How Should ERP Documentation Be Structured and Maintained to Ensure Audit Readiness and Regulatory Compliance for an EASA-Compliant Operator?

Introduction - This document considers typical structure of an EASA Compliant ERP – however to note that each operator should configure

For an aviation operator regulated under EASA rules, the Emergency Response Plan (ERP) must be a controlled, structured, and systematically maintained document that aligns with EASA's regulatory framework, industry best practices, and ICAO standards.

The ERP is a core component of the operator's Management System, as required under EASA Part-ORO.GEN.200(a)(3) and aligned with ICAO Annex 19 – Safety Management.

ICAO Annex 19 - 1.4 Coordination of emergency response planning

The service provider required to establish and maintain an emergency response plan for accidents and incidents in aircraft

operations and other aviation emergencies shall ensure that the emergency response plan is properly coordinated with the

emergency response plans of those organizations it must interface with during the provision of its products and services.

SECTION 2 – MANAGEMENT - ORO.GEN.200 Management system - *Regulation (EU) No 965/2012*

(a) The operator shall establish, implement and maintain a management system that includes:

(1) clearly defined lines of responsibility and accountability throughout the operator, including a direct safety accountability of the accountable manager;

(2) a description of the overall philosophies and principles of the operator with regard to safety, referred to as the safety policy;

(3) the identification of aviation safety hazards entailed by the activities of the operator, their evaluation and the management of associated risks, including taking actions to mitigate the risk and verify their effectiveness;

Here's how ERP documentation should be structured and maintained to ensure audit readiness and regulatory compliance:

ERP Structure: A Clear, Logical, and Accessible Framework

An EASA-compliant ERP must be designed as a living document, structured to reflect regulatory expectations and operational realities. The recommended structure includes:

a) Core Sections of the ERP:

- Policy and Scope Statement: Endorsed by the Accountable Manager, clearly stating the ERP's purpose, scope (covering all operational activities), and commitment to compliance with EASA regulations and ICAO SARPs.
- Definitions and Abbreviations: Consistent with ICAO Annex 13, EASA definitions (e.g., "accident," "serious incident"), and operator-specific terminology.
- Management System Integration: Demonstrate how the ERP fits within the operator's Safety Management System (SMS) as required by ORO.GEN.200 and AMC1 ORO.GEN.200(a)(3), showing links to hazard identification, risk assessment, and safety assurance processes.

AMC1 ORO.GEN.200(a)(3) Management system *ED Decision 2014/017/R*
COMPLEX OPERATORS — SAFETY RISK MANAGEMENT - (g) The emergency response plan (ERP)

(1) An ERP should be established that provides the actions to be taken by the operator or specified individuals in an emergency. The ERP should reflect the size, nature and complexity of the activities performed by the operator.

(2) The ERP should ensure:

(i) an orderly and safe transition from normal to emergency operations;
(ii) safe continuation of operations or return to normal operations as soon as practicable; and
(iii) coordination with the emergency response plans of other organisations, where appropriate

Roles and Responsibilities: Clearly define and document roles, including the Accountable Manager, Emergency Response Manager (ERM), Go Team, and departmental leads (e.g., Flight Ops, Engineering, HR, Crisis Communications), ensuring alignment with ORO.GEN.110 (accountability) and AMC1 ORO.GEN.110.

Activation and Notification Procedures: Establish clear criteria for ERP activation, notification flows, and escalation processes, ensuring compliance with national and international reporting obligations under Regulation (EU) 376/2014 on Occurrence Reporting.

Response Checklists: Include role-specific, detailed, and actionable checklists for each department (Flight Ops, OCC, HR, Security, Engineering, etc.), ensuring practical usability during an emergency.

Family and Passenger Support Procedures: Align with ICAO Doc 9998 – Policy on Assistance to Aircraft Accident Victims and their Families and EASA best practices, detailing processes for Next of Kin (NOK) notifications, Family Assistance Center setup, and care protocols.

Crisis Communications Framework: Define media handling protocols, approval chains, and prepared templates for press releases, consistent with the operator's management system and corporate communications policy.

