

Improvement of Compliance Monitoring System in an EASA AOC and Part-CAMO organisation

Versão final após defesa

Maria Beatriz de Sousa Leite

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Orientador: Prof. Doutor José Manuel Mota Lourenço da Saúde

Co-orientadora: Eng.^a Carla Ribeiro Moreira

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Resumo

Desde o início do desenvolvimento da indústria da aviação e durante toda a sua evolução e aperfeiçoamento, foram múltiplos os fatores a considerar para proporcionar e maximizar a sua coordenação e conformidade com as necessárias normas implícitas.

Como resultado do avanço do sector da aviação, houve um aumento notório da pressão no sentido de garantir a sua segurança, eficiência, responsabilidade e conformidade com as regras ditadas pelas autoridades da aviação civil.

Consequentemente, as organizações do sector da aviação podem garantir que as suas operações cumprem os mais rigorosos requisitos regulamentares e de segurança.

O termo conformidade no sector da aviação é uma referência à capacidade de um operador para cumprir os requisitos especificados pela própria empresa e pelas autoridades responsáveis.

O sistema de gestão da conformidade numa organização de aviação pode abranger todos os diferentes domínios, desde as operações de voo à formação da tripulação, passando pela manutenção das aeronaves e pela aeronavegabilidade contínua.

Consequentemente, é fundamental uma interação coesa entre a segurança e a conformidade no sector da aviação, a fim de garantir a integridade operacional e apresentar segurança tanto aos clientes como à tripulação de voo.

As organizações de aviação detentoras de um COA (Certificado de Operador Aéreo) estão autorizadas a efetuar operações de transporte aéreo comercial e têm de cumprir os severos regulamentos estabelecidos pelas autoridades de aviação internacionais e regionais, por exemplo, a Agência Europeia para a Segurança da Aviação (EASA).

Estes quadros regulamentares exigem que os titulares de COA implementem sistemas de gestão dinâmicos que garantam o cumprimento contínuo das normas de segurança e operacionais. Neste sentido, a crescente complexidade dos requisitos de conformidade exige uma abordagem estruturada e eficaz da supervisão regulamentar.

O documento apresentado abordará e responderá a estes desafios de conformidade na PHS Aviation - um operador detentor de COA e uma organização Part Camo - através do desenvolvimento e implementação de listas de verificação de conformidade. A integração destas listas de verificação na empresa foi o resultado de um estudo e de uma análise das lacunas do Sistema de Monitorização da Conformidade do operador.

A empresa e as autoridades da aviação civil estabeleceram requisitos e normas regulamentares que devem ser cumpridos por todas as atividades relacionadas com a manutenção e operação de aeronaves. Estes requisitos devem ser sistematicamente verificados e continuamente monitorizados. O papel e a importância da monitorização da conformidade numa empresa de aviação, uma divisão da CAMO, serão examinados em pormenor neste projeto.

O resultado deste estudo visa melhorar os processos de auditoria, aumentar a adesão à regulamentação e, em última análise, contribuir para a segurança e fiabilidade de todos os departamentos e operações da PHS Aviation.

Palavras-chave

PHS Aviation; AOC; Sistema de Gestão; CAMO (Sistema de Gestão da Aeronavegabilidade Contínua); Sistema de Gestão de Conformidade; Listagens de Conformidade; Análise de Falhas; Auditoria.

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Abstract

For as long as the aviation industry has been developed, and during all its evolution and improvement, there have been multiple factors to be considered in order to improve and maximise its coordination and conformity with the necessary norms implied.

As a result of the advancement of the aviation sector, there was a notorious increase of pressure in order to guarantee its safety, efficiency, accountability and compliance with the rules dictated by civil aviation authorities. Consequently, aviation organisations may ensure their operations fulfil the strictest regulatory and safety requirements.

The term compliance in the aviation sector is a reference to an operator's capability to meet the requirements specified by the own company and responsible authorities. The compliance management system in an aviation organisation may cover all different areas, from flight operations to crew training to aircraft maintenance and continued airworthiness.

Consequently, a cohesive interaction between safety and compliance in the aviation industry is fundamental in order to assert operational integrity and present safety to both clients and flight crew.

Aviation organisations which hold an AOC (Air Operator Certificate) are authorized to perform commercial air transport operations and must conform with severe regulations set forth by international and regional aviation authorities, for example the European Union Aviation Safety Agency (EASA).

These regulation frameworks mandate that AOC holders implement dynamic management systems that ensure continuous adherence to safety and operational standards.

In this sense, the increasing complexity of compliance requirements mandates a structured and effective approach to regulatory oversight.

The presented paper will address and answer these compliance challenges in PHS Aviation - an AOC holder operator and Part Camo organisation - through the development and implementation of Compliance Checklists (see Annex B, Annex C and Annex D). The integration of these checklists in the company was a result of a study and gap analysis of the operator's Compliance Monitoring System.

The company and civil aviation authorities have established regulatory requirements and standards that must be met by all activities related to aircraft maintenance and operation. These requirements must be systematically verified and continuously monitored. The role and significance of compliance monitoring in an aviation company, a division of CAMO, will be examined in detail in this project.

The result of this study aims to improve auditing processes, enhance regulatory adherence and ultimately contribute to the safety and reliability of all PHS Aviation's departments and operations.

Keywords

PHS Aviation; AOC; CAMO (Continuing Airworthiness Management Organisation); Safety Management System; Compliance Monitoring System; Gap Analysis; Compliance Checklist; Audit.

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List of abbreviations and acronyms

| | |
|---------|--|
| A/C | Aircraft/Aeroplane |
| ACFT | Aircraft/Aeroplane |
| ADREP | Accident/Incident Reporting System |
| AIR-OPS | Commission Regulation (EU) No 965/2012 on Air Operations includes provisions for commercial operations, for non-commercial operations and for specialized operations (e.g. aerial work). |
| ANAC | Autoridade Nacional da Aviação Civil (Portuguese Civil Aviation Authority) |
| AOC | Air Operator Certificate |
| CAA | Civil Aviation Authority |
| CAMO | Continuing Airworthiness Management Organisation |
| CAT | Comercial Air Transportation |
| CMS | Compliance Monitoring System |
| EASA | European Union Aviation Safety Agency |
| FOM | Flight Operations Manual |
| ICAO | International Civil Aviationorganisation |
| OM | Operations Manual |
| ORO | Organization Requirements for Air Operations |
| SMS | Safety Management System |

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1. Introduction

1.1. Motivation

In order to assert safety, efficiency and accountability in its operations, the aviation industry is subject to complex compliance requirements. Even more complicated is compliance for organisations that hold both an Air Operator Certificate and a Part-CAMO (Continuing Airworthiness Management Organisation) approval.

PHS Aviation holds both certificates, so the organisation must meet their standards which leads to a two-fold compliance challenge. The purpose of this report is to address these compliance challenges by conducting a detailed gap analysis of PHS Aviation's Compliance Monitoring System (CMS).

The outcome of this study highlights areas where regulatory compliance could be reinforced, particularly in how flight operations and continuing airworthiness are audited and monitored. The result is the development of specialized compliance checklists (see Annex B, Annex C and Annex D) that were designed to fill and answer these gaps as a form of enhancing compliance across PHS Aviation.

1.2. Objective

The primary objective of this thesis report is to improve the Compliance Monitoring System at PHS Aviation, by conducting a thorough gap analysis of the CMS (see annex A) , identifying discrepancies and areas where compliance with regulatory standards could be improved.

Secondarily, to design and implement compliance checklists (see Annex B, Annex C and Annex D) tailored to both flight operations and the CAMO department of the company, ensuring that all regulatory requirements are met, and compliance is maintained.

The final purpose of this paper is to create a compliance framework that integrates the findings from the gap analysis (see annex A) into PHS Aviation's operational procedures, improving auditing processes and ensuring continuing compliance with EASA regulations.

1.3. Methodology

The methodology employed in this study was divided into three key phases:

In the first phase, a comprehensive review of the theoretical framework for compliance management within aviation organisations was conducted. This included an in-depth analysis of the applicable regulations set forth by relevant aeronautical authorities, particularly focusing on those that directly impact PHS Aviation.

The existing regulatory requirements and compliance practices within PHS Aviation were thoroughly examined to identify areas where the implementation of Compliance Checklists (see Annex B, Annex C and Annex D) could be most beneficial.

In the second one, a gap analysis (see annex A) was conducted through the study of previous documented internal audits and examination of day-to-day work at PHS Aviation, focusing on areas where compliance monitoring was insufficient. This process allowed for a comprehensive insight of the compliance gaps within the organisation.

In the third phase, tailored Compliance Checklists (see Annex B, Annex C and Annex D) were developed, targeting the specific audit requirements and compliance challenges identified during the gap analysis (see annex A).

These checklists were designed to align with industry standards and the unique operational context of PHS Aviation. Each checklist was then evaluated for its effectiveness in ensuring adherence to regulatory standards during audits, with the goal of improving overall compliance processes within the company.

1.4. Work limits

The scope of this study was limited by its timeframe and availability of historical data. Since the gap analysis (see annex A) and compliance checklists (see Annex B, Annex C and Annex D) were developed as part of this project, sufficient time has not passed to observe their influence on consecutive audit cycles.

This limitation restricts the ability to analyse tendencies and performance over long periods, thus limiting the potential for drawing definitive conclusions about the sustained benefits and challenges associated with this approach.

Future studies would benefit from a longer evaluation period, enabling a more comprehensive assessment of the checklists' effectiveness and their role in promoting continuous improvement within the Compliance Monitoring System.

Further empirical analysis will be necessary to validate the long-term impact of these tools on audit efficacy, regulatory adherence, and overall operational safety at PHS Aviation.

1.5. Structure

This thesis report is divided into four main sections:

- **Section 1:** Introduction, covering the motivation, objective, methodology, and scope.
- **Section 2:** An overview of PHS Aviation as an AOC and Part-CAMO organisation and an overview of PHS Aviation's general Monitoring System.
- **Section 3:** A review of the relevant regulations and compliance requirements in the aviation industry.
- **Section 4:** A case study focusing on the gap analysis (see annex A) of the Compliance Monitoring System and implementation of the compliance checklists (see Annex B, Annex C and Annex D) and their impact on PHS Aviation.
- **Section 5:** Conclusion and reflection of the report.

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2. PHS Aviation

2.1. History

PHS Aviation is an organisation based at Aeródromo Municipal de Palmeira Hangar 3, Braga North of Portugal and was founded on the 10th of July in 2009. Currently, the company operates a fleet consisting of three complex Type B aircraft, each with a seating capacity of fewer than 19 passengers and a maximum take-off weight of less than 1,000 kg.

PHS Aviation operates under an Air Operator Certificate (AOC) with the reference AOC PT-01/11, which is a certificate that allows the company to perform specific operations of commercial air transport. The AOC is issued in accordance with EASA (European Union Aviation Safety Agency)¹ regulations and ensures that the organisation has the personnel, assets and systems in compliance, confirming the safety of its employees and the general public. Commonly referenced as the air operator permit, this document specifies the aircraft types PHS Aviation may use, their purpose and in which geographic region are they permitted to fly.

PHS Aviation's operations are regulated under Regulation (EU) 965/2012, which establishes the technical requirements for air operations and Regulation (EU) 1321/2014 for continuing airworthiness. The company is also a certified Continuing Airworthiness Management Entity in accordance with PART-CAMO (PT.CAMO.34). In order to meet the Part M, Part CAMO and Part ML standards, PHS Aviation works with appropriate Part 145 or PART-CAO approved maintenance organisations.

PHS Aviation operates as both an AOC holder and a Part-CAMO approved organisation, requiring a complex interplay of flight operations and continuing airworthiness management. As an AOC holder, it is PHS Aviation's responsibility to ensure the safety of its commercial flights, which can involve the transport of passengers, medical patients and transplant organs and introduces additional compliance challenges and safety responsibilities.

¹ The European Union Aviation Safety Agency was created to establish and maintain high uniform levels of civil aviation safety and environmental protection throughout its Member States. As Portugal is one of its member states, and PHS Aviation's AOC was approved by the Portuguese national authority, the operator must comply with EASA's legislation.

The organisation is structured in a sense that supports these compliance needs, with key nominated personnel such as the Accountable Manager, Flight Operations Manager, and Airworthiness Manager playing fundamental roles in maintaining operational and regulatory oversight.

In order to understand PHS Aviation's work, we have to establish the definition of operations in the aviation industry. There are three main types of operation:

- **Commercial Operations (Commonly referred to as CAT operations)**

This kind of operation involves the transportation of passengers, cargo or mail for remuneration or hire. It can be divided in:

- Scheduled Operations;
- Non-scheduled Operations;
- Charter;
- On demand (air-taxi, commercial business aviation, other).

- **Specialised operations (SPO)²**

SPO is any operation other than CAT where the aircraft is used for specialised activities such as:

- Agriculture;
- Construction;
- Photography;
- Surveying;
- Observation and patrol;
- Aerial advertisement.

- **Non-commercial Operations:**

Refers to any operation that does not fall within the definition of commercial and it is divided in:

- Non-commercial with complex motor-powered aircraft (NCC);
- Non-commercial with other-than-complex motor-powered-aircraft (NCO).

² Note that commercial operations and specialised operations are not exclusive, i.e. an SPO can be a commercial operation, but it also can be a non-commercial operation. For example, an agriculture work, if done by a farmer on their own farm, would be non-commercial. If the same farmer did the same activity on a neighbour's farm for a fee, this would be a commercial operation (but not a CAT since no transportation takes place). (ICAO, 2020)

2.2. PHS Aviation's specific approvals

As established in point 2.1., PHS Aviation has an air operator certificate issued by ANAC (Autoridade Nacional de Aviação Civil) that authorizes the company to perform Commercial Air Operations, commonly referred as CAT operations, in accordance with their Operations Manual, Annex V to Regulation (EU) 2018/1139 and its delegated and implemented acts.

With its Air Transport Operator (AOC), PHS Aviation performs:

- Executive Aviation Flights;
- Air Ambulance Flights;
- ONT (Organ Transport) Flights.

The air operator license and certificate allows PHS Aviation to carry passengers. In order to operate under an AOC, the organisation must hold a Part-CAMO approval.

2.3. General organisation

PHS Aviation's organisational structure is designed to support the complex regulatory environment of both AOC and Part-CAMO operations. The company has a robust management system that integrates the Safety Management System (SMS) and Compliance Monitoring System (CMS) to ensure adherence to both internal policies and external regulations.

The general organisation of PHS Aviation is presented in Image 1.

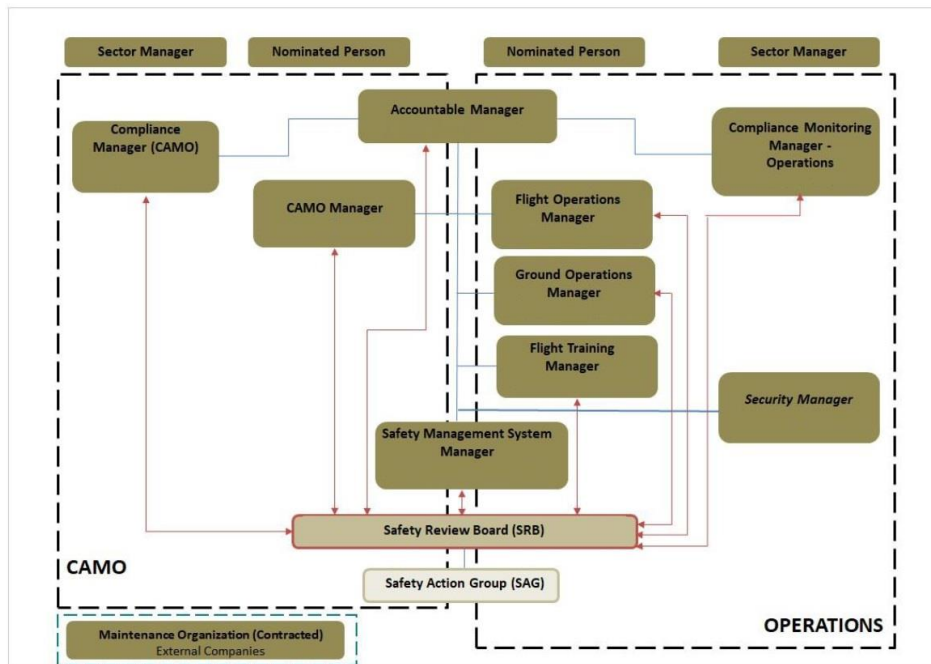


Image 1 - PHS Aviation's Organogram -
Source: (PHS Aviation, 2024a)

As we can see from the organogram, PHS Aviation's CAMO Department and Flight Operations Department must have a harmonized and well-structured interplay, as their functions work concurrently.

The Flight Operations Department's primary goal is to guarantee that all operator flights are staffed with qualified Flight Crew and Ground Support personnel. The department is responsible for establishing and maintaining the necessary functions to ensure that all operations are conducted safely and in compliance with both internal rules and regulatory requirements.

The Nominated Person for Flight Operations is appointed by, and reports directly to, the Accountable Manager of the operator. The flight operations department also comprises the Flight Training Department and Ground Operations Department.

The Flight Training Department is the one responsible for providing high-quality training to both Flight Crew and Ground Support personnel to ensure they are well-prepared for their roles.

The Airworthiness Department or CAMO Department is responsible for the overall system of maintaining the airworthiness of the operator's aircraft, ensuring that all maintenance is completed on schedule and meets approved standards.

2.3.1. Nominated persons

2.3.1.1. Accountable Manager

In accordance with EASA's Regulation (EU) No 965/2012 ORO.GEN.210, the Accountable Manager holds overall responsibility and accountability for the Safety Management System (SMS) and has established the formal Safety Policy, stating the commitment, fundamentals, and objectives of the SMS.

