ROYAUME DE BELGIQUE - KONINKRIJK BELGIE

Service public fédéral Mobilité et Transport
Federale Overheidsdienst Mobiliteit en Vervoer

Direction générale Transport aérien – Directoraat-generaal Luchtvaart

CIRCULAIRE

CIR/OPS-18

Objet: Contrôle par l'exploitant de la conformité et de l'adéquation de son organisation avec les procédures requises pour assurer la sécurité des méthodes d'exploitation et la navigabilité des aéronefs.

Réf.:

Les différentes références utilisées pour rédiger cette circulaire sont listées au verso de cette page

Betreft: Toezicht door de exploitant op de naleving en de gelijkheid van de procedures, vereist om de veiligheid van de exploitatiewerkwijze en de luchtwaardigheid van de luchtvaartuigen te verzekeren.

Ref.:

De verschillende referenties gebruikt om deze circulaire op te stellen worden opgesomd op de keerzijde van deze pagina

Le Directeur Général,
De Directeur-Generaal,

F. DURINCKX

L'édition 7 comprend
De 7de uitgave bevat

37 pages datées
blz. gedagtekend : 01/09/11

Références

1) A.M. du 13.02.1970 portant règlement fixant les mesures techniques à prendre pour l'exploitation dans le transport aérien commercial des avions d'un poids total maximum autorisé égal ou supérieur à 5.700 kg, en particulier le chapitre: 2.

2) A.M. du 12.09.1991 fixant les mesures techniques d'exploitation des aéronefs utilisés dans le transport aérien commercial, dont la masse totale maximale autorisée est inférieure à 5.700 kg, en particulier le chapitre: 2.

Referencies

1) M.B. van 13.02.1970 houdende reglement waarbij de technische maatregelen worden vastgesteld die moeten genomen worden voor de exploitatie van de vliegtuigen in het handelsluchtvervoer, met een hoogst toegelaten totaalgewicht van 5.700 kg en meer, in het bijzonder het hoofdstuk 2.

2) M.B. van 12.09.1991 tot vaststelling van de technische maatregelen voor de exploitatie van de in het handelsluchtvervoer gebruikte lucht-vaartuigen waarvan de hoogst toegelaten totale massa lager is dan 5.700 kg, in het bijzonder het hoofdstuk 2.

3) Council Regulation (EEC) N° 3922/91 – Annex III (EU OPS) as lastly amended.[1].

4) JAR-OPS 3.

5) JAA AGM Section 4, Part 3, Temporary Guidance Leaflet (OPS) N° 21.

6) JAA AGM Section 4, Part 3, Temporary Guidance Leaflet (OPS) N° 32.

7) JAA AGM Section 4, Part 3,Temporary Guidance Leaflet (OPS) N° 44.

[1] On the date of publication of this 7th edition of CIR/OPS-18, the Council Regulation has been lastly amendment by Commission Regulation (EC) N° 859/2008 (Ref. Consolidated text dated 20 September 2008).

Règle générale

1. Un exploitant doit établir un système interne (communément dénommé "Système Qualité") et désigner une personne responsable afin de contrôler la conformité et l'adéquation avec les procédures requises pour assurer la sécurité des méthodes d'exploitation et la navigabilité des aéronefs. Le contrôle de la conformité doit comporter un système de retour de l'information au responsable afin d'assurer la prise des mesures correctives nécessaires.

2. Ce Système Qualité doit comporter un programme d'assurance qualité précisant les procédures prévues pour vérifier que toutes les opérations sont exécutées conformément à la réglementation. aux instructions de la Direction Générale du Transport Aérien.

3. Le Système Qualité et la personne responsable de ce système doivent être acceptables pour la Direction Générale du Transport Aérien.

4. Le Système Qualité doit être décrit dans le Manuel d'Opération de l'exploitant ou, le cas échéant, dans un manuel distinct.

5. Nonobstant les exigences du paragraphe 1, la Direction Générale du Transport Aérien peut accepter la désignation de deux responsables qualité, un pour les opérations et un pour la maintenance, pour autant que l'opérateur ait désigné une seule unité de gestion de la qualité de façon à garantir une application uniforme du système de qualité dans l'entièreté de son organisation.

