

## Annex III to ED Decision 2023/011/R

### 'AMC and GM to Part ATCO.OR — Issue 1, Amendment 2'

The text of the amendment is arranged to show deleted, new and unchanged text as follows:

- deleted text is ~~struck through~~;
- new or amended text is highlighted in blue;
- an ellipsis '[...]' indicates that the rest of the text is unchanged.

#### **Note to the reader**

In amended, and in particular in existing (that is, unchanged) text, 'Agency' is used interchangeably with 'EASA'. The interchangeable use of these two terms is more apparent in the consolidated versions. Therefore, please note that both terms refer to the 'European Union Aviation Safety Agency (EASA)'.

**Table of contents**

<b>ANNEX III (PART ATCO.OR)</b> .....	<b>3</b>
<b>REQUIREMENTS FOR AIR TRAFFIC CONTROLLER TRAINING ORGANISATIONS AND AERO-MEDICAL CENTRES</b> .....	<b>3</b>
SUBPART B — REQUIREMENTS FOR AIR TRAFFIC CONTROLLER TRAINING ORGANISATIONS .....	3
GM1 ATCO.OR.B.015 Changes to the training organisation .....	3
<b>AMC1 ATCO.OR.B.030(b) Findings and corrective actions</b> .....	4
<b>AMC1 ATCO.OR.B.040 Occurrence reporting</b> .....	4
GM1 ATCO.OR.B.040 Occurrence reporting .....	4
<b>AMC1 ATCO.OR.B.040(a) Occurrence reporting</b> .....	4
SUBPART C — MANAGEMENT OF AIR TRAFFIC CONTROLLER TRAINING .....	5
AMC1 ATCO.OR.C.001(b) Management system of training organisations .....	5
<b>GM1 ATCO.OR.C.001(b) Management system of training organisations</b> .....	6
AMC1 ATCO.OR.C.001(g) Management system of training organisations .....	7

Annex III to ED Decision 2015/010/R of the Executive Director of the Agency of 13 March 2015 is amended as follows:

## **ANNEX III (PART ATCO.OR)**

### **REQUIREMENTS FOR AIR TRAFFIC CONTROLLER TRAINING ORGANISATIONS AND AERO-MEDICAL CENTRES**

#### **SUBPART B — REQUIREMENTS FOR AIR TRAFFIC CONTROLLER TRAINING ORGANISATIONS**

#### **GM1 ATCO.OR.B.015 Changes to the training organisation**

##### **GENERAL**

- (a) Examples of changes that may affect the certificate or the terms of approval of the training organisation or the training organisation's management system are listed below:
- (1) the name of the training organisation;
  - (2) change of legal entity;
  - (3) the training organisation's principal place of operation;
  - (4) the training organisation's type(s) of training;
  - (5) additional locations of the training organisation;
  - (6) the accountable manager;
  - (7) any of the persons referred to in Part ATCO.OR;
  - (8) the training organisation's documentation as required by Subpart ATCO.OR.BC on safety policy and procedures;
  - (9) the facilities.
- (b) Prior approval by the competent authority is required for any changes to the training organisation's procedure describing how changes not requiring prior approval will be managed and notified to the competent authority.

## AMC1 ATCO.OR.B.030(b) Findings and corrective actions

### GENERAL

The corrective action plan defined by the training organisation should address the effects of any non-compliance and its root cause.

## AMC1 ATCO.OR.B.040 Occurrence reporting

### MANDATORY REPORTING — GENERAL

Training organisations should report all occurrences that may involve an actual or potential aviation safety risk. Commission Implementing Regulation (EU) 2015/1018 of 29 June 2015 laying down a list classifying occurrences in civil aviation to be mandatorily reported according to Regulation (EU) No 376/2014<sup>1</sup> and point ATCO.OR.B.040(c) of Annex III (Part ATCO.OR) to Commission Regulation (EU) 2015/340 provide examples of what is required to be reported. Reporting should not be limited to those items listed in Commission Implementing Regulation (EU) 2015/1018 and in point ATCO.OR.B.040(c) of Annex III (Part ATCO.OR) to Commission Regulation (EU) 2015/340.

## GM1 ATCO.OR.B.040 Occurrence reporting

### GENERAL

The training organisation's report should focus on occurrences taking place during on-the-job training with regard to the training aspects involved.

Without prejudice to Regulation (EU) No 376/2014 and its delegated and implementing acts, ~~the~~ the report may be submitted together with, or as an integral part of, the report prepared by the air navigation service provider.

## AMC1 ATCO.OR.B.040(a) Occurrence reporting

### GENERAL

(a) Where the training organisation holds one or more additional organisation certificates within the scope of Regulation (EU) 2018/1139 and its delegated and implementing acts:

- (1) it may establish an integrated occurrence-reporting system covering all certificate(s) held; and

---

<sup>1</sup> Commission Implementing Regulation (EU) 2015/1018 of 29 June 2015 laying down a list classifying occurrences in civil aviation to be mandatorily reported according to Regulation (EU) No 376/2014 of the European Parliament and of the Council (OJ L 163, 30.6.2015, p. 1).