The accountable manager is responsible for ensuring that the organisation is properly structured and adapted to meet the commitments undertaken by PHS Aviation, establishing objectives that the organisation will aim for, while evaluating gained experience and trends related to flight safety standards. It is also enforced in this role the management of the frequency, format, and structure of internal management audit activities and the continuous monitoring of safety to ensure the highest safety standards.

2.3.1.2. Flight Operations Manager

The Flight Operations Manager is tasked with reporting to the Accountable Manager and is responsible for preparing and proposing the department's budget. Additionally, they carry direct accountability to ANAC for the entirety of flight operations, establishing the objectives for the Flight Operations Department and evaluating any experiences or tendencies that could enhance flight safety standards at PHS Aviation.

Maintaining regular communication with ANAC and other relevant authorities in different countries is a critical part of the Flight Operations Manager's role. This includes determining the usability of airdromes for company operations in accordance with operational procedures, setting restrictions on their use, and establishing minimum operating conditions. Furthermore, the Flight Operations Manager assesses the usability of airways and areas for company operations, ensuring that minimum flight altitudes are established appropriately.

To ensure safe and compliant operations, the Flight Operations Manager is responsible for verifying that all flights are conducted along routes and in areas where ground facilities, services, and meteorological information are adequate for the planned operation. They also ensure that the aircraft's performance meets minimum altitude requirements, that the aircraft equipment is suitable for the flight, and that current maps, charts, and relevant navigational data are available. Special consideration is given to ensuring compliance with operational procedures limitations for twin-engine aircraft.

2.3.1.3. Compliance Monitoring Manager

The Compliance Monitoring Manager's role is to oversee compliance with, and assess the adequacy of, the procedures necessary to ensure safe operational practices and the airworthiness of aircraft, as mandated by EASA's Easy Access Rules for Air Operations AMC1 ORO.GEN.200 a) 6) c) 1) 2) 3)³. This position entails the responsibility for establishing, implementing, maintaining, and continuously improving the Compliance Monitoring Program. The Compliance Monitoring Manager must have direct access to the Accountable Manager and all areas of PHS Aviation, as well as any relevant subcontractor organisations.

Additionally, the individual in this role must not be one of the persons specified in EASA's Easy Access Rules ORO.GEN.210(b) and must demonstrate a solid understanding and experience in the company's activities, particularly in compliance monitoring.

³ AMC1 ORO.GEN.200(a)(6) Compliance Monitoring Function outlines the role and structure of the compliance monitoring function within an aviation operator's management system. (EASA, 2023).

2.3.1.4. Airworthiness Manager

The Continuing Airworthiness Manager is the nominated person approved by ANAC for Continuing Airworthiness and reports to the Accountable Manager. The Continuing Airworthiness Manager is responsible for the safety of maintenance and engineering activities and for the relevant contracted suppliers, and also for ensuring compliance with all relevant national and international regulations and the provisions of the company's AOC.

2.3.1.5. Postholders role

After understanding individually, the roles of each nominated person within PHS Aviation, we can understand that every postholder has duties and responsibilities defined in a sense to assist the Accountable Manager in achieving compliance:

- **Flight Operations Manager:** Oversees all flight operations, ensuring they comply with regulatory standards and the internal operational procedures defined in the Operations Manual (OM).
- **Compliance Monitoring Manager:** Responsible for overseeing the Compliance Monitoring Program, ensuring that all aspects of the organisation meet regulatory standards, including airworthiness and operational safety. This role involves continuous auditing and reporting to the Accountable Manager to maintain high levels of compliance.
- **Safety Manager:** Manages the **Safety Management System (SMS)**, ensuring that safety hazards are identified and addressed proactively. The Safety Manager works in collaboration with the Compliance Monitoring Manager to ensure that corrective actions are implemented when non-compliance or safety risks are identified.

2.4. Structure of PHS Aviation's management system

PHS Aviation's management system was designed in order to ensure that all aspects of its operations are following the established regulatory standards and their own internal safety and quality requirements. The management system includes crucial elements such as the Safety Management System (SMS) and the Compliance Monitoring System (CMS). The correlation between these two structures is the key to creating a comprehensive framework that governs the organisation's activities in line with EASA regulations.

The harmonized correlation between the two systems ensures that both flight operations and continuing airworthiness activities are managed safely and efficiently. As previously mentioned, it is the Accountable Manager's ultimate responsibility to supervise, coordinate and support the management system, ensuring that all departments are compliant with the regulatory framework set by EASA and ANAC.

Furthermore, as also mentioned in point 2.2., the postholders are appointed to oversee specific functions such as Flight Operations, CAMO, and Ground Operations. These nominated personnel play a key role in guaranteeing that the management system is adhered to across the organisation.

2.5. Safety management system

The Safety Management System (SMS) at PHS Aviation works as a proactive method designed for the identification, assessment and mitigation of risks and hazards before they result in safety incidents.

EASA's ORO.GEN.200 is a regulatory framework that dictates that all the operators holding an Air Permit must implement an official safety management system in their operational structure. As an AOC holder, PHS Aviation is aligned with and follows this regulatory implementation.

Safety Management Systems are therefore implemented as a form of maintenance for the high levels of safety that PHS Aviation operates by and is a pathway to promoting a culture of continuous improvement and risk management. At PHS Aviation, the SMS was created on four main components:

- Safety Policy
Implemented by the Accountable Manager, the safety policy represents the operator's commitment to safety in an articulated format and sets the tone for the entire safety management framework, ensuring that safety is prioritized across all operational areas.
- Safety Risk Management
At PHS Aviation, the risk management is the key to the safety management system. In order to manage risks inside the company, PHS Aviation implemented the Safety Risk Management as a form of identifying hazards, assess associated risks, and the implement the right mitigating measures. As mentioned previously in point 2.2.m it is the Safety

Manager's responsibility to coordinate safety risk assessments, ensuring that identified risks are managed effectively.

- Safety Assurance

In order to ensure the efficacy of the SMS, PHS Aviation utilizes a continuous safety assurance procedure, that includes regular safety audits, internal inspections, and monitorization of key safety performance indicators (SPIs). Feedback from these activities is used to improve safety practices and procedures.

- Safety Promotion

The promotion of safety awareness is an essential element of the SMS at PHS Aviation. The aviation operator conducts consistent and recurrent safety training sessions for its personnel, from the office personnel to the flight crew. This on-going training ensures that PHS Aviation is fostering a culture where safety is rooted in day-to-everyday operations. This boosts and stimulates an open communication about safety concerns and encourages reporting of hazards.

2.6. Compliance monitoring system

The Compliance Monitoring System (CMS) is a crucial part of PHS Aviation's management system and works parallelly with the SMS.

This correlation ensures that all activities and departments within the operators are being conducted compliantly with the established regulations and internal policies.

Air Operator's Certificate holders must implement a formal compliance monitoring program as required by EASA's regulatory framework ORO.GEN.200. This requirement forms the backbone of PHS Aviation's approach to regulatory adherence.

At PHS Aviation, the Compliance Monitoring System was created following and focusing on three main components:

- Regulatory Compliance

The CMS has to ensure that all operational and safety procedures at PHS Aviation adhere to EASA and ANAC regulations. This includes maintaining up-to-date operational manuals, adhering to airworthiness directives, and ensuring that all flights comply with the regulatory framework for commercial operations.

- Internal Audits:

A critical component of the CMS is the regular auditing of internal processes. These audits, overseen by the Compliance Monitoring Manager, assess the organisation's

adherence to its own procedures and regulatory requirements. Audit findings are reported directly to the Accountable Manager, and corrective actions are implemented where necessary.

- Reporting and Documentation

The CMS also focuses on maintaining comprehensive documentation of all compliance activities, including audit reports, regulatory updates, and corrective action plans. This documentation is essential for demonstrating compliance to external auditors and regulatory authorities.

The Compliance Monitoring System (CMS) at PHS Aviation is a key component of the management system, ensuring that all flight, ground and maintenance and crew training operations comply with the applicable regulatory and internal standards. The CMS includes systematic audits, inspections, and feedback loops that provide oversight across the organisation. Compliance audits are conducted by qualified personnel who are independent of the functions being audited, maintaining the objectivity and integrity of the CMS.

The Compliance Monitoring Manager has the critical role of overseeing the CMS, ensuring that audits are conducted on all relevant activities, including actual flight operations, ground services, maintenance, and training standards. This role also involves ensuring that findings are reported to relevant departments for corrective actions and verifying the implementation of those actions. The Compliance Monitoring Manager reports directly to the Accountable Manager, ensuring transparency and accountability.

The main goals of the Compliance Monitoring System include the verification of the PHS Aviation's compliance with regulations and directives leading to the enforcement of the necessary measures in case of identified deviations from standards. The CMS has to ensure an independent assessment to the relevant requirements, policies and procedures that will lead to a mandative course of action in order to eliminate all the non-conformities.

Ensuring the independence of the Compliance Monitoring System involves having audits and inspections carried out by individuals who are not directly involved in the functions or oversight of the processes and departments under audit or inspection.

2.6.1. Audit

PHS Aviation performs systematic, independent audits in order to assess compliance with internal policies of the organisation, industry standards and regulatory requirements from the respective countries' authority. The audits have the main objective of ensuring PHS

Aviation's continuing airworthiness directives and flight operations. In a Part CAMO (Continuing Airworthiness Management organisation) aviation organisation, such as aircraft maintenance, record management and keeping, and safety practices, and flight operations, adhere to the regulations outlined by the European Union Aviation Safety Agency.

Internal audits comprise of the examination of documentation, procedures, and operational practices in order to identify divergences⁴, non-conformities⁵, or potential risks⁶ that could affect the airworthiness of the aircraft and the organisation's operation.

It is the auditor's function to analyse areas such as maintenance planning, fault reporting, component tracking, and subcontractor oversight. During an audit, when the auditor identifies a non-conformity from the standards established by the competent authorities, it is referred to as a finding. Audit findings typically lead to the implementation of corrective actions address and mitigate potential risks. Findings from internal audits are documented and reported to senior management and the Nominated Person responsible for continuing airworthiness.

The organisation then formulates corrective actions to resolve the findings, ensuring sustained compliance and continuous improvement of airworthiness standards. Furthermore, internal audits serve as a proactive mechanism to identify areas for enhancement and maintain the overall safety and efficiency of aviation operations.

2.6.2. Compliance monitoring program - audit plan

For PHS Aviation, an audit is a systematic and independent comparison between the actual conduct of operations and the procedures specified in the organisation's internally published operational guidelines. Audits encompass at least the following compliance procedures and processes:

- A statement outlining the audit's scope;
- Planning and preparation;
- The collection and documentation of evidence; and
- The analysis of gathered evidence.

⁴ Divergences refer to deviations from established procedures, rules, or expected outcomes. For example, if maintenance records are found to be incomplete or outdated, this would be considered a divergence.

⁵ Non-conformities are instances where the organisation fails to comply with the regulations, standards, or contractual obligations. An example would be if an aircraft component is not replaced or maintained as per EASA's prescribed intervals.

⁶ Potential Risks represent situations or factors that could lead to non-compliance or safety hazards if not addressed. For instance, insufficient staff training could be a potential risk, as it might result in errors during aircraft maintenance.

The techniques employed by PHS Aviation, which contribute to an effective audit, include:

- Interviews and discussions with personnel;
- A review of published documents;
- Examination of a representative sample of records;
- Observation of operational activities;
- Preservation of documents and recording of observations.

The audits are structured based on checklists prepared according to the audit schedule. These checklists are developed under the supervision of, or by, the Compliance Monitoring Manager. At the beginning of each year, the Compliance Monitoring Manager establishes an annual audit plan covering all relevant departments, specifying the planned audit dates. Upon completion of an audit, the actual execution date must be recorded. This plan is communicated to the Accountable Manager and submitted to ANAC for approval.

The plan remains flexible, allowing for unscheduled audits when trends warrant such action. Follow-up audits are scheduled when necessary to verify the implementation and effectiveness of corrective actions. All aspects of the operation are reviewed annually in accordance with the program, unless an extension of the audit period is granted, as explained below. PHS Aviation may increase the frequency of audits at the discretion of the Compliance Monitoring Manager but may not reduce the frequency without ANAC's agreement.

When drafting the audit plan, PHS Aviation must consider significant changes to management, organisational structure, operations, technologies, and regulatory requirements. For example, the appointment of a new Accountable Manager, a reorganization of departments, the introduction of new aircraft types or maintenance technologies, or changes in EASA regulations regarding continuing airworthiness could all significantly impact compliance and must be factored into the audit plan.

The auditor is responsible for:

- Preparing the audit and selecting the appropriate working documents;
- Reviewing all relevant documentation related to the audited sector and informing it of the findings;
- Communicating the audit conclusions in a report.

The audited sector is responsible for:

- Appointing a person to oversee the audit;
- Providing the auditor with all necessary resources for the proper execution of the audit;
- Cooperating with the auditor to achieve the audit's objectives;
- Determining and initiating the required corrective actions.

2.6.2.1. Audited areas

PHS Aviation monitors compliance with its current operational procedures and also the CAMO department to ensure the safety of operations, the airworthiness of aircraft, and the serviceability of both operational and safety equipment. In this context, audits assess the following areas:

- Organizational structure and privileges of the company;
- Company's operational plans and objectives;
- Operational procedures;
- Flight safety;
- PHS Aviation's certification (AOC/Operations specifications);
- Operational supervision;
- Aircraft performance;
- Communications and navigational equipment and practices;
- Mass, balance, and aircraft loading;
- Instruments and safety equipment;
- Manuals, logs, and records;
- Flight and duty time limitations, rest requirements, and scheduling;
- Aircraft maintenance/operations interface;
- Use of the Minimum Equipment List (MEL);
- Flight crew;
- Dangerous goods handling;
- Security measures;
- Training standards;
- Regulatory compliance;
- Compliance with sub-contractor agreements.

2.6.3. Control of detected findings

Findings detected are documented and controlled through a specific program (PHS Aviation's IQ.074 - Plano de Ação de Melhoria). The resolution of findings is managed according to this program.

2.6.4. Compliance monitoring audit procedures

Auditors use various techniques to promote effective audits, including interviews, document reviews, sample record examinations, observing operations, and preserving documents.

The audit process is methodically planned and include steps such as determining the audit process, consulting the Compliance Monitoring Manager, reviewing relevant documentation, conducting the audit, and preparing and discussing the audit report. Findings should be classified by severity and include a timeframe for compliance.

2.7. SMS and CMS interaction

As mentioned previously, the SMS and CMS at PHS Aviation work simultaneously in a way that creates a robust structure that guarantees both safety and regulatory compliance. As we can conclude from chapters 2.4 and 2.5., while the SMS is predominantly focused on the proactive management of risks and promotion of safety across the organisation, the CMS is the component that provides the tools that ensure that all activities are directed in accordance with regulatory standards.

At PHS Aviation, there is an interdependency between the two systems as confirmed below:

- **Safety Risk Identification and Compliance**
When risks are identified through the SMS, the CMS ensures that the appropriate regulatory requirements are met to address these risks. For example, if a safety audit reveals a risk related to aircraft maintenance, the CMS ensures that all necessary airworthiness directives and compliance procedures are followed to mitigate the risk.
- **Feedback Loops**
Both the SMS and CMS rely on feedback loops to continuously improve the organisation's safety and compliance performance. Information from safety audits conducted under the SMS is fed into the CMS to ensure that regulatory compliance is maintained. Likewise, findings from compliance audits conducted under the CMS are used to improve the organisation's safety practices.
- **Training and Awareness**

The interaction between the two systems is further reinforced through training and awareness programs. All personnel are trained in both safety and compliance procedures, ensuring that they understand how the two systems work together to maintain operational safety and regulatory compliance.

2.8. Overall importance of the management system

After analysing the structure of PHS Aviation we can conclude that the management system – with its integrated SMS and CMS – plays a critical role in ensuring that the organisation operates safely and in full compliance with regulatory requirements.

By adopting a proactive approach to safety and providing structured processes for compliance monitoring, PHS Aviation is able to mitigate risks, maintain high safety standards, and ensure adherence to EASA regulations.

The continuous interaction between the SMS and CMS ensures that the organisation remains agile in responding to regulatory changes and operational challenges, creating a culture of safety and compliance that permeates all aspects of its operations.

Folha em branco

3. State of art of compliance monitoring

3.1. Contextualisation of compliance in aviation

In the aviation industry, it is standard practice to adhere to worldwide and country specific aviation laws in order to perform safe and effective flight operations and continuing airworthiness management while also meeting legal requirements.

The European Union Aviation Safety Agency (EASA) explains compliance as the level of performance that aligns with the provisions mentioned in regulations established, for instance, Regulation (EU) No 1321/2014 concerning continuing airworthiness. Compliance ensures safe operations of organisations such as PHS Aviation by addressing human, technical, and organisational factors, which are related to risk assessment (EASA, 2024a).

Compliance management systems (CMS) are systematic ways through which organisations can assure compliance with all the legal and regulatory frameworks. A strong CMS not only shields the organisation from non-conformities but also ensures compliance with procedures to lessen safety concerns. Recently, culture has transformed from low-risk reactive compliance, which reveals conformity deviations upon audit, to high-risk proactive compliance, which involves searching for threats and applying preventive measures (ICAO, 2020a).

For organisations such as PHS Aviation, ensuring compliance in both flight operations and CAMO departments requires supervision on a regular basis and course of action when required changes are needed. There are stringent rules and regulation set by the regulatory bodies like EASA and such rules need to be made effective between the two departments (EASA, 2022a) (EASA, 2024b).

For instance, compliance in flight operations entails, assurance that all operational activities, standard operating procedures, human resources competence and safety measures meet the recommended and required regulatory standards while in CAMO, compliance entails management of airworthiness through proper scheduling of maintenance checks, record keeping and adherence to continuing airworthiness directives. (Regulation (EU) No 1321/2014)

There is a close relationship between the operations and the airworthiness management departments to ensure that the security and safety of the company are in proper working condition.

