



Schweizerische Eidgenossenschaft
Confédération suisse
Confederazione Svizzera
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Federal Department of the Environment, Transport,
Energy and Communications DETEC
Federal Office of Civil Aviation FOCA
Safety Division - Flight Operations



SASOC 2022

Swiss Aviation Safety and Operators Conference

Operation of Complex Airplanes SBOC

6 Mai 2022 - Zentrum Paul Klee, Bern



Agenda Afternoon

13:30 - 14:30 **Oversight Policy, CAMO News, Handling of Changes**

- *Roger Wellauer, Head SBOC*

- *Ronald Meier, Head STOZ*

14:30 - 15:00 **Break**



15:00 - 15:35 **New / Changed Regulations**

- *Thomas Gass, Senior FOI SBOC*

15:35 - 15:45 **Closing**

- *Roger Wellauer, Head SBOC*



Oversight

Let's start with some terminology

Compliance, risk and performance based oversight

Anyone talks about it...

... but what does it mean?





Compliance

All of our oversight activities (audit/inspections) are compliance based!

But...

In the world of generically formulated goal-oriented regulations the task of auditors and inspectors changed slightly from pure norm-based comparison (target/actual values) to an assessment of individual systems/processes which are built upon the organisation's demands, size and complexity.

Of course a process design has to comply with the regulations, but the process also have to fulfil the goal given by the regulation and/or the organisation itself.



Compliance

- Being compliant means the ability to demonstrate **effective processes/systems**
- **it's not the book only, or whether people follow instructions, but about the processes/systems providing the expected results (enable/prevent/protect etc.)**



Risk and performance based

The planning and steering of oversight activities and the allocation of resources to different domains and/or organisation are **based on the overall risk** of the domain / organisation **and its performance**.

Summary

- Risk and performance based oversight means management of activities
- Compliance based oversight means the conduct of oversight activity



Oversight programme

- ARO.GEN.305 Oversight programme...

...requires FOCA to categorize its organisations (based on the compliance and performance) and plan with an oversight planning cycle of 24, 36 or 48 month

... the 24 months cycle may be reduced when decreased safety performance is evident

