



Notice of Proposed Amendment 2014-28

AMC/GM for non-complex approved training organisations (ATOs)

RMT.0421 (FCL.014) — 8.12.2014

EXECUTIVE SUMMARY

This NPA aims at the simplification of the way to comply with the requirements — laid down in Part-ORA — for non-complex approved training organisations (ATOs) by providing more focussed detailed information, specific alleviations and more detailed guidance on safety risk management and compliance monitoring in a format of either dedicated new or adequately amended AMCs and GMs. In order for this to be achieved, the amendment of ED Decision 2012/007/R 'Acceptable Means of Compliance and Guidance Material to Part-ORA' is proposed.

Said amendment is stemming on the one hand from the consultation of rulemaking task FCL.001 during which stakeholders expressed concerns about the level of complexity of the requirements to be complied with in case of ATOs representing the non-commercial sector and providing training mainly for the LAPL and the other non-commercial licences, as well as the associated ratings and certificates, and on the other hand from the recommendations made in the context of the General Aviation (GA) roadmap.

The Agency addressed most of these concerns by simplifying the criteria to meet the intent of the requirements in Section II — Management of Subpart GEN and Section I — General of Subpart ATO of Part-ORA. In Subpart GEN, topics as organisation and accountability, safety policy and safety risk management, and in Subpart ATO issues like the training programme, the training manual and the aircraft and FSTDs used for training are affected. By including this rulemaking task RMT.0421 (FCL.014) in its Rulemaking Programme, the Agency fulfilled the commitment to improve 'proportionality' of the rules concerning non-complex ATOs.

Applicability		Process map	
Affected regulations and decisions:	ED Decision No 2012/007/R (AMC/GM to Part-ORA)	Concept Paper:	No
Affected stakeholders:	Non-complex approved training organisations (ATOs)	Terms of Reference:	9.3.2012
Driver/origin:	Legal obligation; proportionality	Rulemaking group:	No
Reference:	N/A	RIA type:	None
		Technical consultation during NPA drafting:	No
		Duration of NPA consultation:	2 months
		Review group:	No
		Focussed consultation:	Yes
		Publication date of the Decision:	2015/Q1



Table of contents

1. Procedural information	3
1.1. The rule development procedure.....	3
1.2. The structure of this NPA and related documents.....	4
1.3. How to comment on this NPA	4
1.4. The next steps in the procedure.....	4
2. Explanatory Note.....	5
2.1. Overview of the issues to be addressed.....	5
2.2. Objectives	6
2.3. Overview of the proposed amendments.....	6
3. Proposed amendments	9
3.1. Draft Acceptable Means of Compliance and Guidance Material — Part-ORA (Draft EASA Decision) ..	9
4. References.....	33
4.1. Affected AMC and GM.....	33



1. Procedural information

1.1. The rule development procedure

The European Aviation Safety Agency (hereinafter referred to as the 'Agency') developed this Notice of Proposed Amendment (NPA) in line with Regulation (EC) No 216/2008¹ (hereinafter referred to as the 'Basic Regulation') and the Rulemaking Procedure².

This rulemaking activity is included in the [Agency's Rulemaking Programme](#) under RMT.0421 (FCL.014). The related Terms of Reference were published on the Agency's website on 9 March 2012 ([http://easa.europa.eu/rulemaking/docs/tor/fcl/ToR%20RMT.0421%20\(FCL.014%20\).pdf](http://easa.europa.eu/rulemaking/docs/tor/fcl/ToR%20RMT.0421%20(FCL.014%20).pdf)).

The text of this NPA has been developed by the Agency in close cooperation with GA organisations and Member States.

There was an agreement between the Commission and the Agency to organise a workshop based on the input received by Member States, GA organisations and the GA roadmap activities having identified a need to address certain additional problems/issues related to non-complex training organisations (specifically ATOs providing training for the LAPL, PPL, BPL and SPL). This workshop ('Registered Facility/ATO Workshop') was held on 15-16 May 2014 at the EASA premises, Cologne, Germany.

The aim of the workshop was further defined by the Commission which mandated the Agency to:

- review the current situation of non-complex training organisations;
- identify the constraints and problems experienced;
- develop options of how to address these issues in a coordinated manner before the end of the given opt-out; and
- identify long-term strategies or options.

During the workshop, proposals for items to be discussed in smaller groups were collected. The following items were selected and were dealt with by 3 working groups:

Group 1: Content of the training and operations manuals;

Group 2: Simplification of the requirements for the management system; and

Group 3: Qualifications of responsible personnel and combination of tasks.

The outcome of these working groups is reflected in this NPA.

Furthermore, the Agency and the Commission launched a second aircrew amendment package which includes significant changes for non-complex ATOs providing training only for the PPL, LAPL, SPL and

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

² The Agency is bound to follow a structured rulemaking process as required by Article 52(1) of the Basic Regulation. Such process has been adopted by the Agency's Management Board and is referred to as the 'Rulemaking Procedure'. See Management Board Decision concerning the procedure to be applied by the Agency for the issuing of Opinions, Certification Specifications and Guidance Material (Rulemaking Procedure), EASA MB Decision No 01-2012 of 13 March 2012.



BPL as well as for the associated ratings or certificates. Hence, the related proposals for additional AMCs and GMs related to the amended requirement ORA.GEN.200, (AMC1, GM1 and GM2 ORA.GEN.200(c)) which will introduce the possibility to perform an organisational review, are included in this NPA.

It should, in addition, be highlighted that with this amendment package, the Agency, the Commission and the Member States agreed that a change will be proposed in order to allow Member States to further delay the implementation of the rules for ATOs that provide training only for the LAPL, PPL, SPL and BPL and the associated ratings or certificates until April 2018. This derogation was proposed in order to provide the time to develop alternative rules for the training for these licences, ratings and certificates which will include a training route outside ATOs. An additional initiative and a rulemaking task will be launched soon.

The NPA is hereby submitted for consultation of all interested parties³.

The process map on the title page contains the major milestones of this rulemaking activity to date and provides an outlook of the timescale of the next steps.

1.2. The structure of this NPA and related documents

Chapter 1 of this NPA contains the procedural information related to this task. Chapter 2 (Explanatory Note) explains the core technical content. Chapter 3 contains the proposed text for the new requirements. Finally, no Regulatory Impact Assessment (RIA) has been made considering the classification of this rulemaking task as a systematic and non-controversial one.