In this case, there are sequences of trustful relationships between the two areas; compliance breakdown in either area may impact the other. For instance, technical non-compliance in CAMO, such as missed maintenance checks may lead to the compromise of flight operations safety while operational non-compliance may put extra strain on the aircraft systems hence enhancing its maintenance requirements. Hence, an effective CMS should take the interaction of flight operations and CAMO into consideration in order to provide a comprehensive compliance management.

It is also crucial to maintain compliance to pass certifications that are necessary for the running of an aviation company like EASA Part CAMO and Air Operator Certificate both of which deal with the operation and the airworthiness aspects. Non-compliance in either area can lead to this certification loss which would be disastrous to the functionality of the company. Thus, the CMS has to embrace the operational dynamics of the flight operation environment in addition to the technical operating environment of the CAMO function. By doing so, PHS Aviation also incorporates compliance principles in both wings so as to guarantee legal compliance and compliance in general throughout the organisation.

Compliance in the aviation industry is dictated by stringent regulations designed to ensure the safety of flight operations, continuing airworthiness, and overall management systems. organisations operating under both AOC and Part-CAMO approvals must adhere to EASA Regulation (EU) No 965/2012 Part ORO (Organization Requirements for Air Operations), specifically focusing on the management system (ORO.200) and responsibilities of postholders (ORO.AOC.135) (a).

AOC holders must adhere to particular operational standards for all types of operations, including commercial and non-commercial flights, as well as non-scheduled revenue flights. This involves overseeing leasing contracts, compliance with ICAO regulations, and supervision from the national aviation authorities (in this instance, ANAC). Moreover, the company needs to make sure that its monitoring for compliance and systems for managing safety match up with the size and intricacy of its activities (ICAO, 2020b).

The Safety Management System (SMS) is a crucial component of compliance in aviation, working proactively to recognize and minimize risks. The CMS works in conjunction with the SMS to verify that an organisation's operational and maintenance procedures meet regulatory standards. In this way, adherence serves as an ongoing process of overseeing, inspecting, and enhancing safety protocols.

3.2. Contextualisation of the safety management system

3.2.1. Definition of SMS in the aviation industry

The International Civil Aviation organisation (ICAO) describes SMS as a systematic approach to managing safety, including the necessary organisational structures, accountabilities, policies and procedures. For ESARR 3⁷ the SMS is a systematic and explicit approach defining the activities by which safety management is undertaken by an organisation in order to achieve acceptable or tolerable safety (Eurocontrol, 2011a).

3.2.2. Purpose of SMS in the aviation industry

The main focus of the Safety Management System is to conduct an well-structured management approach to control safety risks in company's operations. In order to implement and conduct an effective safety management, the organisation's specific structures and processes related to safety of operations must be taken into consideration.

The application of a Safety Management System (SMS) can generally be viewed as utilizing a quality management approach to manage and control safety risks. Similar to other management roles, safety management involves planning, organizing, communicating, and providing direction.

The development of an SMS starts with establishing the organisation's safety policy, which lays out the foundational principles on which the SMS will operate. This initial step outlines the strategy for achieving an acceptable level of safety within the organisation.

The next stages in the SMS involve safety planning and implementing safety management procedures aimed at mitigating and controlling operational risks. Once these controls are in place, quality management techniques are employed to ensure they meet the intended goals, and if they do not, adjustments can be made to improve them. This is achieved through safety assurance and audit processes that provide continuous monitoring of operations and identify areas for improvement.

⁷ ESARR 3 concerns the use of Safety Management Systems (SMS) by providers of Air Traffic Management (ATM) services.

In essence, effective SMSs employ risk and quality management techniques to meet their safety objectives. Furthermore, SMS establishes the necessary organisational structure to foster and maintain a strong safety culture within the company. Implementing an SMS gives management a structured set of tools to meet the safety obligations set out by regulatory authorities.

3.2.2.1. General SMS regulatory framework

ICAO Standards and Recommended Practices (SARPs), outlined in several annexes to the Chicago Convention, require various aviation service providers, such as aircraft operators, maintenance organisations, air navigation service providers, and airport operators, to implement SMS. More recently, these requirements have been expanded to include training organisations and aircraft manufacturers (ICAO, 2020c).

However, as ICAO SARPs are not directly applicable under national laws, individual states are required to create safety programs and ensure that operators and service providers implement an SMS. In Europe, EUROCONTROL mandates the implementation of SMS for air navigation service providers, transposing it into European law.

3.2.2.2. ICAO SMS framework

The ICAO SMS Framework is comprised of four key components and twelve elements, which must be tailored to fit the size and complexity of the organisation:

- Safety Policy and Objectives
- Safety Risk Management
- Safety Assurance
- Safety Promotion

The key elements of an ATM provider's SMS include:

- Safety Policy and Planning
- Safety Achievement
- Safety Assurance
- Safety Promotion

In order for an SMS to be successful, it needs to do more than just mechanically implementing these elements. The way these systems interact with human elements like attitudes, values, and behaviours is essential in influencing an organisation's safety culture. A good safety

culture encourages employees to recognize the significance of safety in their job (ICAO, 2020d).

3.2.2.3. SMS in the aviation sector

International SMS standards are mainly based on objectives, emphasizing the necessary actions over the specific methods of implementation. This method gives organisations the freedom to adapt safety management practices to suit their unique operations, regardless of their type or size (ICAO, 2020e)

3.2.2.4. SMS in airline operations

EASA regulations, such as Part ORO, Part CAMO, and Part SPA, control the regulatory structure for AOC holders. EASA ORO.200 sets out the criteria for a management system, including compliance monitoring and safety management, whereas EASA ORO.AOC.135 details the duties of the Accountable Manager and postholders in ensuring safe and compliant flight operations (EASA, 2022b).

EASA Part CAMO sets the guidelines for upholding the ongoing airworthiness of aircraft in the CAMO sector, guaranteeing that safety standards are met through consistent audits and inspections (EASA, 2024b).

3.3. Compliance monitoring methodologies in the aviation industry

Compliance practices in the aviation industry differ based on the scale and intricacy of the organisation. The majority of AOC holders function within comparable regulatory structures that highlight the incorporation of SMS and CMS. Regular audits, compliance checklists, and gap analyses are commonly used in industry standards to monitor and maintain compliance with regulatory and safety standards.

Adhering to regulations in the industry also means dealing with the specific difficulties that come with various types of operations, such as commercial flights, non-commercial flights, and non-scheduled revenue flights.

Every operation type has unique regulatory needs, and companies need to make sure their compliance methods can adapt to these variations.

3.4. Role of compliance checklists in the compliance monitoring system

Compliance checklists can be described as detailed, structured lists of requirements or guidelines that aids in compliance with regulatory standards and operational models. These checklists are fundamental to ensure flight safety and operational norm especially across multi functions in aviation ranging from the flight operations department to the CAMO department. They help to detect and remove non-conformities in the course of internal audits (EASA, 2022c), as mentioned previously.

The checklist approach serves two purposes – it ensures that nothing with a safety, or regulatory compliance question is in non-conformity and provides auditors with an easy way to track internal processes. An effective checklist is designed to meet all EASA standards and company’s guidelines.

3.5. Limitations and challenges of the compliance system

3.5.1. Limitations

One of the key limitations in maintaining compliance is the complexity of managing both flight operations and continuing airworthiness within the same organisation. The need for constant coordination between the CAMO and flight operations departments creates potential gaps in compliance, particularly when it comes to adhering to the distinct regulatory requirements of each domain.

Additionally, the increasing regulatory burden on AOC holders, particularly those operating multiple types of flights, can strain resources and create operational challenges. Ensuring that all staff are trained and aware of the latest regulatory changes is also a significant challenge for compliance teams.

3.5.2. Challenges

The primary challenge facing organisations like PHS Aviation is maintaining a seamless compliance system that integrates both safety management and compliance monitoring.

Coordinating between flight operations and continuing airworthiness, while ensuring that each domain operates in compliance with EASA Part ORO and Part CAMO, requires significant effort from both postholders and the compliance monitoring team.

The development of compliance checklists is one solution that helps bridge gaps and ensure that all areas of the organisation are aligned with regulatory requirements. However, the challenge remains in continuously updating these checklists to reflect changes in the regulatory environment and addressing gaps as they are identified through regular audits and inspections.

3.6. The role of EASA in the aviation industry

The European Union Aviation Safety Agency (EASA) plays a critical role in ensuring the safety, environmental sustainability, and efficiency of civil aviation within the European Union and associated countries. Established in 2002, EASA's mission is to promote high and uniform safety standards across the aviation industry, ensuring that the risks associated with air operations are minimized.

EASA's responsibilities encompass various aspects of civil aviation, including aircraft certification, regulatory oversight, airworthiness, and operational safety. The agency develops regulations and standards that must be adhered to by all aviation stakeholders, including airlines, aircraft manufacturers, maintenance organisations, and national aviation authorities within the EU. These regulations are designed to harmonize safety protocols and ensure that all aviation activities meet the strict safety criteria established by international and European law.

EASA also works closely with international organisations such as the International Civil Aviation organisation (ICAO) to ensure that European aviation regulations are aligned with global standards. The agency is pivotal in maintaining the Single European Sky initiative, which aims to optimize air traffic management across Europe, ensuring efficiency and safety for both airlines and passengers.

One of EASA's key functions is the development and enforcement of rules that regulate air operations within Europe. These rules, which include requirements for Air Operator Certificates (AOCs), continuing airworthiness, flight crew qualifications, and operational safety, form the basis of safe and efficient air transport across the continent.

3.6.1. EASA Regulation (EU) No 965/2012

The Easy Access Rules for Air Operations is an essential resource developed by EASA to consolidate and present the regulatory framework for air operations in a user-friendly format. This comprehensive document combines the regulations and acceptable means of compliance (AMC), as well as the guidance material (GM) related to air operations into a single reference guide.

The Easy Access Rules for Air Operations provide the detailed regulations that govern various aspects of air operations, including the requirements for AOC holders, commercial air transport, specific approvals for specialized operations, and continuing airworthiness. These rules are based on EASA's Part-ORO, Part-CAT, Part-SPA, and other relevant parts of the Air Operations Regulations, and they help standardize operational safety and compliance procedures across all EU member states and associated countries.

3.6.1.1. Structure of the Easy Access Rules for Air Operations

The document is divided into several annexes, each corresponding to specific regulatory areas, such as:

- Annex III (Part-ORO): organisation requirements for air operators, including management system requirements.
- Annex IV (Part-CAT): Commercial air transport regulations, specifying operational requirements for commercial airlines.
- Annex V (Part-SPA): Regulations for specific approvals needed for specialized operations, such as Low Visibility Operations (LVO) and Extended Range Operations (ETOPS).

By consolidating these rules, EASA ensures that aviation stakeholders, from operators to national aviation authorities, can easily access and understand the regulatory requirements necessary to maintain safety and compliance. The Easy Access Rules are regularly updated to reflect changes in regulations, ensuring that aviation stakeholders have the most current and accurate information.

In addition to the regulatory content, the Easy Access Rules include AMC and GM, which provide guidance on how to interpret and implement the regulations. This structure enables operators to understand not only the legal requirements but also the practical steps needed to comply with these regulations effectively.

The document is widely used by aviation operators, maintenance organisations, and regulatory authorities to ensure that all aspects of air operations are conducted in accordance with EASA standards. By providing a clear and organized structure for complex regulations, the Easy Access Rules for Air Operations simplify compliance and promote a harmonized approach to aviation safety across Europe.

3.6.1.1.1. Part-ORO (Organization Requirements for Air Operations)

Part-ORO is part of the EASA Easy Access Rules for Air Operations, which provides the requirements for the organisational structure and management systems of air operators. It outlines the responsibilities of operators in establishing a comprehensive system that ensures safety, compliance, and operational efficiency.

Context in EASA Regulations:

Part-ORO applies to all operators, including those holding an Air Operator Certificate (AOC), and establishes the foundational framework for an operator's internal structure. This part is crucial for organisations as it defines the duties of postholders, such as the Accountable Manager, and addresses the need for implementing a Safety Management System (SMS) and a Compliance Monitoring System (CMS).

What Part-ORO Covers:

- ORO.GEN (General Requirements): Includes requirements for the management system, safety policies, personnel, and responsibilities.
- ORO.AOC (Air Operator Certificate): Outlines the requirements for obtaining and maintaining an AOC, including the operational control, safety, and oversight responsibilities.
- ORO.FC (Flight Crew): Specifies the requirements for the training, qualifications, and responsibilities of flight crew members.

Structure in EASA Easy Access Rules for Air Operations:

Part-ORO is located in Annex III of the Easy Access Rules for Air Operations. It provides the organisational requirements for all air operations, ensuring that operators are compliant with safety and operational guidelines. The annex is structured to guide organisations in setting up management systems that foster safety and efficiency in all aspects of their operations.

3.6.1.1.2. Part-CAT (Commercial Air Transport)

Part-CAT governs the rules for Commercial Air Transport (CAT), which involves the carriage of passengers, cargo, or mail for hire or reward. This part ensures that all commercial air transport activities meet stringent safety and operational standards as prescribed by EASA.

Context in EASA Regulations:

Part-CAT applies to all operators involved in commercial air transport and is a key component of the EASA Easy Access Rules for Air Operations. It sets out the operational procedures that must be followed to ensure safety during all phases of flight, including ground handling, in-flight operations, and post-flight procedures.

Part-CAT:

- CAT.GEN (General Requirements for Air Operations): Defines the general obligations of commercial operators, including requirements related to manuals, record-keeping, and operational control.
- CAT.OP (Operating Procedures): Covers the specific requirements for flight operations, including flight planning, fuel policies, dangerous goods, and extended flight operations (ETOPS).
- CAT.IDE (Instruments, Data, and Equipment): Specifies the required equipment and instruments for commercial operations, ensuring that aircraft are adequately equipped for safe flights.

Structure in EASA Easy Access Rules for Air Operations:

Part-CAT is located in Annex IV of the Easy Access Rules for Air Operations. This annex is comprehensive and ensures that commercial air transport operators comply with operational standards that enhance passenger safety and operational reliability. It also focuses on specific areas such as equipment, training, and operational control, essential for maintaining safe commercial air transport operations.

3.6.1.1.3. Part-SPA (Specific Approvals)

Part-SPA deals with Specific Approvals required for certain types of specialized operations that fall outside the standard scope of commercial air transport. These operations often involve higher risks or specialized conditions, and Part-SPA ensures that additional safety requirements are in place to mitigate these risks.

Context in EASA Regulations:

Part-SPA applies when an operator conducts specific activities such as Extended Range Operations (ETOPS), Low Visibility Operations (LVO), Transport of Dangerous Goods, or Performance-Based Navigation (PBN). These activities require additional approvals due to the higher risks or specialized nature of the operations, ensuring that both safety and compliance are maintained at all times.

What Part-SPA Covers:

- SPA.LVO (Low Visibility Operations): Regulates the conditions and equipment necessary for operating in low-visibility environments.
- SPA.ETOPS (Extended Range Operations with Two-Engined Aircraft): Governs the specific requirements for aircraft operations beyond a certain distance from an adequate aerodrome.
- SPA.DG (Transport of Dangerous Goods): Specifies the necessary approvals and procedures for transporting dangerous goods safely.
- SPA.PBN (Performance-Based Navigation): Requires approvals for operations that rely on advanced navigation techniques to increase efficiency and safety.

Structure in EASA Easy Access Rules for Air Operations:

Part-SPA is located in Annex V of the Easy Access Rules for Air Operations. This annex is structured to outline the additional requirements for operators seeking approval for specialized operations. It sets specific conditions under which these operations can be safely carried out and requires operators to meet stringent operational standards to obtain and maintain these approvals.

3.7. Summary

Ultimately, adherence in the aviation sector is a complex procedure that necessitates ongoing supervision, evaluation, and revision to adhere to regulatory criteria. For AOC and Part-CAMO holders such as PHS Aviation, using compliance checklists helps to ensure that flight operations and airworthiness are in line with EASA regulations by providing a structured approach to development and implementation.

Folha em branco

4. Case Study

4.1. Continuous improvement of PHS Aviation's CMS

The need for a thorough gap analysis (see annex A) at PHS Aviation occurred after the operator observed non-conformities during internal audits of its flight operations department and CAMO department.

These audits highlighted potential shortcomings within the system, particularly in areas related to the coordination between multiple departments. The operator established that these non-conformities signalled underlying gaps in the CMS's ability to fully meet EASA regulatory requirements.

As PHS Aviation identified a rising number of non-conformities, it became evident that it was necessary to perform a more extensive breakdown to understand the root causes of these issues. The gap analysis (see annex A) began to assess the efficacy of the existing CMS and to identify any areas where compliance management might be lacking. The analysis aimed to locate limitations in the organisation's current processes and to assess whether the Compliance Monitoring System was effectively regulated and structured to handle the requirements outlined in EASA Easy Access Rules.

As we will see in this chapter, this study allowed the operator to identify specific gaps in the auditing and monitoring processes, particularly in departments such as Flight Operations and CAMO and how they collaborated on compliance matters.

This study led to the development of tailored compliance checklists (see Annex B, Annex C and Annex D) designed to enhance the CMS, ensuring that all aspects of PHS Aviation's operations adhered to regulatory standards. The checklists addressed the deficiencies revealed by the gap analysis (see annex A) and provided a structured tool to facilitate regular audits and improve the overall effectiveness of the compliance system.

4.2. GAP analysis for CMS at PHS Aviation

In order to understand how PHS Aviation could improve its CMS, the following gap analysis (see annex A) was conducted, examining multiple elements of the organisation.

4.2.1. Element 1: regulatory framework and system design

- Current Status:

The Compliance Monitoring System (CMS) at PHS Aviation is designed to meet CAMO.A.200(a)(6) and related EASA standards, integrated with Part-CAMO requirements. The CMS is part of the management system that ensures adherence to airworthiness requirements.

- Gaps Identified:

There is a need to ensure continuous updates in the regulatory framework to meet evolving EASA regulations.

