

**Please identify the specific areas where you would like to receive detailed review or state general as applicable**

**Kindly Note – all comments are the opinion of Sofema Aviation Service only and carry no authority please refer to your CA for specific answers**

- What are the differences between observation and Finding Levels

Any observation from the inspector not classified as safety relevant will be treated as “Category 1” and duly recorded

Three categories of findings have been defined.

“Category 1” finding is called a minor finding; “Category 2” is a significant finding and “Category 3” a major finding.

The terms “minor”, “significant” and “major” relate to the level of influence on safety.

The prime purpose of categorising the findings is to classify the compliance with a standard and the severity of non-compliance with this standard.

- How to close observation/finding in the most effective way

In order to close the finding, the reply of the operator does not necessarily need to contain evidence that the deficiency has been corrected.

The “corrective action taken” by the operator might also be included in the implementation of a corrective action plan. It is up to the inspecting NAA to decide, based on the related risk and impact, whether or not a finding may be closed based on future corrective actions taking into account the severity and recurrence of the detected findings.

Depending on the severity and recurrence of the findings detected, the Inspecting NAA may consider the actual closure of the associated report(s) only after having received satisfactory documented evidence of appropriate implementation of preventive actions.

**Regarding the operator’s competent authority, no reply is expected. Only where appropriate or when the follow-up process has revealed operations outside limitations, the operator’s competent authority should be asked for “confirmation that they are satisfied with the corrective actions taken” by the operator. In this case, the competent authority who performed the inspection**

	<b>should monitor if such a reply is received and if the content is satisfactory.</b>
- How to communicate it properly if one disagrees with the SAFA inspection result report	<p>Note the following – without evidence there should be no finding</p> <p>All findings should be substantiated by evidence; these should be uploaded into the ramp inspection tool under the tab of the respective finding. Elements of supporting evidence could be any of the following:</p> <ul style="list-style-type: none"> <li>picture(s) of the deficiency itself (detailed and clear);</li> <li>pictures of the manufacturer references used to assess the technical defects, if available to the inspector;</li> <li>documents received via email;</li> <li>pictures or copy of the technical logbook entries performed;</li> <li>or</li> <li>pictures from operator's manuals (MEL, OMs., licences, AOCs, etc.).</li> </ul> <p>Such documents or records could be very useful in the follow-up phases of the ramp inspection either to explain in detail and illustrate detected findings or to be able to exchange appropriate documented evidence when findings are challenged.</p>
What exactly I need to check during SAFA inspection (go through checklist)?	<p>The operator is not required to check anything – however note that the key to successful preparation for SAFA /SACA audits is to thoroughly ensure all elements are in compliance.</p> <p>Note this is not just a task for the flight crew rather it is an organizational approach to being prepared</p>
Commanders' competences, duties and responsibilities.	<p>Inspect for:</p> <ul style="list-style-type: none"> <li>• The presence and validity of crew licences and appropriate ratings.</li> <li>• The form and content (including English translation) is in compliance with Part-ARA or with ICAO Annex 1 requirements, as applicable (e.g. the means to easily determine the licence's privileges and validity of ratings).</li> <li>• The endorsement of language proficiency (LP) in the licence. <ul style="list-style-type: none"> <li>o The explicit mentioning of the LP level in the licence is mandatory and such a case should be considered as finding.</li> </ul> </li> </ul>

	<p>o If during a ramp inspection a pilot is found to be properly endorsed with the required ELP, but has obvious difficulties in communicating in English, this should be reported as a finding. Such finding should be raised only by inspectors possessing an adequate English knowledge (e.g. native speakers, holders of a valid language proficiency certificate).</p> <p>o Notwithstanding the note above, whenever a licence holder is found not having his/her licence endorsed with the required ELP, but the inspector is satisfied that such flight crew member can obviously communicate effectively in English (e.g. in case of an English native speaker), the absence of the endorsement shall be reported as a CAT 1 finding.</p>
Company rights in findings discussions post factum.	<p>Class 1 action (to operators)</p> <p>A class 1 action is to be taken after each inspection and consists of providing information about the results of the ramp inspection, regardless of whether findings have been identified or not. The Proof of Inspection should always be provided to the pilot in command or to the representative of the operator after the completion of the inspection.</p> <p>Class 2 action</p> <p>In case category 2 and/or category 3 findings are raised, communication to the operator and to the operator's competent authority is necessary. All communication should, as a rule of thumb, be done via the ramp inspection tool.</p> <p>A category 2 finding always needs further follow-up, since it contains a request for corrective actions taken or planned.</p> <p>The Inspecting State should monitor if a reply was received and if sufficient feedback/evidence to close the finding(s) was given, or if there is a need to request further information.</p>