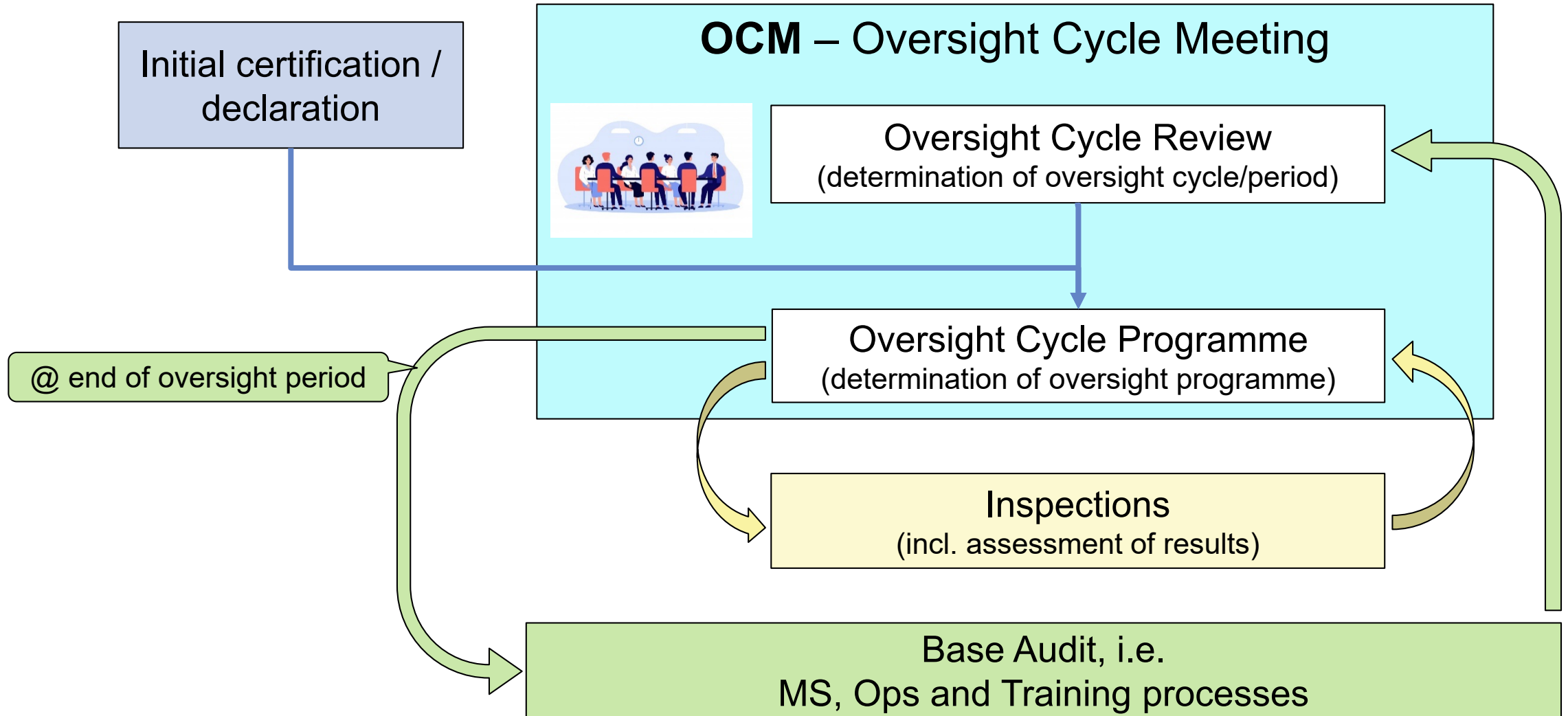


SBOC / SBHE Policy

Kat.	Zyklus-Dauer	Anwendung
A	24 Monate	Erhöhte Aufsicht (increased oversight) Sollten Anzeichen einer verminderten Safety Performance bestehen, wird nicht die Aufsichtsperiode gekürzt, sondern die Aufsicht intensiviert; d.h. nebst den Standardaufsichtswerkzeugen werden im Aufsichtsprogramm zusätzliche gezielte Aufsichtstätigkeiten festgelegt.
B	24 Monate	Standard Aufsicht
C	36 Monate	Möglich, wenn Bedingungen unter ARO.GEN.305(c)(1-4) erfüllt sind: <ul style="list-style-type: none">• <i>the organisation has demonstrated an effective identification of aviation safety hazards and management of associated risks;</i>• <i>the organisation has continuously demonstrated under ORO.GEN.130 that it has full control over all changes;</i>• <i>no level 1 findings have been issued; and</i>• <i>all corrective actions have been implemented within the time period accepted or extended by the competent authority as defined in ARO.GEN.350(d)(2).</i>
D	48 Monate	Bedingungen aus Kat C müssen erfüllt sein, plus: <ul style="list-style-type: none">• <i>approved continuous reporting system on safety performance and regulatory compliance</i>
E	12 Monate	Nach Erstzertifizierung Dieser Zyklus wird nach einer Erstzertifizierung standardmässig festgelegt.



How do we plan oversight?





Oversight process

Oversight cycle/period

- **Cycle:** e.g. Cat. B 24 month standard oversight
- **Period:** e.g. 01.05.2021 until 30.04.2023
- If the Base Audit is conducted within the last 3 month of the oversight period
-> same starting date of next oversight period (like validity of licenses)
e.g. in example above, if BA is in FEB 2023 -> period will start 01.05.2023

Assigned FOI concept SBOC

- Start with project lead initial certification and remain for first oversight cycle
- Change will take place with Base Audit (end of oversight period)
- assigned FOI will keep operator usually for 2 oversight cycles



Facts and figures 2021/22

Despite of COVID restrictions, during 2021 SBOC conducted

- 150 Audits and inspections
- 550 Cases (Manual Revision, initial certifications, Import, EASA exemptions etc.)
= changes (approval/non-approval)

Further

- we proudly announce 5 new CAT operators certified since JUN 21



Q & A so far





CAMO News

by Ronald Meier, Head STOZ





Agenda

- **Part CAMO Certification project**
 - Status
 - Experience
- **One CAMO**
 - Info
 - Current project
- **New developments**



Part-CAMO Certification

Thank you for your good work and cooperation with our inspectors in the process of re-certifying your CAMO Organisation into a Part-CAMO Organisation



- | | |
|--|------------|
| • Total # of Part-M/G to Part-CAMO re-certifications performed | 73 |
| • First Part-CAMO Certificate issued on | 10.02.2021 |
| • Last Part-CAMO Certificates issued on | 24.03.2022 |
| • Total # of M/G Organisations re-certifying into Part-CAO | 14 |
| • Total # of M/G Organisations surrender the M/G Certificate | 4 |