1.3. How to comment on this NPA

Please submit your comments using the automated **Comment-Response Tool (CRT)** available at <http://hub.easa.europa.eu/crt/>⁴.

The deadline for submission of comments is **9 February 2015**.

1.4. The next steps in the procedure

Following the closing of the NPA public consultation period, the Agency will review all comments.

The outcome of the NPA public consultation will be reflected in the respective Comment-Response Document (CRD) which the Agency will publish along with the Decision containing Acceptable Means of Compliance (AMC) and Guidance Material (GM) to Part-ORA and amending ED Decision 2012/007/R 'Acceptable Means of Compliance and Guidance Material to Part-ORA'.

³ In accordance with Article 52 of the Basic Regulation and Articles 5(3) and 6 of the Rulemaking Procedure.

⁴ In case of technical problems, please contact the CRT webmaster (crt@easa.europa.eu).



2. Explanatory Note

2.1. Overview of the issues to be addressed

Subpart GEN of Part-ORA (hereinafter referred to as 'Subpart ORA.GEN') establishes the general requirements for training organisations. Section II of Subpart GEN defines requirements for the management system, which shall correspond to the size of the organisation and to the nature and complexity of its activities, taking into account the hazards and associated risks inherent in these activities. Criteria for determining if an organisation is complex are already provided in AMC1 ORA.GEN.200(b). It should be highlighted that ATOs providing only training for the LAPL, PPL, SPL or BPL and the associated ratings or certificates are by default considered to be non-complex organisations.

Subpart ATO of Part-ORA (hereinafter referred to as 'Subpart ORA.ATO') complements the general requirements with specific provisions for organisations providing training for pilot licences, as well as the associated ratings and certificates.

Section I of Subpart ORA.ATO contains provisions for the issue of a certificate as an ATO, the personnel requirements for an ATO, the training programme, the training and operations manual, the aircraft and aerodromes to be used for training, and some additional requirements for training provided in third countries.

Section II establishes the additional provisions for ATOs providing training for commercial pilot licences. It defines additional requirements with regard to the personnel and the training programme, and describes in more detail the additional requirements for the training and operations manual.

Several AMCs already contain explanations of how to comply with the rule in the case of ATOs providing training only for the LAPL, PPL, SPL or BPL, as well as the associated ratings and certificates.

During the consultation of rulemaking task FCL.001, stakeholders expressed concerns about the level of detail required for ATOs representing the non-profit sector and providing training mainly for the LAPL and the other private licences or the associated ratings and certificates. The Agency addressed after said consultation most of these concerns by simplifying some of the provisions in Section I of Subpart ATO. The Agency committed to further improve the 'proportionality' of the rules concerning non-complex ATOs and included rulemaking task RMT.0421 in its Rulemaking Programme in order to review the AMC/GM for non-complex ATOs and provide more detailed information.

In Annex I to the Explanatory Note (the Explanatory memorandum on the review of comments on NPAs 2008-22c and 2009-02c 'Part-OR' and the resulting text) to Opinion 03/2011, an example for additional AMC/GM to be developed for non-complex ATOs was already given by referring to the content of the training and operations manual (old reference OR.ATO.130).

The main purpose of this NPA is, therefore, to simplify the requirements — laid down in Part-ORA — for non-complex approved training organisations (ATOs) by providing more detailed information and guidance. In order for this to be achieved, the amendment of ED Decision 2012/007/R 'Acceptable Means of Compliance and Guidance Material to Part-ORA' is proposed.

Furthermore, the Agency introduced via an amendment package to the Aircrew Regulation the concept of an organisational review which may be used by an ATO only providing training for the LAPL, PPL, SPL or BPL and the associated ratings or certificates in order to meet the requirements for the



safety risk management and compliance monitoring defined in in ORA.GEN.200(a)(3) and (a)(6). This NPA provides the respective AMC and GM to this new requirement ORA.GEN.200(c).

2.2. Objectives

The overall objectives of the EASA system are defined in Article 2 of the Basic Regulation. This proposal will contribute to the achievement of the overall objectives by addressing the issues outlined in Chapter 2 of this NPA.

The specific objective of this proposal is to:

- review and eventually amend the AMC/GM to Part-ORA (organisation requirements for aircrew);
- consider developing new AMC/GM for Subparts ORA.GEN and ORA.ATO on how to comply with the rule in the case of non-complex ATOs; and
- develop new ‘proportionate’ AMC/GM for those non-complex ATOs.

2.3. Overview of the proposed amendments

Subpart GEN

AMC1 ORA.GEN.200(a)(1);(2);(3);(5) for non-complex organisations is deleted and the requirements for the non-complex organisations are now to be found in their own separate AMC. The rationale behind this is that now there will be an AMC1 with requirements under ORA.GEN.200 for complex organisations and an AMC2 with requirements under ORA.GEN.200 for non-complex organisations. When the same requirements for both complex and non-complex apply, there is just one AMC (AMC1). When the applicability of the AMC is only for complex organisations or only for non-complex organisations, this is indicated by the ‘UPPERCASE’ letter type in the title, like:

COMPLEX ORGANISATIONS or

NON-COMPLEX ORGANISATIONS

A new AMC2 ORA.GEN.200(a)(1) regarding organisation and accountabilities for non-complex organisations is inserted. The requirements are the same as under points (c) and (d) of the former AMC1 ORA.GEN.200(a)(1);(2);(3);(5).

A new AMC2 ORA.GEN.200(a)(2) regarding safety policy for the non-complex organisations is inserted. The requirements are the same as under point (e) of the former AMC1 ORA.GEN.200(a)(1);(2);(3);(5).

A new AMC2 ORA.GEN.200(a)(3) regarding safety risk management is inserted. The requirements in (a) are the same as under point (a) of the former AMC1 ORA.GEN.200 (a)(1);(2);(3);(5). Furthermore, this AMC contains minimum inputs for hazard identification and risk assessment and requirements to record the risk assessment and actions taken in a (simple) risk register.

A new AMC3 ORA.GEN.200(a)(3) regarding safety risk management for the non-complex organisations is inserted. The requirements are the same as under point (b) of the former AMC1 ORA.GEN.200(a)(1);(2);(3);(5) in combination with the proposal made by the working group of the ‘Registered Facility/ATO Workshop’ in order to simplify the existing guidance.