The system should be revised for integration with compliance monitoring department to avoid inconsistencies in standards.

4.2.2. Gap analysis of element 2: compliance audit plan and implementation

- Current Status:

PHS has a well-designed audit plan that is implemented every year, which covers all operational aspects, including flight operations, CAMO, and maintenance organisations. The audit plan outlines responsibilities, audit types, and timelines.

- Gaps Identified:

The frequency of audits was not adjusted based on identified risk areas, and the audit plan should include provisions for product audits, particularly when new aircraft or operational procedures are introduced.

4.2.3. Gap analysis of element 3: monitoring and feedback

- Current Status:

PHS Aviation's CMS includes a feedback mechanism to inform management and staff about compliance issues.

Safety and compliance reports are reviewed at PHS Aviation.

- **Gaps Identified:**

Even though the feedback loop is established, there is room for improvement in reporting audit findings promptly and ensuring that corrective actions are implemented in a timely manner.

Safety and compliance reports need to be filled more regularly and reviewed at a senior level.

In order to improve this element, there should be an enhanced communication between compliance and other departments for prompt corrective measures.

4.2.4. Gap analysis of element 4: training and competence

- **Current Status:**

PHS Aviation does not provide compliance monitoring training for personnel, focusing on regulatory knowledge and auditing skills. The CMS does not ensure that auditors maintain their competence through ongoing training.

- **Gaps Identified:**

There should be periodic assessments of auditor qualifications and experience to ensure that they are fully equipped to handle complex audits, especially when dealing with new regulations or aircraft models.

Additionally, there should be a system to ensure continuous professional development.

4.2.5. Gap analysis of element 5: continuous improvement

- **Current Status:**

The CMS monitors compliance with corrective actions and regulatory updates, ensuring that compliance is an ongoing process.

- **Gaps Identified:**

It should be implemented a more structured process for reviewing the effectiveness of corrective actions and updating compliance monitoring processes accordingly. Trend analysis and proactive measures should be incorporated into the CMS to anticipate potential issues before they escalate.

This analysis shows that while PHS Aviation's CMS is compliant with current EASA standards, enhancements are needed in communication, feedback mechanisms, and auditor training to fully meet best practices and ensure the system's effectiveness.

4.2.6. Gap analysis questionnaire

A follow-up questionnaire was designed in order to thoroughly examine the Compliance Monitoring System of the organisation. This approach comprised of systematically asking and answering essential questions in order to reach deep into the core of each issue.

This method ensured that potential gaps were identified and fully understood, allowing for a comprehensive evaluation of the system's effectiveness and its alignment with regulatory standards.

1. General compliance monitoring at PHS Aviation

Questions:

- Is there a formal Compliance Monitoring System in place at PHS Aviation?
- Does the system comply with EASA Easy Access Rules regulations?
- How well are responsibilities assigned to the Compliance Monitoring Manager and other key personnel?

Current Status:

- Yes, as analysed in the everyday work at PHS Aviation and also all the operators relevant manuals, it can be confirmed that PHS Aviation has a CMS that complies with EASA Easy Access Rules.
- Responsibilities are clearly defined, with the Compliance Monitoring Manager overseeing the auditing processes and reporting directly to the Accountable Manager.

Identified Gaps:

- Although having a good CMS, there were some communication gaps detected.
- The alignment between different departments (CAMO, flight operations, and ground operations) requires improvement for better integration and seamless compliance efforts.

Recommendations:

- In order to resolve this gap, the operator should increase collaboration between key departments through regular meetings focused on compliance issues.

2. Auditing and monitoring methods**Questions:**

- Are there regular internal audits scheduled to monitor compliance across all departments?
- Does the audit cover all areas such as flight operations, airworthiness department, ground operations, and contracted services?
- Is the audit frequency based on risk assessments, and if so, is it adjustable to changes in operations?

Current State:

- After analysing PHS Aviation's everyday work and its prior audit plans and follow-ups, it was confirmed that the company conducts regular audits across all key areas.
- However, the current audit frequency is based on an annual plan and not always adjusted according to specific risk factors.

Identified Gaps:

- As the audit plan is scheduled yearly, the audits are not always adjusted according to high-risk areas, such as new operations, aircraft models, or updated regulations.
- After analysing the audit scope it could be confirmed that some areas, such as ground handling or contracted maintenance, were not thoroughly integrated into the audit plan.

Recommendations:

- In order to fix these gaps, PHS Aviation should implement a risk-based approach to auditing, adjusting audit frequency based on areas identified as high-risk or after operational changes.
- PHS Aviation should ensure that all contracted services are included in the audit scope.

3. Reporting and follow-up on non-compliance**Questions:**

- Are non-compliance issues documented and tracked efficiently?
- Is there a evident process for implementing corrective actions?
- How frequently are corrective actions implemented, and are they followed up effectively?

Current State:

- At PHS Aviation it was confirmed that non-compliance is recorded during audits, and corrective actions are tracked in follow-up audits. However, some corrective actions are delayed, especially those that require cross-departmental collaboration.

Identified Gaps:

- A timeline gap was detected in the organisation, as corrective actions were not always implemented promptly, which could lead to operational delays.
- There were some issues detected in the cross-department coordination. At PHS Aviation, matters that require involvement from multiple departments, such as flight operations and CAMO, faced some delays in execution.

Recommendations:

- In order to solve these detected gaps, PHS Aviation should strengthen cross-departmental processes for quicker corrective action implementation.

4. Compliance monitoring training and competence

Questions:

- Are compliance monitoring personnel, including auditors, adequately trained in EASA regulations?
- Is there a formal process to ensure ongoing professional development for compliance monitoring staff?
- Does PHS Aviation regularly review the competence of its auditing staff?

Current State:

- At PHS Aviation training programs are in place, but there is limited emphasis on ongoing professional development, especially in light of regulatory updates or operational changes.

Identified Gaps:

- While analysing PHS Aviation's training department, it was confirmed that conversion and recurrent training was provided but professional development is lacking. Auditors may not always be updated by the operator on the latest regulations or changes.

Recommendations:

- PHS Aviation should implement a continuous training program focused on updates to EASA regulations, new audit techniques, and operational changes, as there is no formal process for regularly reviewing the competence of compliance staff.
- The operator should also establish an annual competence review for auditors to ensure they are up-to-date with the required skills.

5. Communication and integration across departments

Questions:

- Is there effective communication between compliance monitoring and other departments (Flight Operations, CAMO, Ground Handling)?
- How are compliance findings communicated to key stakeholders within the organisation?
- Are the Compliance Monitoring System and Safety Management System (SMS) fully integrated to ensure safety risks are mitigated?

Current State:

- At PHS Aviation, the communication between compliance monitoring and other departments is established but still has room for improvement, especially for ensuring that compliance findings are acted upon promptly.

Identified Gaps:

- It was identified an interdepartmental communication gap, as it was verified that there were delays in communication between department that led to slow downs in the implementation of corrective actions.

Recommendations:

- PHS Aviation should set up regular interdepartmental meetings to improve coordination and communication on compliance issues.
- The operator should conduct meetings between the safety and compliance departments to ensure all risks are managed holistically.

6. Continuous improvement and risk management

Questions:

- Are compliance monitoring results regularly analyzed to identify trends and improvements?
- Is there a process for updating the CMS in response to regulatory changes or new operational risks?
- Does PHS Aviation have a framework for continuous improvement of its compliance processes?

Current State:

- At PHS Aviation, the CMS includes periodic reviews, but there is no formal framework that analysis tendencies in compliance issues or linking that links them to proactive improvements.

Identified Gaps:

- At PHS Aviation there is no structured process for analysing long-term compliance data and identifying trends that could inform improvements.
- Also, there is a gap in regulatory updates as the revisions to the CMS are often reactive rather than proactive, meaning they follow regulatory changes rather than anticipate them.

Recommendations:

- PHS Aviation should introduce trend analysis as part of the regular review of compliance data to proactively identify areas for improvement.
- The organisations should also establish a proactive approach to updating the CMS in response to anticipated regulatory changes and operational risks.

A more detailed gap analysis (see annex A) questionnaire was presented to PHS Aviation, as a form of keeping the operator's Compliance Monitoring System Manual updated and well structured.

This gap analysis questionnaire is attached in Annex A and is to be filled out by PHS Aviation, when implementing the new revision of the CMS manual.

4.3. Compliance checklists in PHS Aviation

Compliance checklists are essential tools in aviation compliance monitoring, ensuring that all operations at PHS Aviation adhere to regulatory requirements, internal procedures, and safety standards.

These checklists guide internal audits across flight operations, maintenance, and continuing airworthiness, aligning with EASA regulations, particularly Part ORO, Part CAT, Part SPA, and Part CAMO.

Following a gap analysis (see annex A) of PHS Aviation's departments, deficiencies in coordination were identified, which posed risks to operational safety and compliance.

The newly developed checklists (see Annex B, Annex C and Annex D) address these gaps, ensuring smoother interdepartmental collaboration with clearly defined responsibilities, in line with EASA ORO.200 and the Compliance Monitoring Manual. (Regulation (EU) No 965/2012, 2023)

As a Part-CAMO certified organization, PHS Aviation is obligated to conduct internal audits to uphold compliance with EASA Annex III, IV, and V. This case study illustrates how adopting updated checklists enhances the internal audit process, improving safety and minimizing compliance risks across operations.

The customized checklists focus on specific operational areas, targeting risks identified in internal evaluations and ensuring regulatory standards are met.

4.3.1. Purpose and scope

The implementation of the new compliance checklists at PHS Aviation has the purpose of modernising and simplifying the internal audit process, making it more efficient and comprehensive.

The primary objectives include:

- To be compliant with all EASA rules Regulation (EU) No 965/2012;
- Making the audit process more systematic, encompassing all key safety, operations and maintenance topics;
- Anticipating the potential risks and non-conformities, even before an unsafe incident has occurred or a regulation is breached;
- Improving communication and understanding between audit-involved departments (operations, safety, compliance, etc.).

The checklists were created and customized to PHS Aviation's activities, in order to enhance the internal audit process, focusing on aspects like air operations, ongoing airworthiness, and particular authorizations. These checklists are designed to guarantee that every operational activity meets regulatory standards, minimizing the dangers of not conforming and enhancing safety protocols.

4.3.2. Data and Information gathered for implementation

Data for the compliance checklists was collected from various important sources in PHS Aviation such as internal audits, safety reports, and compliance monitoring documentation. Furthermore, key parts of the company's Operations Manual and Compliance Monitoring Manual were examined to verify that the checklists aligned with the organisation's current policies and procedures.

Regulatory information was collected from EASA Regulation (EU) No 965/2012 and the compliance monitoring program outlined in the compliance manual. Additional information from industry benchmarks and best practices of other AOC and CAMO holders was examined to confirm that the checklists aligned with industry norms.

The compliance checklists were created after analysing the gaps in PHS Aviation's departments. The examination showed that although the company's CAMO and flight operations department mostly followed EASA rules, there were notable deficiencies in their coordination. These openings presented a possible danger to operational security and compliance with regulations. The checklists are designed to make sure that all PHS Aviation departments are aligned and each postholder has clearly defined responsibilities, following the guidelines of EASA Regulation (EU) No 965/2012 and the Compliance Monitoring Manual.

4.3.3. Structure of the checklist

The Compliance Checklists were meticulously structured and organized into different parts, based on operational areas and specific regulatory requirements. As an European operator, PHS Aviation must follow and comply with EASA's regulation framework. In this sense, all the checklists formulated were created following its Regulation (EU) No 965/2012.

Regulation (EU) No 965/2012 Annex III is the regulation that establishes requirements to be followed by an air operator conducting:

- Commercial air transport operations (CAT);
- Commercial specialised operations;
- Non-commercial operations with complex motor-powered aircraft;
- Non-commercial specialised operations with complex motor-powered aircraft.

As these requisites englobe commercial air transport, it was necessary to create a specific checklist for Part-ORO, following every point of Annex III that was suitable for PHS Aviation's operation. The same method was applied to Annexes IV and V of the Regulation (EU) No 965/2012. As Annex IV specifies all the rules related to commercial air transport, a specific checklist was created for this part.

Annex V comprises of the rules specifically related to Special Approvals and the competent authority's that can provide them. PHS Aviation has the approval from ANAC to perform other operations beyond its air operator permit, so it was convenient to also create a separate Compliance Checklist comprising all Annex V rules.

The structure of the checklist ensures that all relevant aspects of the organisation's activities are thoroughly reviewed during audits. As they are meant to be used during internal audits, the checklist includes the following areas to be completed:

- **Audit number**
The audit number is an important reference that will help auditors to keep track of the processes and record-keeping, as they will use the same checklist template multiple times.
- **Date of audit**
Like the audit number, the date of audit is important for record keeping of the audit process.
- **PHS Aviation's operations manual reference**

This segment is to be filled with the reference of the OM where the specific rule is mentioned.

- **Documentation**

This segment is to be filled with all the relevant documentation that will ensure that PHS Aviation complies with the rule being audited.

- **Remarks (S/NS/NA)**

The remarks are to be completed with one of three options: S (Satisfactory); NS (Non-Satisfactory) and NA (Not Applicable)⁸.

- **Non-conformity Level**

If PHS Aviation receives a non-satisfactory remark, it indicates the need to open a non-conformity. In this section, the auditor is required to complete the designated field by assigning the appropriate level of non-conformity.

4.3.4. Implementation and monitoring

Once implemented, the compliance checklists are used in internal audits performed by PHS Aviation. The effectiveness of the checklists is monitored through periodic reviews by the compliance monitoring manager and feedback from audit teams. Continuous updates ensure that the checklists remain relevant and aligned with the latest regulatory changes and operational requirements.

4.4. Results

The gap analysis (see annex A) identified multiple areas that needed enhancement in PHS Aviation's compliance monitoring system. One important discovery revealed that the Flight Operations and CAMO departments of the organisation were not completely aligned in ensuring adherence to regulatory framework. This became particularly evident during internal audits, which revealed that certain aspects of Regulation 965/2012 were not explicitly referenced in PHS Aviation's operations manual. While the procedures were often described, they were not specifically aligned with the regulation.

⁸ While the checklists are tailored to the specific needs of PHS Aviation, the option 'Not Applicable' was included for regulations that may become relevant in the near future. This approach reduces the need for frequent updates to the checklist.

4.5. Critical analysis

The use of compliance checklists has given PHS Aviation a more organized and methodical way to monitor compliance and perform audits. The checklists are advantageous because they offer postholders clear instructions to ensure that flight operations and airworthiness activities comply with regulations. This has greatly enhanced the organisation's capacity to manage oversight and guarantee that any compliance gaps are recognized and dealt with promptly.

Nevertheless, the examination also identified some difficulties. An obstacle is the necessity of regularly updating the checklists to ensure they are aligned with regulatory changes. PHS Aviation must consistently review and update its compliance checklists to keep them relevant and effective as EASA regulations change.

Moreover, continual training is necessary for staff in both Flight Operations and CAMO departments in order to effectively implement the checklists. It will be essential for the long-term success of the system that all staff are knowledgeable about the new procedures and their role in upholding compliance.

4.6. Validation and sustainability of implemented solutions

A test run was conducted in PHS Aviation's Flight Operations department to verify the compliance checklists' efficacy. The organisation's Compliance Monitoring Program incorporated the checklists, with postholders receiving training on using them for compliance verification in audits and inspections.

The initial trial showed that the checklists effectively found areas of non-compliance and ensured prompt actions were taken in order to correct them. Postholders' feedback suggested that the checklists were effective in overseeing operations and ensuring compliance with EASA regulations.

4.7. Reflections on the elaboration of CMS gap analysis and checklists

The creation and use of compliance checklists at PHS Aviation have given the company a methodical way to ensure regulatory compliance in flight operations and airworthiness maintenance. The gap analysis (see annex A) identified important areas for improvement in the organisation's compliance practices, and the resulting checklists have filled these gaps by offering clear instructions on how to ensure smooth collaboration between departments.

In the future, it will be necessary for PHS Aviation to regularly update the checklists to reflect regulatory changes and ensure that all staff are trained in using them correctly. In general, the case study shows the importance of having an organized monitoring system for compliance to ensure safety and regulatory compliance in an operator.

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5. Conclusion

5.1. Summary

This thesis report aimed to address the challenges of maintaining regulatory compliance at PHS Aviation by focusing on the development of compliance checklists and conducting a thorough gap analysis (see annex A) of the existing Compliance Monitoring System (CMS).

The gap analysis (see annex A) revealed several areas where the current system could be strengthened, particularly in terms of interdepartmental communication, the timeliness of corrective actions, and the need for ongoing auditor training.

The creation and implementation of compliance checklists provided a structured approach to closing some identified gaps, ensuring that flight operations, continuing airworthiness, and other critical functions meet the high standards set out by EASA. These checklists serve as a practical tool for operational staff and postholders, promoting both compliance and operational safety.

However, the findings from the gap analysis (see annex A) highlight that the checklists alone are not sufficient. To build a more resilient compliance monitoring system, PHS Aviation must adopt a more integrated approach to compliance management. This includes a risk-based auditing strategy, enhanced feedback mechanisms, and a continuous review process that adapts to regulatory updates.

5.2. Report's contribute

The primary contribution of this report was the improvement of PHS Aviation's Compliance Monitoring System, conducting a gap analysis (see annex A) and then developing compliance checklists (see Annex B, Annex C and Annex D) customized for every department and function in PHS Aviation. By creating these instruments, the company has managed to guarantee that its activities adhere to EASA regulations, covering all types of flights.

Moreover, the organized analysis of gaps and subsequent creation of solutions have given PHS Aviation a methodical approach to recognizing compliance issues and dealing with them

proactively. This improvement has not only increased safety but also boosted the effectiveness of internal audits and monitoring compliance endeavours.

