

## **Addressing Nominated Post Holder Competence within EASA Domains**

### **A Strategic Review Across Operations, Aircrew, and Continuing Airworthiness**

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**Introduction** - As the CEO of Sofema Aviation Services, I have observed at firsthand how aviation organizations respond when deficiencies are highlighted by a competent authority. Frequently, such issues are treated as isolated occurrences. However, these findings are symptomatic indicators of deeper systemic problems. Typically, such incidents occur "on the watch" of a nominated Post Holder responsible for quality control, compliance processes, and procedures, and should, in theory, additionally have been proactively addressed by the organization's Compliance Monitoring Manager

### **Sofema Online's Position and Training Philosophy**

Sofema Online (SOL) offers intensive theoretical training addressing a wide range of regulatory domains. While our programs are comprehensive in content and aligned with EASA requirements, we emphasize the following:

- **Training is Foundational:** Regulatory courses represent an essential knowledge base. They are not a substitute for practical experience or full competence.
- **Competence Requires Depth:** Subject mastery demands operational immersion, continuous learning, peer interaction, and mentoring.
- **Support for Harmonization:** We recognize the variance in oversight expectations across CA's and advocate for consistent standards to support competence development.
- **Training Versus Competence:** While intensive regulatory training—such as that provided by Sofema Online—can offer critical exposure, competence is achieved through accumulated knowledge, experience, and contextual understanding. Candidates often overestimate their readiness for nominated roles based solely on course completion.

### **A Call to Collaborate**

SOL welcomes dialogue with EASA and National Authorities to co-develop blended learning models combining theoretical instruction with practical workshops, simulation-

based learning, and validation tools. We believe this is vital to build a robust post holder ecosystem across the EU.

**ARTSA** - (Aviation Regulatory Training Standards Association) was established and funded by Sofema Aviation Services as a non-profit organization, with a mission rooted in elevating the standard and quality of aviation regulatory training across the globe.

**Disappointing Note** – EASA was contacted to provide a level of oversight and engagement with ARTSA to improve amongst other objectives the continuous development of all organisational stakeholders. EASA declined to provide support assistance or additional guidance.

### **Consequences of Post Holder Competence Shortfall**

- **Reduced Internal Control of Standards**

When nominated persons lack understanding of procedural requirements or audit expectations, non-conformities go undetected, and regulatory compliance becomes reactive, rather than proactive.

- **Ineffective Risk-Based Thinking**

Without foundational SMS knowledge, nominated post holders fail to distinguish between risk indicators and performance indicators, or to apply root cause thinking to audit findings and safety reports.

- **Lost Opportunities for Improvement**

A compliance system managed by underqualified leaders tends to become paper-based, backward-looking, and unable to drive continuous improvement or innovation in maintenance practices.

### **Nominated Post Holders**

The role of nominated post holders (NPs) within the European Union Aviation Safety Agency (EASA) regulatory system—spanning Air Operations (Regulation (EU) 965/2012), Aircrew (Regulation (EU) 1178/2011), Continuing Airworthiness including Maintenance & CAMO (Regulation (EU) 1321/2014)—is pivotal in safeguarding aviation safety. However, growing concerns from both regulators and industry practitioners suggest a significant disparity between regulatory expectations and the demonstrated competence of these individuals.

This white paper explores the systemic shortfalls, the absence of effective competence benchmarking, leadership and compliance disconnects, and the consequential regulatory fragmentation across EASA member states.

Our findings are based on a detailed analysis of referenced regulatory material, anecdotal evidence from oversight activities, and comparative insights from adjacent high-compliance industries.

### **The Core Problem: Lack of Regulatory Competence Benchmarking**

EASA regulations provide minimum eligibility criteria for nominated post holders. However, these often remain overly general and leave excessive discretion to individual organizations and national competent authorities (CA's). Key deficiencies include:

- **Undefined Competency Standards:** Although the regulations highlight required experience and knowledge, they do not establish performance-based, measurable competence criteria.
- **Absence of Objective Benchmarking:** There is no standardized framework to assess and compare post holder capabilities across different organizations or jurisdictions, allowing for subjective interpretation and inconsistent application.
- **Variable Implementation:** CA's vary significantly in how they interpret and apply EASA's competence-related requirements, further exacerbating inconsistencies across the aviation sector.

This systemic lack of clarity contributes to poorly prepared applicants who are unable to demonstrate a working knowledge of essential topics like compliance management, quality assurance, and safety system implementation.

