger compartment and galley(s)
17	CAT	OP.MPA	235	Life-jackets — helicopters
18	CAT	OP.MPA	250	Ice and other contaminants — ground procedures
19	CAT	OP.MPA	255	Ice and other contaminants — flight procedures
20	CAT	OP.MPA	281	In-flight fuel management — helicopters
21	CAT	POL.H	225	Helicopter operations to/from a public interest site
22	CAT	IDE.H	355	Management of aeronautical databases
23	SPA	LVO	125	Operating procedures
24	SPA	NVIS	110	Equipment requirements for NVIS operations
25	SPA	NVIS	120	NVIS operating minima

#	Part	Subpart	Number	Title
26	SPA	HOFO	125	Airborne radar approaches (ARAs) to offshore locations — CAT operations
27	SPA	HOFO	160	Equipment requirements
28	NCC	GEN	119	Taxiing of aircraft
29	NCC	OP	110	Aerodrome operating minima — general
30	NCC	OP	120	Noise abatement procedures
31	NCC	OP	135	Stowage of baggage and cargo
32	NCC	OP	155	Refuelling with passengers embarking, on board or disembarking
33	NCC	OP	165	Carriage of passengers
34	NCC	OP	185	Ice and other contaminants — ground procedures
35	NCC	OP	190	Ice and other contaminants — flight procedures
36	NCC	OP	205	In-flight fuel management
37	NCC	IDE.H	260	Management of aeronautical databases
38	NCO	GEN	104	Use of aircraft included in an AOC by an NCO operator
39	NCO	OP	116	Performance-based navigation — aeroplanes and helicopters
40	NCO	IDE.H	205	Management of aeronautical databases
41	NCO	SPEC	105	Checklist
42	NCO	SPEC	125	Safety briefing
43	NCO	SPEC	130	Minimum obstacle clearance altitudes — IFR flights
44	NCO	SPEC	175	Performance and operating criteria – helicopters
45	NCO	SPEC.HESLO	100	Checklist
46	NCO	SPEC.HEC	100	Checklist
47	NCO	SPEC.PAR	100	Checklist
48	NCO	SPEC.ABF	100	Checklist
49	NCO	SPEC.MCF	110	Checklist and safety briefing
50	NCO	SPEC.MCF	130	Simulated abnormal or emergency procedures in flight
51	SPO	GEN	119	Taxiing of aircraft
52	SPO	GEN	150	Transport of dangerous goods
53	SPO	OP	100	Use of aerodromes and operating sites
54	SPO	OP	110	Aerodrome operating minima — aeroplanes and helicopters
55	SPO	OP	135	Safety briefing
56	SPO	OP	155	Refuelling with persons embarking, on board or disembarking
57	SPO	OP	175	Ice and other contaminants — ground procedures
58	SPO	OP	176	Ice and other contaminants — flight procedures
59	SPO	OP	195	Use of supplemental oxygen

#	Part	Subpart	Number	Title
60	SPO	OP	230	Standard operating procedures
61	SPO	IDE.H	230	Management of aeronautical databases
62	SPO	SPEC.HESLO	100	Standard operating procedures
63	SPO	SPEC.HEC	100	Standard operating procedures
64	SPO	SPEC.PAR	100	Standard operating procedures
65	SPO	SPEC.ABF	100	Standard operating procedures
66	SPO	SPEC.MCF	125	Crew composition and persons on board

5.6.4.1 Explanation of the administrative burden

The multiplied administrative burden lies in the wide variety of types of operations, resulting from the versatility of helicopters, which is much greater than that of fixed-wing aircraft. An operator may consider that for every type of mission and/or operation, a dedicated standard operating procedure (SOP) is required, which must be written down and approved, even though the procedures and associated risks may be more or less common to all missions/operations.

5.6.4.2 Recommendations

There are no specific recommendations on the related rules.

5.6.5 Administrative requirement ‘Managing and applying for changes’

The administrative activities and burden stem from the following regulatory requirements (see Table 14).

Table 14 — Regulatory requirements for the category ‘Managing and applying for changes’

#	Part	Subpart	Number	Title
1	ORO	GEN	135	Continued validity of an AOC
2	ORO	SPO	115	Changes
3	SPA	GEN	115	Changes to a specific approval
4	ORA	GEN	130	Changes to organisations

5.6.5.1 Explanation of the administrative burden

Updates of OMs are either mandated by changes in a regulation or by changes in the operations. Such updates require checking and approval by the national competent authority. The survey respondents consider that such updates are required frequently, but they did not distinguish between manual changes required through regulation updates or changes in the operations. In any case, the operators indicated that the approval process can be very lengthy (e.g. 6 months). The frequency of the updates, combined with the long time that is required for the approval of those updates, creates a substantial administrative burden.

5.6.5.2 Recommendations

As specific remarks were made on the lengthy approval process, this recommendation focusses on that aspect. Point ORO.MLR.100 (h) requires operators to immediately publish and apply amendments or revisions in the interest of safety, provided that any required approval is applied for. However, GM1 ORO.GEN.130(b) contains a non-exhaustive checklist of items that require prior approval from the competent authority without providing any guidance on the extent of the changes. It is therefore recommended to provide guidance that distinguishes ‘Minor’ from ‘Major’ changes, the former not requiring prior approval from the competent authority. For example, adding items to the minimum equipment list (MEL) may be considered a ‘Major’ change that requires approval, while the removal of an item from the MEL may be considered a ‘Minor’ change that does not require approval.

5.6.6 Administrative requirement ‘Checking and maintaining personnel compliance’

The administrative activities and burden stem from the following regulatory requirements (see Table 15).

Table 15 — Regulatory requirements for the category ‘Checking and maintaining personnel compliance’

#	Part	Subpart	Number	Title
1	ORO	FC	105	Designation as pilot-in-command/commander
2	ORO	FC	200	Composition of flight crew
3	ORO	FC	202	Single-pilot operations under IFR or at night
4	ORO	FC.H	250	Commanders holding a CPL(H)
5	CAT	GEN.MPA	130	Rotor engagement — helicopters
6	CAT	GEN.MPA	175	Endangering safety
7	SPA	NVIS	130	Crew requirements for NVIS operations
8	SPA	HHO	130	Crew requirements for HHO
9	NCC	GEN	105	Crew responsibilities
10	ORA	GEN	210	Personnel requirements

5.6.6.1 Explanation of the administrative burden

Different validity periods and expiring dates for various ratings and approvals of personnel make it challenging for small operators to keep track of all due dates. When part-time or seasonal personnel is employed, which is often the case, this becomes even more challenging. Many small operators do not have dedicated personnel and/or IT systems to support this activity. Normally, a pilot/manager keeps track of expiration dates using a simple *Excel* sheet, and based on that information, organises the prescribed checks and examinations to keep all personnel on the required level.

5.6.6.2 Recommendations

There are no specific recommendations on the related rules.

5.6.7 Administrative requirement ‘Maintenance/Check flights’

The administrative activities and burden stem from the following regulatory requirements (see Table 16):

Table 16 — Regulatory requirements for the category ‘Maintenance/Check flights’

#	Part	Subpart	Number	Title
1	NCO	SPEC.MCF	100	Levels of maintenance check flights
2	SPO	SPEC.MCF	100	Levels of maintenance check flight
3	SPO	SPEC.MCF	105	Flight programme for a ‘Level A’ maintenance check flight
4	SPO	SPEC.MCF	110	Maintenance check flight manual for a ‘Level A’ maintenance check flight
5	SPO	SPEC.MCF	115	Flight crew requirements for a ‘Level A’ maintenance check flight
6	SPO	SPEC.MCF	120	Flight crew training course for Level A maintenance check flights

5.6.7.1 Explanation of the administrative burden

Point SPO.SPEC.MCF.110 requires operators to describe Level A maintenance check flight operations and procedures in the OM or in a dedicated maintenance check flight manual. AMC1 SPO.SPEC.MCF.110 defines the items to be listed in such manuals. The stakeholder consultation (survey and interviews) did not provide a detailed insight into the related administrative burden other than that a burden is perceived to exist. The relatively recent introduction of the requirement for the documentation of Level A maintenance/check flight operations may affect the current perception of the administrative burden.

Most comments do not refer to the administrative burden, but to other aspects of the regulation. For example, many respondents indicated the heavy administrative burden that is borne by organisations that combine approvals of Annex II (Part-145) and Annex Vc (Part-CAMO) to the CAW Regulation; however, such approvals fall outside the scope of this evaluation.

5.6.7.2 Recommendations

As no related administrative burden was identified, no concrete recommendations can be made.

5.6.8 Administrative requirement ‘Audits by the competent authority’

The administrative activities and burden stem from the following regulatory requirements (see Table 17).

Table 17 — Regulatory requirements for the category ‘Audits by the competent authority’

#	Part	Subpart	Number	Title
1	ORO	GEN	140	Access
2	ORO	GEN	150	Findings
3	NCC	POL	105	Mass and balance, loading

4	SPO	POL	105	Mass and balance
5	ORA	GEN	150	Findings

5.6.8.1 Explanation of the administrative burden

For small operators that need multiple approvals, e.g. for an air operator certificate (AOC), a continuing-airworthiness management organisation (CAMO), and an approved training organisation (ATO), separate audits for each approval are considered inefficient. At a small operator, most managers have combined functions (e.g. nominated person, accountable manager, safety manager, compliance manager, etc.) for the various approvals. Therefore, those managers are audited on partially similar topics for each approval. For a small operator, it would be much more efficient to combine the audits for different approvals into a single audit. Although this stems from Annex II (Part-ARO) to the Air OPS Regulation, which falls outside the scope of this evaluation, it is reported, as many survey and interview respondents illustrated this important aspect.

Many respondents consider the requirement to do a root cause analysis and to develop a corrective action plan in case of audit findings a significant administrative burden with no safety benefit. Therefore, only a demonstration of the corrective action should be sufficient. It is the corrective action that improves safety, not the root cause analysis or the action plan. As small operators have much simpler organisational structures and decision-making processes, they can more easily perform corrective action, compared to large organisations. Root cause analyses and defining corrective action plans only delay the corrective action with no safety or other benefit.

5.6.8.2 Recommendations

According to point (b) of AMC2 ARO.GEN.305(b), audits and inspections should be conducted ‘on a scale and frequency appropriate to the operation [...]’. It is therefore recommended to introduce a quantitative guideline on the number of audits per year for a given scale of operations. This can either be included in a risk-based scheme, where already used, or be based on an analysis of existing records, which may help to determine a historical European norm and identify potential outliers.

Point (d) of AMC2 ARO.GEN.305(b) allows for audits and inspections to be combined. However, the survey responses suggest that this is not routinely done. It is therefore recommended to instruct and/or coordinate with the national competent authorities to streamline the audit process for small helicopter operators based on information regarding the organisational structure of such operators. The effectiveness of audits that are performed by an NAA may be improved, and the related administrative burden reduced, by introducing EASA guidance material (GM) on the structure, prioritisation, and frequency of recurrent audits.

Points ORA.GEN.150 and ORO.GEN.150 do not explicitly require a root cause analysis of every finding (they only require that the root cause is identified). Furthermore, an underlying aspect of root cause analysis is that findings without an apparent link to safety may have a root cause that can have an impact on other safety-related areas. To remove this ambiguity, it is therefore recommended:

- to amend points ORA.GEN.150 and ORO.GEN.150 to require findings to be analysed for their safety significance, as is the case for point M.B.303 (d) of Annex I (Part-M) to the CAW Regulation; and

- to introduce GM on the underlying aspects of the root cause analysis and its contribution to the maturing of safety management systems (SMSs).

5.6.9 Administrative requirement ‘Weight and balance’

The administrative activities and burden stem from the following regulatory requirements (see Table 18).

Table 18 — Regulatory requirements for the category ‘Weight and balance’

#	Part	Subpart	Number	Title
1	CAT	POL.MAB	100	Mass and balance, loading
2	CAT	POL.MAB	105	Mass and balance data and documentation
3	NCC	POL	110	Mass and balance data and documentation
4	SPO	POL	115	Mass and balance data and documentation — commercial operations with aeroplanes and helicopters and non-commercial operations with complex motor-powered aircraft

5.6.9.1 Explanation of the administrative burden

The respondents highlighted the administrative burden resulting from the ‘Weight and balance’ documentation, particularly when completed on paper. The survey results suggest that appropriate and reliable (digital) tools are either not available or not widely used for the types of helicopters that are operated by small operators.

5.6.9.2 Recommendations

It is recommended to review the requirements in Table 18 and their associated AMC to identify any requirements for a paper version of the documentation, which would decelerate the digitalisation of the industry.