5.3. Recommendations

To further strengthen PHS Aviation's compliance framework, the following recommendations are proposed:

1. Risk-Based Auditing

Adjust audit frequency based on risk assessments and operational changes, ensuring that high-risk areas receive greater attention.

2. Enhanced Communication

Improve cross-departmental coordination by implementing regular compliance meetings and integrating compliance reports into daily operations.

3. Ongoing Auditor Training

Provide continuous professional development for auditors to ensure they remain up to date with new regulations and best practices.

4. CMS-SMS Integration

Strengthen the integration between the CMS and SMS to ensure that both compliance and safety risks are managed holistically.

5. Continuous Update of the implemented Compliance Checklists:

As aviation regulations evolve, it is essential to regularly update the compliance checklists to reflect any changes in EASA requirements. This will ensure that the organisation remains compliant with the most current standards.

6. Improved Communication Between Departments:

Strengthening communication between the Flight Operations and CAMO departments will further enhance compliance monitoring. Regular meetings and collaborative processes should be institutionalized to facilitate this communication.

5.4. Future work

Future work should explore the integration of more advanced compliance monitoring tools, such as digital platforms for automating checklist management, audit processes, and

regulatory updates. These tools would enable PHS Aviation to respond more quickly to changes in regulations and streamline compliance efforts across departments. With the introduction of new technologies, PHS Aviation will naturally evolve into digitizing its departments.

As known from previous analysis of the digitizing of certain areas, there may be a new coming of wave digital compliance checklists that will allow real-time data entry, analysis, and reporting, streamlining the process and reducing the margin for error. This may be a future improvement PHS Aviation will adopt, as we are progressively moving and growing in this direction.

The adoption of digital tools would also improve traceability and transparency, as audit trails could be easily accessed and reviewed by relevant stakeholders.

One day, the digital transformation of auditing practices will ensure that all data is centralized, making it easier to track trends, assess recurring issues, and implement corrective measures. This evolution will always have to align with EASA's increasing focus on data-driven decision-making in safety and compliance management (EASA, 2021).

As for now, the current compliance checklists at PHS Aviation are a manual process, which require human input at every stage. However, this does come with several advantages. The checklists presented – being spreadsheet-based – offer auditors a structured, systematic approach to verify all necessary regulatory requirements are covered. They guarantee that the knowledge of an expert is included every step of the way so decisions are made contextually, and cases can change as a consequence.

Flexibility is a key feature and can be an advantage for example in more in-depth audits where the skill and experience of the auditor are crucial in spot instances of non-compliance. As a manual system, these checklists secure business from being hands-on in processes therefore keeping every decision ever made accountable back to an actively engaged auditor.

Additionally, further research could expand on the integration of compliance processes across other areas of the organisation, such as ground operations and safety management. This would ensure a more comprehensive approach to compliance and operational safety within the organisation.

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Annex A. PHS Aviation Gap Analysis for Compliance Monitoring

IMPLEMENTATION PROCESS

1. GAP ANALYSIS

1.1. The implementation of a CMS requires an operator to conduct an analysis of its system to determine which components and elements of an SMS are currently in place and which components and elements must be added or modified to meet the implementation requirements. This analysis is known as gap analysis, and it involves comparing the CMS requirements against the existing resources of the operator.

1.2. The gap analysis provides, in checklist format, information to assist in the evaluation of the components and elements that comprise the ICAO CMS framework and to identify the components and elements that will need to be developed. Once the gap analysis is complete and documented, it will form one basis of the CMS implementation plan.

2. ICAO CMS FRAMEWORK

The ICAO CMS framework consists of four components and twelve elements, ensuring compliance with safety and operational standards. It should be tailored to the size and complexity of the organization.

1. Compliance policy and objectives
 - 1.1. Management commitment to compliance
 - 1.2. Compliance accountabilities
 - 1.3. Appointment of key compliance personnel
 - 1.4. Integration with emergency response plans
 - 1.5. CMS documentation and record-keeping
2. Compliance risk management
 - 2.1. Identification of compliance requirements
 - 2.2. Compliance risk assessment and mitigation strategies

- 3. Compliance assurance
 - 3.1. Compliance monitoring and measurement
 - 3.2. Management of compliance-related changes
 - 3.3. Continuous improvement of the CMS

- 4. Compliance promotion
 - 4.1. Training and education on compliance issues
 - 4.2. Communication of compliance requirements and updates

3. CMS GAP ANALYSIS FOR PHS AVIATION

The gap analysis questionnaire that follows can be used as a template to conduct a gap analysis. Each question is designed for a “Yes” or “No” response. A “Yes” answer indicates that the service provider already has the component or element of the CMS framework in question incorporated into its system and that it either matches or exceeds the requirement. A “No” answer indicates that a gap exists between the component/element of the CMS framework and the service provider’s system.

CMS Gap Analysis for Service Providers

| ICAO reference | Aspects to be analyzed or question to be answered | Answer | Status |
|---|---|-----------|--------|
| Component 1 – COMPLIANCE POLICIES AND OBJECTIVES | | | |
| Element 1.1 – Management commitment and responsibility | | | |
| | Is there a compliance policy in place? | Yes No | |
| | Does the compliance policy reflect organizational commitments regulatory compliance? | Yes No | |
| | Does the compliance policy include a clear statement about the provision of necessary resources for its implementation? | Yes No | |
| | Does the compliance specify reporting procedures for regulatory violations? | Yes No | |
| | Does the compliance policy clearly indicate which types of non-compliance are unacceptable? | Yes No | |
| | Is the compliance policy signed by the Accountable Manager? | Yes No | |
| | Is the compliance policy communicated with visible endorsement throughout PHS Aviation? | Yes No | |
| | Is the compliance policy periodically reviewed to ensure it remains relevant and up-to-date? | Yes No | |

| ICAO reference | Aspects to be analyzed or question to be answered | Answer | Status |
|---|--|-----------|--------|
| Component 1 – COMPLIANCE POLICIES AND OBJECTIVES (Continued) | | | |
| Element 1.2 – Compliance accountabilities | | | |
| | Has PHS Aviation identified an Accountable Manager who has ultimate responsibility for the CMS? | Yes No | |
| | Does the Accountable Manager have responsibility for ensuring the CMS is functioning in all areas of PHS Aviation? | Yes No | |
| | Does the Accountable Manager have full control of the financial resources needed to support the compliance function? | Yes No | |
| | Does the Accountable Manager have full control of the human resources required for CMS operations? | Yes No | |
| | Does the AM have direct authority over decisions related to compliance risk? | | |
| Element 1.3. – Appointment of key compliance personnel | | | |
| | Has a qualified person been appointed to oversee the day-to-day operation of the CMS? | Yes No | |
| | Are the authorities, responsibilities, and accountabilities of personnel at all levels of the organization defined and documented? | Yes No | |
| Element 1.4. – CMS documentation | | | |
| | Has PHS Aviation developed, and does it maintain CMS documentation for all relevant compliance procedures? | Yes No | |
| | Is CMS documentation reviewed and updated regularly to reflect regulatory changes? | Yes No | |

| | | | |
|--|--|-----------|--|
| Component 2 – COMPLIANCE ASSURANCE | | | |
| Element 2.1 – Compliance performance monitoring & measurement | | | |
| | Does PHS Aviation have a system for monitoring compliance performance? | Yes No | |
| | Are compliance audits, surveys, and reports conducted regularly? | Yes No | |
| | Are internal investigations conducted when necessary? | Yes No | |

Annex B. PHS Aviation Compliance Checklist Part-ORO

| | |
|---|---|
|  | COMPLIANCE CHECKLIST Ref: Commission Regulation (EU) 965/2012 Annex III ORGANISATION REQUIREMENTS FOR AIR OPERATIONS [PART-ORO] |
|---|---|

SECTION I: Compliance Checklist

| Audit N°: | | | | | | |
|-------------------------|---|---------|---------------|------|---------------------|----------|
| PART-ORO Reference | Subject | OM Ref. | Documentation | Date | Remarks S / NS / NA | NC Level |
| SUBPART GEN | GENERAL REQUIREMENTS | | | | | |
| SECTION 1 | General | | | | | |
| ORO.GEN.110 | Operator responsibilities | | | | | |
| AMC1 ORO.GEN.110(a) | Operator responsibilities | | | | | |
| AMC 2 ORO.GEN.110(a) | Operator responsibilities | | | | | |
| AMC1 ORO.GEN.110(c) | Operator responsibilities | | | | | |
| AMC1 ORO.GEN.110(c)&(e) | Operator responsibilities | | | | | |
| AMC1 ORO.GEN.110(e) | Operator responsibilities | | | | | |
| AMC2 ORO.GEN.110(e) | Operator responsibilities | | | | | |
| AMC1 ORO.GEN.110(f) | Operator responsibilities | | | | | |
| AMC1 ORO.GEN.110(f)(h) | Operator responsibilities | | | | | |
| AMC2 ORO.GEN.110(f) | Operator responsibilities | | | | | |
| ORO.GEN.115 | Application for an operator certificate | | | | | |
| ORO.GEN.120 | Means of compliance | | | | | |
| AMC1 ORO.GEN.120(a) | Means of compliance | | | | | |
| ORO.GEN.125 | Terms of approval and privileges of an operator | | | | | |
| AMC1 ORO.GEN.125 | Terms of approval and privileges of an operator | | | | | |
| ORO.GEN.130 | Changes related to an AOC holder | | | | | |
| AMC1 ORO.GEN.130 | Changes related to an AOC holder | | | | | |
| AMC1 ORO.GEN.130(b) | Changes related to an AOC holder | | | | | |
| ORO.GEN.135 | Continued validity | | | | | |
| ORO.GEN.140 | Access | | | | | |

SECTION I: Compliance Checklist

| Audit N°: | | | | | | |
|---------------------|--|---------|---------------|------|---------------------|----------|
| PART-ORO Reference | Subject | OM Ref. | Documentation | Date | Remarks S / NS / NA | NC Level |
| SUBPART GEN | GENERAL REQUIREMENTS | | | | | |
| SECTION 1 | General | | | | | |
| ORO.GEN.150 | Findings | | | | | |
| AMC1 ORO.GEN.150(b) | Findings | | | | | |
| ORO.GEN.155 | Immediate reaction to a safety problem | | | | | |
| ORO.GEN.160 | Occurrence reporting | | | | | |
| AMC1 ORO.GEN.160 | Occurrence reporting | | | | | |
| AMC2 ORO.GEN.160 | Occurrence reporting | | | | | |

| Audit N°: | | | | | | |
|----------------------------|-----------------------------|---------|---------------|------|---------------------|----------|
| PART-ORO Reference | Subject | OM Ref. | Documentation | Date | Remarks S / NS / NA | NC Level |
| SUBPART A | GENERAL REQUIREMENTS | | | | | |
| SECTION 2 | Management | | | | | |
| ORO.GEN.200 | Management system | | | | | |
| AMC1.ORO.GEN.200(a) (1) | Management system | | | | | |
| AMC1.ORO.GEN.200(a) (2) | Management system | | | | | |
| AMC1.ORO.GEN.200(a) (3) | Management system | | | | | |
| AMC1.ORO.GEN.200(a) (4) | Management system | | | | | |
| AMC1.ORO.GEN.200(a) (5) | Management system | | | | | |
| AMC2.ORO.GEN.200(a) (5) | Management system | | | | | |
| AMC1.ORO.GEN.200(a) (6) | Management system | | | | | |
| AMC1.ORO.GEN.200(b) | Management system | | | | | |
| ORO.GEN.205 | Contracted activities | | | | | |
| AMC1ORO.GEN.205 | Contracted activities | | | | | |
| AMC2 ORO.GEN.205 | Contracted activities | | | | | |
| ORO.GEN.210 | Personnel requirements | | | | | |
| AMC1ORO.GEN.210(a) | Personnel requirements | | | | | |
| ORO.GEN.215 | Facility requirements | | | | | |
| ORO.GEN.220 | Record-keeping | | | | | |
| AMC1ORO.GEN.220(b) | Record-keeping | | | | | |

Audit N°:

| PART-ORO Reference | Subject | OM Ref. | Documentation | Date | Remarks S / NS / NA | NC Level |
|-----------------------------|---|---------|---------------|------|---------------------|----------|
| SUBPART AOC | AIR OPERATOR CERTIFICATE | | | | | |
| SECTION 3 | Additional Organisational Requirements | | | | | |
| ORO.GEN.310 | Use of aircraft listed on an AOC for non-commercial operations and specialised operations | | | | | |
| AMC1ORO.GEN.310(b);(e) | Use of aircraft listed on an AOC for non-commercial operations and specialised operations | | | | | |
| AMC1 ORO.GEN.310(b);(d);(f) | Use of aircraft listed on an AOC for non-commercial operations and specialised operations | | | | | |

| Audit N°: | | | | | | |
|------------------------|---|---------|---------------|------|---------------------|----------|
| PART-ORO Reference | Subject | OM Ref. | Documentation | Date | Remarks S / NS / NA | NC Level |
| SUBPART AOC | AIR OPERATOR CERTIFICATE | | | | | |
| ORO.AOC.105 | Operations specifications and privileges of an AOC holder | | | | | |
| ORO.AOC.110 | Leasing agreement | | | | | |
| AMC1ORO.AOC.110 | Leasing agreement | | | | | |
| AMC1ORO.AOC.110(c) | Leasing agreement | | | | | |
| AMC2ORO.AOC.110(c) | Leasing agreement | | | | | |
| AMC1ORO.AOC.110(f) | Leasing agreement | | | | | |
| ORO.AOC.115 | Code-share agreements | | | | | |
| AMC1 ORO.AOC.115(a)(1) | Code-share agreements | | | | | |
| AMC1ORO.AOC.115(b) | Code-share agreements | | | | | |
| AMC2ORO.AOC.115(b) | Code-share agreements | | | | | |
| ORO.AOC.125 | Non-commercial operations of aircraft listed in the operations specifications by the holder of an AOC | | | | | |
| AMC1 ORO.AOC.125(a) | Non-commercial operations of an AOC holder with aircraft listed on its AOC | | | | | |
| AMC2 ORO.AOC.125(a) | Non-commercial operations of an AOC holder with aircraft listed on its AOC | | | | | |
| AMC1 ORO.AOC.125(a)(2) | Non-commercial operations of an AOC holder with aircraft listed on its AOC | | | | | |
| AMC2 ORO.AOC.125(a)(2) | Non-commercial operations of an AOC holder with aircraft listed on its AOC | | | | | |
| ORO.AOC.130 | Flight data monitoring — aeroplanes | | | | | |
| AMC1ORO.AOC.130 | Personnel requirements | | | | | |
| ORO.AOC.135 | Personnel requirements | | | | | |
| AMC1ORO.AOC.135(a) | Personnel requirements | | | | | |
| AMC2ORO.AOC.135(a) | Personnel requirements | | | | | |
| ORO.AOC.140 | Facility requirements | | | | | |

Audit N°:

| PART-ORO Reference | Subject | OM Ref. | Documentation | Date | Remarks S / NS / NA | NC Level |
|---------------------------|---------------------------------|----------------|----------------------|-------------|--------------------------------|-----------------|
| SUBPART AOC | AIR OPERATOR CERTIFICATE | | | | | |
| ORO.AOC.150 | Documentation requirements | | | | | |

| Audit N°: | | | | | | |
|------------------------|----------------------------------|---------|---------------|------|---------------------|----------|
| PART-ORO Reference | Subject | OM Ref. | Documentation | Date | Remarks S / NS / NA | NC Level |
| SUBPART MLR | MANUALS, LOGS AND RECORDS | | | | | |
| ORO.MLR.100 | Operations manual — general | | | | | |
| AMC1 ORO.MLR.100 | Operations manual — general | | | | | |
| AMC2 ORO.MLR.100 | Operations manual — general | | | | | |
| AMC3 ORO.MLR.100 | Operations manual — general | | | | | |
| AMC5 ORO.MLR.100 | Operations manual — general | | | | | |
| ORO.MLR.101 | Operations manual — structure | | | | | |
| ORO.MLR.105 | Minimum equipment list | | | | | |
| AMC1ORO.MLR.105(c) | Minimum equipment list | | | | | |
| AMC1ORO.MLR.105(d) | Minimum equipment list | | | | | |
| AMC1 ORO.MLR.105(d)(1) | Minimum equipment list | | | | | |
| AMC1 ORO.MLR.105(d)(3) | Minimum equipment list | | | | | |
| AMC2 ORO.MLR.105(d)(3) | Minimum equipment list | | | | | |
| AMC1ORO.MLR.105(f) | Minimum equipment list | | | | | |
| AMC1ORO.MLR.105(g) | Minimum equipment list | | | | | |
| AMC1ORO.MLR.105(h) | Minimum equipment list | | | | | |
| AMC1ORO.MLR.105(j) | Minimum equipment list | | | | | |
| ORO.MLR.110 | Journey log | | | | | |
| AMC1ORO.MLR.110 | Journey log | | | | | |