A new GM5 ORA.GEN.200(a)(3) regarding risk management for non-complex organisations is inserted. It provides an example of a simple risk register.



A new GM6 ORA.GEN.200(a)(3) on hazard identification of organisational risks, designed for non-complex organisations, and a new GM7 ORA.GEN.200(a)(3) regarding hazard identification in relation to operational risks, are inserted. These provide examples of related hazard checklists which are based on the hazard taxonomy examples prepared by the Safety Management International Collaborations Group (SM ICG)⁵.

A new GM8 to ORA.GEN.200(a)(3) regarding the emergency response plan (ERP) for non-complex organisations is inserted.

Furthermore, for AMC1 ORA.GEN.200(a)(6), a separate AMC2 for non-complex organisations was not deemed to be necessary. Instead, the existing AMC1 ORA.GEN.200(a)(6) is amended so that certain requirements do not apply to non-complex organisations.

A new GM4 ORA.GEN.200(a)(6) is added to provide guidance on how to acquire the relevant knowledge, background and appropriate experience on compliance monitoring in relation to the activities of the organisation.

New AMC1, GM1 and GM2 to ORA.GEN.200(c) are inserted regarding the organisational review of ATOs providing training only for the LAPL, PPL, SPL and BPL and associated ratings or certificates. The new AMC will provide a means to comply with the new approach to allow ATOs for an organisational review. The main objective of this recently introduced concept of the organisational review is to provide a more proportionate way for these organisations to implement risk management and compliance monitoring. By using this organisational review and the related AMC and GM, the ATO will ensure that these two functions remain effective by verifying that it has continually identified its aviation safety hazards, has mitigated the associated risks and monitors compliance with the applicable requirements. A non-complex training organisation using the organisational review will be required to conduct such review at least once every calendar year and to provide an annual report to the competent authority. It should be highlighted, however, that ATOs might also decide to comply with (a)(3) and (a)(6) and not to use the organisational review. In this case, the existing AMC and GM related to ORA.GEN(a)(3) and (a)(6) have to be used instead.

Subpart ATO

The application form in AMC1 ORA.ATO.105 has been amended in order to ask for less detailed information for non-complex ATOs. For the numbered questions with an asterisk, the non-complex ATOs may fill in a general statement instead of very detailed information required for complex ATOs.

A new AMC1 ORA.ATO.110 is added regarding the combination of post holder tasks in a non-complex organisation. This AMC should better clarify that the tasks of the accountable manager, head of training, safety manager and compliance monitoring manager may be combined under certain conditions.

Concerning the training programme in ORA.ATO.125, a new AMC5 ORA.ATO.125 has been added stating that in the case of a non-complex ATO, when developing the training programme for a class-rating course for aeroplanes or type-rating course for single-engine piston helicopters or a flight-test training course for aeroplanes or helicopters, the requirements set in AMC2 ORA.ATO.125,

⁵ <http://www.skybrary.aero/bookshelf/books/2301.pdf>



AMC3 ORA.ATO.125 and AMC4 ORA.ATO.125 for these training programme may be satisfied by a more proportionate training programme.

A new GM1 ORA.ATO.130 regarding the training manual and operations manual has been added. This GM contains a template for an integrated training and operation manual for non-complex ATOs. It details that in the case of a non-complex ATO, an integrated training and operations manual may be used.



3. Proposed amendments

The text of the amendment is arranged to show deleted text, new or amended text as shown below:

- (a) deleted text is marked with ~~strike through~~;
- (b) new or amended text is highlighted in grey;
- (c) an ellipsis (...) indicates that the remaining text is unchanged in front of or following the reflected amendment.

3.1. Draft Acceptable Means of Compliance and Guidance Material — Part-ORA (Draft EASA Decision)

Subpart GEN

1. **AMC1 ORA.GEN.200(a)(1);(2);(3);(5) is deleted and its contents incorporated into a number of new AMCs.**

~~AMC1 ORA.GEN.200(a)(1);(2);(3);(5) Management system
NON-COMPLEX ORGANISATIONS – GENERAL~~

- ~~(a) Safety risk management may be performed using hazard checklists or similar risk management tools or processes, which are integrated into the activities of the organisation.~~
- ~~(b) The organisation should manage safety risks related to a change. The management of change should be a documented process to identify external and internal change that may have an adverse effect on safety. It should make use of the organisation's existing hazard identification, risk assessment and mitigation processes.~~
- ~~(c) The organisation should identify a person who fulfils the role of safety manager and who is responsible for coordinating the safety management system. This person may be the accountable manager or a person with an operational role in the organisation.~~
- ~~(d) Within the organisation, responsibilities should be identified for hazard identification, risk assessment and mitigation.~~
- ~~(e) The safety policy should include a commitment to improve towards the highest safety standards, comply with all applicable legal requirements, meet all applicable standards, consider best practices and provide appropriate resources.~~
- ~~(f) The organisation should, in cooperation with other stakeholders, develop, coordinate and maintain an emergency response plan (ERP) that ensures orderly and safe transition from normal to emergency operations and return to normal operations. The ERP should provide the actions to be taken by the organisation or specified individuals in an emergency and reflect the size, nature and complexity of the activities performed by the organisation.~~

2. **The following new AMC2 ORA.GEN.200(a)(1) is inserted:**

AMC2 ORA.GEN.200(a)(1) Management system
NON-COMPLEX ORGANISATIONS — ORGANISATION AND ACCOUNTABILITIES



- (a) Within the organisation, responsibilities should be identified for hazard identification, risk assessment and mitigation.
- (b) The organisation should identify a person who fulfils the role of the safety manager and who is responsible for the coordination of the safety management processes and tasks.

3. The following new AMC2 ORA.GEN.200(a)(2) is inserted:

AMC2 ORA.GEN.200(a)(2) Management system
NON-COMPLEX ORGANISATIONS — SAFETY POLICY

The safety policy should include a commitment to improve towards the highest safety standards, comply with all applicable legal requirements, meet all applicable standards, consider best practices and provide appropriate resources.