5.6.10 Administrative requirement ‘Internal audits’

The administrative activities and burden stem from the following regulatory requirements (see Table 19).

Table 19 — Regulatory requirements for the category ‘Internal audits’

#	Part	Subpart	Number	Title
1	ORO	GEN	200	Management system
2	ORA	GEN	200	Management system

5.6.10.1 Explanation of the administrative burden

Small helicopter operators may not have personnel with the relevant competency that is defined in point (3)(3)(iii) of AMC1 ORO.GEN.200(a)(6) and point (3)(3)(iii) of AMC1 ORO.GEN.200(a)(6), while ensuring independence of the audit function as explained in point (b) of GM1 ORO.GEN.200(a)(6) and point (b) of

GM1 ORO.GEN.200(a)(6). In addition, small helicopter operators may struggle with planning and organising the internal audits to cover all relevant topics, as well as with recording and monitoring findings and corrective actions.

5.6.10.2 Recommendations

GM1 ORA.GEN.200(a)(6) allows to allocate the compliance-monitoring function within, as well as outside, the organisation, always under the responsibility of the compliance-monitoring manager. However, there are other unavoidable and burdensome administrative tasks that stem from the auditing process. A potential means to reduce the overall administrative burden is to issue specific GM for small operators on the frequency and scope of internal audits, as well as on the related documentation that is listed in point (4)(2) of AMC1 ORA.GEN.200(a)(6).

5.6.11 Administrative requirement ‘Occurrence reporting’

The administrative activities and burden stem from the following regulatory requirements (see Table 20).

Table 20 — Regulatory requirements for the category ‘Occurrence reporting’

#	Part	Subpart	Number	Title
1	ORO	GEN	160	Occurrence reporting
2	NCC	GEN	150	Transport of dangerous goods
3	NCO	GEN	140	Transport of dangerous goods
4	ORA	GEN	160	Occurrence reporting

5.6.11.1 Explanation of the administrative burden

All respondents acknowledge the importance of occurrence reporting. However, many indicated that they struggle with the occurrence-reporting form and that the system for submitting occurrence reports to the competent authority is difficult to use. The occurrence-reporting form contains so many elements that most operators do not fill it out completely.

5.6.11.2 Recommendations

There are no specific recommendations on the related rules.

5.6.12 Administrative requirement ‘Training and checking’

The administrative activities and burden stem from the following regulatory requirements (see Table 21).

Table 21 — Regulatory requirements for the category ‘Training and checking’

#	Part	Subpart	Number	Title
1	ORO	FC	115	Crew resource management (CRM) training
2	ORO	FC	120	Operator conversion training

3	ORO	FC	125	Differences training and familiarisation training
4	ORO	FC	130	Recurrent training and checking
5	ORO	FC	135	Pilot qualification to operate in either pilot's seat
6	ORO	FC	140	Operation on more than one type or variant
7	ORO	FC	145	Provision of training
8	ORO	FC	205	Command course
9	ORO	FC	215	Initial operator's crew resource management (CRM) training
10	ORO	FC	220	Operator conversion training and checking
11	ORO	FC	230	Recurrent training and checking
12	ORO	FC	235	Pilot qualification to operate in either pilot's seat
13	ORO	FC	240	Operation on more than one type or variant
14	ORO	FC	330	Recurrent training and checking — operator proficiency check
15	ORO	TC	105	Conditions for assignment to duties
16	ORO	TC	110	Training and checking
17	ORO	TC	115	Initial training
18	ORO	TC	120	Operator conversion training
19	ORO	TC	125	Differences training
20	ORO	TC	130	Familiarisation flights
21	ORO	TC	135	Recurrent training
22	ORO	TC	140	Refresher training
23	CAT	OP.MPA	290	Ground proximity detection
24	CAT	OP.MPA	295	Use of airborne collision avoidance system (ACAS)
25	SPA	LVO	120	Flight crew training and qualifications
26	SPA	HOFO	170	Crew requirements
27	NCC	OP	140	Passenger briefing
28	NCC	OP	215	Ground proximity detection
29	NCC	OP	220	Airborne collision avoidance system (ACAS)
30	NCO	OP	200	Airborne collision avoidance system (ACAS II)
31	NCO	OP	220	Airborne collision avoidance system (ACAS II)
32	NCO	SPEC	115	Crew responsibilities
33	NCO	SPEC.MCF	125	Crew composition and persons on board
34	SPO	OP	200	Ground proximity detection
35	SPO	OP	205	Airborne collision avoidance system (ACAS)

5.6.12.1 Explanation of the administrative burden

With respect to ORO.FC.230 *Recurrent training and checking*, the respondents indicated the increased frequency of operator proficiency checks (every 6 months). For small helicopter operators, such frequent proficiency checks have no safety benefit according to the respondents. Some operators pointed out that

line checks have no added value at all. Proficiency checks and line checks result in substantial administrative burden:

- organising the flights and arranging for examiners;
- recording the results; and
- keeping track of due dates.

Furthermore, some respondents suggested that the content of such training does not change over time: *'I do a CRM course every year for 20 years. Nothing new was found on the scientific side of it.'* Such experiences are believed to contribute to the perception of those types of training as being superfluous, thus burdensome.

5.6.12.2 Recommendations

There are no specific recommendations on the related rules.

5.7 Assessment of additional administrative requirements

Almost all survey respondents and interviewed operators pointed out that the rules are amended very frequently. This is considered problematic for the following two reasons:

- a significant administrative effort is required to keep track of all the changes in the rules and to determine whether the changes are applicable; and
- changes to the rules often require changes to the manuals; in addition, the changed manuals need to be approved by the national competent authority.

Different interpretation of EASA rules by different Member States (MSs) is problematic for organisations that operate in multiple MSs. A considerable amount of time is spent by the operators on corresponding with the various authorities to solve this issue. To operators, this is incomprehensible and does not contribute at all to aviation safety.

Recommendation No 1

The administrative burden that stems from the frequent changes to the rules may be reduced by issuing related EASA GM. However, this evaluation does not include a comprehensive list of such specific topics, which may also change over the course of time. Alternatively, for operators with cross-border operations in multiple MSs, EASA may be designated as their competent authority, which is believed to alleviate the issue of different interpretation of the rules by different MSs.

For contracted activities, the organisation must ensure that the contracted or purchased service or product conforms to the applicable requirement (e.g. points ORA.GEN.205 or ORO.GEN.205). This is considered an administrative burden with no safety benefit if the contractor has an approval from their national authority. The respondents also stated that they do not consider themselves sufficiently competent to verify conformity of the contractor to applicable requirements.

Recommendation No 2

This interpretation of points ORA.GEN.205 and ORO.GEN.205 by the respondents seems not to be in line with GM2 ORO.GEN.205(b) *Contracted activities*. Therefore, it is recommended that EASA informs of this difference in interpretation either the MSs or the operators concerned.

5.7.1 Other survey findings

Several survey respondents indicated that there are other requirements (not captured in the initial requirement list) that are perceived as particularly burdensome. The following requirements are retrieved from the survey, but fall outside the scope of this evaluation as they relate to other types of rules:

- ask for an authorisation to fly below the minimum safe altitudes as defined in Implementing Regulation (EU) No 923/2012 (the ‘SERA Regulation’)²⁰;
- ask for a permit for a maintenance facility;
- combine information from national labour law and Subpart FTL of Part-ORO to cover for the missing flight duty period (FDP) rules for CAT helicopter operations;
- develop and approve a syllabus for every variant of an approved training organisation (ATO) operation (even when operational suitability data (OSD) is available); and
- organise and participate in the exams, which is perceived as burdensome due to the high number of exams and the tight time frames (within 18 months).

5.7.2 Other recommendations

- To alleviate the administrative burden that stems from the regular revisions of the rules, it is suggested to provide the revisions with a timeline for their mandatory implementation. This would allow operators to operate in accordance with the latest revisions of the rules and to include (subsequent) revisions into fewer (and thereby more efficient) updates of (operations) manuals.
- The initial application for an AOC is an understandably complex and time-consuming process. The application for variations in the AOC, e.g. a change in the number or type of aircraft operated, is typically facilitated at national level by using dedicated forms. However, approval times of up to 1 year were reported. Therefore, it is recommended that competent authorities share best practice to streamline or automate such approval processes.
- Part of the administrative burden stems from the decentralised processing of SPO approvals/declarations, potentially involving multiple NAAs that interpret the rules differently. It is

²⁰ Commission Implementing Regulation (EU) No 923/2012 of 26 September 2012 laying down the common rules of the air and operational provisions regarding services and procedures in air navigation and amending Implementing Regulation (EU) No 1035/2011 and Regulations (EC) No 1265/2007, (EC) No 1794/2006, (EC) No 730/2006, (EC) No 1033/2006 and (EU) No 255/2010 (OJ L 281, 13.10.2012, p. 1)
(<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32012R0923&qid=1612451084553>).

recommended to issue related European or EU rules, and to verify that the associated GM on how those rules should be interpreted and applied is clear.

- As a wide variety of operations is perceived to require a similarly wide variety of individual standard operating procedures (SOPs), it is recommended to verify that this is the case or whether comparable operations can be combined under one single SOP. However, SOPs and checklists are essential to aviation safety. The large variety of operations performed by helicopter operators requires to define and maintain multiple SOPs/checklists. This is mostly applicable to operations that are carried out infrequently. By contrast, the survey responses indicated that operators do not fully acknowledge the associated safety benefits. Therefore, it is recommended to reinforce the message that SOPs and checklists are essential to safe operations, e.g. through targeted campaigns, training, or workshops. Such action should be linked to the European Safety Promotion Network — Rotorcraft (ESPN-R) Operations (OPS) & Safety Management System (SMS) team as well as to Safety Promotion Task (SPT).094 *Helicopter safety and risk management*.
- Keeping track of rule changes and determining whether and/or how an operator is affected by the changes is also considered a time-consuming administrative burden. The notification feature of the new EASA website is expected to help relieve this burden by giving the option to tailor the notifications to the topics that are of interest to the user. To maximise the impact of the new feature, it is recommended to raise awareness among stakeholders of its availability on the EASA website. This may reduce the effort to identify the changed rules; however, clear and detailed guidance on the exact changes should be provided. Therefore, it is recommended to include a short explanatory note in each notification to identify which type(s) of operators are affected by the rule changes. In doing so, the time spent by operators on identifying the individual changes and on assessing their impact on their specific operations is reduced, and potential errors are avoided.
- It is recommended to define requirements for the frequency of, and exemptions for, recurrent training and checks, depending on the experience of the pilot involved and the type of operations. Alternatively, recurrent training and checks could be further tailored to the experience of the pilot to increase their (perceived) value among the other pilots.
- To address the administrative burden that stems from tracking validity/expiration dates, it is recommended to set up a centralised database that generates automated (email) notifications to the operator or individual pilot of upcoming required training and checks.
- It is unlikely that automated on-board weight & balance (W&B) systems will become widely available for the types of helicopters that are operated by small operators. As such, preflight W&B sheets are expected to remain the primary means of obtaining and documenting W&B information. The widespread use of digital W&B tools would reduce the administrative burden stemming from the W&B calculation, documentation, and information exchange. AMC1 CAT.POL.MAB.105 allows to use a computerised system to document and approve W&B information, if the integrity of such information is verified at intervals not exceeding 6 months.
- A general trend towards digital record-keeping may help to alleviate the administrative burden of helicopter operations. It is recommended to actively promote the use of digital record-keeping and

that the competent authorities accept such digital records, as the authorities are key to spreading the use of the related digital tools.

- The administrative burden that stems from occurrence reporting is not related to the rule but to its implementation. To reduce such administrative burden, it is recommended to streamline and simplify the reporting forms that are available at www.aviationreporting.eu. This may be achieved by:
 - enabling the user of the forms to design templates;
 - using conditional (branch) logic to control which of the required input fields are displayed; and
 - adding tool tips to aid the user in filling in the forms.
- On training and checking activities, it is recommended to reinforce the message that these are essential to safe operations, e.g. through targeted campaigns or workshops. Furthermore, tailoring the training to the specific needs of each operator may change the current perception of training as something burdensome. Therefore, it is recommended to reconsider the required frequency of operator proficiency checks and line checks (see point ORO.FC.230), while adhering to ICAO standards, as well as to consider including evidence-based training (EBT) and competency-based training (CBT) for small helicopter operators in rulemaking task (RMT).0599.

6 Conclusions and recommendations

In this final Chapter 6, the results of the evaluation are summarised into the main conclusions. In addition, based on the previous Chapter 5, recommendations are made.