A few days of online training whilst providing an integrated and often intensive exposure to the relevant role regulatory drivers and responsibilities does not replace the fundamental need for establishing competence.

**Reality Check** – Persons presenting themselves to the authority for Nominated Person Interviews clearly believe they are ready – however in reality there is often a competence gap. This gap can sometimes be significant. At Sofema we meet two types of individual – those who engage in multiple online courses taking time to assimilate a huge amount of critical information and those who seek the minimum engagement and a fast-track certificate of completion. (the second group often come unstuck)

## **Leadership Accountability and Systemic Disconnects**

When deficiencies are identified during oversight audits, they are often treated as isolated findings. However, these are typical symptoms of deeper organizational failings—primarily related to leadership effectiveness and the competence of the nominated post holders.

- **Compliance Monitoring Deficiencies:** The nominated person is accountable for ensuring effective systems and procedures. Findings that emerge under their oversight reflect directly on their performance and capacity.
- **Root Cause Failures:** Root cause analysis is frequently oversimplified, failing to identify organizational or systemic factors. There is a prevailing tendency to treat symptoms, not causes, due to weak analytical competence within leadership teams.
- **Conflated Roles:** Especially in small and medium-sized organizations, it is not uncommon for a single person to simultaneously act as Safety Manager, Compliance Manager, and Training Manager. While permitted, this approach often dilutes accountability and overextends the individual, undermining the effectiveness of safety oversight.

## **Cross-Domain Review: Continuing Airworthiness, Aircrew, and Operations**

**Continuing Airworthiness (Regulation 1321/2014)** - While Regulation 1321/2014 sets clear responsibilities for nominated persons, oversight by many National Competent Authorities (CA's) remains largely document-centric rather than performance-driven.

- CAMO oversight is often superficial, focusing on documentation rather than actual performance.
- Audits reveal gaps in post holders' understanding of maintenance control, subcontractor oversight, and safety reporting requirements.
- Audit trend: Many audits focus on whether documentation exists (e.g., CAME, job descriptions, compliance matrices) but fail to assess whether nominated persons fully understand and actively manage these responsibilities in day-to-day operations.

- Some authorities still treat approval interviews as administrative formalities, accepting role-based CVs and declarations of experience without probing practical competence or regulatory awareness.
- Despite the critical safety responsibility held by nominated persons in Part 145 organisations, approval processes often fail to validate the practical competence and regulatory fluency of these individuals.
- Under 145.A.30(b), nominated persons must be “acceptable to the competent authority,” and able to demonstrate they are “appropriately qualified.” However, across the EU, the approach to validating this requirement lacks structure and uniformity.
- In many cases, CVs and historic approvals are accepted at face value, without further probing of the nominee’s current knowledge of EASA regulations, maintenance management systems, or quality oversight responsibilities.
- Few CA’s apply scenario-based interviews, practical competence tests, or technical evaluations during the approval process.

In several Member States, nominated Continuing Airworthiness Managers were approved without ever being questioned on their practical understanding of Part M Subpart C, or the interface with Part-145 organisations—leading to regulatory findings during EASA standardisation inspections.

- Some CA require real-time scenario assessments and review actual safety and compliance data with the nominee during the approval process.

### **Post Holder Knowledge Deficiencies in Critical Areas**

Numerous audit reports and EASA standardisation findings reveal a disturbing pattern:

- Many nominated post holders lack working-level knowledge in areas fundamental to safe and compliant CAMO operation. These include:
- Deficient understanding of what constitutes effective control of scheduled and unscheduled maintenance activities.
- Nominated persons were unfamiliar with the interface between AMP escalation procedures, MEL deferral criteria, and operator responsibilities under Part-ML or M.A.302.

- A recurring weakness is the failure to ensure effective oversight of subcontracted activities, as mandated under AMC1 CAMO.A.125(c). This includes lack of:
  - Defined scopes of work.
  - Performance monitoring mechanisms.
  - Risk assessments and safety assurance procedures.

**Reported Example:** In 2021, EASA identified during standardisation inspections in two Member States that several CAMOs had approved subcontracts with maintenance data management providers without any performance KPIs or safety feedback loops. The nominated post holders had not reviewed these arrangements in over 12 months.