4. The following new AMC2 ORA.GEN.200(a)(3) is inserted:

AMC2 ORA.GEN.200(a)(3) Management system
NON-COMPLEX ORGANISATIONS — HAZARD IDENTIFICATION AND RISK ASSESSMENT

- (a) Hazard identification and risk assessment may be performed using hazard checklists or similar risk management tools or processes which are integrated into the activities of the organisation.
- (b) As a minimum, hazard identification and risk assessment should consider the following inputs:
 - (1) internal safety reports;
 - (2) assessment of changes to the organisation (changes in personnel, in training facilities, aircraft, etc.) that may have an impact on safety;
 - (3) external safety reports and safety information as relevant to the activity of the organisation; and
 - (4) the selection of suppliers and contracting to organisations not themselves approved to perform the tasks.
- (c) The organisation should, in particular, focus on the events, safety issues, proposals or recommendations reported internally.
- (d) The hazards and safety issues identified, the related risk assessment and the actions taken, if any, should be recorded. A simple risk register may be used to this effect.
- (e) The person fulfilling the role of the safety manager should ensure that the risk register is maintained and reviewed on a regular basis. He/she should involve relevant staff in the risk assessment and determination of risk mitigation actions.
- (f) The risk register should be made available to all staff, in order to provide feedback on issues identified and actions taken. The register should form the basis for the review of the risk management function at the occasion of the annual organisational review.

5. The following new AMC3 ORA.GEN.200(a)(3) is inserted:

AMC3 ORA.GEN.200(a)(3) Management system
NON-COMPLEX ORGANISATIONS — SAFETY RISK MANAGEMENT



- (a) The organisation should manage safety risks related to a change. The management of change should be a documented process to identify external and internal change that may have an adverse effect on safety. It should make use of the organisation's existing hazard identification, risk assessment and mitigation processes.
- (b) The organisation should, in cooperation with other stakeholders, develop, coordinate and maintain an emergency response plan (ERP) that ensures orderly and safe transition from normal to emergency operations and return to normal operations. The ERP should provide for the actions to be taken by the organisation or specified individuals in an emergency and reflect the size, nature and complexity of the activities performed by the organisation.

[...]

6. GM3 ORA.GEN.200(a)(3) is renumbered to GM2 ORA.GEN.200(a)(3):

GM32 ORA.GEN.200(a)(3) Management system

APPROVED TRAINING ORGANISATIONS — RISK MANAGEMENT OF FLIGHT OPERATIONS WITH KNOWN OR FORECAST VOLCANIC ASH CONTAMINATION

7. GM4 ORA.GEN.200(a)(3) is renumbered to GM3 ORA.GEN.200(a)(3) and is amended as follows:

GM43 ORA.GEN.200(a)(3) Management system

COMPLEX ORGANISATIONS — SAFETY RISK ASSESSMENT — RISK REGISTER

8. The following new GM4 ORA.ATO.200(a)(3) is inserted:

GM4 ORA.GEN.200(a)(3) Management system

NON-COMPLEX ORGANISATIONS — SAFETY RISK ASSESSMENT — RISK REGISTER

- (a) Risk register example:



A. Ref	Date	B. Short description of hazard / issue ⁽¹⁾	C. Existing risk controls	D. Related risk (severity/likelihood)	E. Is the risk acceptable ? ⁽²⁾	F. Action(s) to mitigate risk	G. Action owner

⁽¹⁾ Include link to internal occurrence report, as applicable.

⁽²⁾ if yes, add justification. If not, complete columns F and G.

All hazards and reported issues will be assessed for severity and likelihood using the following definitions and then assessed using the following risk acceptability matrix.

The person responsible for risk assessment will carry out the initial risk assessment and an independent validation may be carried out by another person, e.g. the accountable manager, HT or internal auditor.



(b) Proposed severity and likelihood definitions:

Likelihood of occurrence		
Qualitative definition	Meaning	Value
Likely	Likely to reoccur or to occur several times in a year	3
Possible	Possible to reoccur or to occur at least once a year	2
Unlikely	Very unlikely to reoccur or occur	1

Severity of Consequences		
Definition	Meaning	Value
Fatal accident	Results in a serious accident or incident with fatalities	5
Serious incident	Results in a serious incident (without fatalities) that would be reportable to the competent authority	3
Negligible	Results in minor incident that would not be reportable to the competent authority	1

(c) Proposed risk acceptability matrix:

		Likelihood		
		Unlikely (1)	Possible (2)	Likely (3)
Severity	Fatal Accident (5)	REVIEW (5)	UNACCEPTABLE (10)	UNACCEPTABLE (15)
	Serious Incident (3)	REVIEW (3)	REVIEW (6)	UNACCEPTABLE (9)
	Negligible (1)	ACCEPTABLE (1)	ACCEPTABLE (2)	REVIEW (3)



(d) Proposed risk acceptance actions:

The following table will determine the appropriate action to be taken:

Unacceptable	Risk intolerable, the accountable manager must be immediately informed and action must be taken to reduce the risk to a tolerable level.
Review — Act	Risk mitigation action must be considered. Where risk mitigation is not practical or viable, acceptance by the accountable manager is required.
Acceptable	Risk is considered acceptable but would be reviewed if it reoccurs.

9. The following new GM5 ORA.ATO.200(a)(3) is inserted:

GM5 ORA.GEN.200(a)(3) Management system

NON-COMPLEX ORGANISATIONS — HAZARD CHECKLIST ORGANISATIONAL RISKS

Hazard checklist example — organisational risks:

A. Ref	B. Area	B. Possible hazards may stem from:	C. Assessment	D. Action ⁽¹⁾
1	Organisation — Management	<ul style="list-style-type: none"> — rapid growth; — recession or financial distress; — limited or lack of management commitment — the management does not demonstrate support for the activity; — limited or lack of resource availability or planning, including staffing; — lack of or ineffective reporting policy (just culture); — high ratio of students to FIs; and — extensive use of part-time or freelance instructors. 		
2	Contracted activities	<ul style="list-style-type: none"> — contractual arrangements not clearly specified; — contracted party not approved; and — unforeseen change in provider. 		
3	Personnel requirements	<ul style="list-style-type: none"> — unclear reporting lines; — absence of arrangements for deputising in case of 		



		<p>planned/unplanned absence;</p> <ul style="list-style-type: none"> — incorrect or incomplete or lack of training and knowledge transfer; — absence of recurrent training programme ; — high rate of turnover; — change of instructor during ongoing training; — lack of or incomplete duty description; and — lack of, incorrect or incomplete control of necessary certificates of staff (licences, ratings, medical certificates). 		
4	Facility requirements & equipment	<ul style="list-style-type: none"> — facilities shared between different organisations; — facilities exposed to high level of noise, distraction, etc.; — same facilities being used for flight planning and theoretical instruction; and — changes, upgrades or new equipment. 		
4	Record keeping	<ul style="list-style-type: none"> — unauthorised access; and — hardware or software changes. 		
5	Processes & procedures	<ul style="list-style-type: none"> — lack of, incorrect or incomplete manuals, or operating procedures; — lack of, incorrect, incomplete or complicated document update; — existence of informal procedures; — language barriers; and — difficulties to access procedures. 		
6	Terms of approval and training courses	<ul style="list-style-type: none"> — frequent changes; — wide range of different approved training courses; and — inadequate supervision of distance learning. 		