6.1 Main conclusions

The typical small helicopter operator profiles are derived from the survey by grouping respondents based on their unique combination of operations:

- SPO only (typical operator 1);
- SPO and CAT operations (typical operator 2); and
- SPO and CAT operations, as well as training operations (typical operator 3).

Table 22 shows the results from the assessment of the administrative burden for the three typical small helicopter operator profiles in Europe.

Table 22 — Assessment of the administrative burden for three typical small helicopter operator profiles in Europe

Generic information		Typical operator 1	Typical operator 2	Typical operator 3
	CAT	N/a	50 %	25 %
	SPO	100 %	50 %	25 %
	Training	N/a	N/a	50 %
Total number of helicopters		2–3	2–3	2–3
Total FTEs		5–8	5–8	7–10
Administrative effort (measured in FTEs)	CAT	N/a	1,04	0,52
	SPO	1,90	0,95	0,47
	Training	N/a	N/a	1,28
	Total	1,90	1,99	2,27
Average BaU		65 %	65 %	65 %
Administrative burden (measured in FTEs)	CAT	N/a	0,36	0,18
	SPO	0,67	0,33	0,17
	Training	N/a	N/a	0,44
	Total	0,67	0,70	0,79

The following overall findings on the **administrative effort of small European helicopter operators** emerged from the survey:

- operators that conduct CAT operations need on average 2,1 FTEs per year to perform the (required) administrative activities;
- operators that conduct SPO need on average 1,9 FTEs per year to perform the administrative activities; and

- operators that conduct training operations spend the most time on administrative activities (2,6 FTEs per year).

The **Business as usual (BaU)** results are based on the qualitative remarks of the survey respondents and interviewees:

- the percentage of BaU that is perceived as safety-related varies between 50 % and 90 %;
- on average, approximately one third of the administrative effort is seen as BaU; and
- the survey results indicate that the administrative requirements could be met in a less burdensome way without compromising the safety performance of the operations.

The evaluation results regarding the **administrative burden** per type of operations conducted by small European helicopter operators are the following:

- operators that conduct CAT operations have an estimated annual administrative burden of almost 1 400 hours (0,7 FTE);
- operators that conduct SPO have an estimated annual administrative burden of approximately 1 300 hours (0,7 FTE); and
- operators that conduct training operations have an estimated annual administrative burden of approximately 1 700 hours (0,9 FTE).

Table 23 lists the categories of burdensome activities in descending order, based on the calculations made for all 26 categories of the related administrative requirements:

Table 23 — Most ‘burdensome’ administrative requirements

Section	Administrative requirement
4.6.1.	Management system as a whole
4.6.2.	Record-keeping, manuals, and documentation
4.6.3.	Application for an air operator certificate (AOC), specific approval (SPA), authorisation or declaration
4.6.4.	Establishing -specific procedures/checklists
4.6.5.	Managing and applying for changes
4.6.6.	Checking and maintaining personnel compliance
4.6.7.	Maintenance flights/Check flights
4.6.8.	Audits by the competent authority
4.6.9.	Establishing mass-and-balance data
4.6.10.	Internal audits
4.6.11.	Occurrence reporting
4.6.12.	Training and checking

75 % of the total administrative burden stems from the 12 most ‘burdensome’ administrative requirements (as categorised and ranked in Table 23).

6.2 Recommendations

Based on the evaluation results, the following recommendations are made for improving the rules:

- review the definition of ‘complex operator’ in AMC1 ORO.GEN.200(b) *Management system* considering the variety of the operations and helicopter types that are operated by small helicopter operators; alternatively, define a new category of operators with a required intermediate level of safety management;
- introduce a new GM ORO.GEN.130(b) that distinguishes ‘Minor’ from ‘Major’ changes, with the former not requiring prior approval from the competent authority;
- include a quantitative guideline in point (b) of AMC2 ARO.GEN.305(b) as to the annual number of audits for a given scale of operations;
- in line with point (d) of AMC2 ARO.GEN.305(b), instruct, and/or coordinate with the national competent authorities to streamline the audit process for small helicopter operators, based on the organisational structure of such operators;
- introduce new GM on the structure, prioritisation, and frequency of recurrent audits;
- amend points ORA.GEN.150 *Findings* and ORO.GEN.150 *Findings* to require findings to be analysed for their safety significance as does point M.B.303(d) of Annex I (Part-M) to the CAW Regulation, and introduce GM on the role of the root cause analysis;
- issue GM that is specific to small operators on the frequency and scope of internal audits, including on the associated documentation that is defined in point (4)(2) of AMC1 ORA.GEN.200(a)(6) *Management system*;
- while adhering to ICAO standards, reconsider the frequency of operator proficiency checks and line checks, which is required by point ORO.FC.230 *Recurrent training and checking*; and
- consider including EBT and CBT for small helicopter operators in RMT.0599 *Evidence-based and competency-based training*.

Next to the identified administrative burden that stems from specific rules and requirements as detailed above, further administrative burden is imposed by the implementation of those rules and requirements. Although this falls outside of the scope of this evaluation, various detailed recommendations on the implementation issue are made in Chapter 5, Section 5.7.

Annex I — Overview of the interviewed stakeholders

Table 24 — Interviewed stakeholders per country and date of interview

Organisation	Interview completed on
1. Organisation 1 (UK)	3 February 2020
2. Organisation 2 (Germany)	4 February 2020
3. Organisation 3 (Netherlands)	9 January 2020
4. Organisation 4 (France)	4 March 2020
5. Organisation 5 (Switzerland)	27 February 2020
6. Organisation 6 (Switzerland)	25 February 2020
7. Organisation 7 (Germany)	5 March 2020
8. Organisation 8 (Denmark)	11 March 2020
9. Organisation 9 (Germany)	5 March 2020
10. Organisation 10 (Greece)	23 April 2020
11. Organisation 11 (France)	22 January 2020
12. Organisation 12 (Netherlands)	17 September 2020
13. Organisation 13 (Germany)	28 September 2020
14. Organisation 14 (Belgium)	17 September 2020
15. Organisation 15 (Norway)	8 October
16. Organisation 16 (Netherlands)	22 September 2020
17. Organisation 17 (Greece)	23 September 2020
18. Organisation 18. (Slovenija)	6 October 2020
19. Organisation 19 (France)	2 October 2020
20. Organisation 20 (UK)	2 October 2020
21. Organisation 21 (Austria)	7 October 2020
22. Organisation 22 (Finland)	7 October 2020
23. Organisation 23 (Netherlands)	6 October 2020

24.	Organisation 24 (Netherlands)	7 October 2020
25.	Organisation 25 (Estonia)	6 October 2020
26.	Organisation 26 (Spain)	12 October 2020
27.	Organisation 27 (Sweden)	12 October 2020
28.	Organisation 28 (Estonia)	9 October 2020
29.	Organisation 29 (Poland)	14 October 2020
30.	Organisation 30 (Germany)	22 January 2020

Annex II — In-depth interview guidelines

Introducing the evaluation

Ecorys and NLR are asked by EASA to perform an evaluation, which aims at identifying the rules and provisions that impose administrative burden to small helicopter operators and assessing the related impact. The following rules are subject to the evaluation:

- those in Regulation No 965/2012 (OPS Regulation), Part ORO, CAT, NCC, NCO and SPO and related provisions in the Acceptable Means of Compliance (AMC) and Guidance Materials (GM).
- those in Regulation No 1178/2011 (AIRCREW Regulation), part ORA, and related provisions in the Acceptable Means of Compliance (AMC) and Guidance Materials (GM).

The first (exploratory) stage of the project is now completed. During the, second, stage we are looking further into the different administrative requirements and burdensome activities for helicopter operators. Specific information on the burdensome activities with regard to the frequency, monetary costs, time needed to comply with the requirements is much appreciated.

General

- In what country or region are you based?
- What type of operations do you perform or are you certified to perform?
- How many helicopters do you operate?

Administrative burden

- What are the (most) burdensome administrative requirements (top 10 most burdensome)?
- Are the most burdensome administrative requirements (as identified earlier) safety critical? In the absence of regulation, would this activity be performed differently? And if so, how?

Annex IX contains a categorisation of the requirements imposed by EASA. Please indicate which administrative requirements falls under which category and mention why these requirements are specifically perceived as being burdensome?

Frequency

- What kind of data needs to be recorded (multiple times) for different purposes and what is the frequency of such recordings (recurring activities e.g. per flight, day-to-day or incidental activities e.g. manuals)?
- Who are the actors that record the data and what is the time and frequency needed for these activities?

Costs

When considering the administrative requirements mentioned in one of the following questions:

- What is the average time needed to perform these administrative requirements?
- Please indicate the estimated monetary cost of performing the requirements.

Table 25 — Categorisation of administrative requirements

Administrative categorisation	
1	Applications and changes
1,1	Application for an AOC, SPA, authorisation or declaration
1,2	Managing and applying for changes
1,3	Specific compliance demonstration items
2	Implementing and managing the (Safety) Management System
2,1	Define lines of responsibility
2,2	Describe philosophies and principles
2,3	Identify and manage risks/hazards
2,4	Occurrence reporting
2,5	Record-keeping, manuals and documentation
2,6	Establish (specific) procedures/checklists
2,7	Management system as a whole
2,8	Personnel training (detailed under 3)
2,9	Monitor compliance (detailed under 4)
2,10	Other required items (detailed under 5)
3	Recording operations, training and personnel compliance
3,1	Preparation and execution of a flight
3,2	Training and checking
3,3	Recording of (annual) flight hours
3,4	Checking and maintaining personnel compliance
4	Compliance monitoring (audits)
4,1	Audits from the competent authority
4,2	Internal audits
4,3	Contracted activities
5	Miscellaneous
5,1	Monitoring Systems and support programs
5,2	Tracking usage of specific items
5,3	Maintenance / Check flights

Annex III — Survey guidelines

Evaluation of Helicopter Rules and Provisions

Helicopter operators need to run a rotorcraft operation and at the same time they have to comply with the legal requirements that are imposed by EASA and national authorities. As in any air transport operation, they should not be spending too much time and effort on administrative tasks, which could be used for their core tasks (operating a safe rotorcraft operation).

This is in line with the EASA Rotorcraft Safety Roadmap (adopted in 2018), which contains recommendations to reduce the administrative burden and the costs for the helicopter operators, so they can focus on safety-related tasks and improve their performance. In the light of these recommendations, EASA has asked Ecorys and NLR to evaluate the administrative burden of the following rules and provisions for helicopter operators:

- those in Regulation No 965/2012 (OPS Regulation), Part ORO, CAT, NCC, NCO and SPO and related provisions in the Acceptable Means of Compliance (AMC) and Guidance Materials (GM)
- those in Regulation No 1178/2011 (AIRCREW Regulation), part ORA, and related provisions in the Acceptable Means of Compliance (AMC) and Guidance Materials (GM).

The main aim of this survey is to gather important information to identify the administrative requirements that impose an administrative burden. This data forms the essential basis (together with interviews and desk research) of a report that will be delivered to EASA for further considerations.

The survey is structured in the following sections:

- Part I: General information – background information on your type of organisation and country
- Part II: Identification of burdensome administrative requirements – you are invited to identify the requirements which are burdensome for you
- Part III: Administrative burden and safety relevance – you are invited to specify the burden of the requirements
- Part IV: Other requirements

The survey will close on **11 October 2020**.

Please note that the collected data and your responses will be treated with strict confidentiality. The data provided will be aggregated in a report to avoid the possibility to recognise any individual entity or person who answered to the survey. Any information which will be used for the purpose of the report will be de-identified to ensure the confidentiality of the respondents.

Any additional questions with respect to this survey or evaluation can be addressed to aviationresearch@ecorys.com

Prior to filling in the survey, we want to thank you for your participating and inform you that the survey is expected to take a couple of minutes to complete.

Part I: General information

The collected data and your responses will be treated with strict confidentiality. However, for our analysis we would like to know some background information on the type of organisations. This will also allow us to guide you through the relevant questions for your organisation

*** 1. Please select the organisation you represent**

- ☐ Helicopter operator
- ☐ European or National Helicopter Association
- ☐ National Aviation Authority
- ☐ Other, please specify

.....

* mandatory

*** 2. What is the name of the organisation you represent?**

* mandatory

3. What type of operations do you perform?

- ☐ Commercial Air Transport (CAT)
- ☐ Specialised Operations (SPO)
- ☐ Non-Commercial Operations with complex motor-powered aircraft (NCC)
- ☐ Non-Commercial Operation (NCO)
- ☐ Training operation
- ☐ Other, please specify

.....

