

What Are the Essential Differences Between GCAA CAR OPS 1 & EU OPS Reg 965

The short answer is between GCAA CAR OPS 1 & EU OPS Reg 965 the differences are significant whilst between GCAA CAR OPS 1 and EU-OPS 1 the differences are somewhat less!

Let's start by considering GCAA CAR OPS & EU-OPS 1. At inception EU OPS was based upon JAROPS 1 up to and including Rev 13 plus some differences in respect of cabin crew training, all weather operations, & flight time limitations.

Considering the difference between GCAA CAR OPS 1 and EASA EU OPS we can use the following as an example. (OPS 1.035 & 1.037)

EASA OPS 1.035 Quality system

(a) An operator shall establish one quality system and designate one quality manager to monitor compliance with, and adequacy of, procedures required to ensure safe operational practices and airworthy aeroplanes. Compliance monitoring must include a feed-back system to the accountable manager (see also OPS 1.175 (h)) to ensure corrective action as necessary.

(b) The quality system must include a quality assurance programme that contains procedures designed to verify that all operations are being conducted in accordance with all applicable requirements, standards and procedures.

(c) The quality system and the quality manager must be acceptable to the Authority.

(d) The quality system must be described in relevant documentation.

(e) Notwithstanding subparagraph (a) above, the Authority may accept the nomination of two quality managers, one for operations and one for maintenance provided that the operator has designated one Quality Management Unit to ensure that the quality system is applied uniformly throughout the entire operation.

If we now compare with UAE GCAA we see the following

CAR-OPS 1.035 Quality system

(a) An operator shall establish one Quality System and designate one Quality Manager to monitor compliance with, and the adequacy of, procedures required to ensure safe operational practices and airworthy aeroplanes. Compliance monitoring must include a feed-back system to the Accountable Manager (See also CAR-OPS 1.175(h)) to ensure corrective action as necessary.

(b) The Quality System must include a Quality Assurance Programme that contains procedures designed to verify that all operations are being conducted in accordance with all applicable requirements, standards and procedures.

(c) The Quality System and the Quality Manager must be acceptable to the Authority.

(d) The quality system must be described in relevant documentation.

(e) Notwithstanding sub-paragraph (a) above, the Authority may accept the nomination of two Quality Managers, one for operations and one for maintenance, provided that the operator has designated one Quality Management Unit to ensure that the Quality System is applied uniformly throughout the entire operation.

OPS 1.037 Accident prevention and flight safety programme

(a) An operator shall establish and maintain an accident prevention and flight safety programme, which may be integrated with the quality system, including:

1. programmes to achieve and maintain risk awareness by all persons involved in operations; and
2. an occurrence reporting scheme to enable the collation and assessment of relevant incident and accident reports in order to identify adverse trends or to address deficiencies in the interests of flight safety. The scheme shall protect the identity of the reporter and include the possibility that reports may be submitted anonymously; and
3. evaluation of relevant information relating to accidents and incidents and the promulgation of related information, but not the attribution of blame; and
4. a flight data monitoring programme for those aeroplanes in excess of 27 000 kg MCTOM. Flight data monitoring (FDM) is the pro-active use of digital flight data from routine operations to improve aviation safety. The flight data monitoring programme shall be non-punitive and contain adequate safeguards to protect the source(s) of the data;
And
5. the appointment of a person accountable for managing the programme.

If we now compare with UAE GCAA we see the following

CAR-OPS 1.037 Safety Management System

(a) An operator shall establish and implement a safety management system as specified by CAR PART X acceptable to the Authority.

(b) A safety management system shall clearly define lines of safety accountability throughout the operator's organisation, including a direct accountability for safety on the part of senior management.

(c) An operator that operates aeroplanes of a maximum certificated take-off mass in excess of 27000 kg shall establish and maintain a flight data analysis programme as part of its Safety Management System. (See AC 1.037(c)).

(d) A flight data analysis programme shall be non-punitive and contain adequate safeguards to protect the source(s) of the data. (See AC 1.037(d))

(e) An operator shall establish a flight safety documents system, for the use and guidance of operational personnel, as part of its safety management system.

(f) Safety management system shall include an occurrence reporting scheme to enable the collation and assessment of relevant incident and accident reports in order to identify adverse trends or to address deficiencies in the interests of flight safety. Post Holder SMS shall ensure that the scheme shall protect the identity of the reporter and include the possibility that reports may be submitted anonymously (See AC OPS 1.037 (f)).

(g) evaluation of relevant information relating to accidents and incidents and the promulgation of related information, but not the attribution of blame;

(h) The Operator shall manage fatigue risks within the constraints of their approved Flight and Duty Time Schemes. If supplemental mitigations are required for Fatigue hazards identified as part of their SMS, operators shall introduce documented company rules to supplement the Flight and Duty Time scheme rules to demonstrably control their fatigue related risks.

(i) The SMS Post Holder shall implement and maintain an updated “safety risk register” accessible to Authority, including fatigue hazards ref to AC OPS 1.037(h)

Considerations

Whilst the codification is similar between EASA EU OPS and GCAA the wording, which is identical in the case of 1.035 has been modified and developed to suit the specific needs of the UAE in the case of 1.037 (As a sovereign state of course this is totally the prerogative of the GCAA)

Consider the OPS Regulatory Development within the EASA system

Since a 2 year transition from 2012 to 2014 EU OPS is no longer applicable the relevant approval is related to compliance with EASA Regulation 965/2012

Significant Differences with EASA Regulation 965/2012

The old concept of Quality Manager has been replaced with the term “Compliance Manager” (Why do you think this is?)

Whilst the need for an all areas each year approach has been retained by the GCAA – EASA is related the need to audit assessed against the “effectiveness of compliance” for a given area – so audit periodicity may in fact be relaxed at the discretion of the Compliance Manager (supported by data of course)

The most significant change in 965 is the development of the so called “Management System” Within the concept the Nominated Persons are considered a team under the authority of the AM both the CM & SM are considered as Service Providers and are actually outside of the core “Management Team”

EASA operates through a number of qualified entities which are essentially the regulatory authority of each member state. EASA produces regulations in “A” (For Industry) and “B” (For the Competent Authority).

The GCAA is equivalent to EASA not to a competent authority (means GCAA is not obliged to comply directly with any EASA requirements – only where it so chooses to do)