7	Human factors	<ul style="list-style-type: none"> — combination of positions (workload and stress); — instructor fatigue; — alcohol and substance abuse; — medications; — complacency; and — psycho-social stresses (financial, birth of child, divorce, bereavement, etc.). 		
---	---------------	---	--	--

⁽¹⁾ update risk register as required.

10. The following new GM6 ORA.ATO.200(a)(3) is inserted:

GM6 ORA.GEN.200(a)(3) Management system

NON-COMPLEX ORGANISATIONS — HAZARD CHECKLIST OPERATIONAL RISKS

Hazard checklist example — operational risks:

A. Ref	B. Area	B. Possible hazards may stem from:	C. Assessment	D. Action ⁽¹⁾
1	Preflight preparation	<ul style="list-style-type: none"> — lack of or poor airworthiness verification; — lack or poor verification of equipment and instruments necessary for a particular training flight; — lack of, incorrect or incomplete aircraft performance limitations verification; — lack of, incorrect or incomplete flight planning; — poor fuelling processes; and — lack of or poor aircraft dispatch or release. 		
2	Aircraft loading	<ul style="list-style-type: none"> — improper stowage of carry-on baggage; and — improper weight and balance calculations. 		
3	Flight operations	<ul style="list-style-type: none"> — use of obsolete documents; — absence of or incorrect flight manuals or charts on board; — improper execution of procedures 		



		<p>in all flight phases due to instruction (e.g. stall and spin recovery), including taxiing and parking;</p> <ul style="list-style-type: none"> — inadequate or complicated procedures; — equipment and instruments necessary for a particular flight or operation not available or malfunctioning; and — lack of or poor communication (ATC, dispatch etc.). 		
4	Special flight operations	<ul style="list-style-type: none"> — use of aircraft not equipped/not approved for the particular training flight (e.g. IFR). 		
5	Aerodromes and operating sites	<ul style="list-style-type: none"> — use of aerodromes or operating sites with high traffic volumes; — use of uncontrolled aerodromes or operating sites; and — taxiway and runway system complexity. 		
6	Refuelling	<ul style="list-style-type: none"> — poor refuelling procedures; and — improper fuel. 		
7	Parking	<ul style="list-style-type: none"> — lack of, limited or incorrect type of aircraft parking and tie down procedures. 		

⁽¹⁾ update risk register as required.

11. The following new GM7 ORA.ATO.200(a)(3) is inserted:

GM7 ORA.ATO.200(a)(3)

NON-COMPLEX ORGANISATIONS — EMERGENCY RESPONSE PLAN (ERP)

The ERP is designed to help the organisation to respond in the case of accidents, serious incidents or any other abnormal event triggering a crisis.

The details of what should be considered an emergency and what the ERP should contain need to be established with a view to preventing the potential confusion that can result when emergency situations arise. It is important that the organisation is thoroughly prepared to react effectively in the case of an emergency. The progress of events will depend on how the organisation initiates an alert (or relays an alert message).

1. Purpose

The aim of an ERP is to communicate relevant information to relevant staff within the organisation and third parties, including members of the public as necessary.



2. Examples of events which may activate the ERP

The following events may result in a crisis situation and require activation of the ERP:

- (a) aviation accident or serious incident;
- (b) disaster in the premises: fire, explosion, pollution, flood; including possible impacts of a disaster, including natural disasters or climatic events within the vicinity of the facilities;
- (c) loss of the working resource: offices, hangar, aircraft; and
- (d) loss of communication means: internet, landlines or mobile telephones.

3. Organisation

It is important to define a single point of contact that any member of staff may alert in the case of an emergency, including outside normal operating hours.

This single point of contact will be responsible for activating the ERP and coordinating required actions. In order to prevent unnecessary delay, the nominated contact must have immediate access to the following:

- (a) emergency checklists defining required actions depending on the nature of the event;
- (b) an up-to-date list of staff to be contacted (a schedule of 'on-call' staff to be contacted could be created); and
- (c) a list of emergency services and officials organisations to be contacted in the event of an emergency, including up-to-date contact information.

Elements (a) to (c) may be combined in a single document.

4. Reaction to an emergency call

Whenever the organisation is made aware of an emergency, the person or department that receives the alert must endeavour to establish the following information:

- (a) date and time of the call;
- (b) name and contact details of the informant; and
- (c) the authenticity of the call (where possible).

Once this information has been captured, the ERP may be initiated.

5. Maintaining the ERP

The person fulfilling the role of safety manager is responsible for ensuring that the information contained in the ERP documentation remains current and appropriate to the activities of the organisation and the emergencies it may be exposed to, and to determine the need for and frequency of emergency 'drills' to test the ERP.



12. The second AMC1 ORA.GEN.200(a)(5) is renumbered to AMC2 ORA.GEN.200(a)(5) :

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

COMPLEX ORGANISATIONS — ORGANISATION'S SAFETY MANAGEMENT MANUAL

[...]

13. AMC1 ORA.GEN.200(a)(6) is amended as follows:

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

COMPLIANCE MONITORING — GENERAL

(a) Compliance monitoring

The implementation and use of a compliance monitoring function should enable the organisation to monitor compliance with the relevant requirements of this Part and other applicable Parts.