### **Safety Reporting and Risk Management**

- CA audits consistently show that nominated persons struggle to:
  - Distinguish between compliance monitoring and safety management.
  - Implement effective hazard identification processes.
  - Interpret or act on safety performance indicators (SPIs).

In one case, a Compliance Monitoring Manager in a Southern European state responded to a finding about missing internal occurrence trend analysis by stating, “We have not had enough safety events to analyse trends,” indicating a lack of both understanding and ownership.

### **SMS Integration and Safety Roles Remain Poorly Understood**

- Although Part 145 SMS requirements have been formally introduced via Regulation (EU) 2021/1963, many nominated persons are yet to fully integrate these principles into their oversight.
- Safety Managers are often appointed from within the quality team without receiving dedicated safety risk management training.
- Nominated post holders are frequently unable to describe how safety and compliance data are merged, or how internal hazard identification works in practice.

- Many organisations are still struggling to implement effective SPIs, safety promotion strategies, or feedback mechanisms, especially in small to medium-sized enterprises.
- During a review in 2023, an NCA reported that an organisation's SMS existed only as a PDF manual, with no evidence of occurrence investigation trend analysis or safety action group engagement. Nevertheless, the nominated Safety Manager was re-approved based on prior tenure.

### **Weak Understanding of Quality and Compliance Monitoring Functions**

- The Compliance Monitoring Manager (formerly "Quality Manager") role is central to ensuring the effectiveness of internal oversight in Part 145 organisations. However, many post holders lack clarity regarding:
- The independence requirement outlined in AMC1 145.A.200(a)(6): that audits must be performed by personnel independent of the audited activity.
- The difference between regulatory compliance auditing and product inspections.
- The requirements under 145.A.65(c) (regarding compliance monitoring and quality feedback into maintenance procedures and training systems).
- Audits frequently reveal that some Compliance Managers view the role as a paper-pushing function, focused on generating audit reports rather than managing a dynamic compliance system with measurable outcomes and continuous improvement.

**Reported Example** - In one recent standardisation visit, EASA identified a case where the Compliance Monitoring Manager delegated nearly all responsibilities to a junior inspector, and had not reviewed audit closure effectiveness or root cause analysis for over a year.

### **Fragmented and Inconsistent CA Approval Practices**

As with the aircrew domain, EASA's intent for harmonised standards is undermined by variation in the practices of different CA's. Some conduct robust interviews and practical validation, while others grant approval based solely on experience declarations and outdated training certificates.

- EASA's Standardisation Reports regularly highlight inconsistencies in how Member States assess nominees for CAMO roles.



- While the Basic Regulation (EU) 2018/1139 and Regulation 1321/2014 require that nominated persons be “qualified by training and experience,” there is no standardized EU-wide benchmark for this qualification.

### **Consequences of Weak Nominated Person Approval**

#### **Ineffective Safety Culture**

The lack of understanding in key areas like SMS, maintenance planning, and contractor oversight weakens the organisation’s ability to foster a reporting culture or respond to operational risks proactively.

#### **Reputational and Regulatory Exposure**

As EASA increasingly moves towards performance-based oversight (PBO), organisations with weak internal leadership may face intensified audits, findings, and potentially suspended approvals.

### **Aircrew (Regulation 1178/2011)**

- Inconsistent assessment methods for training organizations lead to discrepancies in how pilot competence is ensured.
- Some CA’s conduct robust, structured audits; others rely heavily on desk-based reviews.

#### **Inconsistent Assessment Methods Across CA’s**

One of the most pressing concerns is the lack of a standardized approach to assessing the competence of nominated persons (such as Head of Training, Chief Flight Instructor, and Safety Manager) within ATOs. While Annex VII (Part-ORA) of Regulation 1178/2011 provides some framework, the level of detail regarding how competence is demonstrated and assessed is not uniformly interpreted.

**Reported Example:** In some countries, CAs conduct in-depth in-person interviews, requiring the nominee to present detailed knowledge of Part-FCL, operational procedures, and SMS implementation strategies.

- In contrast, other authorities have been observed to accept documentary submissions only, without structured interviews or validation of regulatory knowledge.



This disparity leads to a "postcode lottery" effect, where the rigour of approval depends more on geography than on the candidate's actual competence.

## **Desk-Based vs. On-Site Assessments**

Another notable shortfall is the overreliance on desk-based assessments by some CAs. This often results in an inability to verify the real-world understanding and operational capability of nominated post holders.