Re-certification experience

Positive

- Some of the organisations performed very well and/or started early
- EASA extended the due date from 24.09.2021 to 24.03.2022

Negative

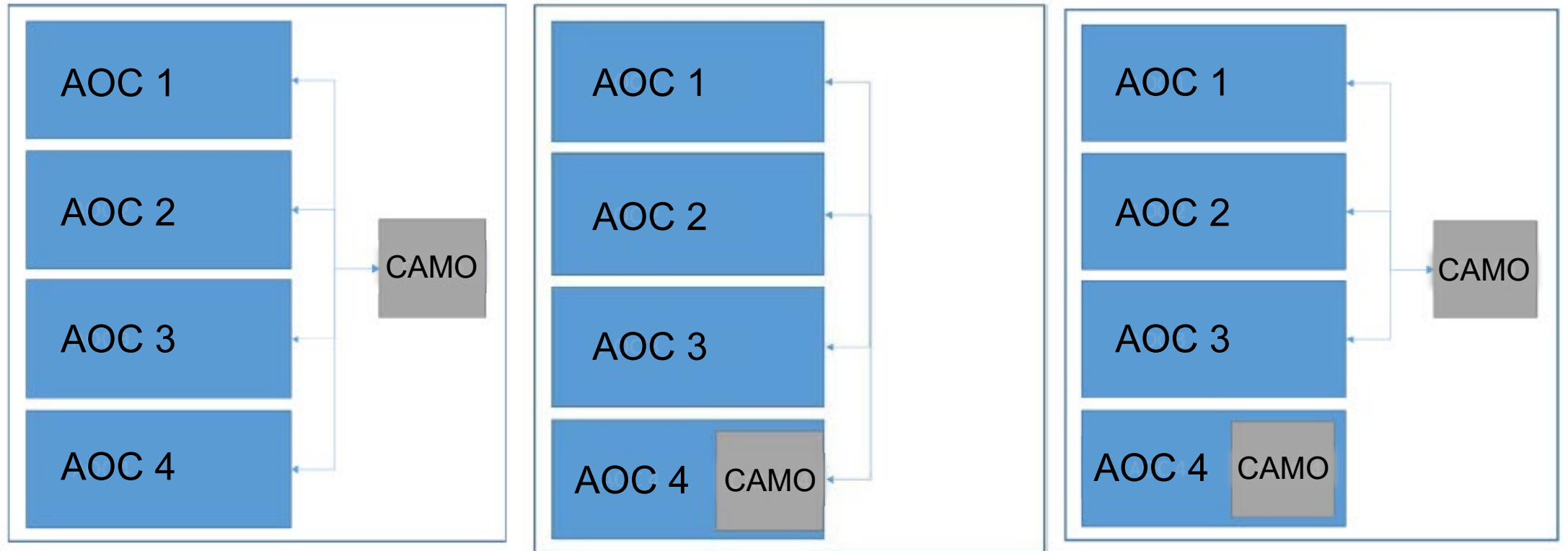
- Some organisations underestimated the time needed for the whole process
- 12 organisations submitted their CAME only in January 2022
- 42 organisations received their certificate only in 2022
- Major issues found:
 - Integration of the Management System into OPS MS
 - Role of CMM and SM



OneCAMO for Business Group Airlines

- New Rule (EU) 2022/410 is effective since 30.03.2022, in CH as of 01.08.2022
- Allowing AOC-Operators within a Business Group to join their CAMO's into OneCAMO

Single business group of licenced air carriers





OneCAMO for Business Group Airlines

Benefits

- One AMP for the entire Fleet of the same A/C Type
- One planning Organisation (CAMO)
- Easier movement of A/C between the AOC's

To be considered

- Harmonisation of Management Systems necessary
- Plan enough time to implement OneCAMO if you consider it
- Please get in contact with us as early as possible

- Cooperation Agreement between the affected NAA's must be set-up



New developments

Part-145

- Implementation of (S)MS with (EU) 2021/1963, effective 02.12.2022
- 2 year transition period until 02.12.2024
- FOCA to start audits after 2.12.2022 based on (EU) 2021/1963
- Generate Findings for deviations to (EU) 2021/1963.
Due date for corrections to deviations acc. (EU) 2021/1963 is 02.12.2024 the latest.