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

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

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

(c) Organisational set up

- (1) To ensure that the organisation continues to meet the requirements of this Part and other applicable Parts, the accountable manager should designate a compliance monitoring manager. The role of the compliance monitoring manager is to ensure that the activities of the organisation are monitored for compliance with the applicable regulatory requirements, and any additional requirements as established by the organisation, and that these activities are being carried out properly under the supervision of the relevant head of functional area.
- (2) The compliance monitoring manager should be responsible for ensuring that the compliance monitoring programme is properly implemented, maintained and continually reviewed and improved.
- (3) The compliance monitoring manager should:
 - (i) have direct access to the accountable manager;
 - (ii) in case of a complex organisation, not be one of the other persons referred to in ORA.GEN.210 (b);



- (iii) be able to demonstrate relevant knowledge, background and appropriate experience related to the activities of the organisation;
 - (iv) in case of a complex organisation have relevant knowledge and experience in compliance monitoring; and
 - (v) have access to all parts of the organisation, and as necessary, any contracted organisation.
- (4) In the case of a non-complex organisation, this task may be exercised by the accountable manager provided he/she has demonstrated having the related competence as defined in (c)(3)(iii).
- (5) In the case the same person acts as compliance monitoring manager and as safety manager, the accountable manager, with regards to his/her direct accountability for safety, should ensure that sufficient resources are allocated to both functions, taking into account the size of the organisation and the nature and complexity of its activities.
- (6) The independence of the compliance monitoring function should be established by ensuring that audits and inspections are carried out by personnel not responsible for the function, procedure or products being audited.
- (d) Compliance monitoring documentation should include:
- (1) Relevant documentation should include for the relevant part(s) of the organisation's management system documentation.
 - (2) A compliance monitoring programme that should reflect:
 - (i) the schedule of the monitoring programme;
 - (ii) the audit procedures;
 - (iii) the reporting procedures;
 - (iv) the follow-up and corrective action procedures; and
 - (v) the recording system.
 - (2)(3) For complex organisations, in addition, relevant documentation should also include the following:
 - (i) terminology;
 - (ii) specified activity standards;
 - (iii) a description of the organisation;
 - (iv) the allocation of duties and responsibilities;
 - ~~(v)~~ procedures to ensure regulatory compliance;
 - ~~(vi)~~ the compliance monitoring programme; , reflecting:
 - A. schedule of the monitoring programme;
 - B. audit procedures;



- ~~C. reporting procedures;~~
- ~~D. follow up and corrective action procedures; and~~
- ~~E. recording system.~~

~~(vii)~~ (vi) the training syllabus referred to in (e)(2);

~~(viii)~~ (vii) document control.

(e) Training

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

14. The following new GM4 ORA.GEN.200(a)(6) is inserted

GM4 ORA.GEN.200(a)(6) Management system
NON-COMPLEX ORGANISATIONS

A typical way for the compliance monitoring manager to acquire the relevant knowledge, background and appropriate experience related to the activities of the organisation is by:

- (a) having conducted an audit under supervision;
- (b) having participated in an audit as an observer; or
- (c) having been focal point during competent authority audits.

15. The following new AMC1 ORA.GEN.200(c) is inserted:

AMC1 ORA.GEN.200(c) Management system
ATOs PROVIDING TRAINING ONLY FOR THE LAPL, PPL, SPL AND BPL AND THE ASSOCIATED RATINGS OR CERTIFICATES — ORGANISATIONAL REVIEW

- (a) The primary objective of the organisational review is to enable the organisation to ensure that its management system remains effective by verifying that it:
 - (1) has continually identified its aviation safety hazards;
 - (2) has mitigated the associated risks; and
 - (3) monitors compliance with the applicable requirements.



- (b) The organisation should define, as part of its management system documentation required by ORA.GEN.200(a)(5):
- (1) the person responsible for the organisational review programme;
 - (2) qualification criteria for the person(s) responsible for performing the organisational reviews;
 - (3) the organisational review programme;
 - (4) the procedure(s) for performing the organisational reviews and managing the related records;
 - (5) the procedure(s) for ensuring that risk mitigation actions initiated following the hazard identification and the risk assessment process, and corrective actions initiated as a result of compliance monitoring are carried out in the appropriate time frame; and
 - (6) the procedure for communicating the results of the organisational review to the competent authority.
- (c) Persons responsible for the organisational review should have a thorough knowledge of the applicable requirements and of the organisation's procedures. They should also have knowledge of audits, acquired through training or through experience (preferably as an auditor, but also possibly because they have actively participated in several audits conducted by the competent authority).
- (d) All level 1 findings in the sense of ARA.GEN.350 should be immediately notified to the competent authority and all necessary actions immediately taken.
- (e) All corrective and additional risk mitigation actions should be approved by the person responsible for the organisational review programme and implemented within a specified time frame. Once the person responsible for the organisational review programme is satisfied that the action is effective, action closure should be recorded along with a summary of the action taken.
- (f) The results of the organisational review, including all non-compliance findings and new risks identified, should be presented to the accountable manager and the person or group of persons nominated in accordance with ORA.GEN.210(b) prior to notification to the competent authority.
- (g) Based on the results of the organisational review, the accountable manager should determine the need for and initiate, as appropriate, further actions to address deficiencies in or further improve the organisation's management system.

16. The following new GM1 ORA.GEN.200(c) is inserted:

GM1 ORA.GEN.200(c) Management system

ATOs PROVIDING TRAINING ONLY FOR THE LAPL, PPL, SPL OR BPL AND THE ASSOCIATED RATINGS OR CERTIFICATES — ORGANISATIONAL REVIEW PROGRAMME

- (a) The organisational review programme may consist of:
- (1) checklist(s) covering all items necessary to be addressed in order to ensure that the organisation identified its aviation safety hazards, mitigates the associated risks and



ensures effective compliance with the applicable requirements. These should address all procedures described in the management system documentation and training manual; and

- (2) a schedule for the accomplishment of the different checklist items, with each item being checked at least once within any 12-month period. The organisation may choose to conduct one full review annually or to conduct several partial reviews.

(b) Performance of organisational reviews:

Each checklist item may be addressed using an appropriate combination of:

- (1) review of training records, training documentation;
- (2) review of internal safety reports (e.g. notified difficulties in using current procedures and training material, etc.);
- (3) review of the risk register and hazard checklists;
- (4) sample check of training courses;
- (5) witnessing of examinations, as appropriate;
- (6) interview of the personnel involved; and
- (7) review of the feedback provided by students and customers.

- (c) It is recommended that internal safety reports and occurrence reports are reviewed on a continual basis with the aim of identifying possible corrective and risk mitigation actions.

