

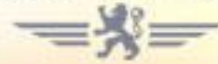
OPS Implementing Rules

Regulation No 965/2012

Operators Meeting

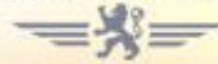
28 Oct 2015

DAC OPS Department



Content

- Rule structure
- UPRT
- CRM Training
- Regulation 376/2014
- DAC findings
- Internal audit
- ACAS 7.1

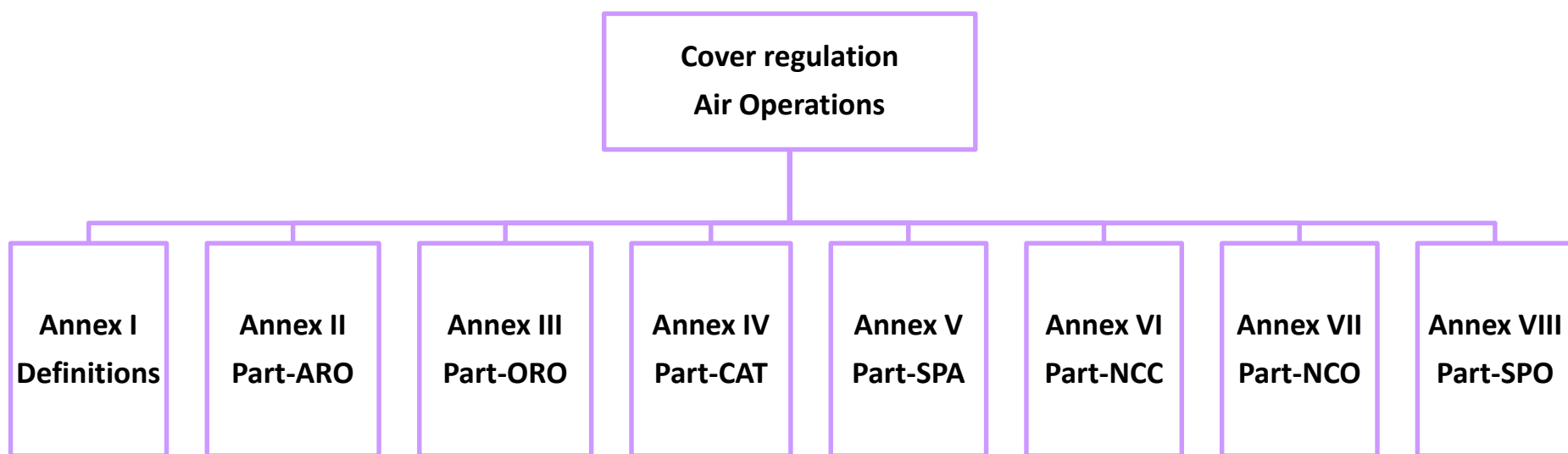


What does it look like?

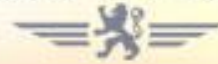
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Rule structure

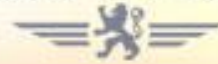


Those texts are included in Reg 965/2012, 800/2013, 71/2014, 83/2014, 379/2014, 2015/140, **2015/640 & 2015/1329**



What does it look like?

- Rule structure
- **UPRT**
- CRM Training
- Regulation 376/2014
- DAC findings
- Internal audit
- ACAS 7.1



UPRT

- EASA Decision 2015/012/R of 4 May 2015
 - Amending GM to Part-Definitions
 - Amending AMC & GM to Part-ORO
 - Applicable from 4 May 2016





UPRT

- New requirements:
 - UPRT should be included in operator conversion training & checking and recurrent training & checking
 - UPRT should be divided in:
 - ✈ Prevention training
 - ✈ Recovery training



UPRT

- New requirements:
 - Prevention training:
 - Ground training
 - Flight training (in FSTD or aeroplane)
 - Detailed syllabus is published in AMC





UPRT

- New requirements:

- Recovery training:

- Ground training
 - Flight training in FFS qualified and from either seat (for either seat qualified pilots)
 - Detailed syllabus is published in AMC





UPRT

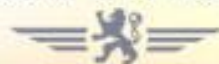
- New requirements:
 - Other additional requirements:
 - Recurrent training should be covered in a 3 years period
 - The personnel providing UPRT in FSTD should be competent and current and should understand the capabilities & limits of the device used



UPRT

- How to implement this?
 - Gap analysis:
 - What is already in my current training programme?
 - What are the requirements and the UPRT programme?
 - An example of gap analysis has been sent to you (from McKechnie Aviation)





UPRT

- How to implement this?