4. Do you need a specific approval according to Air Operations Regulation for any of your operations? Please explain which approval you need and how many specific approvals your company has

*** 5. How many helicopters are currently registered with your organisation?**



1



2



3



4



5



Other, please specify

.....

* mandatory

6. In what country or region are you currently based?



Austria



Belgium



Bulgaria



Croatia



Cyprus



Czech Republic


























Denmark



Estonia



Finland

-  France
-  Germany
-  Greece
-  Hungary
-  Iceland
-  Ireland
-  Italy
-  Latvia
-  Liechtenstein
-  Lithuania
-  Luxembourg
-  Malta
-  Netherlands
-  Norway
-  Poland
-  Portugal
-  Romania
-  Slovakia
-  Slovenia
-  Spain
-  Sweden
-  Switzerland
-  Other, please specify

.....

7. Please select the country (or countries) in which you perform helicopter operation(s)

- ☐ Austria
- ☐ Belgium
- ☐ Bulgaria
- ☐ Croatia
- ☐ Cyprus
- ☐ Czech Republic
- ☐ Denmark
- ☐ Estonia
- ☐ Finland
- ☐ France
- ☐ Germany
- ☐ Greece
- ☐ Hungary
- ☐ Iceland
- ☐ Ireland
- ☐ Italy
- ☐ Latvia
- ☐ Liechtenstein
- ☐ Lithuania
- ☐ Luxembourg
- ☐ Malta
- ☐ Netherlands
- ☐ Norway
- ☐ Poland
- ☐ Portugal



Romania



Slovakia



Slovenia



Spain



Sweden



Switzerland



Other, please specify

.....

Part II: Identification of burdensome administrative requirements

The aim is to identify existing requirements that are posing unnecessary burden for helicopter operators. With this survey we also aim to understand which requirements could be performed in a way that causes less burden while upholding the high safety standards.

The following rules and AMCs are subject to the evaluation:

- Regulation No 965/2012 (OPS Regulation), Part ORO, CAT, NCC, NCO and SPO.
- Regulation No 1178/2011 (AIRCREW Regulation), part ORA.

For these most burdensome requirements we would like to, assess the related burden, while understanding possible alternative ways of achieving the same intend. An initial categorisation of administrative requirements are listed below. Please identify the perceived amount of administrative burden (with 1 representing minimal burden and 10 considered extremely burdensome).

Please note that the impact will be analysed for the requirements that are ranked with 6 or more. The remainder of the survey will present follow-up questions related to these most burdensome requirements in order to assess the impact.

Note: NAAs are invited to respond considering the view of the operators

8. Applications and changes

	1	2	3	4	5	6	7	8	9	10	N/A
Application for an AOC, SPA, authorisation or declaration											
Managing and applying for changes											
Specific compliance demonstration items											

9. Implementing and managing the (Safety) Management System

	1	2	3	4	5	6	7	8	9	10	N/A
Defining lines of responsibility											
Describing philosophies and principles											
Identifying and managing risks/hazards											
Occurrence reporting											
Record-keeping, manuals and documentation											
Establishing (specific) procedures/checklists											
Management system as a whole											

10. Operational, training and personnel compliance records

	1	2	3	4	5	6	7	8	9	10	N/A
Preparation and execution of a flight											
Post flight duties											
Training and checking											
Recording of (annual) flight hours											
Checking and maintaining personnel compliance											

11. Flight associated

Ensuring (current) data availability during flight											
Establishing operational flight plan											
Establishing supplemental oxygen need											
Establishing mass- and balance data											
Contingency planning											

12. Compliance monitoring (audits)

	1	2	3	4	5	6	7	8	9	10	N/A
Audits from the competent authority											
Internal audits											
Contracted activities											

13. Miscellaneous

	1	2	3	4	5	6	7	8	9	10	N/A
Monitoring systems and support programs											
Tracking usage of specific items											
Maintenance / Check flights											

14. Are you aware of any inconsistency between a European and a national regulation that is creating an administrative burden?

Yes☐**No**☐

15. If yes, please define the issue between European and national regulation

*** 16. Are there other administrative requirements you consider particularly burdensome that are not included in the lists above?**

Yes☐**No**☐

* mandatory

Part III: administrative burden and safety relevance

In the second part of the survey, you have indicated the perceived amount of administrative burden (with 1 representing minimal burden and 10 considered extremely burdensome). The impact for the requirements that are ranked with 6 or more will be analysed in more detailed in this third part of the survey. The following questions are therefore related to these 'most' burdensome requirements

Please fill in questions 17 to 23 for every requirement ranked with 6 or more.

17. Please indicate the burdensome activities you are currently performing in order to meet this requirement**18. Could this be performed in a less burdensome way without compromising the safety performance of your operation?**

Yes



No



I don't know

.....

19. With the intention of maintaining the safety performance of your operation what and in which cases would you perform the requirement differently in the absence of relevant EU regulation?

*** 20. Please indicate the frequency of performing this requirement for your organisation (please fill in one of the fields below)**

	number of times per day
	number of times per week
	number of times per month
	number of times per year
	other, please specify

* mandatory

*** 21. What is the average time needed to perform this administrative requirement?**

- ☐ 0 – 15 minutes
- ☐ 15 – 30 minutes
- ☐ 30 – 60 minutes
- ☐ 1 hour – 2 hours
- ☐ 2 hours – 4 hours
- ☐ Other, please specify
.....

* mandatory

22. What is the estimated monetary cost of performing this requirement? Please provide an estimation (in euros)

--

23. Who is performing the administrative requirement?

- ☐ Pilot
- ☐ Crew staff
- ☐ Administrative staff
- ☐ Other, please specify
.....

Part IV: Other requirement

At the beginning of the survey (question 16), you have indicated that there are other requirements (not obtained in the requirement list) that are perceived as particularly burdensome. The following questions are therefore related to this other requirement.

Please note that this evaluation focuses on European legislation. If the other administrative requirement results from national rules, we would kindly invite you to specify the burdensome rules, but there will not be an exhaustive assessment of this national legislation.

Please fill in questions 24 to 32 for every other burdensome requirement.

24. Please describe this other requirement**25. Please indicate the burdensome activities you are currently performing in order to meet this requirement****26. Could this be performed in a less burdensome way without compromising the safety performance of your operation?**

- ☐ Yes
- ☐ No
- ☐ I don't know

.....

27. With the intention of maintaining the safety performance of your operation what and in which cases would you perform the requirement differently in the absence of relevant EU regulation?

*** 28. What is the frequency of performing this administrative requirement? Please fill in one of the fields below**

<input type="text"/>	number of times per day
<input type="text"/>	number of times per week
<input type="text"/>	number of times per month
<input type="text"/>	number of times per year
<input type="text"/>	other, please specify

* mandatory

*** 29. What is the average time needed to perform this administrative requirement?**

- ☐ 0 – 15 minutes
- ☐ 15 – 30 minutes
- ☐ 30 – 60 minutes
- ☐ 1 hour – 2 hours
- ☐ 2 hours – 4 hours
- ☐ Other, please specify
.....

* mandatory

30. What is the estimated monetary cost of performing this requirement? Please provide an estimation (in euros)

31. Who is performing the administrative requirement?

- ☐ Pilot
- ☐ Crew staff

☐ Administrative staff☐ Other, please specify

.....

32. Are there other administrative requirements you consider particularly burdensome that are not discussed in this survey?

Yes

☐

No

☐

Part V: Other questions

On behalf of the entire project team, we would like to thank you for participating. The survey results will be treated with strict confidentiality. In case you have addition questions with respect to this survey or evaluation, please reach out to aviationresearch@ecorys.com.

33. Please provide questions, comments or areas for improvement, that are relevant for the purpose of this study, in the text box below

34. Please provide us with your email address in case you want to be informed on the results of this study

35. Are we allowed to contact you in case of questions and/or clarifications?

Yes

☐

No

☐

Your responses have been registered! Thank you for taking the time to complete the survey, your input is valuable to us.

Annex IV — Average scoring of administrative requirements

Table 26 — Average scoring of the administrative requirements for different types of operations²¹

Administrative requirements	Total	CAT	SPO	NCC	Training
Application for an AOC, SPA, authorisation or declaration	7,3	8,2	8,2	6,5	8,3
Managing and applying for changes	6,9	7,4	7,4	6,0	7,6
Specific compliance demonstration items	7,2	7,8	7,6	6,8	7,8
Defining lines of responsibility	5,4	5,7	5,6	5,6	5,9
Describing philosophies and principles	5,5	5,6	5,7	5,1	5,8
Identifying and managing risks/hazards	6,5	6,8	6,8	5,8	6,7
Occurrence reporting	5,9	6,3	6,2	5,7	6,2
Record-keeping, manuals and documentation	6,7	7,2	7,3	6,3	7,4
Establishing (specific) procedures/checklists	6,5	6,8	6,8	5,6	7,4
Management system as a whole	7,0	7,4	7,5	6,2	7,5
Preparation and execution of a flight	5,4	6,1	5,6	5,0	6,0
Post flight duties	5,3	5,8	5,5	4,3	5,9
Training and checking	6,2	6,7	6,5	5,8	6,4
Recording of (annual) flight hours	4,8	5,4	4,8	5,5	5,1
Checking and maintaining personnel compliance	6,1	6,6	6,3	5,2	6,4
Ensuring (current) data availability during flight	4,7	5,0	4,9	4,9	4,6
Establishing operational flight plan	4,8	5,1	4,8	4,9	4,7
Establishing supplemental oxygen need	3,8	4,0	3,7	4,3	4,0
Establishing mass- and balance data	4,5	4,9	4,6	4,8	4,4
Contingency planning	4,4	4,8	4,5	4,3	4,5
Audits from the competent authority	6,8	7,3	7,3	6,0	7,7
Internal audits	5,8	6,3	6,2	5,1	6,3
Contracted activities	5,7	6,1	6,0	5,3	6,5
Monitoring systems and support programs	5,8	6,3	6,1	5,9	6,1
Tracking usage of specific items	5,2	5,6	5,5	4,9	5,9
Maintenance / Check flights	5,2	5,8	5,4	6,0	5,7

²¹ The average score of the administrative requirements (categories) is based upon the survey results. Every respondent was asked to identify the perceived amount of administrative burden ('1' representing minimal burden and '10' considered extremely burdensome). The results are reflected in Table 26.

Annex V — Weighted average time and frequency of the categories subject to the evaluation

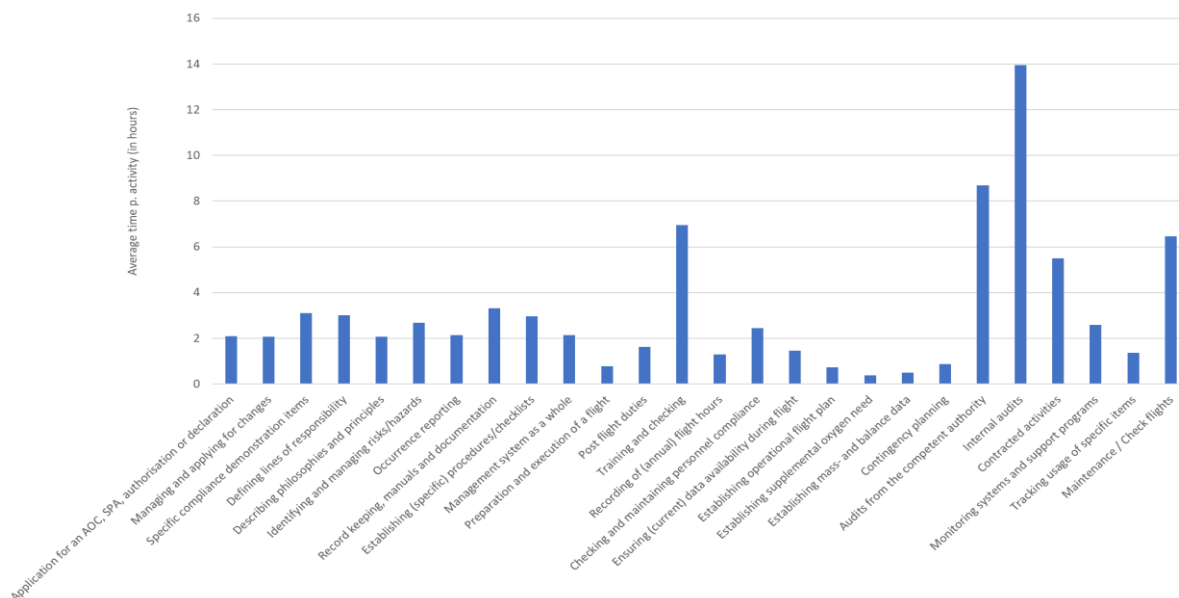


Figure 12 — Assessment of the weighted average time of administrative requirements for all types of operations