17. The following new GM2 ORA.GEN.200(c) is inserted:

GM2 ORA.GEN.200(c) Management system

ATOs PROVIDING TRAINING ONLY FOR THE LAPL, PPL, SPL OR BPL AND THE ASSOCIATED RATINGS OR CERTIFICATES — ORGANISATIONAL REVIEW FOR COMPLIANCE

The following provides a list of typical check items for an organisational review checklist focussing on compliance, to be adapted as necessary to cover all relevant procedures described in the management system documentation and training manual:

(a) Terms of approval

Check that:

- (1) no training has been performed outside the terms of approval;
- (2) changes not requiring prior approval have been properly managed.

(b) Training syllabi and course material

Check:

- (1) that the training course syllabi and material are in compliance with the applicable requirements, as last amended;
- (2) that the training practice is in compliance with the documentation; and
- (3) flight instructors standardisation actions.



(c) Training equipment and tools

Check that all equipment and tools other than aircraft and FSTDs are present and meet the criteria defined in the training manual.

(d) Facilities

Check that the facilities meet the criteria defined in the training manual.

(e) Training aircraft and FSTDs

Check that the training aircraft and FSTDs meet the criteria defined in the training manual.

(f) Personnel

Check:

- (1) that the current accountable manager and other nominated persons are correctly identified;
- (2) that the organisation chart accurately indicates lines of responsibility and accountability throughout the organisation;
- (3) if the organisation remains in compliance with the applicable requirements, in case the number of personnel has decreased or if the activity has increased, ;
- (4) that the qualification of all new personnel (or personnel with new functions) has been appropriately assessed;
- (5) that staff involved in any safety management-related processes and tasks has been properly trained; and
- (6) that staff has been trained, as necessary, to cover changes in regulations, in competent authority publications, in the management system documentation and in associated procedures, etc.

(g) Contracted activities (In case the organisation has contracted activities)

Check if:

- (1) the contracted or purchased service conforms to the applicable requirements as described in ORA.GEN.205; and
- (2) any new providers have been assessed prior to the establishment of any contract.

(h) Training and communication on safety

Check:

- (1) that all personnel are aware of safety management policies, processes and tasks;
- (2) availability of safety-related documentation and publications; and
- (3) that safety-critical information derived from occurrence reporting and the hazard identification have been timely communicated to all staff concerned.

(i) Management system documentation

Check:



- (1) that the documentation is adequate and updated;
- (2) awareness of staff of the safety policy; and
- (3) that staff can easily access such documentation when needed.

(j) Record keeping

Check:

- (1) that the records cover all the training activities and management system processes; and
- (2) compliance with minimum record keeping periods (random checks).

(k) Emergency Response Plan (ERP)

Check:

- (1) that the ERP is up to date and readily available;
- (2) that all staff are aware of the ERP (random checks); and
- (3) in case the ERP has been activated, how effective it was.

(l) Internal safety reporting procedures

Check:

- (1) the number of reports received since the last review;
- (2) that internal reporting and external occurrence reporting are properly performed;
- (3) that the safety reports are analysed and the risk register updated where relevant; and
- (4) that feedback is provided to reporters.

(m) Hazard checklists and risk register

(1) Check:

- (i) that the risk register is updated on an ongoing basis;
 - (ii) that the risk register is made available to staff;
 - (iii) the use of hazard checklists, in particular when significant changes occur (regulations, personnel, training aircraft, training courses, etc.);
 - (iv) that the risks are assessed and the risk mitigation actions followed-up and recorded;
 - (v) that any risk that has been found acceptable is duly justified; and
 - (vi) that the assumptions made for the risk assessment remain valid;
- (2) Verify the effectiveness of all risk mitigation actions initiated since the last organisational review.



Subpart ATO**1. AMC1 ORA.ATO.105 is amended as follows:****AMC1 ORA.ATO.105 Application****APPLICATION FORM**

APPLICATION FORM FOR AN ATO CERTIFICATE		
N°	Question	Supplementary information
1.	Name of training organisation under which the activity is to take place	address, fax number, e-mail, URL
2.	Training courses offered	theory and /or flight training
3.	Name of head of training	type and number of licence full-time, part-time or freelance
4.*	Name of chief flight instructor	as (3)
5.*	Name of chief theoretical knowledge instructor	as (3)
6.*	Name of flight instructor(s), where applicable	as (3)
7.	Aerodrome(s) / operating site(s) to be used	(a) IFR approaches, if applicable (b) night flying, if applicable (c) air traffic control (d) flight testing facilities, if applicable (e) data reply facilities, if applicable
8.	Flight operations accommodation	location, number and size of rooms
9.	Theoretical instruction facilities	location, number and size of rooms
10.*	Description of training devices (as applicable)	FFS, FNPT I, II and III, FTD 1, 2 and 3, and 3, and BITD
11.*	Description of aircraft	(a) Class/ or type(s) of aircraft (b) registration of aircraft (c) IFR equipped, if applicable (d) Flight test instrumentation, if applicable



12.	Proposed administration and manuals : (submit with application if required)	(a) course programmes (b) training records (c) operations manual (d) training manual
13.*	Details of proposed compliance monitoring function or organisation review as applicable system	

Note 1: If answers to any of the above questions are incomplete, the applicant should provide full details of alternative arrangements separately.

Note 2: instrument flight rules (IFR), full flight simulator (FFS), flight and navigation procedures trainer (FNPT), flight training device (FTD), basic instrument training device (BITD).

*Note 3: In case of non-complex organisations, the items with the asterisk * may be satisfied by a general statement.*

I, (name), on behalf of (name of training organisation) certify that all the above named persons are in compliance with the applicable requirements and that all the above information given is complete and correct.

(Date) (Signature)



2. The following new AMC1 ORA.ATO.110 is inserted:**AMC1 ORA.ATO.110 Personnel requirements****NON-COMPLEX ORGANISATIONS — COMBINATION OF TASKS OF NOMINATED PERSONS**

The tasks of the accountable manager, the head of training, the safety manager, the compliance monitoring manager and the persons responsible for organisational review, if necessary, may be combined under the following conditions:

- (a) In the case the same person exercises several tasks, the accountable manager, with regard to his/her direct accountability for safety, should ensure that sufficient resources are allocated to each function, taking into account the size of the organisation and the nature and complexity of its activities;
- (b) Where only one person is employed, the compliance monitoring function or organisational review, as applicable, should be contracted to an appropriate organisation or to a person who is able to demonstrate relevant knowledge, background and appropriate experience related to the activities of the organisation, including knowledge of and experience in compliance monitoring, with the agreement of the competent authority.