Audit N°:

| PART-ORO Reference | Subject | OM Ref. | Documentation | Date | Remarks S / NS / NA | NC Level |
|--------------------|----------------------------------|---------|---------------|------|---------------------|----------|
| SUBPART SEC | SECURITY | | | | | |
| ORO.SEC.100 | Flight crew compartment security | | | | | |

| Audit N°: | | | | | | |
|---------------------------|---|---------|---------------|------|---------------------|----------|
| PART-ORO Reference | Subject | OM Ref. | Documentation | Date | Remarks S / NS / NA | NC Level |
| SUBPART FC | FLIGHT CREW | | | | | |
| SECTION 1 | COMMON REQUIREMENTS | | | | | |
| ORO.FC.100 | Composition of flight crew | | | | | |
| ORO.FC.105 | Designation as pilot-in-command/commander | | | | | |
| AMC1 ORO.FC.105(b)(2);(c) | Designation as pilot-in-command/commander | | | | | |
| AMC1 ORO.FC.105(c) | Designation as pilot-in-command/commander | | | | | |
| AMC2 ORO.FC.105(c) | Designation as pilot-in-command/commander | | | | | |
| ORO.FC.110 | Flight engineer | | | | | |
| ORO.FC.115 | Crew resource management (CRM) training | | | | | |
| AMC1ORO.FC.115 | Crew resource management (CRM) training | | | | | |
| ORO.FC.120 | Operator conversion training | | | | | |
| AMC1 ORO.FC.120&130 | Operator conversion training and checking & recurrent training and checking | | | | | |
| ORO.FC.125 | Differences training, familiarisation, equipment and procedure training | | | | | |
| AMC1 ORO.FC.125 | Differences training and familiarisation training | | | | | |
| AMC1 ORO.FC.125 (b) | Differences training and familiarization, equipment and procedure training | | | | | |
| ORO.FC.130 | Recurrent training and checking | | | | | |
| ORO.FC.135 | Pilot qualification to operate in either pilot's seat | | | | | |
| ORO.FC.140 | Operation on more than one type or variant | | | | | |
| AMC1 ORO.FC.140(a) | Operation on more than one type or variant | | | | | |
| ORO.FC.145 | Provision of training, checking and assessment | | | | | |
| AMC1ORO.FC.145(a) | Provision of training, checking and assessment | | | | | |
| AMC1ORO.FC.145(b) | Provision of training, checking and assessment | | | | | |
| AMC1ORO.FC.145(d) | Provision of training, checking and assessment | | | | | |

Audit N°:

| PART-ORO Reference | Subject | OM Ref. | Documentation | Date | Remarks S / NS / NA | NC Level |
|----------------------------|---|---------|---------------|------|---------------------|----------|
| SUBPART FC | FLIGHT CREW | | | | | |
| SECTION 1 | COMMON REQUIREMENTS | | | | | |
| AMC2ORO.FC.145(d) | Provision of training, checking and assessment | | | | | |
| AMC1 ORO.FC.145(g) | Provision of training, checking and assessment | | | | | |
| ORO.FC.146 | Personnel providing training, checking and assessment | | | | | |
| AMC1 ORO.FC.146 | Personnel providing training, checking and assessment | | | | | |
| AMC2 ORO.FC.146 | Personnel providing training, checking and assessment | | | | | |
| AMC1 ORO.FC.146(b) | Personnel providing training, checking and assessment | | | | | |
| AMC1 ORO.FC.146 (c) | Personnel providing training, checking and assessment | | | | | |
| AMC2 ORO.FC.146 (c) | Personnel providing training, checking and assessment | | | | | |
| AMC1 ORO.FC.146(e);(f)&(g) | Personnel providing training, checking and assessment | | | | | |

| Audit N°: | | | | | | |
|-----------------------|--|---------|---------------|------|---------------------|----------|
| PART-ORO Reference | Subject | OM Ref. | Documentation | Date | Remarks S / NS / NA | NC Level |
| SUBPART FC | FLIGHT CREW | | | | | |
| SECTION 2 | ADDITIONAL REQUIREMENTS FOR COMMERCIAL AIR TRANSPORT OPERATIONS | | | | | |
| ORO.FC.200 | Composition of flight crew | | | | | |
| AMC1ORO.FC.200(a) | Composition of flight crew | | | | | |
| ORO.FC.A.201 | In-flight relief of flight crew members | | | | | |
| ORO.FC.205 | Command course | | | | | |
| ORO.FC.215 | Initial operator's crew resource management (CRM) training | | | | | |
| AMC1ORO.FC.215 | Initial operator's crew resource management (CRM) training | | | | | |
| ORO.FC.220 | Operator conversion training and checking | | | | | |
| AMC1ORO.FC.220 | Operator conversion training and checking | | | | | |
| AMC2ORO.FC.220 | Operator conversion training and checking | | | | | |
| AMC2 ORO.FC.220& 230 | Operator conversion training and checking& recurrent training and checking | | | | | |
| ORO.FC.230 | Recurrent training and checking | | | | | |
| AMC1 ORO.FC.230 | Recurrent training and checking | | | | | |
| AMC3 ORO.FC.230 | Recurrent training and checking | | | | | |
| ORO.FC.231 | Evidence-based training | | | | | |
| AMC1 ORO.FC.231(a) | Evidence-based training | | | | | |
| AMC3 ORO.FC.231(a) | Evidence-based training | | | | | |
| AMC1 ORO.FC.231(a)(1) | Evidence-based training | | | | | |
| AMC1 ORO.FC.231(a)(2) | Evidence-based training | | | | | |
| AMC2 ORO.FC.231(a)(2) | Evidence-based training | | | | | |
| AMC1 ORO.FC.231(a)(3) | Evidence-based training | | | | | |

| Audit N°: | | | | | | |
|-----------------------|-------------------------|---------|---------------|------|---------------------|----------|
| PART-ORO Reference | Subject | OM Ref. | Documentation | Date | Remarks S / NS / NA | NC Level |
| SUBPART FC | FLIGHT CREW | | | | | |
| AMC1 ORO.FC.231(a)(4) | Evidence-based training | | | | | |
| AMC1 ORO.FC.231(a)(5) | Evidence-based training | | | | | |
| AMC1 ORO.FC.231(b) | Evidence-based training | | | | | |
| AMC1 ORO.FC.231(c) | Evidence-based training | | | | | |
| AMC1 ORO.FC.231(d)(1) | Evidence-based training | | | | | |
| AMC1 ORO.FC.231(d)(2) | Evidence-based training | | | | | |
| AMC1 ORO.FC.231(e) | Evidence-based training | | | | | |
| AMC1 ORO.FC.231(f) | Evidence-based training | | | | | |
| AMC1 ORO.FC.231(f)(3) | Evidence-based training | | | | | |
| AMC1 ORO.FC.231(g) | Evidence-based training | | | | | |
| AMC1 ORO.FC.231(h) | Evidence-based training | | | | | |
| AMC1 ORO.FC.231(h)(3) | Evidence-based training | | | | | |
| AMC1 ORO.FC.231(i) | Evidence-based training | | | | | |
| AMC2 ORO.FC.231(a) | Evidence-based training | | | | | |
| AMC2 ORO.FC.231(b) | Evidence-based training | | | | | |
| AMC2 ORO.FC.231(c) | Evidence-based training | | | | | |
| AMC2 ORO.FC.231(d)(1) | Evidence-based training | | | | | |
| AMC2 ORO.FC.231(g) | Evidence-based training | | | | | |
| AMC2 ORO.FC.231(h) | Evidence-based training | | | | | |

| Audit N°: | | | | | | |
|-----------------------|--|---------|---------------|------|---------------------|----------|
| PART-ORO Reference | Subject | OM Ref. | Documentation | Date | Remarks S / NS / NA | NC Level |
| SUBPART FC | FLIGHT PROCEDURES | | | | | |
| AMC2 ORO.FC.231(h) | Evidence-based training | | | | | |
| AMC2 ORO.FC.231(a)(2) | Evidence-based training | | | | | |
| AMC3 ORO.FC.231(a) | Evidence-based training | | | | | |
| AMC3 ORO.FC.231(d)(1) | Evidence-based training | | | | | |
| AMC4 ORO.FC.231(d)(1) | Evidence-based training | | | | | |
| ORO.FC.232 | EBT programme assessment and training topics | | | | | |
| AMC1 ORO.FC.232 | EBT programme assessment and training topics | | | | | |
| AMC2 ORO.FC.232 | EBT programme assessment and training topics | | | | | |
| AMC3 ORO.FC.232 | EBT programme assessment and training topics | | | | | |
| AMC4 ORO.FC.232 | EBT programme assessment and training topics | | | | | |
| AMC5 ORO.FC.232 | EBT programme assessment and training topics | | | | | |
| AMC6 ORO.FC.232 | EBT programme assessment and training topics | | | | | |
| AMC7 ORO.FC.232 | EBT programme assessment and training topics | | | | | |
| AMC8 ORO.FC.232 | EBT programme assessment and training topics | | | | | |
| AMC1 ORO.FC.232(b)(1) | EBT programme assessment and training topics | | | | | |
| AMC1 ORO.FC.232(b)(3) | EBT programme assessment and training topics | | | | | |
| ORO.FC.235 | Pilot qualification to operate in either pilot's seat — aeroplanes | | | | | |
| ORO.FC.240 | Operation on more than one type or variant | | | | | |
| AMC1 ORO.FC.240 | Operation on more than one type or variant | | | | | |

Audit N°:

| PART-ORO Reference | Subject | OM Ref. | Documentation | Date | Remarks S / NS / NA | NC Level |
|----------------------------|--|---------|---------------|------|---------------------|----------|
| SUBPART FC | FLIGHT PROCEDURES | | | | | |
| ORO.FC.A.245 | Alternative training and qualification programme | | | | | |
| AMC1ORO.FC.A.245 | Alternative training and qualification programme | | | | | |
| AMC1ORO.FC.A.245(a) | Alternative training and qualification programme | | | | | |
| AMC1 ORO.FC.A.245(d)(e)(2) | Alternative training and qualification programme | | | | | |
| AMC1ORO.FC.A.245(g) | Alternative training and qualification programme | | | | | |
| ORO.FC.A.250 | Commanders holding a CPL(A) | | | | | |

Audit N°:

| PART-ORO Reference | Subject | OM Ref. | Documentation | Date | Remarks S / NS / NA | NC Level |
|---------------------------|--|----------------|----------------------|-------------|--------------------------------|-----------------|
| SUBPART FC | FLIGHT PROCEDURES | | | | | |
| ORO.FC.320 | Operator conversion training and checking | | | | | |
| AMC1 ORO.FC.320 | Operator conversion training and checking | | | | | |
| ORO.FC.325 | Equipment and procedure training and checking | | | | | |
| AMC1 ORO.FC.325 | Equipment and procedure training and checking | | | | | |
| ORO.FC.330 | Recurrent training and checking – operator proficiency check | | | | | |
| AMC1 ORO.FC.330 | Recurrent training and checking – operator proficiency check | | | | | |

Audit N°:

| PART-ORO Reference | Subject | OM Ref. | Documentation | Date | Remarks S / NS / NA | NC Level |
|------------------------|-----------------------------------|---------|---------------|------|---------------------|----------|
| SUBPART FTL | FLIGHT TIME LIMITATIONS | | | | | |
| SECTION 1 | GENERAL | | | | | |
| ORO.FTL.100 | Scope | | | | | |
| ORO.FTL.105 | Definitions | | | | | |
| ORO.FTL.110 | Operator Responsibilities | | | | | |
| AMC1 ORO.FTL.110 | Operator Responsibilities | | | | | |
| AMC1 ORO.FTL.110 (a) | Operator Responsibilities | | | | | |
| AMC1 ORO.FTL.110 (j) | Operator Responsibilities | | | | | |
| ORO.FTL.115 | Crew Members | | | | | |
| ORO.FTL.120 | Fatigue Risk Assessment (FRM) | | | | | |
| AMC1 ORO.FTL.120(b)(1) | Fatigue Risk Assessment (FRM) | | | | | |
| AMC2 ORO.FTL.120(b)(2) | Fatigue Risk Assessment (FRM) | | | | | |
| AMC1 ORO.FTL.120(b)(4) | Fatigue Risk Assessment (FRM) | | | | | |
| AMC2 ORO.FTL.120(b)(4) | Fatigue Risk Assessment (FRM) | | | | | |
| AMC1 ORO.FTL.120(b)(5) | Fatigue Risk Assessment (FRM) | | | | | |
| AMC1 ORO.FTL.120(b)(6) | Fatigue Risk Assessment (FRM) | | | | | |
| AMC1 ORO.FTL.120(b)(7) | Fatigue Risk Assessment (FRM) | | | | | |
| ORO.FTL.125 | Flight Time Specification Schemes | | | | | |

| Audit N°: | | | | | | |
|------------------------|-----------------------------------|---------|---------------|------|---------------------|----------|
| PART-ORO Reference | Subject | OM Ref. | Documentation | Date | Remarks S / NS / NA | NC Level |
| SUBPART FTL | FLIGHT TIME LIMITATIONS | | | | | |
| SECTION 1 | GENERAL | | | | | |
| ORO.FTL.100 | Scope | | | | | |
| ORO.FTL.105 | Definitions | | | | | |
| ORO.FTL.110 | Operator Responsibilities | | | | | |
| AMC1 ORO.FTL.110 | Operator Responsibilities | | | | | |
| AMC1 ORO.FTL.110 (a) | Operator Responsibilities | | | | | |
| AMC1 ORO.FTL.110 (j) | Operator Responsibilities | | | | | |
| ORO.FTL.115 | Crew Members | | | | | |
| ORO.FTL.120 | Fatigue Risk Assessment (FRM) | | | | | |
| AMC1 ORO.FTL.120(b)(1) | Fatigue Risk Assessment (FRM) | | | | | |
| AMC2 ORO.FTL.120(b)(2) | Fatigue Risk Assessment (FRM) | | | | | |
| AMC1 ORO.FTL.120(b)(4) | Fatigue Risk Assessment (FRM) | | | | | |
| AMC2 ORO.FTL.120(b)(4) | Fatigue Risk Assessment (FRM) | | | | | |
| AMC1 ORO.FTL.120(b)(5) | Fatigue Risk Assessment (FRM) | | | | | |
| AMC1 ORO.FTL.120(b)(6) | Fatigue Risk Assessment (FRM) | | | | | |
| AMC1 ORO.FTL.120(b)(7) | Fatigue Risk Assessment (FRM) | | | | | |
| ORO.FTL.125 | Flight Time Specification Schemes | | | | | |

Audit N°:

| PART-ORO Reference | Subject | OM Ref. | Documentation | Date | Remarks S / NS / NA | NC Level |
|----------------------|---|---------|---------------|------|---------------------|----------|
| SUBPART FTL | FLIGHT TIME LIMITATIONS | | | | | |
| SECTION 2 | Commercial Air Transport Operations | | | | | |
| ORO.FTL.200 | Home Base | | | | | |
| ORO.FTL.205 | Flight Duty Period | | | | | |
| AMC1 ORO.FTL.205(f) | Flight Duty Period | | | | | |
| ORO.FTL.210 | Flight Times and Duty Periods | | | | | |
| AMC1 ORO.FTL.210 (c) | Flight Times and Duty Periods | | | | | |
| AMC1 ORO.FTL.110 (j) | Operator Responsibilities | | | | | |
| ORO.FTL.215 | Positioning | | | | | |
| ORO.FTL.220 | Split Duty | | | | | |
| ORO.FTL.225 | Standby and duties at the airport | | | | | |
| ORO.FTL.230 | Reserve | | | | | |
| ORO.FTL.235 | Rest periods | | | | | |
| AMC1 ORO.FTL.235(b) | Rest periods | | | | | |
| ORO.FTL.240 | Nutrition | | | | | |
| AMC1 ORO.FTL.240 | Nutrition | | | | | |
| ORO.FTL.245 | Records of home base, flight times, duty and rest periods | | | | | |
| ORO.FTL.250 | Fatigue management training | | | | | |
| AMC1 ORO.FTL.250 | Fatigue management training | | | | | |

| Audit N°: | | | | | | |
|--------------------|--|---------|---------------|------|---------------------|----------|
| PART-ORO Reference | Subject | OM Ref. | Documentation | Date | Remarks S / NS / NA | NC Level |
| SUBPART Q | FLIGHT TIME LIMITATIONS | | | | | |
| Subpart Q | Reference documents are used to control flight times and retain crew members | | | | | |
| Subpart Q | Reference documents are used in the computer program or Crew Schedule Programming Manual | | | | | |
| Subpart Q | Check compliance with rest minimums relating to time zone intervals, "split duty time" and night time (circadian) and reinforced crew (N/A). | | | | | |
| Subpart Q | Verify by sampling that pilots do not exceed PSV, duty times and minimum daily rest periods | | | | | |
| Subpart Q | The adequacy of the PSV control procedure, Flight Time and check-in time | | | | | |
| Subpart Q | Verify that weekly, 28-day, and annual PSV limits are not exceeded | | | | | |
| Subpart Q | Check that the weekly extension limit has not been exceeded | | | | | |
| Subpart Q | Check whether the Commander's report is Authority when there are exceedances | | | | | |

Notes:

- (1) In the Operations Manual Reference Column, include all references that show full compliance with the applicable regulation or AMC.
- (2) Use the following annotations:
 - S = Satisfactory;
 - NS = Not Satisfactory;
 - NA = Not Applicable
 - NC = Não Conformidade

Annex C. Part-CAT Compliance Checklist

| | |
|---|---|
|  | COMPLIANCE CHECKLIST Ref: Commission Regulation (EU) 965/2012 Annex IV COMMERCIAL AIR TRANSPORT OPERATIONS [PART-ORO/SPO] |
|---|---|

SECTION I: Compliance Checklist

| Audit N°: | | | | | | |
|-----------------------------------|--|---------|---------------|------|---------------------|----------|
| PART-CAT Reference | Subject | OM Ref. | Documentation | Date | Remarks S / NS / NA | NC Level |
| SUBPART A | GENERAL REQUIREMENTS | | | | | |
| SECTION 1 | Motor-powered aircraft | | | | | |
| CAT.GEN.MPA.100 | Crew responsibilities | | | | | |
| AMC1 CAT.GEN.MPA.100(b) | Crew responsibilities | | | | | |
| AMC1 CAT.GEN.MPA.100(c) (1) | Crew responsibilities | | | | | |
| CAT.GEN.MPA.105 | Responsibilities of the commander | | | | | |
| CAT.GEN.MPA.110 | Authority of the commander | | | | | |
| CAT.GEN.MPA.115 | Personnel or crew members other than cabin crew in the passenger compartment | | | | | |
| AMC1 CAT.GEN.MPA.115(a) | Personnel or crew members other than cabin crew in the passenger compartment | | | | | |
| CAT.GEN.MPA.120 | Common language | | | | | |
| CAT.GEN.MPA.124 | Taxiing of aeroplanes | | | | | |
| AMC1 CAT.GEN.MPA.124 | Taxiing of aeroplanes | | | | | |
| CAT.GEN.MPA.125 | Taxiing of aeroplanes | | | | | |
| CAT.GEN.MPA.135 | Admission to the flight crew compartment | | | | | |
| AMC1 CAT.GEN.MPA.135(a) (3) | Admission to the flight crew compartment | | | | | |
| CAT.GEN.MPA.140 | Portable electronic devices | | | | | |
| AMC1 CAT.GEN.MPA.140 | Portable electronic devices | | | | | |
| AMC2 CAT.GEN.MPA.140 | Portable electronic devices | | | | | |
| CAT.GEN.MPA.141 | Use of electronic flight bags | | | | | |
| AMC1 CAT.GEN.MPA.141(a) | Use of electronic flight bags | | | | | |
| AMC1 CAT.GEN.MPA.141(b) | Application Classification | | | | | |
| CAT.GEN.MPA.145 | Information on emergency and survival equipment carried | | | | | |