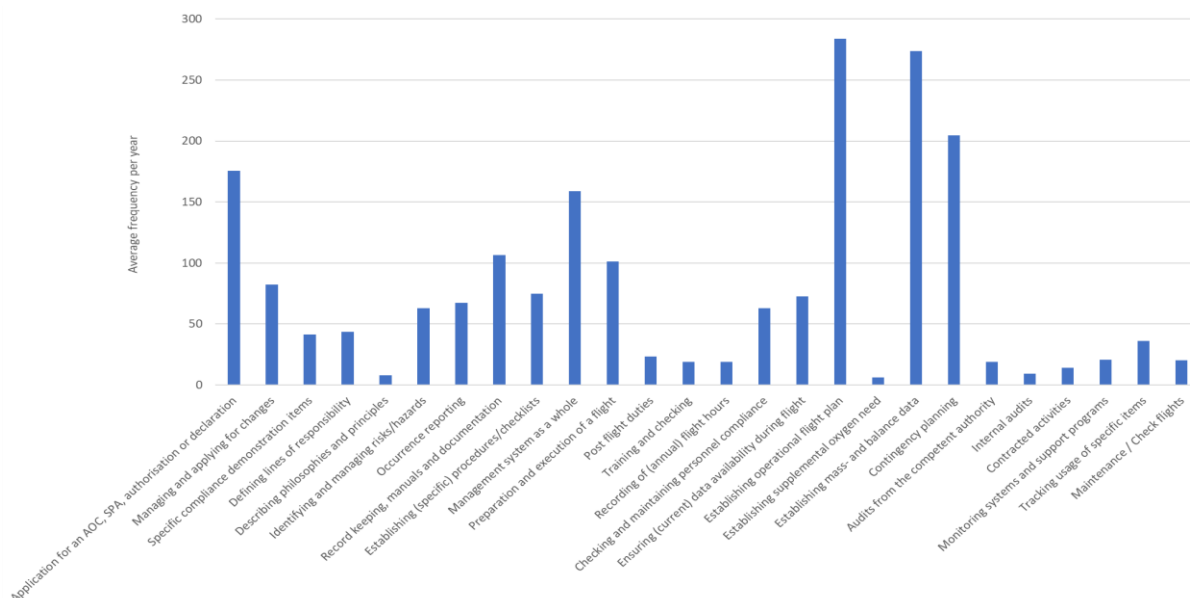


Figure 13 — Assessment of the weighted average frequency of administrative requirements for all types of operations

Annex VI — Detailed administrative effort per category of rules and type of operations

Commercial Air Transport (CAT)

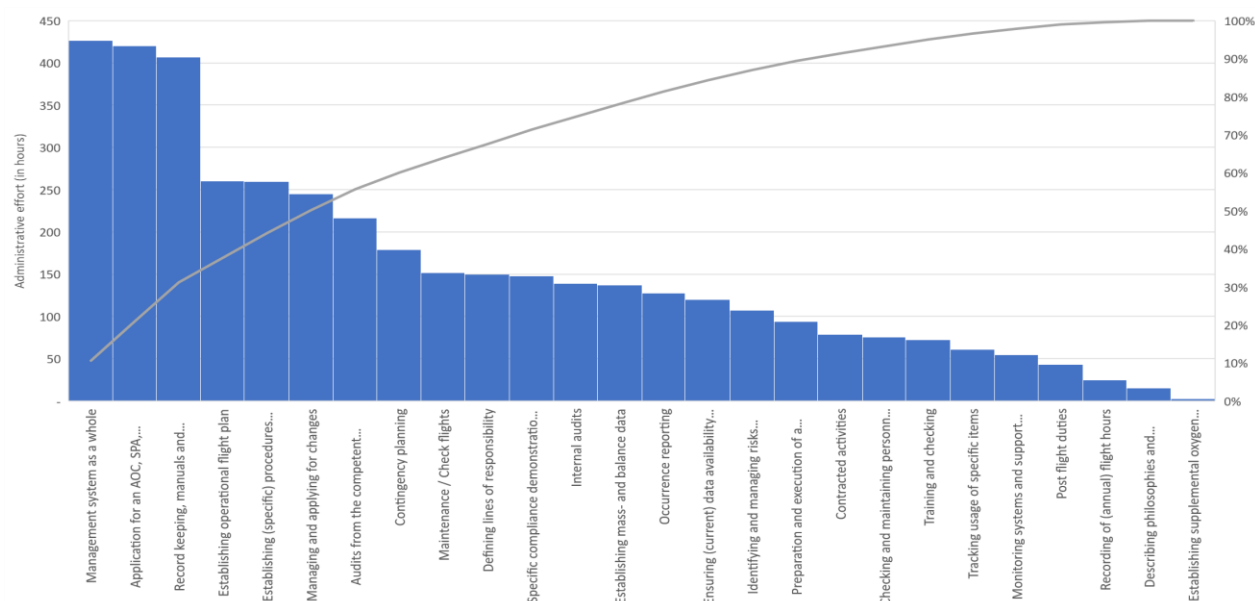


Figure 14 — Assessment administrative effort (measured in hours per year) – CAT operations

Specialised Operations (SPO)

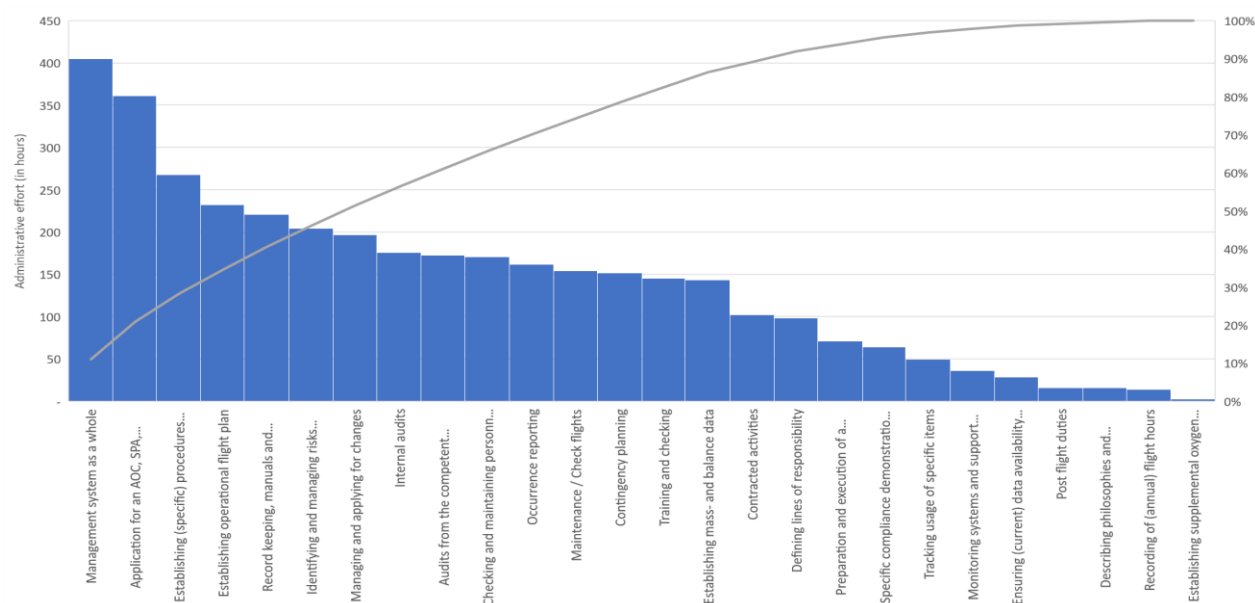


Figure 15 — Assessment administrative effort (measured in hours per year) – SPO operations

Training operations

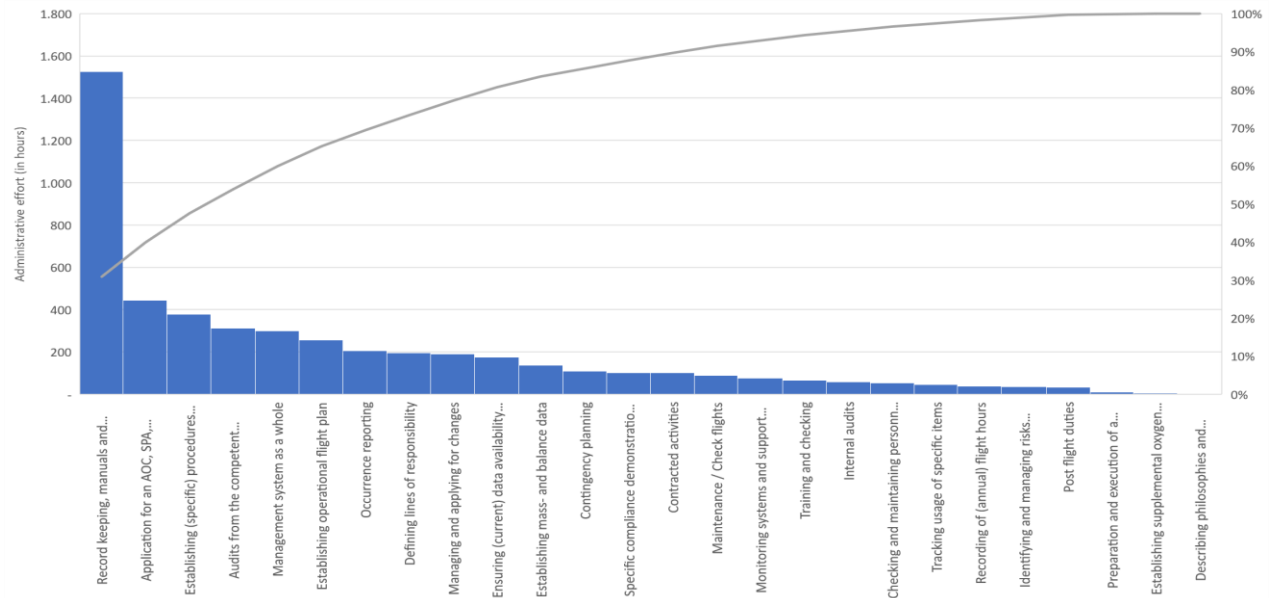


Figure 16 — Assessment administrative effort (measured in hours per year) – Training operations

Annex VII — Detailed assessment of Business as Usual

Table 27 — Assessment of Business as Usual (BaU)

		Questions: “Could the requirement be performed in a less burdensome way?”			
Cluster Category	Administrative requirements	Answer = ‘No’	Answer = ‘I don’t know’	Answer = ‘Yes’	Business as Usual (BaU) ²²
1.1	Application for an AOC, SPA, authorisation or declaration	12%	24%	64%	66%
1.2	Managing and applying for changes	6%	17%	77%	58%
1.3	Specific compliance demonstration items	8%	23%	69%	63%
2.1	Defining lines of responsibility	8%	25%	67%	65%
2.2	Describing philosophies and principles	0%	25%	75%	59%
2.3	Identifying and managing risks/hazards	18%	24%	59%	70%
2.4	Occurrence reporting	14%	18%	68%	82%
2.5	Record-keeping, manuals and documentation	6%	28%	67%	65%
2.6	Establishing procedures/checklists (specific)	9%	18%	73%	61%
2.7	Management system as a whole	11%	16%	74%	60%
3.1	Preparation and execution of a flight	20%	10%	70%	63%
3.2	Post flight duties	25%	13%	63%	68%
3.3	Training and checking	9%	18%	73%	61%
3.4	Recording of (annual) flight hours	0%	25%	75%	59%
3.5	Checking and maintaining personnel compliance	0%	20%	80%	56%
4.1	Ensuring (current) data availability during flight	50%	0%	50%	76%
4.2	Establishing operational flight plan	13%	38%	50%	76%
4.3	Establishing supplemental oxygen need	50%	0%	50%	76%
4.4	Establishing mass- and balance data	25%	0%	75%	59%
4.5	Contingency planning	33%	33%	33%	87%

²² A more detailed explanation of the approach to calculate the BaU is provided in the methodology section (Chapter 3) and estimation of safety relevance (Section 5.3).