- **Structured audits**—as conducted by more robust CA's—include visits to the ATO, observations of instructor briefings, reviews of the safety management system in operation, and interviews with nominated persons.
- **Desk-based reviews**, however, often rely solely on submitted CVs, licenses, and general descriptions of training programs, without interaction with the nominee or staff.

**Reported Example** EASA Standardisation Inspection Reports show recurring findings regarding inconsistent CA performance in overseeing ATOs and personnel approvals.

- EASA has issued Standardisation Findings to CA's for inadequate procedures when evaluating nominated persons.

## **Gaps in Benchmarking of Competence Standards**

- While the regulation requires that nominated persons are competent and experienced, Regulation 1178/2011 does not provide clear, measurable competence benchmarks. This leaves interpretation open and leads to:
  - Divergence in expectations: One NCA may expect a Head of Training to hold instructional and managerial experience, while another may accept a nominee with minimal operational leadership exposure.
  - Lack of harmonised tools: No uniform competence assessment template is mandated by EASA for CA's to follow when approving nominated persons.

## **Consequences of Inconsistencies**

- **Safety risk:** Poorly selected Heads of Training or Safety Managers may lack understanding of safety data analysis, risk assessment, and quality control, all of which impact the robustness of the ATO's output.

- **Regulatory risk:** An uneven playing field across the EU undermines mutual recognition and the principle of harmonisation that underpins EASA's current founding regulation—Basic Regulation (EU) 2018/1139.

### **Operations (Regulation 965/2012)**

- Weaknesses are seen in operational risk management, Safety Management Systems (SMS), and compliance monitoring.
- Regulatory interpretation of SMS implementation varies widely, with some CA's demanding detailed safety surveys and others content with basic documentation.

### **Inadequate Competence in Operational Risk Management, SMS, and Compliance Monitoring**

- Under Regulation 965/2012, particularly Annex III (Part-ORO), operators must appoint competent persons to key safety roles such as Accountable Manager, Safety Manager, Compliance Monitoring Manager, and various operational post holders (e.g. Flight Operations, Ground Operations, Crew Training).
- However, audits and standardisation reviews reveal that many nominated persons are approved without adequate evaluation of their knowledge, practical competence, or risk-based thinking skills.
- **Operational Risk Management Deficiencies:** There is a growing concern that many nominees fail to demonstrate a structured approach to risk identification, mitigation, and follow-up actions within their domain (ORO.GEN.200)
- **SMS Misunderstanding:** Some nominated Safety Managers confuse SMS documentation with actual SMS functionality. For example, operators may present safety manuals and hazard reporting forms during audits, but the post holder is unable to explain how risks are prioritized, investigated, or tracked to resolution.
- **Compliance Monitoring Gaps:** Nominated Compliance Managers frequently lack a proactive understanding of compliance oversight. Instead of using compliance data to drive improvement, many adopt a tick-box approach, focused on fulfilling documentation requirements rather than engaging with the operational realities.

**Reported Example:** EASA's standardisation inspection report on one Member State highlighted that a nominated Safety Manager could not explain the process for determining

Safety Performance Indicators (SPIs) or the difference between a reactive and proactive risk indicator—despite being approved in their role for over two years.

### **Inconsistent Regulatory Interpretation of SMS Implementation**

- The lack of harmonization across CA's regarding the expectations and enforcement of SMS implementation under ORO.GEN.200 is one of the most damaging shortfalls within the operational domain.
- Some CA's—require operators to demonstrate functional SMS processes, including:
  - Completed and analyzed safety surveys
  - Active safety action groups
  - Use of bowtie or risk matrix models
  - Evidence of risk assessments with prioritisation and mitigation
- By contrast, other authorities appear content with superficial documentation, such as:
  - A safety manual without demonstrated implementation
  - Hazard logs that are never updated
  - A compliance matrix showing theoretical alignment but no evidence of use

**Reported Example** In an EASA review of Member States' oversight practices, more than 30% of operators across several jurisdictions had SMS documentation that had not been revised in over 18 months, and safety meetings were either not held or not minuted. Nevertheless, their post holders had been recently re-approved without any competence re-evaluation.

### **Variation Among CA's Undermines Harmonisation**

- EASA's intent for a harmonised safety system across all EU aviation domains is compromised by the variable standards applied by CA's in approving Nominated Post Holders.
  - Robust authorities conduct periodic revalidation interviews and competency assessments.
  - Others rely solely on documentation, experience logs, or recycled approvals with minimal challenge or updating, even post-regulatory changes such as SMS implementation or revisions to AMC/GM.