3. AMC1 ORA.ATO.110(b) is amended as follows:**AMC1 ORA.ATO.110(b) Personnel requirements****HEAD OF TRAINING**

The nominated head of training (HT) should have the overall responsibility to ensure that the training is in compliance with the appropriate requirements. In an ATO providing training courses for different aircraft categories, or for a variety of class and type ratings within one aircraft category, the HT shall be assisted by one or more nominated deputy HT(s) for certain flight training courses or aircraft categories.

4. The following new AMC5 ORA.ATO.125 is inserted:**AMC5 ORA.ATO.125 Training programme****NON-COMPLEX ORGANISATIONS — DEVELOPING THE TRAINING PROGRAMME**

In the case of a non-complex organisation, when developing the training programme for a class- or type-rating course for aeroplanes or type-rating course for helicopters or a flight test training course for aeroplanes or helicopters, the requirements set in AMC2 ORA.ATO.125, AMC3 ORA.ATO.125 and AMC4 ORA.ATO.125 for these training programmes may be satisfied by a more proportionate training programme.

5. The following new AMC1 ORA.ATO.130 is inserted:**AMC1 ORA.ATO.130 Training manual and operations manual****NON-COMPLEX ORGANISATIONS — CONTENT OF THE TRAINING AND OPERATIONS MANUAL**

An integrated training and operations manual may be used and should include the following:



OPERATIONAL ELEMENTS	
(a) GENERAL	<ul style="list-style-type: none"> (1) A list and description of all volumes in the operations manual; (2) Administration (function and management); (3) Duties and responsibilities (all management and administrative staff); (4) Student discipline and disciplinary action; (5) Approval or authorisation of flights; (6) Preparation of flying programme; (7) Command of aircraft; (8) Responsibilities of the PIC; (9) Carriage of passengers; (10) Aircraft documentation; (11) Retention of documents; (12) Flight crew qualification records and revalidation (licences, medical certificates and ratings); (13) Flight duty period and flight time limitations (instructors and students); (14) Minimum rest requirements (instructors and students); (15) Pilots' logbooks; (16) Flight planning (general); and (17) Safety (general): equipment, radio listening watch, hazards, accidents and incidents (including reports), safety pilots, etc.
(b) TECHNICAL	<ul style="list-style-type: none"> (1) Aircraft descriptive notes, if applicable; (2) Aircraft handling note ; and (3) Allowable deficiencies (based on the master minimum equipment list (MMEL), if applicable).
(c) ROUTE	<ul style="list-style-type: none"> (1) Performance (legislation, mass and balance, take-off, route, landing, etc.); (2) Flight planning and minima relevant to the operation (e.g. weather, operating altitude, exercise specific height requirements, etc.); and (3) Training routes or areas as applicable.
(d) PERSONNEL TRAINING	<ul style="list-style-type: none"> (1) Appointments of persons responsible for standards or competence of flight personnel; (2) Initial training; (3) Standardisation; and



	(4) Upgrade training, if applicable.
--	--------------------------------------

TRAINING ELEMENTS	
(a) TRAINING PLAN	
(1) The aim of the course	A statement of what the student will achieve upon completion of the training.
(2) Pre-entry requirements	Minimum pre-entry requirements appropriate to the training course.
(3) Training syllabi	The ATO should state the reference source of the training syllabi to be used.
(4) Training records and personnel logbooks	<ul style="list-style-type: none"> (i) Rules for security of records and documents, if applicable; (ii) The training records to be kept; (iii) Persons responsible for checking records and students' logbooks; and (iv) Rules concerning logbook entries.
(5) Safety training appropriate to the course	<ul style="list-style-type: none"> (i) Essential exercises; (ii) Emergency drills (frequency); (iii) Requirement before first solo day, night or navigation, etc. if applicable.
(6) Examinations	Procedures for examination preparation and conduct.
(7) Progress monitoring	Detail the process for identifying and correcting non-satisfactory student progress and documentation of remedial action taken, including, if necessary, instructor changes.
(b) BRIEFING AND AIR EXERCISES	The level of detail should be at the discretion of the ATO, based upon (a)(3) above.
(1) Air exercise reference list	A quick reference for daily use by instructors.
(2) Air exercise	A description of the primary objectives of each training exercise including the compliance with the relevant AMC.



(3) Course structure: phase of training	A statement of how the course will be structured. Indication of how the above-mentioned air exercises will be arranged to ensure that they are completed in the most suitable learning sequence and that essential (emergency) exercises are included. Also, the syllabus hours for each exercise should be stated and when any progress tests will be conducted, if applicable.
(4) Course structure: integration of syllabi	The manner in which theoretical knowledge and flight training in an aircraft or an FSTD will be integrated so that as the flying training exercises are carried out, students will be able to apply the knowledge gained from the associated theoretical knowledge instruction and flight training.
(5) Instructional methods	The ATO requirements, particularly in respect of pre- and post-flying briefing, adherence to syllabi and training specifications, authorisation of solo flights, etc.
(6) Progress checks	The instructions given to training staff in respect of the conduct and documentation of any progress checks, if applicable.
(c) FLIGHT TRAINING IN AN FSTD, IF APPLICABLE	Structure generally as for (b).
(d) THEORETICAL KNOWLEDGE INSTRUCTION	
(1) Structure of the theoretical knowledge course	A statement of the structure of the course, including the general sequence of the topics to be taught in each subject and to be compliant with the relevant AMC.
(2) Student progress	The ATO is required to ensure that all the appropriate elements of the theoretical knowledge instruction have been completed to a satisfactory standard before recommending the applicant for the examinations.
APPENDICES	<ul style="list-style-type: none"> (i) Progress check report forms; (ii) ATO certificate of successfully completed training course, etc. as required; and (iii) Examples of any report form which is mentioned in the previous sections of the training and operation manual, such as any report used in the student training files or any other relevant form or chart.



6. The following new GM1 ORA.ATO.130 is inserted:

**GM1 ORA.ATO.130 Training manual and operations manual
NON-COMPLEX ORGANISATIONS**

The reference to the training syllabi to be used as indicated under the training elements of the training and operations manual may be a reference to an external, commercially available, compliance syllabus or material available in AMC format.



4. References

4.1. *Affected AMC and GM*

Decision 2012/007/Directorate R of the Executive Director of the Agency of 19 April 2012 on Acceptable Means of Compliance and Guidance Material to 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 — ‘Acceptable Means of Compliance and Guidance Material to PART-ORA’