5.1	Audits from the competent authority	13%	20%	67%	65%
5.2	Internal audits	6%	19%	75%	65%
5.3	Contracted activities	14%	43%	43%	81%
6.1	Monitoring systems and support programs	0%	11%	89%	50%
6.2	Tracking usage of specific items	43%	29%	29%	90%
6.3	Maintenance / Check flights	10%	10%	80%	56%

Annex VIII — Detailed administrative burden per category of rules and type of operations

Commercial Air Transport (CAT)

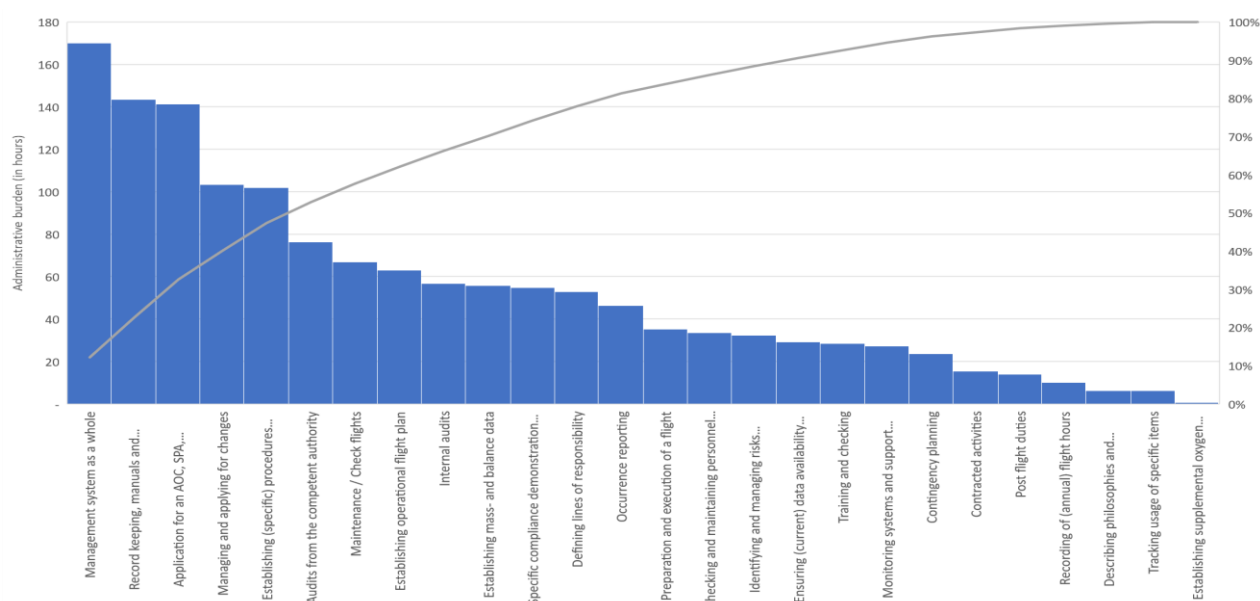


Figure 17 — Assessment of administrative burden (measured in hours per year) — CAT operations

Table 28 — Assessment of administrative burden (measured in hours per year) — CAT operations

Administrative requirements	Commercial Air Transport (CAT)
Management system as a whole	170
Record-keeping, manuals and documentation	143
Application for an AOC, SPA, authorisation or declaration	141
Managing and applying for changes	103
Establishing (specific) procedures/checklists	102
Audits from the competent authority	76
Maintenance / Check flights	67
Establishing operational flight plan	63
Internal audits	57
Establishing mass- and balance data	56
Specific compliance demonstration items	55
Defining lines of responsibility	53

Specialised Operations (SPO)

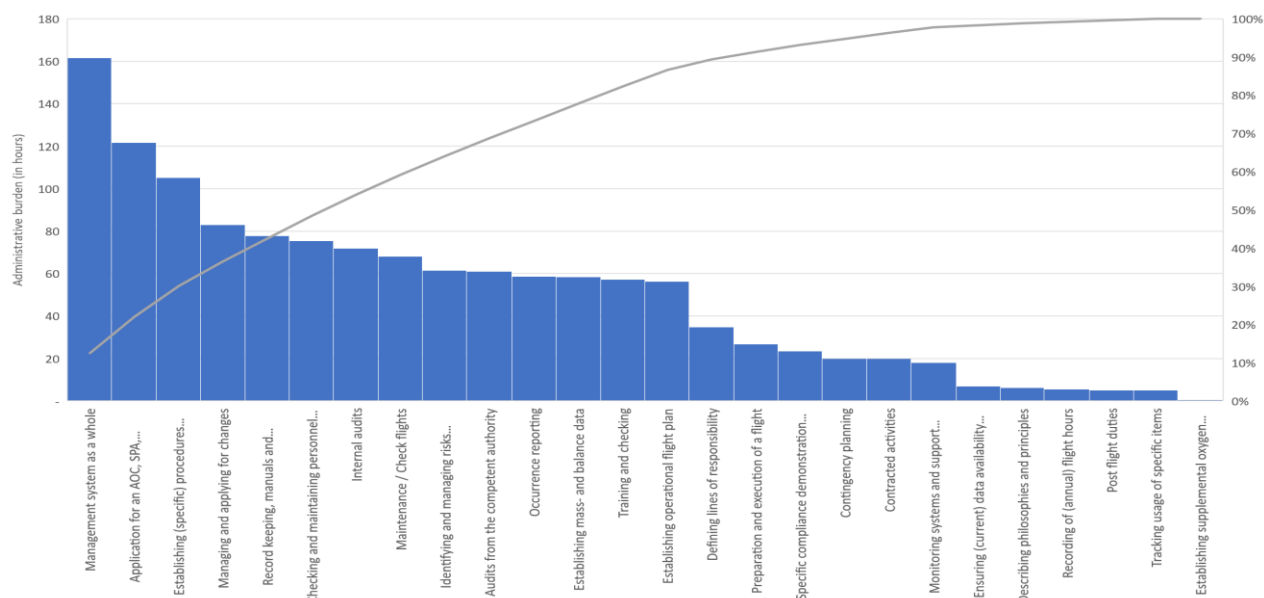


Figure 18 — Assessment of administrative burden (measured in hours per year) — SPO operations

Table 29 — Assessment of administrative burden (measured in hours per year) — SPO operations

Administrative requirements	Specialised Operations (SPO)
Management system as a whole	162
Application for an AOC, SPA, authorisation or declaration	122
Establishing (specific) procedures/checklists	105
Managing and applying for changes	83
Record-keeping, manuals and documentation	78
Checking and maintaining personnel compliance	75
Internal audits	72
Maintenance / Check flights	68
Identifying and managing risks/hazards	61
Audits from the competent authority	61
Occurrence reporting	59
Establishing mass- and balance data	59

Training operations

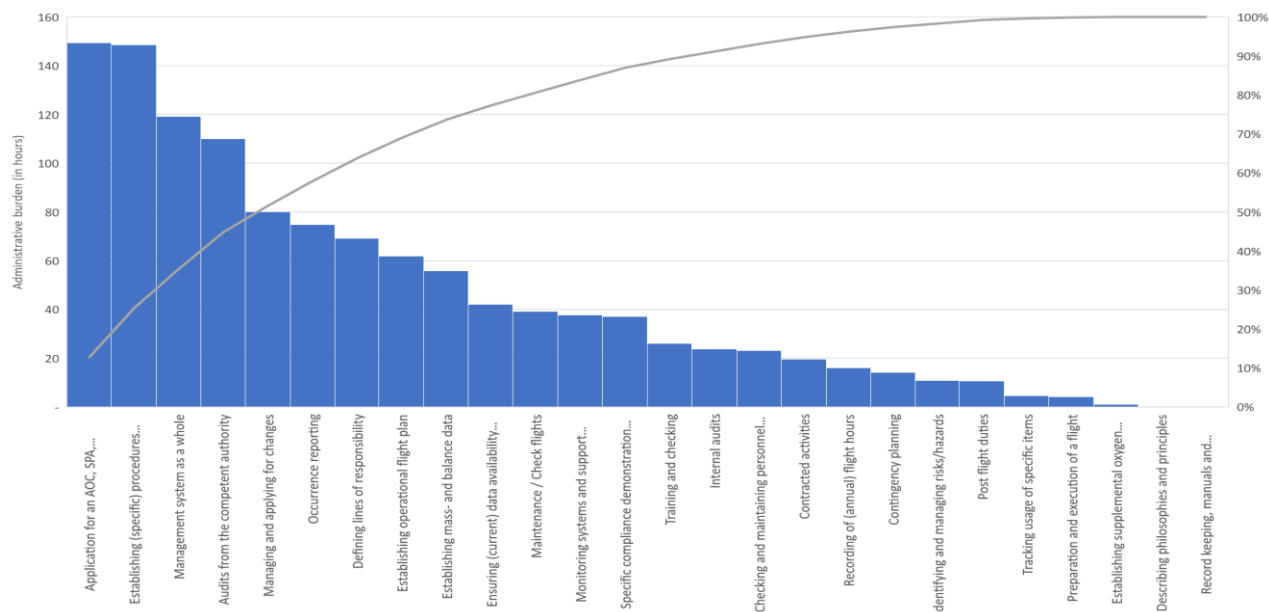


Figure 19 — Assessment of administrative burden (measured in hours per year) — Training operations

Table 30 — Assessment of administrative burden (measured in hours per year) — Training operations

Administrative requirements	Training Operations
Application for an AOC, SPA, authorisation or declaration	149
Establishing (specific) procedures/checklists	148
Management system as a whole	119
Audits from the competent authority	110
Managing and applying for changes	80
Occurrence reporting	75
Defining lines of responsibility	69
Establishing operational flight plan	62
Establishing mass- and balance data	56
Ensuring (current) data availability during flight	42
Maintenance / Check flights	39
Monitoring systems and support programs	38

Table 31 — Assessment of administrative burden (measured in hours per year) — per administrative category

Administrative requirements	CAT	SPO	Training
Application for an AOC, SPA, authorisation or declaration	141	122	149
Managing and applying for changes	103	83	80
Specific compliance demonstration items	55	24	37
Defining lines of responsibility	53	35	69
Describing philosophies and principles	6	6	N/a
Identifying and managing risks/hazards	32	61	11
Occurrence reporting	46	59	75
Record-keeping, manuals and documentation	143	78	538
Establishing (specific) procedures/checklists	102	105	148
Management system as a whole	170	162	119
Preparation and execution of a flight	35	27	4
Post flight duties	14	5	11
Training and checking	29	57	26
Recording of (annual) flight hours	10	6	16
Checking and maintaining personnel compliance	33	75	23
Ensuring (current) data availability during flight	29	7	42
Establishing operational flight plan	63	56	62
Establishing supplemental oxygen need	1	1	1
Establishing mass- and balance data	56	59	56
Contingency planning	24	20	14
Audits from the competent authority	76	61	110
Internal audits	57	72	24
Contracted activities	15	20	20
Monitoring systems and support programs	27	18	38
Tracking usage of specific items	6	5	5
Maintenance / Check flights	67	68	39

Annex IX — Requirements in the Air OPS and Aircrew Regulations

#	Part	Subpart	Number	Title	Cat.	Management Safety	Flight associated	Personnel records	Other	CAT	SPO	SPA	NCC	NCO
1	ORO	GEN	115	Application for an AOC	1,1	x				x				
2	ORO	AOC	100	Application for an air operator certificate	1,1	x		x		x				
3	ORO	DEC	100	Declaration	1,1	x					x		x	
4	ORO	SPO	110	Authorisation of high risk commercial specialised operations	1,1	x					x			
5	CAT	GEN.MPA	155	Carriage of weapons of war and munitions of war	1,1	x				x				
6	CAT	POL.H	420	Helicopter operations over a hostile environment located outside a congested area	1,1	x				x				
7	SPA	GEN	105	Application for a specific approval	1,1	x				x	x	x	x	x
8	SPO	SPEC.HESLO	110	Transportation of dangerous goods	1,1	x					x			
9	ORO	GEN	135	Changes related to an AOC holder	1,2	x				x				
10	ORO	SPO	115	Changes	1,2	x					x			

#	Part	Subpart	Number	Title	Cat.	Management Safety	Flight associated	Personnel records	Other	CAT	SPO	SPA	NCC	NCO
11	SPA	GEN	115	Changes to a specific approval	1,2	x				x	x	x	x	x
12	ORO	AOC	110	Leasing agreement	1,3	x				x				
13	CAT	POL.H	105	General	1,3		x			x				
14	CAT	POL.H	205	Take-off	1,3		x			x				
15	CAT	POL.H	210	Take-off flight path	1,3		x			x				
16	CAT	POL.H	215	En-route – critical engine inoperative	1,3		x			x				
17	CAT	POL.H	220	Landing	1,3		x			x				
18	CAT	POL.H	310	Take-off	1,3	x				x				
19	CAT	POL.H	325	Landing	1,3	x				x				
20	CAT	IDE.H	100	Instruments and equipment – general	1,3	x				x				
21	SPA	PBN	105	PBN operational approval	1,3	x				x	x	x	x	x
22	SPA	LVO	105	LVO approval	1,3	x				x	x	x	x	x