6. Les exigences de l'édition 7 de cette circulaire sont applicables à partir du 1er septembre 2011.

Algemene regel

1. De exploitant moet één intern systeem ("Kwaliteitssysteem" genoemd) instellen en één verantwoordelijk persoon aanduiden om toezicht te houden op de naleving en de gelijkheid van de procedures, vereist om de veiligheid van de exploitatiewerkwijze en de luchtwaardigheid van de luchtvaartuigen te verzekeren. De controle op de éénvormigheid moet een systeem van beantwoording van informatie aan de verantwoordelijke bevatten waardoor noodzakelijke verbeteringen worden gewaarborgd.

2. Dit Kwaliteitssysteem moet een kwaliteitsverzekeringsprogramma bevatten dat de procedures beschrijft die moeten nagaan of alle operaties werden uitgevoerd overeenkomstig de door de Directoraat-generaal van de Luchtvaart uitgevaardigde reglementering en richtlijnen.

3. De Directoraat-generaal van de Luchtvaart moet het Kwaliteitssysteem en de verantwoordelijke persoon voor dit systeem aanvaarden.

4. Het Kwaliteitssysteem moet in de Operaties Handbook van de exploitant of, als het geval zich voordoet, in een apart handboek beschreven worden.

5. Niettegenstaande de vereisten van § 1, mag de Directoraat-generaal van de Luchtvaart de aanduiding van twee verantwoordelijken kwaliteit aanvaarden : één voor de operaties en één voor het onderhoud, voor zover de Operator één enkele beheerseenheid kwaliteit heeft aangeduid, zodat een éénvormige toepassing van het kwaliteitssysteem in het geheel van zijn organisatie gewaarborgd is.

6. De vereisten van de 7de uitgave van deze circulaire zijn van toepassing vanaf 01 september 2011.

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FEDERAL PUBLIC SERVICE – MOBILITY AND TRANSPORT

BELGIAN CIVIL AVIATION AUTHORITY

Company Approvals Directorate – Operations Department

OPERATOR'S QUALITY SYSTEM

I. THE OPERATOR'S QUALITY SYSTEM

1. Introduction

1.1 In order to show compliance with this Circular, an operator must establish his Quality System in accordance with the instructions and information contained in the succeeding paragraphs.

2 General

2.1 Interpretation of Words

To avoid any misunderstanding within this Circular, certain words are to be interpreted as having specific meanings when used in the different paragraphs of this document.

"Must"	is used to indicate a requirement.
"May"	is used to indicate permission, options or alternatives.
"Should"	is used to indicate a strong recommendation. You need to have good reason for not doing so.
"May not"	is used to convey a prohibition;
"Will"	is used to introduce information or a description.

2.2 Terminology

The terms, used in the context of this Circular, have the following meanings :

i. *Accountable Manager:* The person acceptable to the BCAA who has corporate authority for ensuring that all operations and maintenance activities can be financed and carried out to the standard required by the BCAA, and any additional requirements defined by the operator.

ii. *Quality Assurance*: All those planned and systematic actions necessary to provide adequate confidence that operational and maintenance practices satisfy given requirements.

iii. *Quality Manager*: The manager, acceptable to the BCAA, responsible for the management of the Quality System, monitoring function and requesting corrective actions.

iv. Small or Very Small Operator: Operators who employ 5 or less full time staff are considered to be "very small" while those employing between 6 and 20 full time employees are regarded as "small" operators as far as quality systems are concerned. Full-time, in this context, means employed for not less than 35 hours per week excluding vacation periods.

v. *Day-to-day involvement*: day-to-day participation in the running of a department. As far as auditor independence is concerned, this is not limited to postholders but any staff member, holding some responsibilities in the management of a department, is concerned.

vi. *Performance class B aeroplanes*: Propeller driven aeroplanes with a maximum approved passenger seating of 9 or less, and a maximum take-off mass of 5.700 kg or less.

vii. *Full-time staff*: In the context of this circular, the expression "*full-time staff*" means members of staff who are employed for not less than 35 hours per week excluding vacation periods. For the purpose of establishing the scale of operation, administrative staff, not directly involved in operations or maintenance, should be excluded. For the purpose of the paragraph 6.1 of this circular, "*full time equivalent*" will be expressed in percentage of a full time staff.