Part-21

- Implementation of (S)MS with (EU) 2022/201 and 2022/203, effective 07.03.2023
- 2 year transition period until 07.03.2025
- FOCA to start audits after 07.03.2023 based on (EU) 2022/201
- Generate Findings for deviations to (EU) 2022/201.
Due date for corrections to deviations acc. (EU) 2022/201 is 07.03.2025 the latest.



Q & A

- Any Questions?



Changes

by Roger Wellauer, Head SBOC





Changes

EASA

- ORO.GEN.130
 - Changes requiring approval
 - Changes not requiring approval -> according approved process
- ... No change on that part so far

FOCA

- New process with new forms planned
- Same process and same tool for aeroplane and helicopter CAT, NCC, SPO, NCO
- As a first step -> for ops



Changes – process overview

Input

New Form 44.20 for notification of change (approval / non-approval)



Verification

For changes req. approval
➤ published checklist with scope of approval
➤ Working tool for FOCA

Specific approvals	Yes	No	Specification	Remarks
ETOPS <input type="checkbox"/> N/A	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Maximum diversion time: 180min. or 1200 NM	
ATC navigation specifications for PBN operations <input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Minimum navigation performance specification <input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	NAV PUA RSP 140 RCP 140	
Operations of single engine turbine aircraft at night or in IMC (SE-3-JOC) <input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
Helicopter operations with the aid of night vision imaging systems <input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
Helicopter hoist operations <input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
Helicopter emergency medical services operations <input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
Helicopter offshore operations <input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
Cabin crew training <input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Hours of CC operation <input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Use of type B EFB applications <input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	according to OMA 9.9	

Output

Signed list of approvals LofA (formal act) plus Form 138, 139, 140

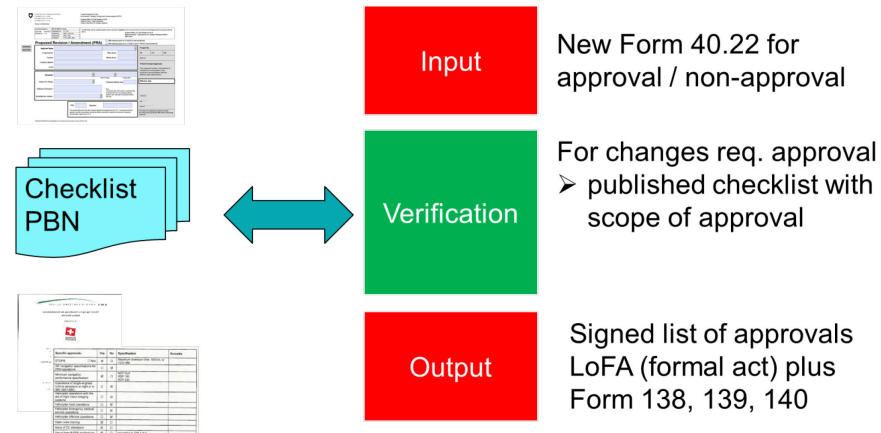


Changes – supporting material

GM/INFO Changes - Process

Describes the process

- Difference approval / non-approval?
- How to apply the process with FOCA?
- Which form do I need?
- Ho to use the Form 44.20?
- What can I expect from FOCA as output
- Where do I find forms and further information?





Changes – supporting material

GM/INFO Changes - Content



GM/INFO
PBN

Describes the content of a topic

- Hints and tips for certain topics, e.g. SPA, fuel policy, FRMS etc. (information part of certification leaflet)

Checklist ETOPS



Describes the scope of a single approval

- Mainly working tool for FOCA
- Lists all regulations (IR/AMC/National law) applicable to the approval (what FOCA considers as a part of the approval)
- May assist you as self-assessment tool
- May assist you with an application for approval



Existing forms / documents

Planned to be withdrawn

- Presently used Form 44.20 (replaced by new Form 44.20)
- PRA AOC; PRA HEL; NMR
- Form 4
- MEL Approval Form
- FOCA Compliance list aeroplane and helicopter (will be replaced by operators compliance list)
- Certification Leaflet -> will be replaced by GM and checklist if deemed necessary; otherwise they will be withdrawn



Implementation plan

First, we plan to implement this with some specific operators for field test around summer holidays... starting with simple changes

...any volunteers are appreciated 😊

After first experience and adaptations we plan to implement the change in close cooperation with you. That means we will change with each operator on an individual schedule.