#	Part	Subpart	Number	Title	Cat.	Management Safety	Flight associated	Personnel records	Other	CAT	SPO	SPA	NCC	NCO
23	SPA	NVIS	100	Night vision imaging system (NVIS) operations	1,3	x				x		x		
24	SPA	HHO	100	Helicopter hoist operations (HHO)	1,3	x				x		x		
25	SPA	HEMS	100	Helicopter emergency medical service (HEMS) operations	1,3	x				x		x		
26	SPA	HOFO	105	Approval for helicopter offshore operations	1,3	x				x	x	x	x	
27	CAT	GEN.MPA	100	Crew responsibilities	2,1	x				x				
28	SPO	GEN	105	Crew responsibilities	2,1	x					x			
29	SPO	GEN	106	Task specialists responsibilities	2,1	x					x			
30	CAT	GEN.MPA	170	Psychoactive substances	2,2	x				x				
31	CAT	OP.MPA	150	Fuel policy	2,2	x				x				
32	CAT	GEN.MPA	140	Portable electronic devices	2,3	x				x		x		
33	SPO	IDE.H	195	Flight over water – other-than complex motor-powered helicopters	2,3	x					x			
34	ORO	GEN	160	Occurrence reporting	2,4		x			x	x	x	x	

#	Part	Subpart	Number	Title	Cat.	Management Safety	Flight associated	Personnel records	Other	CAT	SPO	SPA	NCC	NCO
35	NCC	GEN	150	Transport of dangerous goods	2,4	x	x						x	
36	NCO	GEN	140	Transport of dangerous goods	2,4		x							x
37	ORO	GEN	110	Operator responsibilities	2,5	x		x		x	x		x	
38	ORO	GEN	210	Personnel requirements	2,5			x		x	x		x	
39	ORO	GEN	220	Record-keeping	2,5	x	x	x		x	x		x	
40	ORO	GEN	310	Use of aircraft listed on an AOC for non-commercial operations and specialised operations	2,5	x	x	x			x		x	
41	ORO	AOC	125	Non-commercial operations of an AOC holder with aircraft listed on its AOC	2,5	x				x			x	
42	ORO	AOC	135	Personnel requirements	2,5			x		x				
43	ORO	SPO	100	Common requirements for commercial specialised operators	2,5	x	x	x			x			
44	ORO	MLR	100	Operations manual – general	2,5	x				x	x	x	x	

#	Part	Subpart	Number	Title	Cat.	Management Safety	Flight associated	Personnel records	Other	CAT	SPO	SPA	NCC	NCO
45	ORO	MLR	101	Operations manual – structure for commercial air transport	2,5	x				x				
46	ORO	MLR	105	Minimum equipment list	2,5	x				x	x		x	
47	CAT	GEN.MPA	195	Handling of flight recorder recordings: preservation, production, protection and use	2,5	x				x				
48	CAT	OP.MPA	107	Adequate aerodrome	2,5	x				x				
49	SPA	GEN	110	Privileges of an operator holding a specific approval	2,5	x				x	x	x	x	x
50	SPA	LVO	130	Minimum equipment	2,5	x				x	x	x	x	x
51	SPA	DG	110	Dangerous goods and information and documentation	2,5	x	x	x		x	x	x	x	x
52	SPA	NVIS	140	Information and documentation	2,5	x				x		x		
53	SPA	HHO	110	Equipment requirements for HHO	2,5	x				x		x		
54	SPA	HHO	140	Information and documentation	2,5	x				x		x		

#	Part	Subpart	Number	Title	Cat.	Management Safety	Flight associated	Personnel records	Other	CAT	SPO	SPA	NCC	NCO
55	SPA	HEMS	140	Information and documentation	2,5	x				x		x		
56	SPA	HOFO	110	Operating procedures	2,5	x	x			x	x	x	x	
57	SPA	HOFO	115	Use of offshore locations	2,5	x				x	x	x	x	
58	NCC	GEN	145	Handling of flight recorder recordings: Preservation, production, protection and use	2,5	x							x	
59	NCC	OP	100	Use of aerodromes and operating sites	2,5	x							x	
60	NCO	GEN	155	Minimum equipment list	2,5	x								x
61	SPO	GEN	145	Handling of flight recorder recordings: preservation, production, protection and use	2,5	x					x			
62	CAT	GEN.MPA	124	Taxiing of aircraft	2,6	x				x				
63	CAT	GEN.MPA	161	Carriage of sporting weapons and ammunition — alleviations	2,6	x				x				
64	CAT	GEN.MPA	200	Transport of dangerous goods	2,6	x				x				

#	Part	Subpart	Number	Title	Cat.	Management Safety	Flight associated	Personnel records	Other	CAT	SPO	SPA	NCC	NCO
65	CAT	OP.MPA	105	Use of aerodromes and operating sites	2,6	x				x				
66	CAT	OP.MPA	110	Aerodrome operating minima	2,6	x				x				
67	CAT	OP.MPA	126	Performance-based navigation	2,6	x		x		x				
68	CAT	OP.MPA	131	Noise abatement procedures — helicopters	2,6	x				x				
69	CAT	OP.MPA	137	Routes and areas of operation — helicopters	2,6	x				x				
70	CAT	OP.MPA	145	Establishment of minimum flight altitudes	2,6	x				x				
71	CAT	OP.MPA	155	Carriage of special categories of passengers (SCPs)	2,6	x				x				
72	CAT	OP.MPA	160	Stowage of baggage and cargo	2,6	x				x				
73	CAT	OP.MPA	165	Passenger seating	2,6	x		x		x				
74	CAT	OP.MPA	195	Refuelling/defuelling with passengers embarking, on board or disembarking	2,6	x				x				

#	Part	Subpart	Number	Title	Cat.	Management Safety	Flight associated	Personnel records	Other	CAT	SPO	SPA	NCC	NCO
75	CAT	OP.MPA	200	Refuelling/defuelling with wide-cut fuel	2,6	x				x				
76	CAT	OP.MPA	220	Assisting means for emergency evacuation	2,6	x				x				
77	CAT	OP.MPA	230	Securing of passenger compartment and galley(s)	2,6	x				x				
78	CAT	OP.MPA	235	Life-jackets — helicopters	2,6	x				x				
79	CAT	OP.MPA	250	Ice and other contaminants — ground procedures	2,6	x				x				
80	CAT	OP.MPA	255	Ice and other contaminants — flight procedures	2,6	x				x				
81	CAT	OP.MPA	281	In-flight management fuel — helicopters	2,6	x				x				
82	CAT	POL.H	225	Helicopter operations to/from a public interest site	2,6	x				x		x		
83	CAT	IDE.H	355	Management of aeronautical databases	2,6	x				x				
84	SPA	LVO	125	Operating procedures	2,6	x				x	x	x	x	x

#	Part	Subpart	Number	Title	Cat.	Management Safety	Flight associated	Personnel records	Other	CAT	SPO	SPA	NCC	NCO
85	SPA	NVIS	110	Equipment requirements for NVIS operations	2,6	x				x		x		
86	SPA	NVIS	120	NVIS operating minima	2,6	x				x		x		
87	SPA	HOFO	125	Airborne radar approaches (ARAs) to offshore locations – CAT operations	2,6	x				x		x		
88	SPA	HOFO	160	Additional procedures and equipment for operations in a hostile environment	2,6	x				x	x	x	x	
89	NCC	GEN	119	Taxiing of aircraft	2,6	x							x	
90	NCC	OP	110	Aerodrome operating minima – general	2,6	x							x	
91	NCC	OP	120	Noise abatement procedures	2,6	x							x	
92	NCC	OP	135	Stowage of baggage and cargo	2,6	x							x	
93	NCC	OP	155	Refuelling with passengers embarking, on board or disembarking	2,6	x							x	
94	NCC	OP	165	Carriage of passengers	2,6	x							x	

#	Part	Subpart	Number	Title	Cat.	Management Safety	Flight associated	Personnel records	Other	CAT	SPO	SPA	NCC	NCO
95	NCC	OP	185	Ice and other contaminants – ground procedures	2,6	x							x	
96	NCC	OP	190	Ice and other contaminants – flight procedures	2,6	x							x	
97	NCC	OP	205	In-flight management fuel	2,6	x							x	
98	NCC	IDE.H	260	Management of aeronautical databases	2,6	x							x	
99	NCO	GEN	104	Use of aircraft included in an AOC by an NCO operator	2,6	x								x
100	NCO	OP	116	Performance-based navigation – aeroplanes and helicopters	2,6	x								x
101	NCO	IDE.H	205	Management of aeronautical databases	2,6	x								x
102	NCO	SPEC	105	Checklist	2,6	x								x
103	NCO	SPEC	125	Safety briefing	2,6	x								x

#	Part	Subpart	Number	Title	Cat.	Management Safety	Flight associated	Personnel records	Other	CAT	SPO	SPA	NCC	NCO
104	NCO	SPEC	130	Minimum obstacle clearance altitudes – IFR flights	2,6		x							x
105	NCO	SPEC	175	Performance and operating criteria – helicopters	2,6	x								x
106	NCO	SPEC.HESLO	100	Checklist	2,6	x								x
107	NCO	SPEC.HEC	100	Checklist	2,6	x								x
108	NCO	SPEC.PAR	100	Checklist	2,6	x								x
109	NCO	SPEC.ABF	100	Checklist	2,6	x								x
110	NCO	SPEC.MCF	110	Checklist and safety briefing	2,6	x								x
111	NCO	SPEC.MCF	130	Simulated abnormal or emergency procedures in flight	2,6	x								x
112	SPO	GEN	119	Taxiing of aircraft	2,6						x			
113	SPO	GEN	150	Transport of dangerous goods	2,6	x					x			
114	SPO	OP	100	Use of aerodromes and operating sites	2,6	x					x			

#	Part	Subpart	Number	Title	Cat.	Management Safety	Flight associated	Personnel records	Other	CAT	SPO	SPA	NCC	NCO
115	SPO	OP	110	Aerodrome operating minima – aeroplanes and helicopters	2,6	x					x			
116	SPO	OP	135	Safety briefing	2,6	x					x			
117	SPO	OP	155	Refuelling with persons embarking, on board or disembarking	2,6	x					x			
118	SPO	OP	175	Ice and other contaminants – ground procedures	2,6	x					x			
119	SPO	OP	176	Ice and other contaminants – flight procedures	2,6	x					x			
120	SPO	OP	195	Use of supplemental oxygen	2,6	x					x			
121	SPO	OP	230	Standard operating procedures	2,6	x					x			
122	SPO	IDE.H	230	Management of aeronautical databases	2,6	x					x			
123	SPO	SPEC.HESLO	100	Standard operating procedures	2,6	x					x			
124	SPO	SPEC.HEC	100	Standard operating procedures	2,6	x					x			

#	Part	Subpart	Number	Title	Cat.	Management Safety	Flight associated	Personnel records	Other	CAT	SPO	SPA	NCC	NCO
125	SPO	SPEC.PAR	100	Standard operating procedures	2,6	x					x			
126	SPO	SPEC.ABF	100	Standard operating procedures	2,6	x					x			
127	SPO	SPEC.MCF	125	Crew composition and persons on board	2,6	x					x			
128	ORO	MLR	115	Record-keeping	3,1	x	x	x		x	x		x	
129	ORO	MLR	110	Journey log	3,2		x			x	x		x	
130	NCO	GEN	150	Journey log	3,2		x							x
131	SPO	GEN	107	Pilot-in-command responsibilities and authority	3,2	x	x				x			
132	ORO	FC	115	Crew resource management (CRM) training	3,3	x		x		x	x		x	
133	ORO	FC	120	Operator conversion training	3,3	x		x		x	x		x	
134	ORO	FC	125	Differences training and familiarisation training	3,3	x		x		x	x		x	
135	ORO	FC	130	Recurrent training and checking	3,3	x		x		x	x		x	
136	ORO	FC	135	Pilot qualification to operate in either pilot's seat	3,3	x		x		x	x		x	