2.3 Quality Policy

2.3.1 An operator must establish a formal written Quality Policy Statement that is a commitment by the Accountable Manager as to what the Quality System is intended to achieve. The Quality Policy must reflect the achievement and continued compliance with the Council Regulation (EEC) N° 3922/91 – Annex III [2] or the JAR-OPS 3 together with any additional standards specified by the operator.

The accountable manager's quality policy statement must embrace the intent of the following paragraph:

This exposition defines the organisation and procedures upon which the BCAA Approval of (name of the company) under OPS Part 1 or JAR-OPS 3 is based.

These procedures are approved by the undersigned and must be complied with.

It is accepted that these procedures do not override the necessity of complying with any new or amended regulation published by the BCAA from time to time where these new or amended regulations are in conflict with these procedures.

It is understood that the BCAA will approve this organisation whilst the BCAA is satisfied that the procedures are being followed.

It is understood that the BCAA reserves the right to suspend, vary or revoke the AOC of the company, as applicable, if the BCAA has evidence that the procedures are not followed and the standards not upheld.

In fact this statement may be used without amendment. Any modification to this statement may not alter its intent.

Whenever the Accountable Manager is changed, it is important to ensure that the new Accountable Manager signs the Quality Policy Statement at the earliest opportunity as part of the acceptance by the BCAA. Failure to carry out this action invalidates the operator quality system approval.

[2] Referenced further on as OPS Part 1

2.3.2 The Accountable Manager is an essential part of the AOC holder's management organisation. With regard to the text in OPS 1.175 (h) or JAR-OPS 3.175 (h) and the above termino-logy, the term "*Accountable Manager*" is intended to mean the Chief Executive/President/ Managing Director/Director General/General Manager etc. of the operator's organisation, who by virtue of position has overall responsibility (including financial) for managing the organisation.

2.3.3 The position of the Accountable Manager in the organisation must be such that at least the Nominated Postholders for Operations and Maintenance and the Quality Manager have direct access to him.

2.3.4 The Accountable Manager has overall responsibility for the AOC holders Quality System including the frequency, format and structure of the internal management evaluation activities as prescribed in paragraph 4.9 below or Appendix A, paragraph 3.8, as applicable.

2.4 Purpose of the Quality System

The Quality System must enable the operator to monitor compliance with OPS Part 1 or JAR-OPS 3, the Operations Manual, the Continuous Airworthiness Management Exposition, and any other standards specified by that operator, or the BCAA, to ensure safe operations and airworthy aircraft.

2.5 Quality Manager

2.5.1 The function of the Quality Manager to monitor compliance with, and adequacy of, procedures required to ensure safe operational practices and airworthy aircraft, as required by OPS 1.035(a) or JAR-OPS 3.035(a) and this Circular, may be carried out by more than one person by means of different, but complementary, Quality Assurance Programmes.

2.5.2 The primary role of the Quality Manager is to verify, by monitoring activity in the field of flight operations, maintenance, crew training and ground operations, that the standards required by the BCAA and any additional requirements defined by the operator, are being carried out under the supervision of the relevant Nominated Postholder.

2.5.3 The Quality Manager is responsible for ensuring that the Quality Assurance Programme is properly established, implemented and maintained.

2.5.4 The Quality Manager must :

a. Have direct access and report directly to the Accountable Manager;

b. Not be one of the nominated post holders, except for operators in 2.5.6 below; and

c. Have access to all parts of the operator's and, as necessary, any sub-contractor's organisation.

2.5.5 In the case of small/very small operators (see Appendix A below), the posts of the Accountable Manager and the Quality Manager may be combined. However, in this event, quality audits must be conducted by independent personnel. In accordance with paragraph 2.5.4.b above, it may not be possible for the Accountable Manager to be one of the nominated post holders, except for very small operators of performance class B aeroplanes.