- (2) single reports for occurrences should only be provided if the following conditions are met:
- (i) the report includes all relevant information from the perspective of the different organisation certificates held;
  - (ii) the report addresses all relevant specific mandatory data fields and clearly identifies all certificate holders for which the report is made; and
  - (iii) the competent authority for all certificates is the same and such single reporting was agreed with that competent authority.
- (b) The training organisation should assign responsibility to one or more suitably qualified persons with clearly defined authority for coordinating actions on occurrences and for initiating any necessary further investigation and follow-up activities.
- (c) If more than one person is assigned such responsibility, the training organisation should identify a single person to act as the main focal point for ensuring a single reporting channel is established to the accountable manager. This should in particular apply to training organisations that hold one or more additional organisation certificates within the scope of Regulation (EU) 2018/1139 and its delegated and implementing acts where the occurrence-reporting system is fully integrated with that required under the additional certificate(s) held.

## SUBPART C — MANAGEMENT OF AIR TRAFFIC CONTROLLER TRAINING

### AMC1 ATCO.OR.C.001(b) Management system of training organisations

#### SAFETY POLICY

The safety policy should:

- (a) be ~~endorsed~~ signed by the accountable manager;
- (b) reflect the organisation's commitment regarding safety, and its proactive and systematic management;
- (c) be communicated, with visible endorsement, throughout the organisation;
- (d) include safety-reporting principles and procedures, if applicable;
- ~~(b) clearly identify safety as the highest organisational priority over commercial, operational, environmental or social pressures;~~
- (~~e~~) include ~~a~~ the organisation's commitment to:
  - (1) improve towards the highest safety standards;

- (2) comply with all applicable legal requirements, meet all applicable standards and consider best practices;
  - (3) provide appropriate resources; ~~and~~
  - (4) enforce safety as the primary responsibility of all managers and staff; ~~and~~
  - (5) apply just culture principles in accordance with Regulation (EU) No 376/2014 and, in particular, not to make available or use the information on occurrences:
    - (i) to attribute blame or liability to someone for reporting something that would not have been otherwise detected; or
    - (ii) for any purpose other than the maintenance or improvement of aviation safety;
- ~~(d) be communicated, with visible endorsement, throughout the organisation;~~
- ~~(e) include safety reporting and just culture principles;~~
- (f) clearly indicate which types of operational behaviour are unacceptable, and include the conditions under which disciplinary action would not apply, if applicable;
  - ~~(f)g~~ enhance and embed safety culture and safety awareness; and
  - ~~(g)h~~ be periodically reviewed to ensure it remains relevant and appropriate to the training organisation.

## GM1 ATCO.OR.C.001(b) Management system of training organisations

### SAFETY POLICY

- (a) The safety policy is the means whereby a training organisation states its intention to maintain and, where practicable, improve safety levels in all its activities and to minimise its contribution to the risk of an aircraft accident or serious incident as far as is reasonably practicable. It reflects the management's commitment to safety, and should reflect the organisation's philosophy as regards safety management, as well as become the foundation on which the organisation's management system is built. It serves as a reminder of 'how we do business here'. The establishment of a positive safety culture begins with the issuance of a clear, unequivocal direction.
- (b) The commitment to apply just culture principles forms the basis for the organisation's internal rules describing how just culture principles are guaranteed and implemented, after consulting its staff representatives, as required by Article 16(11) of Regulation (EU) No 376/2014.
- (c) The safety policy should state that the purpose of safety reporting is to improve safety, not to apportion blame to individuals.

## AMC1 ATCO.OR.C.001(g) Management system of training organisations

### SIZE, NATURE AND COMPLEXITY OF THE ACTIVITY

- (a) A training organisation should be considered ~~as~~ complex when it has a workforce of more than 20 full-time equivalents (FTEs) involved in ~~the activities~~ **activity** subject to Regulation ~~(EC) No 216/2008~~ **(EU) 2018/1139**<sup>2</sup> and its ~~Implementing Rules~~ **delegated and implementing acts**.
- (b) A training organisation with up to 20 FTEs involved in ~~activities~~ **the activity** subject to Regulation ~~(EC) No 216/2008~~ **(EU) 2018/1139** and its ~~Implementing Rules~~ **delegated and implementing acts** may also be considered complex based on an assessment of the following factors:
- (1) the extent and scope of contracted activities subject to the certificate, in terms of complexity; and
  - (2) the different types of training provided, in terms of risk criteria.

---

<sup>2</sup> Regulation ~~(EC) No 216/2008~~ **(EU) 2018/1139** of the European Parliament and of the Council of ~~20 February 2008~~ **4 July 2018** on common rules in the field of civil aviation and establishing a European **Union** 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)~~ amending Regulations (EC) No 2111/2005, (EC) No 1008/2008, (EU) No 996/2010, (EU) No 376/2014 and Directives 2014/30/EU and 2014/53/EU of the European Parliament and of the Council, and repealing Regulations (EC) No 552/2004 and (EC) No 216/2008 of the European Parliament and of the Council and Council Regulation (EEC) No 3922/91(OJ L 212, 22.8.2018, p. 1).