#	Part	Subpart	Number	Title	Cat.	Management Safety	Flight associated	Personnel records	Other	CAT	SPO	SPA	NCC	NCO
137	ORO	FC	140	Operation on more than one type or variant	3,3	x		x		x	x		x	
138	ORO	FC	145	Provision of training	3,3	x		x		x	x		x	
139	ORO	FC	205	Command course	3,3	x		x		x				
140	ORO	FC	215	Initial operator's crew resource management (CRM) training	3,3	x		x		x				
141	ORO	FC	220	Operator conversion training and checking	3,3	x		x		x				
142	ORO	FC	230	Recurrent training and checking	3,3	x		x		x		x		
143	ORO	FC	235	Pilot qualification to operate in either pilot's seat	3,3	x		x		x				
144	ORO	FC	240	Operation on more than one type or variant	3,3	x		x		x				
145	ORO	FC	330	Recurrent training and checking – operator proficiency check	3,3	x		x		x	x			
146	ORO	TC	105	Conditions for assignment to duties	3,3	x		x		x	x			
147	ORO	TC	110	Training and checking	3,3	x		x		x	x			

#	Part	Subpart	Number	Title	Cat.	Management Safety	Flight associated	Personnel records	Other	CAT	SPO	SPA	NCC	NCO
148	ORO	TC	115	Initial training	3,3	x		x		x	x			
149	ORO	TC	120	Operator conversion training	3,3	x		x		x	x			
150	ORO	TC	125	Differences training	3,3	x		x		x	x			
151	ORO	TC	130	Familiarisation flights	3,3	x		x		x	x			
152	ORO	TC	135	Recurrent training	3,3	x		x		x	x			
153	ORO	TC	140	Refresher training	3,3	x		x		x	x			
154	CAT	OP.MPA	290	Ground proximity detection	3,3			x		x				
155	CAT	OP.MPA	295	Use of airborne collision avoidance system (ACAS)	3,3	x		x		x				
156	SPA	LVO	120	Flight crew training and qualifications	3,3	x		x		x	x	x	x	x
157	SPA	HOFO	170	Crew requirements	3,3	x		x		x	x	x	x	
158	NCC	OP	140	Passenger briefing	3,3	x		x					x	
159	NCC	OP	215	Ground proximity detection	3,3			x					x	

#	Part	Subpart	Number	Title	Cat.	Management Safety	Flight associated	Personnel records	Other	CAT	SPO	SPA	NCC	NCO
160	NCC	OP	220	Airborne collision avoidance system (ACAS)	3,3	x		x					x	
161	NCO	OP	200	Airborne collision avoidance system (ACAS II)	3,3	x		x						x
162	NCO	OP	220	Airborne collision avoidance system (ACAS II)	3,3	x		x						x
163	NCO	SPEC	115	Crew responsibilities	3,3			x						x
164	NCO	SPEC.MCF	125	Crew composition and persons on board	3,3			x						x
165	SPO	OP	200	Ground proximity detection	3,3	x		x			x			
166	SPO	OP	205	Airborne collision avoidance system (ACAS)	3,3	x		x			x			
167	CAT	OP.MPA	315	Flight hours reporting – helicopters	3,4		x			x				
168	ORO	FC	105	Designation as pilot-in-command/commander	3,5			x		x	x		x	
169	ORO	FC	200	Composition of flight crew	3,5			x		x				

#	Part	Subpart	Number	Title	Cat.	Management Safety	Flight associated	Personnel records	Other	CAT	SPO	SPA	NCC	NCO
170	ORO	FC	202	Single-pilot operations under IFR or at night	3,5	x		x		x				
171	ORO	FC	250	Commanders holding a CPL(H)	3,5			x		x				
172	CAT	GEN.MPA	130	Rotor engagement — helicopters	3,5			x		x				
173	CAT	GEN.MPA	175	Endangering safety	3,5			x		x				
174	SPA	NVIS	130	Crew requirements for NVIS operations	3,5	x		x		x		x		
175	SPA	HHO	130	Crew requirements for HHO	3,5	x		x		x		x		
176	SPA	HEMS	130	Crew requirements	3,5	x		x		x		x		
177	CAT	GEN.MPA	145	Information on emergency and survival equipment carried	4,1		x			x				
178	CAT	GEN.MPA	180	Documents, manuals and information to be carried	4,1		x			x				
179	CAT	GEN.MPA	185	Information to be retained on the ground	4,1		x			x				
180	NCC	GEN	135	Information on emergency and survival equipment carried	4,1		x						x	

#	Part	Subpart	Number	Title	Cat.	Management Safety	Flight associated	Personnel records	Other	CAT	SPO	SPA	NCC	NCO
181	NCC	GEN	140	Documents, manuals and information to be carried	4,1		x						x	
182	NCO	GEN	130	Information on emergency and survival equipment carried	4,1		x							x
183	NCO	GEN	135	Documents, manuals and information to be carried	4,1		x							x
184	SPO	GEN	135	Information on emergency and survival equipment carried	4,1		x				x			
185	SPO	GEN	140	Documents, manuals and information to be carried	4,1		x				x			
186	CAT	OP.MPA	175	Flight preparation	4,2		x			x		x		
187	CAT	OP.MPA	181	Selection of aerodromes and operating sites — helicopters	4,2		x			x		x		
188	CAT	OP.MPA	190	Submission of the ATS flight plan	4,2		x			x				
189	NCC	OP	145	Flight preparation	4,2		x						x	
190	NCO	OP	135	Flight preparation	4,2		x							x

#	Part	Subpart	Number	Title	Cat.	Management Safety	Flight associated	Personnel records	Other	CAT	SPO	SPA	NCC	NCO
191	CAT	IDE.H	240	Supplemental oxygen – non-pressurised helicopters	4,3		x			x				
192	NCC	IDE.H	200	Supplemental oxygen – non-pressurised helicopters	4,3		x						x	
193	NCO	OP	190	Use of supplemental oxygen	4,3		x							x
194	NCO	IDE.H	155	Supplemental oxygen – non-pressurised helicopters	4,3		x							x
195	SPO	IDE.H	175	Supplemental oxygen – non-pressurised helicopters	4,3		x				x			
196	CAT	POL.MAB	100	Mass and balance, loading	4,4	x	x			x				
197	CAT	POL.MAB	105	Mass and balance data and documentation	4,4		x			x		x		
198	NCC	POL	110	Mass and balance data and documentation	4,4	x	x						x	
199	SPO	POL	115	Mass and balance data and documentation – commercial operations with aeroplanes and helicopters and non-commercial operations	4,4		x				x			

#	Part	Subpart	Number	Title	Cat.	Management Safety	Flight associated	Personnel records	Other	CAT	SPO	SPA	NCC	NCO
				with complex motor-powered aircraft										
200	ORO	GEN	140	Access	5,1	x	x			x	x		x	
201	ORO	GEN	150	Findings	5,1	x				x	x		x	
202	ORO	GEN	205	Contracted activities	5,3	x		x		x	x		x	
203	ORO	AOC	115	Code-share agreements	5,3					x				
204	CAT	GEN.MPA	215	Support programme	6,1	x		x		x				
205	SPA	LVO	110	General operating requirements	6,1		x			x	x	x	x	x
206	SPA	HOFO	145	Flight data monitoring (FDM) system	6,1	x				x		x		
207	SPA	HOFO	150	Aircraft tracking system	6,1	x				x	x	x	x	
208	SPA	HOFO	155	Vibration monitoring health system (VHM)	6,1	x				x		x		
209	NCO	POL	105	Weighing	6,1	x								x
210	SPO	OP	125	Minimum obstacle clearance altitudes – IFR flights	6,1	x					x			
211	SPO	POL	110	Mass and balance system – commercial operations	6,1	x	x				x			

#	Part	Subpart	Number	Title	Cat.	Management Safety	Flight associated	Personnel records	Other	CAT	SPO	SPA	NCC	NCO
				with aeroplanes and helicopters and non-commercial operations with complex motor-powered aircraft										
212	CAT	IDE.H	220	First-aid kits	6,2				x	x				
213	CAT	IDE.H	208	Emergency locator transmitter (ELT)	6,2				x	x				
214	NCC	IDE.H	190	First-aid kit	6,2				x				x	
215	NCC	IDE.H	215	Emergency locator transmitter (ELT)	6,2				x				x	
216	NCO	IDE.H	145	First-aid kit	6,2				x					x
217	NCO	IDE.H	170	Emergency locator transmitter (ELT)	6,2				x					x
218	SPO	IDE.H	165	First-aid kit	6,2				x		x			
219	SPO	IDE.H	190	Emergency locator transmitter (ELT)	6,2				x		x			
220	NCO	SPEC.MCF	100	Levels of maintenance check flights	6,3		x							x
221	SPO	SPEC.MCF	100	Levels of maintenance check flight	6,3		x				x			

#	Part	Subpart	Number	Title	Cat.	Management Safety	Flight associated	Personnel records	Other	CAT	SPO	SPA	NCC	NCO
222	SPO	SPEC.MCF	105	Flight programme for a 'Level A' maintenance check flight	6,3		x				x			
223	SPO	SPEC.MCF	110	Maintenance check flight manual for a 'Level A' maintenance check flight	6,3	x					x			
224	SPO	SPEC.MCF	115	Flight crew requirements for a 'Level A' maintenance check flight	6,3	x		x			x			
225	SPO	SPEC.MCF	120	Flight crew training course for Level A maintenance check flights	6,3	x					x			
226	SPA	DG	105	Approval to transport dangerous goods	1.1/ 3.4	x		x		x	x	x	x	x
227	CAT	GEN.MPA	141	Use of electronic flight bags (EFBs)	1.3/ 2.3	x				x		x		
228	SPA	EFB	100	Use of electronic flight bags (EFBs) – operational approval	1.3/ 2.3	x		x		x		x		
229	NCC	GEN	131	Use of electronic flight bags (EFBs)	1.3/ 2.3	x		x					x	
230	SPO	GEN	131	Use of electronic flight bags (EFBs)	1.3/ 2.3	x					x			

#	Part	Subpart	Number	Title	Cat.	Management Safety	Flight associated	Personnel records	Other	CAT	SPO	SPA	NCC	NCO
231	NCC	GEN	106	Pilot-in-command responsibilities and authority	2.1/ 2.4/ 2.6	x							x	
232	NCO	GEN	105	Pilot-in-command responsibilities and authority	2.1/ 2.6	x	x							x
233	NCC	GEN	105	Crew responsibilities	2.1/ 3.5	x	x	x					x	
234	CAT	POL.H	305	Operations without an assured safe forced landing capability	2.3/ 3.3	x		x		x		x		
235	NCC	OP	116	Performance-based navigation – aeroplanes and helicopters	2.6/ 3.3	x		x					x	
236	SPO	POL	146	Performance and operating criteria – helicopters	2.6/ 3.3	x		x			x			
237	NCC	OP	125	Minimum obstacle clearance altitudes – IFR flights	2.6/ 3.1	x	x						x	
238	SPO	OP	116	Performance-based navigation – aeroplanes and helicopters	2.6/ 3.3	x					x			
239	ORO	GEN	200	Management system	2.7/ 5.2	x				x	x		x	

#	Part	Subpart	Number	Title	Cat.	Management Safety	Flight associated	Personnel records	Other	CAT	SPO	SPA	NCC	NCO
240	NCC	POL	105	Mass and balance, loading	3.1/5.1	x	x						x	
241	SPO	POL	105	Mass and balance	3.1/5.1	x	x				x			
242	ORO	AOC	120	Approvals to provide cabin crew training and to issue cabin crew attestations	n/a									
243	ORO	CC			n/a									
244	ORO	FTL			n/a									
245	SPA	MNPS			n/a									
246	SPA	RVSM			n/a									
247	SPA	ETOPS			n/a									
248	SPA	SET-IMC			n/a							x		
#	Part	Sub-part	Number	Title	Cat.	Management Safety	Flight associated	Personnel records	Other	CAT	SPO	SPA	NCC	NCO
1	ORA	GEN	115	Application for an OAC	1,1	x								ORA
2	ORA	GEN	120	Means of compliance	1,1	x								ORA
3	ORA	GEN	125	Terms of approval and privileges of an organisation	2,5	x								ORA

#	Part	Subpart	Number	Title	Cat.	Management Safety	Flight associated	Personnel records	Other	CAT	SPO	SPA	NCC	NCO
4	ORA	GEN	130	Changes to organisation	1,2	x								ORA
5	ORA	GEN	150	Findings	5,1	x								ORA
6	ORA	GEN	160	Occurrence reporting	2,4	x								ORA
7	ORA	GEN	200	Management system	5.2/ 2.7	x								ORA
8	ORA	GEN	205	Contracted activities	5,3	x								ORA
9	ORA	GEN	210	Personnel requirements	3,5			x						ORA
10	ORA	GEN	220	Record-keeping	2,5	x								ORA