FAQ from other operators. Most frequent findings and prevention policies.	<p>Operators tend not to share their findings</p> <p>See SAFA Data base FAQ</p> <p>Note all points are typically covered within the EASA Provided documents</p>
What aspects shall be taken into consideration to prepare cabin crew for a zero finding SAFA inspection from safety training perspective?	<p>Refer to the following section b page 94 to 123 which covers the Cabin Environment ( General comment that it is a whole aircraft inspection of which the cabin crew perform 1 part – consider using the operators own Quality Assurance Department to perform routine inspections for compliance -</p> <p><a href="https://www.easa.europa.eu/en/downloads/136652/en">https://www.easa.europa.eu/en/downloads/136652/en</a></p> <p><b>INSPECTION INSTRUCTIONS AND PRE-DESCRIBED FINDINGS</b></p>
Checking the technical state of the aircraft and the emergency and safety equipment.	<p>Refer to the following section c page 124 to 142 which covers the Technical Environment ( General comment that it is a whole aircraft consider using the operators own Quality Assurance Department to perform routine inspections for compliance -</p> <p><a href="https://www.easa.europa.eu/en/downloads/136652/en">https://www.easa.europa.eu/en/downloads/136652/en</a></p> <p><b>INSPECTION INSTRUCTIONS AND PRE-DESCRIBED FINDINGS</b></p>
I would like to have more detailed insight regarding the possibility to appeal SAFA findings. I wish to find out what is the correct procedure to contest findings.	<p>See above - Company rights in findings discussions post factum.</p> <p>Note that each operator has access to its own findings via the DATA base tool see also the following</p> <p><a href="https://www.austrocontrol.at/jart/prj3/austro_control/data/uploads/ACE/EASA%20Info%20SAFA.pdf">https://www.austrocontrol.at/jart/prj3/austro_control/data/uploads/ACE/EASA%20Info%20SAFA.pdf</a></p>
Does the operating crew have the right to decline the SAFA inspector's access request: e.g., after/preflight procedures are in the process; effect on OTP, etc.	<p>Not recommended – If you are short on time share this with the inspector – he is advised to respect this and to Perform a partial fast track inspection</p> <p>Inspectors are entitled to perform a SAFA inspection and search the aircraft according to Article 16 of the Convention on International Civil Aviation (search of aircraft): "... the appropriate authorities of each of the contracting States shall have the right... to search aircraft of other contracting States..."</p>

	<p>c) Should an operator refuse to permit the performance of a SAFA inspection without a valid reason, the competent authority should consider the detention of the aircraft (provided that the national legislative framework allows for this).</p>
How often SAFA inspection is required and who is responsible to perform it?	<p>A SAFA inspection is performed by Regulatory Authority Nominated Persons</p> <p>The Regulatory Authority will determine which aircraft to audit based on a number of factors including previous findings on company aircraft</p> <p>It is the prerogative of the Regulatory Authority to Perform an inspection of any aircraft either third country (SAFA) or EU (SACA)</p>
Is there SAFA quick reference manual, something simplified for crews?	<p>There is no QRH the following documents explain in details how the process functions</p> <p>Please visit the following website  <a href="https://www.easa.europa.eu/en/domains/air-operations/ramp-inspection-programmes-safa-saca">https://www.easa.europa.eu/en/domains/air-operations/ramp-inspection-programmes-safa-saca</a></p> <p>Here is the Ramp Inspection Manual – 131 pages  <a href="https://www.easa.europa.eu/en/downloads/119314/en">https://www.easa.europa.eu/en/downloads/119314/en</a></p> <p>Here is INSPECTION INSTRUCTIONS AND PRE-DESCRIBED FINDINGS - 304 pages  <a href="https://www.easa.europa.eu/en/downloads/136652/en">https://www.easa.europa.eu/en/downloads/136652/en</a></p>
How often are SAFA findings being contested?	<p>Information not available as neither EASA or operators share this information – clearly based on the development of 100,s of pages of criteria there has been a considerable amount of contentious engagement over the years</p> <p>A great deal of emphasis is now placed on the competence of inspectors</p>
Minimum number of Team member(a) performing a SAFA Inspection. One inspector is acceptable regulatory wise?	<p>The SAFA Ramp Inspection should preferably be performed by at least 2 inspectors.</p> <p>However this is not mandated means it does not preclude a single inspector – but not he should not delay the proceedings as previously mentioned</p>

<p>Unclear SAFA ratio policies. How does this ratio affect company image and business? Can we get more clarity on calculations? Are open items included in ratio?</p>	<p>At the end of the day it is the decision of the Regulatory Authority how many times they inspect a companies aircraft – there is detailed guidance material – but this is guidance if the CA believe they have grounds – it is enough</p> <p>At the end of the day the best practice is to grit your teeth and be as compliant as possible – hopefully if you have encouraged you QA to support the SAFA preparation – the findings will be low and the oversight will diminish</p>
<p>Copy of FCL and MED are accepted during SAFA or Pilots need to hold originals?</p>	<p>Although ICAO does not specifically allow carrying other than the original of the document, inspectors could accept a certified copy provided that it is certified by the issuing authority.</p> <p>Electronic copies could also be accepted as long as their reliability is assured. Such assurance could e.g. be done by means of an authority letter allowing the electronic carriage of document copies and/or by means of the digital (electronic) signature of such copies.</p>