2.5.6 In the case of very small operators of performance class B aeroplanes, the post of Quality Manager may be held by a nominated postholder, if external auditors are used. This applies also where the Accountable Manager is holding one or several of the nominated posts.

3 Quality System

3.1 Introduction

3.1.1 The operator's Quality System must ensure compliance with and adequacy of operational and maintenance activities requirements, standards and procedures.

3.1.2 The operator must specify the basic structure of the Quality System applicable to the operation.

3.1.3 The Quality System must be structured according to the size and complexity of the operation to be monitored (for the "small/very small operators" see the Appendix A to this circular.

3.2 Scope

3.2.1 As a minimum, the Quality System must address the following:

a. The provisions of OPS Part 1 or JAR-OPS 3 and BCAA Circulars;

b. The operator's additional standards and operating procedures;

c. The operator's Quality Policy;

d. The operator's organisational structure;

e. Responsibility for the development, establishment and management of the Quality System;

f. Documentation, including manuals, reports and records;

g. Quality Procedures;

h. Quality Assurance Programme;

i. The required financial, material, and human resources; and

j. Training requirements.

3.2.2 The quality system must include a feedback system to the Accountable Manager to ensure that corrective actions are both identified and promptly addressed. The feedback system must also specify who is required to rectify discrepancies and non-compliance in each particular case, and the procedure to be followed if corrective action is not completed within an appropriate timescale.

3.3 Relevant Documentation

3.3.1 Relevant documentation includes the relevant part of the Operations Manual and the Operator's Maintenance Management Exposition, which may be included in a separate Quality Manual.

3.3.2 In addition, relevant documentation must include the following :

a. Quality Policy;

b. Terminology;

c. Specified operational standards;

d. A description of the organisation;

e. The allocation of duties and responsibilities;;

f. Procedures to ensure regulatory compliance;

g. Accident Prevention and Flight Safety Programme;

h. Quality Assurance Programme, reflecting :
   - i Schedule of the monitoring process;
   - ii Audit procedures;
   - iii Reporting procedures;
   - iv Follow-up and corrective action procedures;
   - v Recording system.

i. The training syllabus; and

j. Document control.

4 Quality Assurance Programme (See OPS 1.035(b) or JAR-OPS 3.035(b))

4.1 Introduction

4.1.1 The Quality Assurance Programme must include all planned and systematic actions necessary to provide confidence that all operations and maintenance are conducted in accordance with all applicable requirements, standards and procedures.

4.1.2 When establishing a Quality Assurance Programme, consideration must, at least, be given to the paragraphs 4.2 to 4.9 below:

4.2 Quality Inspection

4.2.1 The primary purpose of a quality inspection is to observe a particular event/action/document etc., in order to verify whether established procedures and requirements are followed during the accomplishment of that event and whether the required standard is achieved.

4.2.2 Typical subject areas for quality inspections are :

a. Actual flight operation;

b. Ground De-icing/Anti-icing, if appropriate;

c. Flight Support Services;

d. Load Control;

e. Maintenance;

f. Technical Standards; and

g. Training Standards.

4.3 Quality Audit

4.3.1 An audit is a systematic, and independent comparison of the way in which an operation is being conducted against the way in which the published procedures say it must be conducted.

4.3.2 Audits must include at least the following procedures and processes:

a. A statement explaining the scope of the audit;

b. Planning and preparation;

c. Gathering and recording evidence; and

d. Analysis of the evidence.

4.3.3 Techniques which contribute to an effective audit are:

a. Interviews or discussions with personnel;

b. A review of published documents;

c. The examination of an adequate sample of records;

d. The witnessing of the activities which make up the operation; and

e. The preservation of documents and the recording of observations.

4.4 Quality Auditors

4.4.1 An operator will decide, depending on the complexity of the operation, whether to make use of a dedicated audit team or a single auditor. In any event, the auditor or audit team must have relevant operational and/or maintenance experience.

4.4.2 The responsibilities of the auditors must be clearly defined in the Chapter 3 of the Operations Manual Part A or, as applicable, in a separate Quality Manual.