A few words to change management





Principles of change management

We should

1. know what we want to achieve and if it fits with our needs / policy
2. understand how we will operate the changed system and what we need for that
3. have an idea how we measure the changed system and the success of the change
4. not forget to decommission old stuff (changed risks or mitigations, unused KPI etc.)



Change management – what we should consider

With every change we should think at least about the following issues

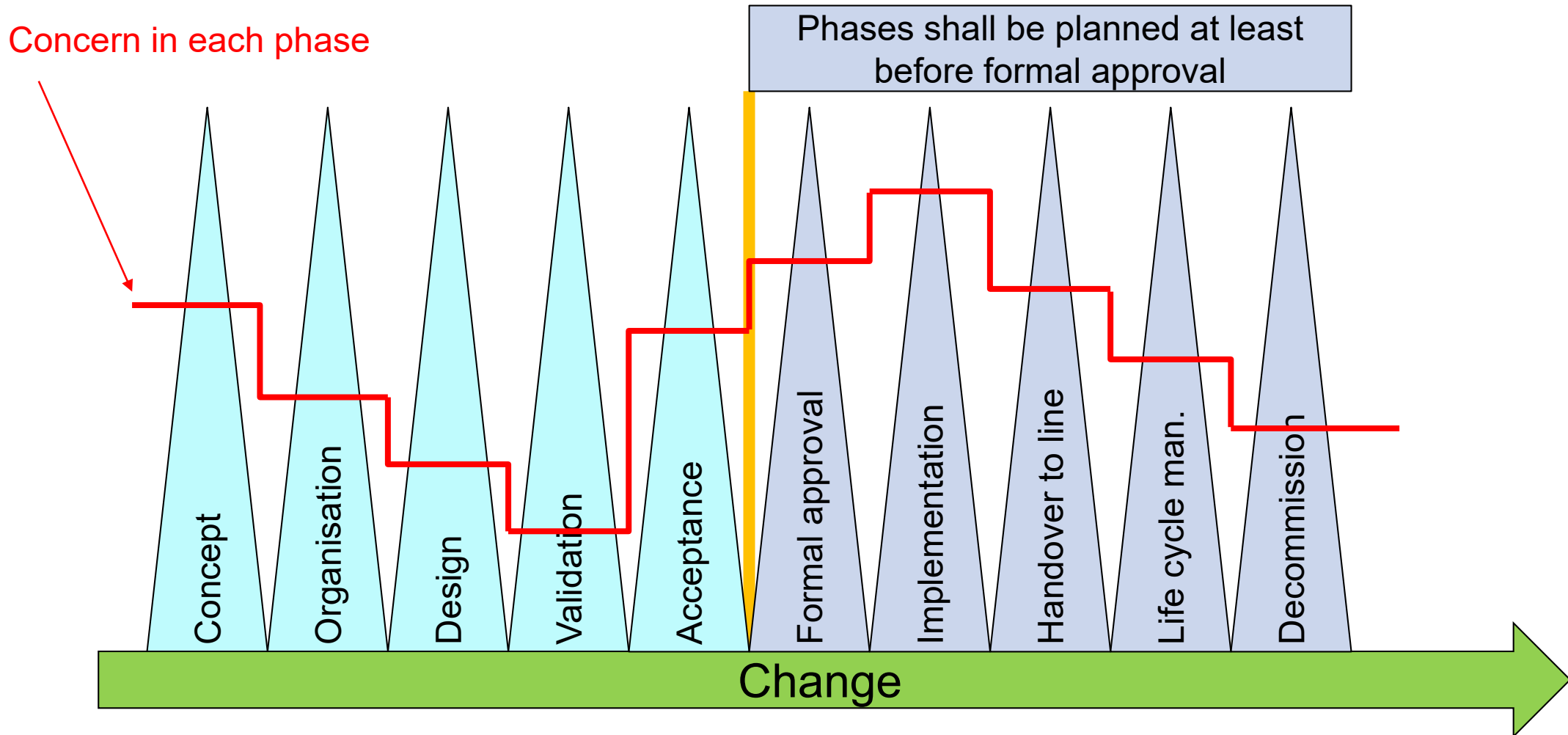
1. Motivation / Goal -> Why change? How far do we go? What do we want to achieve?
2. Organisation -> Project or line organisation?
3. Design / Development -> Policy, processes, risk management, etc.
4. Test / Demonstration -> Operation, reliability, safety performance
5. Acceptance -> Compliance, performance (test results etc.), legal etc.