- Post-Incident Recovery Procedures: Include incident debriefing processes, lessons learned documentation, and continuous improvement cycles, aligned with SMS requirements under ORO.GEN.200.
- Annexes and Appendices: Include emergency contact lists, sample forms, regulatory references, checklists, and maps.

b) Document Control and Version Management:

- Include a revision table tracking version numbers, issue/revision dates, summary of changes, and approvals (signed off by the ERM, Accountable Manager, and Safety Manager).
- Maintain a master copy and controlled distribution list, ensuring all ERP users have access to the current, approved version (per ORO.GEN.115 and document control best practices).

Maintenance and Control for Audit Readiness

To ensure readiness for internal and external audits (e.g., EASA Competent Authority oversight, SMS audits, and operator internal reviews), ERP documentation must be actively maintained and fully traceable. Best practices include:

a) Regular Review and Update Cycles:

- Conduct a formal annual review of the ERP, led by the Safety Manager and Emergency Response Manager, in line with the operator's SMS review cycle (ORO.GEN.200(a)(3)).
- Trigger unscheduled updates in response to:
    - Regulatory changes (e.g., EASA rulemaking amendments, ICAO Annex revisions).
    - Operational changes (e.g., new routes, aircraft types, or services).
    - Findings from drills, exercises, real incidents, or safety investigations.

c) Controlled Distribution and Accessibility:

- Ensure hard copies are available at critical locations (e.g., Emergency Response Center, Operations Control Center, Go Team packs).
- Maintain digital access on a secure platform, with version control, access permissions, and backup protocols.
- Regularly validate contact details (e.g., Emergency Response Team, regulatory authorities, airports, service providers) to ensure accuracy during audits and emergencies.

d) Documented Evidence of Compliance:

- Maintain comprehensive records of:

- ERP revisions, with change justifications, approvals, and effective dates.
- ERT training: attendance lists, training materials, and competency validation.
- Drills and exercises: scenarios, outcomes, improvement actions, and follow-up.
- Incident logs and post-incident reviews: timelines, decisions, communications, and lessons learned.
- Correspondence with authorities: notifications to EASA, the State of Occurrence, and other relevant agencies, as required by Regulation (EU) 996/2010 and Regulation (EU) 376/2014.

Alignment with EASA and ICAO Regulatory Requirements

To achieve regulatory compliance, the ERP must:

- Demonstrate integration within the Safety Management System (SMS) per ORO.GEN.200 and AMC/GM guidance.
- Address Occurrence Reporting obligations under Regulation (EU) 376/2014 and the operator's internal reporting system (linked to the ERP).
- Align with ICAO Annex 19 (Safety Management), Annex 13 (Accident Investigation), and ICAO Doc 9998 (Family Assistance).
- Comply with EASA Air OPS requirements for operational readiness, risk mitigation, and management of emergency situations.
- Include references to applicable regulations and guidance (e.g., ORO.GEN.110, ORO.GEN.115, Regulation (EU) 965/2012), with cross-links in the document for audit traceability.

Usability During Emergencies - An ERP must not only comply on paper but must be practically usable:

- Include quick-reference guides and role-specific checklists accessible in high-pressure situations.
- Ensure information is clear, concise, and accessible, avoiding legalistic language that may confuse responders.
- Provide contact lists in multiple formats (printed, laminated, digital) and validate them quarterly.
- Regularly train staff on ERP use, ensuring familiarity with activation protocols and the location of ERP resources.

Continuous Improvement Culture

- Incorporate post-incident debriefs and feedback into ERP updates, demonstrating an active learning process within the SMS framework.

- Empower staff to raise suggestions for ERP enhancements, fostering a proactive safety culture.
- Use insights from exercises and audits to drive measurable improvements in ERP structure, processes, and readiness.

Summary: Ensuring ERP Compliance and Audit Readiness - For an EASA-compliant operator, ERP documentation must:

- Be structured logically, with clear sections, roles, and responsibilities.
- Be maintained as a controlled document, with version tracking and distribution control.
- Align explicitly with EASA regulations, ICAO standards, and national requirements.
- Be supported by training records, drill outcomes, and incident logs.
- Be practically usable and accessible during real-world emergencies.
- Demonstrate continuous improvement and integration into the operator's Safety Management System.

By embedding these principles, operators ensure their ERP is not only regulator-approved but also fit for purpose in safeguarding passengers, crew, staff, and corporate integrity during emergencies.