This creates a **fragmented oversight landscape**, where approval standards are influenced more by local NCA resourcing than by safety-critical criteria.

### **Regulatory Fragmentation Across EU Member States**

Despite the harmonization intent of EASA, implementation remains fragmented. This is evident in the enforcement of:

- Regulation 1321/2014 (Part-B)
- Regulation 1178/2011 (ARA)
- Regulation 965/2012 (ARO)

Some CA's adopt a proactive, deeply engaged stance, while others remain reactive and superficial. This disparity undermines both the competitive environment and the uniform application of safety standards.

### **Consequences:**

- Operators in high-compliance jurisdictions bear greater compliance costs.
- Safety risks increase in jurisdictions with weak oversight.
- Confidence in European aviation harmonization is eroded.

### **Sofema Aviation Services - Strategic Reform Recommendations to Strengthen Nominated Post Holder Competence Across EASA Domains**

To safeguard the integrity of Europe's aviation safety system and respond to widening inconsistencies in the approval and oversight of nominated persons, we call for a bold and coordinated transformation across the regulatory landscape. The following strategic actions are essential to reinforce competence, ensure uniformity, and close the gap between expectation and practice.

### **Establish a Standardized Competency Framework Across EASA Domains**

EASA should mandate the development and implementation of core competency matrices for all nominated post holder roles—covering Operations, Aircrew, Continuing Airworthiness, and Maintenance. These matrices should clearly define domain-specific responsibilities, required technical knowledge, safety and compliance integration, and behavioural competencies.

### **Mandate Competency-Based Assessment and Structured Evaluation**

Competent Authorities (CAs) should implement harmonized approval protocols, including:

- Scenario-based interviews
- Regulatory case studies
- Role-specific knowledge validation
- Practical demonstrations of compliance and SMS application

This approach should become standard across all EU Member States to ensure equal treatment and measurable competence.

### **Implement Recurrent Competence Validation**

Post holders should undergo mandatory revalidation at intervals of no more than 2 to 3 years. Revalidation should be linked to:

- Significant regulatory changes
- Organisational performance metrics
- Audit outcomes and safety reporting performance

This will ensure that competence is sustained over time and evolves in line with system demands.

### **Mandate Training and Continuous Development**

A harmonised training standard for nominated persons should be introduced by EASA, with emphasis on:

- Safety Management Systems (SMS)
- Quality and compliance oversight
- Regulatory updates
- Organisational leadership and communication

Refresher training must be integrated into continuing development plans and tied to revalidation cycles.

### **Adopt Root Cause Analysis (RCA) Proficiency as a Core Competence**

Robust RCA methodologies must become mandatory knowledge for all nominated persons, with training delivered through certified programs. Competence should be demonstrated through scenario-based assessments.

### **Restrict Unjustified Multi-role Assignments**

EASA and NCAs should introduce clear guidance and thresholds for combining post holder roles, requiring written justifications and independent risk analysis to validate feasibility. This will reduce conflicts of interest and role dilution.

### **Increase Transparency Through Oversight Performance Disclosure**

Regulators should publish anonymized summaries of standardisation outcomes and best practices to drive improvement across the network. Public disclosure will encourage accountability and foster trust in the system.

### **A Call to Action for Regulatory Transformation**

The strength of the European aviation safety framework is not measured solely by its regulations, but by the people entrusted to implement and oversee them. Nominated post holders play a pivotal role in driving safety, quality, and performance within their organisations—yet current oversight models fail to ensure their consistent competence.

The evidence is clear: fragmented regulatory practices, inconsistent approval methodologies, and the absence of a unified competency standard are undermining both safety assurance and operational effectiveness.

To remedy this, EASA must take the lead in mandating a harmonised, performance-driven approach to the assessment, approval, and revalidation of nominated persons—supported by structured training, peer-reviewed oversight, and transparent performance reporting.

### **Final Word**

**Sofema Online** stands ready to support this transformation—offering comprehensive, content-rich programs that go far beyond surface-level training. But regulatory change must lead the way.

- Let us build a future where competence is not assumed but proven—where the role of the post holder is elevated to the standard aviation safety demands.

**We urge EASA and the Member State Competent Authorities to act decisively.**

**Europe's aviation safety deserves no less.**