6. Formal approval (if applicable)
7. Transition into operation and initial monitoring
8. Handover to line ops
9. Life cycle management
10. Decommissioning

Note: that's only an idea; several models exist



Possible phases of change management

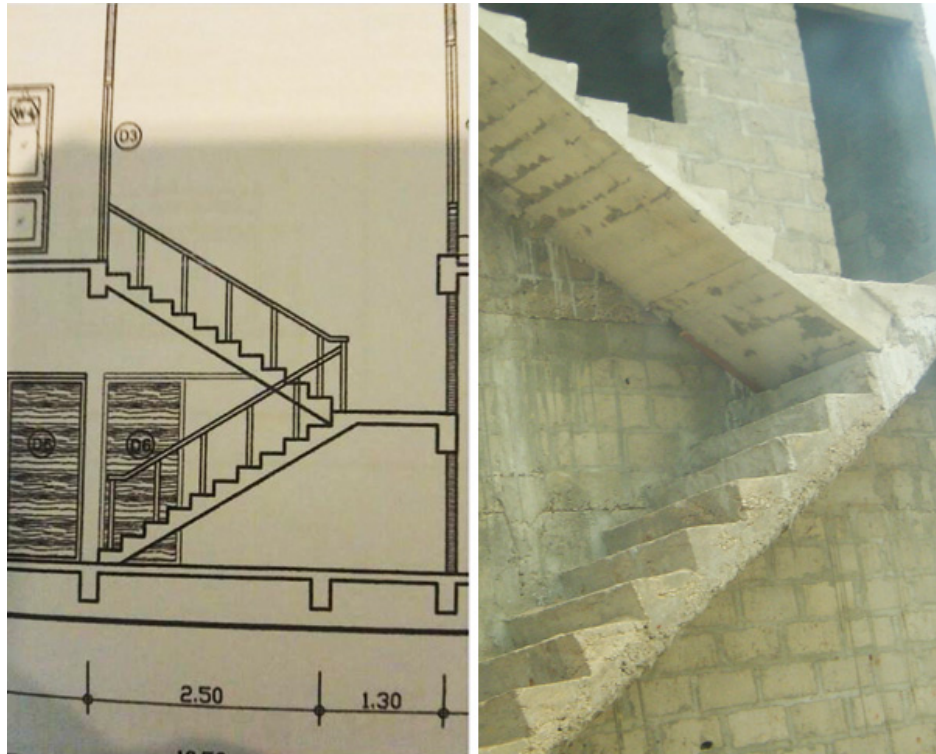


Finally, all phases should be of our concern in any change, of course with different depth.



Samples of unfortunate projects/changes

- If you don't follow a proper change process, the result of a change might be quite different than expected





Finally, a few words to document compliance

- Document compliance means
 - all processes are documented in compliance with the applicable regulation(s).
- Compliance matrix / list / information ...or whatever we call it
 - shows correlation between each chapter of the organisations documentation and the applicable regulation (IR and AMC/AltMOC)

With any changed document, FOCA needs to know (...and probably you too)

- **which chapters/content/DU** have been changed (change log)
- **which regulation(s)** are affected by each chapter (detailed compliance information including status regarding **approval/non-approval**), e.g.
 - OMA 8.7 - ORO.AOC.125 Non commercial operations /non-approval
 - OMA 3.X.X (or OMM) - AMC1 ORO.GEN.200(a)(2) Safety Policy /approval



Detailed compliance information in documentation

Benefits for Organisation and FOCA

- Allows professional compliance management and smart project management
- Easy to list all applicable requirement for compliance management reasons
- Easy to group for approval/non-approval items as a basis for risk based CM / Oversight
- Upon changes in regulation -> simple search for changed IR/AMC shows all related chapters in the organisations documentation
- Manual Revision -> efficient for compliance verification (Org and FOCA)



Summary - Q & A

- **Summary of discussed topics**
 - Oversight process (compliance/risk/performance based, oversight cycle)
 - CAMO News
 - Changes -> upcoming new Forms
 - Change management principles
 - Document compliance issues

now feeling like...



or... ?



- **Questions, Comments, other topics?**