SECTION I: Compliance Checklist

| Audit N°: | | | | | | |
|------------------------------------|--|---------|---------------|------|---------------------|----------|
| PART-CAT Reference | Subject | OM Ref. | Documentation | Date | Remarks S / NS / NA | NC Level |
| SUBPART A | GENERAL REQUIREMENTS | | | | | |
| SECTION 1 | Motor-powered aircraft | | | | | |
| AMC1 CAT.GEN.MPA.145 | Information on emergency and survival equipment carried | | | | | |
| CAT.GEN.MPA.155 | Carriage of weapons of war and munitions of war | | | | | |
| CAT.GEN.MPA.160 | Carriage of sporting weapons and ammunition | | | | | |
| CAT.GEN.MPA.165 | Method of carriage of persons | | | | | |
| CAT.GEN.MPA.170 | Psychoactive Substances | | | | | |
| AMC1 CAT.GEN.MPA.170(b) | Psychoactive Substances | | | | | |
| AMC2 CAT.GEN.MPA.170(b) | Psychoactive Substances | | | | | |
| AMC1 CAT.GEN.MPA.170(c) | Psychoactive Substances | | | | | |
| CAT.GEN.MPA.175 | Endangering safety | | | | | |
| AMC1 CAT.GEN.MPA.175(b) | Endangering safety | | | | | |
| CAT.GEN.MPA.180 | Documents, manuals and information to be carried | | | | | |
| AMC1 CAT.GEN.MPA.180 | Documents, manuals and information to be carried | | | | | |
| AMC1 CAT.GEN.MPA.180(a) (13) | Documents, manuals and information to be carried | | | | | |
| AMC1 CAT.GEN.MPA.180(a) (18) | Documents, manuals and information to be carried | | | | | |
| CAT.GEN.MPA.185 | Information to be retained on the ground | | | | | |
| CAT.GEN.MPA.190 | Provision of documentation and records | | | | | |
| CAT.GEN.MPA.195 | Preservation, production and use of flight recorder recordings | | | | | |
| AMC1 CAT.GEN.MPA.195(a) | Preservation, production and use of flight recorder recordings | | | | | |
| AMC1 CAT.GEN.MPA.195(b) | Preservation, production and use of flight recorder recordings | | | | | |
| AMC1 CAT.GEN.MPA.195(f) (1) | Preservation, production and use of flight recorder recordings | | | | | |

Audit N°:

| PART-CAT Reference | Subject | OM Ref. | Documentation | Date | Remarks S / NS / NA | NC Level |
|------------------------------------|--|---------|---------------|------|---------------------|----------|
| SUBPART A | GENERAL REQUIREMENTS | | | | | |
| SECTION 1 | Motor-powered aircraft | | | | | |
| AMC1 CAT.GEN.MPA.195(f) (1a) | Preservation, production and use of flight recorder recordings | | | | | |
| AMC1 CAT.GEN.MPA.195(f)(3) | Handling of flight recorder recordings: preservation, production, protection and use | | | | | |
| AMC1 CAT.GEN.MPA.195(f) (3a) | Handling of flight recorder recordings: preservation, production, protection and use | | | | | |
| CAT.GEN.MPA.200 | Transport of dangerous goods | | | | | |
| AMC1 CAT.GEN.MPA.200(e) | Transport of dangerous goods | | | | | |
| CAT.GEN.MPA.205 | Aircraft tracking system – Aeroplanes | | | | | |
| AMC1 CAT.GEN.MPA.205 | Aircraft tracking system – Aeroplanes | | | | | |
| AMC2 CAT.GEN.MPA.205 | Aircraft tracking system – Aeroplanes | | | | | |
| CAT.GEN.MPA.210 | Location of an aircraft in distress – Aeroplanes | | | | | |
| AMC1 CAT.GEN.MPA.205 | Location of an aircraft in distress – Aeroplanes | | | | | |
| CAT.GEN.MPA.215 | Support Programme | | | | | |
| AMC 1 CAT.GEN.MPA.215 | Support Programme | | | | | |
| AMC2 CAT.GEN.MPA.215 | Support Programme | | | | | |
| AMC3 CAT.GEN.MPA.215 | Support Programme | | | | | |
| AMC4 CAT.GEN.MPA.215 | Support Programme | | | | | |

Audit N°:

| PART-CAT Reference | Subject | OM Ref. | Documentation | Date | Remarks S / NS / NA | NC Level |
|---------------------------|--|---------|---------------|------|---------------------|----------|
| SUBPART B | OPERATING PROCEDURES | | | | | |
| SECTION 1 | Motor-powered aircraft | | | | | |
| CAT.OP.MPA.100 | Use of air traffic services | | | | | |
| CAT.OP.MPA.101 | Altimeter check and settings | | | | | |
| CAT.OP.MPA.105 | Use of aerodromes and operating sites | | | | | |
| CAT.OP.MPA.106 | Use of isolated aerodromes — aeroplanes | | | | | |
| CAT.OP.MPA.107 | Adequate aerodrome | | | | | |
| CAT.OP.MPA.110 | Aerodrome operating minima | | | | | |
| AMC1 CAT.OP.MPA.110 | Aerodrome operating minima | | | | | |
| AMC3 CAT.OP.MPA.110 | Aerodrome operating minima | | | | | |
| AMC5 CAT.OP.MPA.110 | Aerodrome operating minima | | | | | |
| AMC7 CAT.OP.MPA.110 | Aerodrome operating minima | | | | | |
| AMC9 CAT.OP.MPA.110 | Aerodrome operating minima | | | | | |
| AMC10 CAT.OP.MPA.110 | Aerodrome operating minima | | | | | |
| AMC11 CAT.OP.MPA.110 | Aerodrome operating minima | | | | | |
| CAT.OP.MPA.115 | Approach flight technique — aeroplanes | | | | | |
| AMC1 CAT.OP.MPA.115 | Approach flight technique — aeroplanes | | | | | |
| AMC2 CAT.OP.MPA.115 | Approach flight technique — aeroplanes | | | | | |
| AMC3 CAT.OP.MPA.115 | Approach flight technique — aeroplanes | | | | | |
| AMC1 CAT.OP.MPA.115(a) | Approach flight technique — aeroplanes | | | | | |
| CAT.OP.MPA.125 | Instrument departure and approach procedures | | | | | |
| CAT.OP.MPA.126 | Performance based navigation | | | | | |

Audit N°:

| PART-CAT Reference | Subject | OM Ref. | Documentation | Date | Remarks S / NS / NA | NC Level |
|--------------------------|--|---------|---------------|------|---------------------|----------|
| SUBPART B | OPERATING PROCEDURES | | | | | |
| SECTION 1 | Motor-powered aircraft | | | | | |
| AMC1 CAT.OP.MPA.126 | Performance based navigation | | | | | |
| AMC2 CAT.OP.MPA.126 | Performance based navigation | | | | | |
| AMC3 CAT.OP.MPA.126 | Performance based navigation | | | | | |
| AMC4 CAT.OP.MPA.126 | Performance based navigation | | | | | |
| AMC5 CAT.OP.MPA.126 | Performance based navigation | | | | | |
| AMC6 CAT.OP.MPA.126 | Performance based navigation | | | | | |
| AMC7 CAT.OP.MPA.126 | Performance based navigation | | | | | |
| CAT.OP.MPA.130 | Noise abatement procedures — aeroplanes | | | | | |
| AMC1 CAT.OP.MPA.130 | Noise abatement procedures — aeroplanes | | | | | |
| CAT.OP.MPA.135 | Routes and areas of operation — general | | | | | |
| AMC1 CAT.OP.MPA.135 | Routes and areas of operation — general | | | | | |
| CAT.OP.MPA.136 | Routes and areas of operation — single-engined aeroplanes | | | | | |
| CAT.OP.MPA.140 | Maximum distance from an adequate aerodrome for two-engined aeroplanes without an ETOPS approval | | | | | |
| AMC1 CAT.OP.MPA.140(d) | Maximum distance from an adequate aerodrome for two-engined aeroplanes without an ETOPS approval | | | | | |
| CAT.OP.MPA.145 | Establishment of minimum flight altitudes | | | | | |
| AMC1 CAT.OP.MPA.145(a) | Establishment of minimum flight altitudes | | | | | |
| AMC1.1 CAT.OP.MPA.145(a) | Establishment of minimum flight altitudes | | | | | |
| CAT.OP.MPA.155 | Carriage of special categories of passengers (SCPs) | | | | | |
| AMC1 CAT.OP.MPA.155(b) | Carriage of special categories of passengers (SCPs) | | | | | |
| AMC2 CAT.OP.MPA.155(b) | Carriage of special categories of passengers (SCPs) | | | | | |

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| PART-CAT Reference | Subject | OM Ref. | Documentation | Date | Remarks S / NS / NA | NC Level |
| SUBPART B | OPERATING PROCEDURES | | | | | |
| SECTION 1 | Motor-powered aircraft | | | | | |
| AMC3 CAT.OP.MPA.155(b) | Carriage of special categories of passengers (SCPs) | | | | | |
| AMC1 CAT.OP.MPA.155(c) | Carriage of special categories of passengers (SCPs) | | | | | |
| AMC2 CAT.OP.MPA.155(c) | Carriage of special categories of passengers (SCPs) | | | | | |
| CAT.OP.MPA.160 | Stowage of baggage and cargo | | | | | |
| AMC1 CAT.OP.MPA.160 | Stowage of baggage and cargo | | | | | |
| AMC2 CAT.OP.MPA.160 | Stowage of baggage and cargo | | | | | |
| CAT.OP.MPA.165 | Passenger seating | | | | | |
| AMC1 CAT.OP.MPA.165 | Passenger seating | | | | | |
| AMC2 CAT.OP.MPA.165 | Passenger seating | | | | | |
| CAT.OP.MPA.170 | Passenger briefing | | | | | |
| AMC1 CAT.OP.MPA.170 | Passenger briefing | | | | | |
| AMC1.1 CAT.OP.MPA.170 | Passenger briefing | | | | | |
| AMC3 CAT.OP.MPA.170 | Passenger briefing | | | | | |
| CAT.OP.MPA.175 | Flight preparation | | | | | |
| AMC1 CAT.OP.MPA.175 | Flight preparation | | | | | |
| AMC2 CAT.OP.MPA.175 | Flight preparation | | | | | |
| AMC1 CAT.OP.MPA.175(a) | Flight preparation | | | | | |
| CAT.OP.MPA.177 | Submission of the ATS flight plan | | | | | |
| AMC1 CAT.OP.MPA.177 | Submission of the ATS flight plan | | | | | |
| CAT.OP.MPA.180 | Fuel/energy scheme – aeroplanes | | | | | |
| AMC1 CAT.OP.MPA.180 | Fuel/energy scheme – aeroplanes | | | | | |

Audit N°:

| PART-CAT Reference | Subject | OM Ref. | Documentation | Date | Remarks S / NS / NA | NC Level |
|------------------------|---|---------|---------------|------|---------------------|----------|
| SUBPART B | OPERATING PROCEDURES | | | | | |
| SECTION 1 | Motor-powered aircraft | | | | | |
| CAT.OP.MPA.181 | Selection of aerodromes and operating sites | | | | | |
| AMC1 CAT.OP.MPA.181 | Fuel/energy scheme – fuel/energy planning and in-flight re-planning policy – aeroplanes | | | | | |
| AMC2 CAT.OP.MPA.181 | Fuel/energy scheme – fuel/energy planning and in-flight re-planning policy – aeroplanes | | | | | |
| AMC3 CAT.OP.MPA.181 | Fuel/energy scheme – fuel/energy planning and in-flight re-planning policy – aeroplanes | | | | | |
| AMC4 CAT.OP.MPA.181 | Fuel/energy scheme – fuel/energy planning and in-flight re-planning policy – aeroplanes | | | | | |
| AMC5 CAT.OP.MPA.181 | Fuel/energy scheme – fuel/energy planning and in-flight re-planning policy – aeroplanes | | | | | |
| AMC6 CAT.OP.MPA.181 | Fuel/energy scheme – fuel/energy planning and in-flight re-planning policy – aeroplanes | | | | | |
| AMC7 CAT.OP.MPA.181 | Fuel/energy scheme – fuel/energy planning and in-flight re-planning policy – aeroplanes | | | | | |
| AMC8 CAT.OP.MPA.181 | Fuel/energy scheme – fuel/energy planning and in-flight re-planning policy – aeroplanes | | | | | |
| CAT.OP.MPA.182 | Fuel/energy scheme – aerodrome selection policy – aeroplanes | | | | | |
| AMC1 CAT.OP.MPA.182 | Fuel/energy scheme – aerodrome selection policy – aeroplanes | | | | | |
| AMC2 CAT.OP.MPA.182 | Fuel/energy scheme – aerodrome selection policy – aeroplanes | | | | | |
| AMC3 CAT.OP.MPA.182 | Fuel/energy scheme – aerodrome selection policy – aeroplanes | | | | | |
| AMC4 CAT.OP.MPA.182 | Fuel/energy scheme – aerodrome selection policy – aeroplanes | | | | | |
| AMC5 CAT.OP.MPA.182 | Fuel/energy scheme – aerodrome selection policy – aeroplanes | | | | | |
| AMC6 CAT.OP.MPA.182 | Fuel/energy scheme – aerodrome selection policy – aeroplanes | | | | | |
| AMC7 CAT.OP.MPA.182 | Fuel/energy scheme – aerodrome selection policy – aeroplanes | | | | | |
| AMC8 CAT.OP.MPA.182 | Fuel/energy scheme – aerodrome selection policy – aeroplanes | | | | | |
| AMC9 CAT.OP.MPA.182 | Fuel/energy scheme – aerodrome selection policy – aeroplanes | | | | | |
| AMC1 CAT.OP.MPA.182(f) | Fuel/energy scheme – aerodrome selection policy – aeroplanes | | | | | |
| CAT.OP.MPA.185 | Planning minima for IFR flights – aeroplanes | | | | | |

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| PART-CAT Reference | Subject | OM Ref. | Documentation | Date | Remarks S / NS / NA | NC Level |
| SUBPART B | OPERATING PROCEDURES | | | | | |
| SECTION 1 | Motor-powered aircraft | | | | | |
| AMC1 CAT.OP.MPA.185(a) | Fuel/energy scheme — in-flight fuel/energy management policy — aeroplanes | | | | | |
| AMC2 CAT.OP.MPA.185(a) | Fuel/energy scheme — in-flight fuel/energy management policy — aeroplanes | | | | | |
| AMC3 CAT.OP.MPA.185(a) | Fuel/energy scheme — in-flight fuel/energy management policy — aeroplanes | | | | | |
| CAT.OP.MPA.200 | Special refuelling or defuelling of the aircraft | | | | | |
| AMC1 CAT.OP.MPA.200 | Special refuelling or defueling of the aircraft | | | | | |
| AMC2 CAT.OP.MPA.200 | Special refuelling or defueling of the aircraft | | | | | |
| AMC5 CAT.OP.MPA.200 | Special refuelling or defueling of the aircraft | | | | | |
| AMC6 CAT.OP.MPA.200 | Special refuelling or defueling of the aircraft | | | | | |
| AMC8 CAT.OP.MPA.200 | Special refuelling or defueling of the aircraft | | | | | |
| CAT.OP.MPA.205 | Push back and towing — aeroplanes | | | | | |
| AMC1 CAT.OP.MPA.205 | Push back and towing — aeroplanes | | | | | |
| CAT.OP.MPA.210 | Crew members at stations | | | | | |
| CAT.OP.MPA.215 | Use of headset — aeroplanes | | | | | |
| CAT.OP.MPA.220 | Assisting means for emergency evacuation | | | | | |
| CAT.OP.MPA.225 | Seats, safety belts and restraint systems | | | | | |
| CAT.OP.MPA.230 | Securing of passenger compartment and galley(s) | | | | | |
| CAT.OP.MPA.240 | Smoking on board | | | | | |
| CAT.OP.MPA.245 | Meteorological conditions — all aircraft | | | | | |
| CAT.OP.MPA.246 | Meteorological conditions — aeroplanes | | | | | |
| CAT.OP.MPA.250 | Ice and other contaminants — ground procedures | | | | | |
| CAT.OP.MPA.255 | Ice and other contaminants — flight procedures | | | | | |