- Training programme update:

- Define the 3 years programme
- Develop the training syllabus according AMCs
- Together with your FSTD provide, develop the flight training programme (to be within limits)
- Training could include case studies, aerodynamics, occurrences analysis...
- Guidance can be found in ICAO Doc 10011

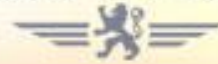




UPRT

- How to implement this?
 - Train your instructors:
 - Instructors need to be trained on those new training programmes
 - Avoid negative training
 - To have the same understanding and the same implementation of the training programmes





UPRT

- Transition planning
 - Letter referenced 2015-52072 sent to the NP Crew Training:
 - OM D sent to the DAC before 31 March 2016
 - Training should start at the latest on 4 May 2016



What does it look like?

- Rule structure
- UPRT
- CRM Training
- Regulation 376/2014
- DAC findings
- Internal audit
- ACAS 7.1



CRM Training

- EASA Decision 2015/022/R of 25 Sep 2015
 - Amending AMC & GM to Part-ARO
 - Amending AMC & GM to Part-ORO
 - Amending AMC & GM to Part-SPA
 - Applicable from 1 Oct 2016





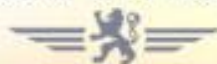
CRM Training

- EASA Decision 2015/023/R of 25 Sep 2015
 - Amending AMC & GM to Part-CC
 - Applicable from 1 Oct 2016



CRM Training

- New AMC1 ORO.FC.115
 - For Multi-pilot operations
 - Training environment (classroom, CBT, FSTD, A/C)
 - Classroom training (away from usual work environment)
 - CBT (Not as stand-alone method)
 - FSTD (e.g. LOFT)



CRM Training

- New AMC1 ORO.FC.115
 - Combined CRM
 - FCM
 - CCM
 - TCM
 - medical passengers
 - By a FCM CRM trainer or a CCM CRM trainer



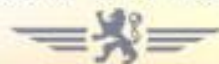
CRM Training

- New AMC1 ORO.FC.115
 - Linked with management system
 - ✈ Hazards
 - ✈ Risks
 - ✈ Identified by the MS of the operator



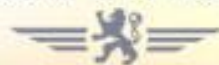
CRM Training

- New AMC1 ORO.FC.115
 - Contracted CRM training:
 - the operator should ensure that the content of the course covers the specific culture, the type of operations and the associated procedures of the operator
 - When crew members from different operators attend the same course, the CRM training should be specific to the relevant flight operations and to the trainees concerned



CRM Training

- New AMC1 ORO.FC.115
 - Initial operator's CRM training:
 - FCM should have once
 - Credit can be given when the type of operations is the same
 - Elements to be covered defined on table 1
 - New elements are « Surprise and startle effect », « Monitoring and intervention » and « resilience development »



CRM Training

- New AMC1 ORO.FC.115
 - Operator conversion course CRM training:
 - Change of operator **OR** change of aircraft type
 - Elements to be covered defined on table 1



CRM Training

- New AMC1 ORO.FC.115
 - Annual recurrent CRM training:
 - 3 years cycle
 - Elements to be covered defined on table 1
 - New elements are « Surprise and startle effect », « Monitoring and intervention » and « resilience development »
 - Operators should update their CRM recurrent training programme over a period not exceeding 3 years. The revision of the programme should take into account information from the operator's management system including the results of the CRM assessment.



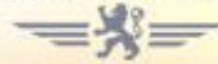
CRM Training

- New AMC1 ORO.FC.115
 - Command course CRM training:
 - ✈ Elements to be covered defined on table 1



CRM Training

- New AMC1 ORO.FC.115
 - Assessment of CRM skills:
 - ✈ The FCM's CRM skills should be assessed in the operational environment
 - ✈ Should include debriefing the crew and the individual crew member
 - ✈ Should be used to improve the CRM training system by evaluating de-identified summaries of all CRM assessments
 - ✈ detailed description of the CRM methodology, including the required CRM standards and the terminology used for the assessment, should be published in the OM



CRM Training

- New AMC2 ORO.FC.115
 - Single pilot operations



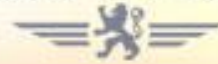
CRM Training

- New AMC3 ORO.FC.115
 - Flight Crew CRM Trainer
 - No major change
 - The training of the CRM trainer has been developed
 - Refresher training is required
 - Assessment of the CRM trainer should be made every 3 years
 - Recency criteria have been added



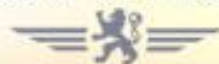
CRM Training

- New GM1 ORO.FC.115
 - Definition of CRM
 - Objective of CRM



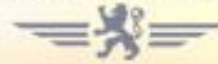
CRM Training

- New GM2 ORO.FC.115
 - Training environment



CRM Training

- New GM3 ORO.FC.115
 - Minimum training times
 - Combined CRM: 6 training hours over a period of 3 years
 - Initial operator's CRM training: 18 training hours with min 12 training hours in classroom
 - Flight Crew CRM trainer for basic and refresher



