



TRUE OR FALSE: OPERATIONS MANUALS INCREASE SAFETY



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MANY HOLDERS OF AN Air Operator Certificate (AOC) for airplanes are suffering from the summer heat, and it's not because of the hot meteorological conditions outside. No, operators are feeling the heat of racing against the clock in reviewing and amending their operations manual system to meet EU-OPS standards.

CONTROL
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Some directors and post holders argue that manuals do not increase safety. Instead, they feel manuals are both an ineffective method for increasing safety and counterproductive in that the time and effort required distracts from what is happening in day-

to-day practice. In fact, some believe generating manuals actually hinders post holders from performing their supervisory duties.

Does the widely held opinion that safety is not promoted by 'producing more paperwork' hold true?

Accountability and Responsibility

The concept of creating *accountability* and *responsibility* within an aviation operation provides some initial clues to better understanding why the regulator requires commercial operators to establish an operations manual system.

In the context of European Aviation Safety Legislation, the terms 'accountability' and 'responsibility' are often used synonymously. In the context of

EU-OPS 1.175 (g) to (i), an AOC holder must be able to demonstrate its organization and management are suitable, match the scale and scope of the operation and have defined procedures for the supervision of operations (which, by the way, includes airworthiness).

The Accountable Manager is both the provider of resources to operations and the 'Lord of Standards'. He or she is typically assisted by four subject matter specialists who act as directors for the various areas of operation (flight and ground operations, crew training, continuing airworthiness).

Should we want to differentiate between accountability and responsibility in this context, keeping also other parts of the former JAR-OPS 1 or EU-OPS in mind, then the term 'accountability' will have to be defined to allow a manager to justify his decisions to the next level of supervision and 'responsibility' to mean a manager is able to resource and supervise his department so as to achieve set goals. The Accountable Manager is accountable to representatives of society, most often the National Aviation Authorities.

Organization, Supervision and Management

The general rules for Air Operator Certification require an operator to suitably organize and manage – as well as supervise – its operations. Scopes and environments of operations will vary considerably, thus a great deal of organizational flexibility is required. Although all operations are based on the same legal requirements, there is no one-size-fits-all solution to describe the organizational and management setup of AOC operators.

It follows that attempts to comply with operation manual requirements by copy and pasting from an existing

manual may prove to be rather inefficient, and likely to fail (although they may serve as a crystallization point to start from). A good manual must ultimately reflect the law and industry best practices, along with serving as an operator's business model. This can be achieved only through close cooperation with senior management, starting with the Accountable Manager. Custom tailored and inter-compatible process descriptions are required.

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Aviation is becoming ever more complex. All involved must cope by simplifying and effectively managing the various business processes and their links, ensuring the boundaries between processes are seamless.

An operator needs to effectively control (or manage) its operation and maintenance activities. Regulators expect – as any other stakeholder would – that a company issues structured, well formulated and reader friendly instructions against which actual behavior and practices can be measured. It is in the very interest of operators if oversight activities by post holders' supervision – by the internal Quality System as well as by Authorities' surveillance – are done against clearly defined benchmarks and standards.

The benchmark is defined in the operations manuals. An incoherent system of internal memos and directives leaves room for personal interpretation, putting the operator at the mercy of the guesswork and gut feeling of an inspector or auditor when assessing the safety and suitability of procedures – let alone the uncertainty and confusion it creates for employees. Writing a manual, a plan or an exposition forces the manager to carefully consider and evaluate the processes and formulate them in a clear and concise manner.

Operations Manual and Continuing Airworthiness Management Exposition

Having learned from aviation (accident) history, regulators require commercial operators to establish a manual system. It comprises the 'Operations Manual' and the Continuing Airworthiness Management Exposition (CAME).

The Operations Manual is divided into four main parts (EU-OPS 1.1045), labeled with letters A through D. Part A covers all generic topics of interest, along with operations personnel, the operator's organizational structure, managerial responsibilities, personnel qualification requirements, Quality System, Accident Prevention and Flight Safety Program, standard operating procedures (SOPs) for all phases of flight, Dangerous Goods and Security.

Part B provides information and guidance on aircraft type-specific issues, including normal, abnormal and emergency procedures and loading, along with emergency and safety equipment. The often quite voluminous Part C is the Route Manual and contains information on aerodromes served and routes flown by the operator. It also contains a categorization of aerodromes. For 'difficult' aerodromes, training and currency requirements of flight crew need to be stepped-up.

Part D is the internal formation (training) manual, providing guidance on the training and the performance assessment of each function needed to gain or maintain the status of being fully qualified for line operations.

Furthermore, the Operations Manual comprehensively describes the 'soft' aspects of an Air Operator's activities. The CAME covers the processes and procedures required and the 'hardware' provides the reliable and safe means to serve the public and the industry with transportation services by air.

Smooth Cruising

The manual system is a team effort of all managers involved in operations and continuing airworthiness, obviously led and inspired by the Accountable Manager. Needless to say, a well-designed and thoroughly thought-out manual helps to firmly put safety measures into day-to-day operations in

combination with a clear organization structure, responsible management and continuous supervision.

For these reasons, the manual's planning and guidance should be realistic – there should not be a little Black Book with the 'real procedures' stuffed in employees' back pockets. To prevent this, the manual must describe best practices and realistic assumptions. The various members (post holders) of the AOC management team are responsible for establishing procedures that are clear, easily read, realistic and based on best industry practices.

Each person working for an operator must know – at all times – exactly what is expected from them and who provides the necessary resources to enable the employee to perform their task. On the other hand, each person working for an operator must be accountable for his or her actions.

Putting safety into a manual also means drawing from the experience and know-how of senior personnel and management, using them as resources when creating procedures about the actual requirements, the actual scope and the size of operation.

In the previous issue of 'Safety Sense', regulations were illustrated as mapping the way towards new horizons in aviation safety. Establishing thorough and clear manuals is like building straight and smooth highways to these horizons. After taking the heat and spending the initial effort, they ensure smooth cruising towards the desired destination of aviation safety.



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