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| PART-CAT Reference | Subject | OM Ref. | Documentation | Date | Remarks S / NS / NA | NC Level |
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| SUBPART B | OPERATING PROCEDURES | | | | | |
| SECTION 1 | Motor-powered aircraft | | | | | |
| AMC1 CAT.OP.MPA.255 | Ice and other contaminants — flight procedures | | | | | |
| CAT.OP.MPA.260 | Fuel/energy and oil supply | | | | | |
| CAT.OP.MPA.265 | Take-off conditions | | | | | |
| AMC1 CAT.OP.MPA.265(a) | Take-off conditions | | | | | |
| CAT.OP.MPA.270 | Minimum flight altitudes | | | | | |
| CAT.OP.MPA.275 | Simulated abnormal situations in flight | | | | | |
| CAT.OP.MPA.285 | Use of supplemental oxygen | | | | | |
| CAT.OP.MPA.290 | Ground proximity detection | | | | | |
| CAT.OP.MPA.295 | Use of airborne collision avoidance system (ACAS) | | | | | |
| CAT.OP.MPA.300 | Approach and landing conditions | | | | | |
| AMC1 CAT.OP.MPA.300(a) | Approach and landing conditions —aeroplanes | | | | | |
| CAT.OP.MPA.303 | In-flight check of the landing distance at time of arrival – aeroplanes | | | | | |
| AMC1 CAT.OP.MPA.303 | In-flight check of the landing distance at timeof arrival — aeroplanes | | | | | |
| AMC1 CAT.OP.MPA.303(e) | In-flight check of the landing distance attime of arrival — aeroplanes | | | | | |
| CAT.OP.MPA.305 | Commencement and continuation of approach | | | | | |
| AMC1 CAT.OP.MPA.305(a) | Commencement and continuation of approach | | | | | |
| AMC1 CAT.OP.MPA.305(c) | Commencement and continuation of approach | | | | | |
| CAT.OP.MPA.310 | Operating procedures — threshold crossing height — aeroplanes | | | | | |
| CAT.OP.MPA.311 | Reporting on runway braking action | | | | | |
| AMC1 CAT.OP.MPA.311 | Reporting on runway braking action | | | | | |

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| PART-CAT Reference | Subject | OM Ref. | Documentation | Date | Remarks S / NS / NA | NC Level |
| SUBPART B | OPERATING PROCEDURES | | | | | |
| SECTION 1 | Motor-powered aircraft | | | | | |
| AMC1 CAT.OP.MPA.311 | Reporting on runway braking action | | | | | |
| AMC1 CAT.OP.MPA.303 & CAT.OP.MPA.311 | In-flight check of the landing distance at time of arrival — aeroplanes & Reporting on runway braking action | | | | | |
| CAT.OP.MPA.312 | EFVS 200 operations | | | | | |
| AMC1 CAT.OP.MPA.312(a)(1) | EFVS 200 operations | | | | | |
| AMC1 CAT.OP.MPA.312(a)(2) | EFVS 200 operations | | | | | |
| AMC2 CAT.OP.MPA.312(a)(2) | EFVS 200 operations | | | | | |
| AMC1 CAT.OP.MPA.312(a)(3) | EFVS 200 operations | | | | | |
| AMC2 CAT.OP.MPA.312(a)(3) | EFVS 200 operations | | | | | |
| AMC3 CAT.OP.MPA.312(a)(3) | EFVS 200 operations | | | | | |
| AMC4 CAT.OP.MPA.312(a)(3) | EFVS 200 operations | | | | | |
| AMC5 CAT.OP.MPA.312(a)(3) | EFVS 200 operations | | | | | |
| AMC1 CAT.OP.MPA.312(a)(4) | EFVS 200 operations | | | | | |
| AMC1 CAT.OP.MPA.312(a)(8) | EFVS 200 operations | | | | | |
| AMC1 CAT.OP.MPA.312(c) | EFVS 200 operations | | | | | |
| CAT.OP.MPA.320 | Aeroplane categories | | | | | |

Audit N°:

| PART-CAT Reference | Subject | OM Ref. | Documentation | Date | Remarks S / NS / NA | NC Level |
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| SUBPART C | AIRCRAFT PERFORMANCE AND OPERATING LIMITATIONS | | | | | |
| SECTION 1 | Aeroplanes | | | | | |
| Chapter 1 | General Requirements | | | | | |
| CAT.POL.A.100 | Performance classes | | | | | |
| CAT.POL.A.105 | General | | | | | |

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| PART-CAT Reference | Subject | OM Ref. | Documentation | Date | Remarks S / NS / NA | NC Level |
| SUBPART C | AIRCRAFT PERFORMANCE AND OPERATING LIMITATIONS | | | | | |
| SECTION 1 | Aeroplanes | | | | | |
| Chapter 3 | Performance Class B | | | | | |
| CAT.POL.A.300 | General | | | | | |
| CAT.POL.A.305 | Take-off | | | | | |
| AMC1 CAT.POL.A.305 | Take-off | | | | | |
| AMC2 CAT.POL.A.305 | Take-off | | | | | |
| CAT.POL.A.310 | Take-off obstacle clearance — multi-engined aeroplanes | | | | | |
| AMC1 CAT.POL.A.310 | Take-off obstacle clearance — multi-engined aeroplanes | | | | | |
| AMC2 CAT.POL.A.310 | Take-off obstacle clearance — multi-engined aeroplanes | | | | | |
| CAT.POL.A.315 | En-route — multi-engined aeroplanes | | | | | |
| CAT.POL.A.325 | Landing — destination and alternate aerodromes | | | | | |
| AMC1 CAT.POL.A.325 | Landing — destination and alternate aerodromes | | | | | |
| CAT.POL.A.330 | Landing — dry runways | | | | | |
| AMC1 CAT.POL.A.330 | Landing — dry runways | | | | | |
| AMC2 CAT.POL.A.330 | Landing — dry runways | | | | | |
| CAT.POL.A.335 | Landing — wet and contaminated runways | | | | | |
| AMC1CAT.POL.A.335 | Landing — wet and contaminated runways | | | | | |
| AMC1CAT.POL.A.335(a)(3) | Landing — wet and contaminated runways | | | | | |
| CAT.POL.A.340 | Take-off and landing climb requirements | | | | | |
| CAT.POL.A.345 | Approval of steep approach operations | | | | | |
| CAT.POL.A.350 | Approval of short landing operations | | | | | |
| CAT.POL.A.355 | Approval of reduced required landing distance operations | | | | | |

Audit N°:

| PART-CAT Reference | Subject | OM Ref. | Documentation | Date | Remarks S / NS / NA | NC Level |
|----------------------------------|--|---------|---------------|------|---------------------|----------|
| SUBPART C | AIRCRAFT PERFORMANCE AND OPERATING LIMITATIONS | | | | | |
| SECTION 1 | Aeroplanes | | | | | |
| Chapter 3 | Performance Class B | | | | | |
| AMC1CAT.POL.A.355 (b)(4) | Approval of reduced required landing distance operations | | | | | |
| AMC1CAT.POL.A.355(b)(5)and(b)(6) | Approval of reduced required landing distance operations | | | | | |
| AMC1CAT.POL.A.355(b)(8)(i) | Approval of reduced required landing distance operations | | | | | |
| AMC1CAT.POL.A.355(b)(9) | Approval of reduced required landing distance operations | | | | | |
| AMC1CAT.POL.A.355(b)(11) | Approval of reduced required landing distance operations | | | | | |

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| PART-CAT Reference | Subject | OM Ref. | Documentation | Date | Remarks S / NS / NA | NC Level |
| SUBPART C | AIRCRAFT PERFORMANCE AND OPERATING LIMITATIONS | | | | | |
| SECTION 3 | Mass and Balance | | | | | |
| Chapter 1 | Motor Powered Aircraft | | | | | |
| CAT.POL.MAB.100 | Mass and balance, loading | | | | | |
| AMC1 CAT.POL.MAB.100 (a) | Mass and balance, loading | | | | | |
| AMC1 CAT.POL.MAB.100 (b) | Mass and balance, loading | | | | | |
| AMC2 CAT.POL.MAB.100 (b) | Mass and balance, loading | | | | | |
| AMC1 CAT.POL.MAB.100 (d) | Mass and balance, loading | | | | | |
| AMC2 CAT.POL.MAB.100 (d) | Mass and balance, loading | | | | | |
| AMC1 CAT.POL.MAB.100 (e) | Mass and balance, loading | | | | | |
| AMC2 CAT.POL.MAB.100 (e) | Mass and balance, loading | | | | | |
| CAT.POL.MAB.105 | Mass and balance data and documentation | | | | | |
| AMC1 CAT.POL.MAB.105 (a) | Mass and balance data and documentation | | | | | |
| AMC1 CAT.POL.MAB.105 (b) | Mass and balance data and documentation | | | | | |
| AMC1 CAT.POL.MAB.105 (c) | Mass and balance data and documentation | | | | | |
| AMC2 CAT.POL.MAB.105 (c) | Mass and balance data and documentation | | | | | |

Audit N°:

| PART-CAT Reference | Subject | OM Ref. | Documentation | Date | Remarks S / NS / NA | NC Level |
|--|--------------------------------------|---------|---------------|------|------------------------|----------|
| SUBPART D | INSTRUMENTS, DATA, EQUIPEMENT | | | | | |
| SECTION 1 | Aeroplanes | | | | | |
| Refer to separate CAT.IDE application forms. | | | | | | |

Notes:

- (1) In the Operations Manual Reference Column, include all references that show full compliance with the applicable regulation or AMC.
- (2) Use the following annotations:
 - S = Satisfactory;
 - NS = Not Satisfactory;
 - NA = Not Applicable

→ INTENTIONALLY LEFT BLANK →

Annex D. Part-SPA Compliance Checklist

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|--|---|
|  <small>Premium Aviation and Handling Services</small> | COMPLIANCE CHECKLIST Ref: Commission Regulation (EU) 965/2012 Annex V SPECIFIC APPROVALS [PART-SPA] |
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SECTION I: Compliance Checklist

| Audit N°: | | | | | | |
|----------------------|---|---------|---------------|------|---------------------|----------|
| PART-SPA Reference | Subject | OM Ref. | Documentation | Date | Remarks S / NS / NA | NC Level |
| SUBPART A | GENERAL REQUIREMENTS | | | | | |
| SPA.GEN.100 | Competent authority | | | | | |
| SPA.GEN.105 | Application for a specific approval | | | | | |
| AMC1 SPA.GEN.105 (a) | Application for a specific approval | | | | | |
| SPA.GEN.110 | Privileges of an operator holding a specific approval | | | | | |
| SPA.GEN.115 | Changes to a specific approval | | | | | |
| SPA.GEN.120 | Continued validity of a specific approval | | | | | |

| Audit N°: | | | | | | |
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| PART-SPA Reference | Subject | OM Ref. | Documentation | Date | Remarks S / NS / NA | NC Level |
| SUBPART B | PERFORMANCE-BASED NAVIGATION (PBN) OPERATIONS | | | | | |
| SPA.PBN.100 | PBN operations | | | | | |
| SPA.PBN.105 | PBN operational approval | | | | | |
| AMC1 SPA.PBN.105 (b) | PBN operational approval | | | | | |
| AMC1 SPA.PBN.105 (c) | PBN operational approval | | | | | |
| AMC1 SPA.PBN.105 (d) | PBN operational approval | | | | | |
| AMC2 SPA.PBN.105 (d) | PBN operational approval | | | | | |
| AMC3 SPA.PBN.105 (d) | PBN operational approval | | | | | |
| AMC1 SPA.PBN.105 (e) | PBN operational approval | | | | | |
| AMC1 SPA.PBN.105 (f) | PBN operational approval | | | | | |

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| PART-SPA Reference | Subject | OM Ref. | Documentation | Date | Remarks S / NS / NA | NC Level |
| SUBPART C | OPERATIONS WITH SPECIFIED MINIMUM NAVIGATION PERFORMANCE (MNPS) | | | | | |
| SPA.MNPS.100 | MNPS operations | | | | | |
| SPA.MNPS.105 | MNPS operational approval | | | | | |
| AMC1 SPA.MNPS.105 | MNPS operational approval | | | | | |

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| PART-SPA Reference | Subject | OM Ref. | Documentation | Date | Remarks S / NS / NA | NC Level |
| SUBPART D | OPERATIONS IN AIRSPACE WITH REDUCED VERTICAL SEPERATION MINIMA (RVSM) | | | | | |
| SPA.RVSM.100 | RVSM operations | | | | | |
| SPA.RVSM.105 | RVSM operational approval | | | | | |
| AMC1 SPA.RVSM.105 | RVSM operational approval | | | | | |
| AMC2 SPA.RVSM.105 | RVSM operational approval | | | | | |
| AMC3 SPA.RVSM.105 | RVSM operational approval | | | | | |
| SPA.RVSM.110 | RVSM equipment requirements | | | | | |
| AMC1 SPA.RVSM.110(a) | RVSM equipment requirements | | | | | |
| SPA.RVSM.115 | RVSM height-keeping errors | | | | | |

| Audit N°: | | | | | | |
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| PART-SPA Reference | Subject | OM Ref. | Documentation | Date | Remarks S / NS / NA | NC Level |
| SUBPART E | LOW- VISIBILITY OPERATIONS (LVOS) AND OPERATIONS WITH OPERATIONAL CREDITS | | | | | |
| SPA.LVO.100 | Low-visibility operations and operations with operational credits | | | | | |
| AMC1 SPA.LVO.100(a) | Low visibility operations | | | | | |
| AMC1 SPA.LVO.100(b) | Low-visibility operations and operations with operational credits | | | | | |
| AMC2 SPA.LVO.100(b) | Low-visibility operations and operations with operational credits | | | | | |
| AMC3 SPA.LVO.100(b) | Low-visibility operations and operations with operational credits | | | | | |
| AMC1 SPA.LVO.100(c) | Low-visibility operations and operations with operational credits | | | | | |
| AMC2 SPA.LVO.100(c) | Low-visibility operations and operations with operational credits | | | | | |
| AMC3 SPA.LVO.100(c) | Low-visibility operations and operations with operational credits | | | | | |
| SPA.LVO.105 | Specific approval criteria | | | | | |
| AMC1 SPA.LVO.105 (a) | Specific approval criteria | | | | | |
| AMC1 SPA.LVO.105 (c) | Specific approval criteria | | | | | |
| AMC2 SPA.LVO.105(c) | Specific approval criteria | | | | | |
| AMC3 SPA.LVO.105(c) | Specific approval criteria | | | | | |
| AMC4 SPA.LVO.105(c) | Specific approval criteria | | | | | |
| AMC5 SPA.LVO.105(c) | Specific approval criteria | | | | | |
| AMC6 SPA.LVO.105(c) | Specific approval criteria | | | | | |
| AMC67 SPA.LVO.105(c) | Specific approval criteria | | | | | |
| AMC1 SPA.LVO.105(g) | Specific approval criteria | | | | | |
| AMC2 SPA.LVO.105(g) | Specific approval criteria | | | | | |

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| SPA.LVO.110 | Aerodrome-related requirements, including instrument flight procedures | | | | | |
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| PART-SPA Reference | Subject | OM Ref. | Documentation | Date | Remarks S / NS / NA | NC Level |
| SUBPART E | LOW-VISIBILITY OPERATIONS (LVOS) AND OPERATIONS WITH OPERATIONAL CREDITS | | | | | |
| AMC1 SPA.LVO.110 | Aerodrome-related requirements, including instrument flight procedures | | | | | |
| AMC2 SPA.LVO.110 | Aerodrome-related requirements, including instrument flight procedures | | | | | |
| AMC3 SPA.LVO.110 | Aerodrome-related requirements, including instrument flight procedures | | | | | |
| AMC4 SPA.LVO.110 | Aerodrome-related requirements, including instrument flight procedures | | | | | |
| SPA.LVO.120 | Flight crew competence | | | | | |
| AMC1 SPA.LVO.120(a) | Flight crew competence | | | | | |
| AMC2 SPA.LVO.120(a) | Flight crew competence | | | | | |
| AMC3 SPA.LVO.120(a) | Flight crew competence | | | | | |
| AMC1 SPA.LVO.120(b) | Flight crew competence | | | | | |
| AMC2 SPA.LVO.120(b) | Flight crew competence | | | | | |
| AMC3 SPA.LVO.120(b) | Flight crew competence | | | | | |
| AMC4 SPA.LVO.120(b) | Flight crew competence | | | | | |
| AMC5 SPA.LVO.120(b) | Flight crew competence | | | | | |
| AMC6 SPA.LVO.120(b) | Flight crew competence | | | | | |
| AMC7 SPA.LVO.120(b) | Flight crew competence | | | | | |
| SPA.LVO.125 | Operating procedures | | | | | |
| SPA.LVO.130 | Minimum equipment | | | | | |
| SPA.ETOPS.115 | ETOPS en-route alternate aerodrome planning minima | | | | | |

| Audit N°: | | | | | | |
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| PART-SPA Reference | Subject | OM Ref. | Documentation | Date | Remarks S / NS / NA | NC Level |
| SUBPART F | EXTENDED RANGE OPERATIONS WITH TWO-ENGINED AEROPLANES (ETOPS) | | | | | |
| SPA.ETOPS.100 | ETOPS | | | | | |
| SPA.ETOPS.105 | ETOPS operational approval | | | | | |
| SPA.ETOPS.110 | ETOPS en-route alternate aerodrome | | | | | |
| SPA.ETOPS.115 | ETOPS en-route alternate aerodrome planning minima | | | | | |

| Audit N°: | | | | | | |
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| PART-SPA Reference | Subject | OM Ref. | Documentation | Date | Remarks S / NS / NA | NC Level |
| SUBPART G | Transport of dangerous goods | | | | | |
| SPA.DG.100 | Transport of dangerous goods | | | | | |
| SPA.DG.105 | Approval to transport dangerous goods | | | | | |
| AMC1 SPA.DG.105(a) | Approval to transport dangerous goods | | | | | |
| AMC1 SPA.DG.105(b) | Approval to transport dangerous goods | | | | | |
| SPA.DG.110 | Dangerous goods information and documentation | | | | | |
| AMC1 SPA.DG.110(a) | Dangerous goods information and documentation | | | | | |
| AMC1 SPA.DG.110(b) | Dangerous goods information and documentation | | | | | |

Notes:

- (1) In the Operations Manual Reference Column, include all references that show full compliance with the applicable regulation or AMC.
- (2) Use the following annotations:
 - S = Satisfactory;
 - NS = Not Satisfactory;
 - NA = Not Applicable
 - NC = Não Conformidade

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