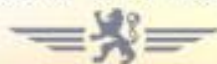
CRM Training

- New GM4 ORO.FC.115
 - Guidance on design, implementation and evaluation of CRM training
 - Checklist developed



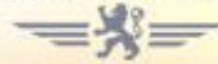
CRM Training

- New GM5 ORO.FC.115
 - Resilience development



CRM Training

- New GM6 ORO.FC.115
 - Non-technical skills assessment
 - NOTECHS is a validated method



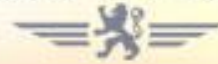
CRM Training

- New GM7 ORO.FC.115
 - CRM trainer assessment
 - Checklist provided



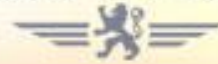
CRM Training

- New AMC1 ORO.FC.215
 - To reflect the requirements of initial operator's CRM training



CRM Training

- Amended AMC1 ORO.FC.220
 - To reflect the requirements of operator conversion CRM training



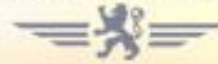
CRM Training

- Amended AMC1 ORO.FC.230
 - To reflect the requirements of recurrent CRM training



CRM Training

- Amended AMC1 ORO.CC.115(e)
 - Similar to AMC1 ORO.FC.115 but for multi-CCM operations



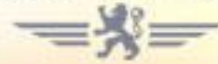
CRM Training

- New AMC2 ORO.CC.115(e)
 - Similar to AMC2 ORO.FC.115 but for single-CCM operations



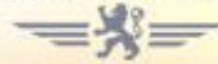
CRM Training

- New AMC3 ORO.CC.115(e)
 - Similar to AMC3 ORO.FC.115 but for cabin crew CRM trainer



CRM Training

- GM1 until GM5 ORO.CC.115(e)
 - Similar to GMs for FCM



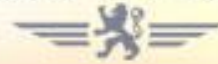
CRM Training

- AMC1 ORO.TC.115(a)
 - For Technical crew members, the training programme is referring to the one for FCM



CRM Training

- AMC1 SPA.HEMS.135(a)
 - CRM training added for HEMS crew members



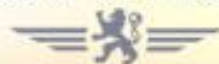
CRM Training

- New AMC1 Appendix 1 to Part-CC(3)
 - Update the CRM training during initial training of CCM



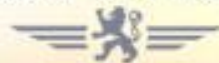
CRM Training

- Transition planning
 - Letter referenced 2015-52087 sent to the NP Crew Training:
 - OM D sent to the DAC before 30 June 2016
 - Training according new requirements should start at the latest on 1 October 2016



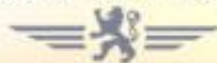
What does it look like?

- Rule structure
- UPRT
- CRM Training
- **Regulation 376/2014**
- DAC findings
- Internal audit
- ACAS 7.1



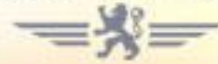
Regulation 376/2014

- Regulatory references:
 - Regulation (EU) No 376/2014 on the reporting, analysis and follow-up of occurrences in civil aviation
 - Commission implementing regulation (EU) 2015/1018 laying down a list classifying occurrences in civil aviation to be mandatorily reported according to Regulation (EU) No 376/2014



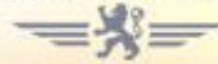
Regulation 376/2014

- Main changes:
 - ECCAIRS format shall be used
 - Follow-up of occurrences is required and the DAC shall be informed of the follow-up
 - Voluntary reports shall also be sent to the DAC
 - A new list of occurrences to be reported has been issued



Regulation 376/2014

- Applicability & impact:
 - From 15-Nov-2015
 - Update of the OMs is necessary
 - Data compatibility to be checked with our Safety department



What does it look like?

- Rule structure
- UPRT
- CRM Training
- Regulation 376/2014
- **DAC findings**
- Internal audit
- ACAS 7.1



DAC findings

- 3 aspects to be discussed:

- Overdue findings
- Root cause analysis
- Recommendations





DAC findings

- Overdue findings:
 - ARO.GEN.350(d)(3) applies
 - Where an organisation fails to submit an acceptable corrective action plan, or to perform the corrective action within the time period accepted or extended by the competent authority, **the finding shall be raised to a level 1 finding** and action taken as laid down in (d)(1)



DAC findings

- Overdue findings:
 - The competent authority shall take immediate and appropriate action to prohibit or limit activities until successful corrective action has been taken by the organisation



DAC findings

- Overdue findings:
 - We did not apply this requirement until now
 - We have to be compliant with the rules



DAC findings

- Root cause analysis:

- Important to avoid re-occurrence
- For the time-being, root cause analysis received are not fully satisfactory
- The corrective action shall address the root cause





DAC findings

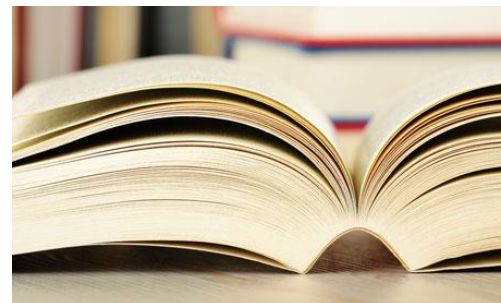
- Root cause analysis – Examples from operators:
 - Human factor
 - Organisational problem
 - Procedure not followed
 - Procedure not up-to-date
 - Administrative
 - Not applicable

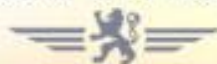


DAC findings

- Root cause analysis – Examples from operators:
 - Description of the finding in another way as root cause analysis
 - Sometimes, the root cause analysis is like an incomprehensible novel

$$1 + 1 = 1 + \text{sqrt}(1)$$





DAC findings

- Root cause analysis – Actions:
 - The DAC will challenge your root cause analysis
 - Use the tools described during a previous operators meeting (5 why's...)
 - Make sure that the corrective action addresses the root cause
 - A proper root cause analysis will save time & money



DAC findings

- Recommendations - Current:
 - Recommendations are raised by the DAC during audits and inspections
 - Recommendations can be rejected by the operator
 - If accepted, follow-up like a finding
 - Some operators are questioning this situation



DAC findings

- Recommendations - Current:
 - Recommendations are not required in the regulation 965/2012
 - DAC is raising those to consider best practices
 - From our point of view, it increases the overall performance of our operators



DAC findings

- Recommendations - Options:
 - Option 1: Current situation (Rec + follow-up if accepted)
 - Option 2: DAC continue to raise recommendations but without follow-up
 - Option 3: DAC stop with recommendations, only findings are raised during audits and inspections



DAC findings

- Recommendations - Options:
 - The aim is to launch the discussion
 - There is no taboo
 - Depending on your feedbacks, we may consider to change



What does it look like?

- Rule structure
- UPRT
- CRM Training
- Regulation 376/2014
- DAC findings
- **Internal audit**
- ACAS 7.1



Internal audit

- Internal audit - Aim:
 - 'Audit' means a systematic, independent and documented process for obtaining evidence and evaluating it objectively to determine the extent to which requirements are complied with.
 - Requirements mean the regulation **AND** the operational procedures



Internal audit

- Internal audit - Procedures:
 - The operator shall transpose requirements into procedures
 - The procedures should not be a copy of the requirements
 - The procedures should describe the way you will comply with the requirements (**The How?**)
 - When developing the procedure, you should use a compliance checklist



Internal audit

- Internal audit:
 - This is an independent verification that the procedures are being followed
 - The checklist used should describe how and what to check to ensure that procedures are or have been followed
 - The internal audit checklist should not only reflect the requirements but also the procedures



Internal audit

- Internal audit – Checklist example:

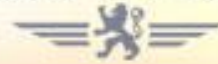
Requirements	Documented	Topic	Questions and Evidences	Implemented
CAT.OP.MPA.150 Fuel policy				
CAT.OP.MPA.175 Flight preparation	OM-A 8.1.7 OM-A 8.1.10 OM-A 8.3.7	Fuel policy and in-flight fuel management	Sample flight preparation documents and check: <ul style="list-style-type: none">- fuel policy, including accountability for depressurisation;- Preparation / actualisation OFP;- Contents of the Operational Flight Plan. Sample minimum of two post flight documentation (verify existence and markings on OFP of in-flight fuel checks)	<input type="checkbox"/> Satisfactory <input type="checkbox"/> Not satisfactory
CAT.OP.MPA.280 In-flight fuel management — aeroplanes				

This should reflect the procedures in place



Internal audit

- Internal audit – Checklist:
 - An efficient checklist is combining:
 - ✈ Regulatory requirement (compliance check)
 - ✈ **Regulation VS Procedures**
 - ✈ Procedures implementation (implementation check)
 - ✈ **Procedures VS Evidences of implementation**



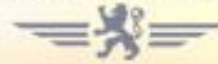
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- **ACAS 7.1**



ACAS 7.1

- Letter referenced 2015-49502:
 - Compliance with ACAS 7.1 is required from 1-Dec-15
 - DAC requested a compliance statement
 - It has not been received for every operator
 - If there is an issue, let us know in advance



Conclusions

- Thanks for your attention
- Questions?