4.5 Quality Auditor's Independence

4.5.1 Auditors may not have any day-to-day involvement in the area of the operation and/or maintenance activity which is to be audited. An operator may, in addition to using the services of full-time dedicated personnel belonging to a separate quality department, undertake the monitoring of specific areas or activities by the use of part-time auditors. An operator whose structure and size does not justify the establishment of full-time auditors, may undertake the audit function by the use of part-time personnel from within his own organisation or from an external source under the terms of an agreement acceptable to the BCAA. In all cases the operator must develop suitable procedures to ensure that persons directly responsible for the activities to be audited are not selected as part of the auditing team. Where external auditors are used, it is essential that any external specialist is familiar with the type of operation and/or maintenance conducted by that particular operator.

4.5.2 The operator's Quality Assurance Programme must identify the persons within the company who have the experience, responsibility and authority to :

a. Perform quality inspections and audits as part of ongoing Quality Assurance;

b. Identify and record any concerns or findings, and the evidence necessary to substantiate such concerns or findings;

c. Initiate or recommend solutions to concerns or findings through designated reporting channels;

d. Verify the implementation of solutions within specific timescales;

e. Report directly to the Quality Manager(s).

4.6 Audit Scope

Operators are required to monitor compliance with the procedures they have designed to ensure safe operations, airworthy aircraft and the serviceability of both operational and safety equipment. In doing so they must as a minimum, and where appropriate, monitor :

a. Organisation;
b. Plans and Company objectives;
c. Operational Procedures;
d. Flight Safety;
e. Operator certification (AOC/Operations specification);
f. Supervision;
g. Aircraft Performance;
h. All Weather Operations;
i. Communications and Navigational Equipment and Practices;
j. Mass, Balance and Aircraft Loading;
k. Instruments and Safety Equipment;
l. Manuals, Logs, and Records;
m. Flight and Duty Time Limitations, Rest Requirements and Scheduling;
n. Aircraft Maintenance/Operations interface;
o. Use of the MEL;
p. Maintenance Programmes and Continued Airworthiness;
q. Airworthiness Directives management;
r. Maintenance Accomplishment;
s. Defect Deferral;
t. Flight Crew;
u. Cabin Crew, if appropriate;
v. Dangerous Goods;
w. Security;
x. Training; and
y. Leasing

4.7 Audit Scheduling

4.7.1 A Quality Assurance Programme must include a defined audit schedule and a periodic review cycle area by area. The schedule may be flexible, and allow unscheduled audits when trends are identified. Follow-up audits may be scheduled when necessary to verify that corrective action was carried out and that it was effective.

4.7.2 An operator must establish a schedule of audits to be completed during a specified calendar period. All aspects of the operation must be reviewed within every period of 12 months in accordance with the audit schedule unless an extension to the audit period is accepted as explained below.
An operator may increase the frequency of their audits at his discretion but may not decrease the frequency without the agreement of the BCAA. It is considered unlikely that a period greater than 24 months would be acceptable for any audit topic.

4.7.3 When an operator defines the audit schedule, significant changes to the management, organisation, operation, or technologies must be considered as well as changes to the regulatory requirements.

4.8 Monitoring and Corrective Action

4.8.1 The aim of monitoring within the Quality System is primarily to investigate and judge its effectiveness and thereby to ensure that defined policy, operational, and maintenance standards are continuously complied with. Monitoring activity is based upon quality inspections, audits, corrective action and follow-up. The operator must establish and publish a quality procedure to monitor regulatory compliance on a continuing basis. This monitoring activity must be aimed at eliminating the causes of unsatisfactory performance.

4.8.2 Any non-compliance identified as a result of monitoring must be communicated to the manager responsible for taking corrective action or, if appropriate, the Accountable Manager. Such non-compliance must be recorded, for the purpose of further investigation, in order to determine the cause and to enable the recommendation of appropriate corrective action.

4.8.3 The Quality Assurance Programme must include procedures to ensure that corrective actions are developed in response to findings. These procedures must monitor such actions to verify their effectiveness and that they have been completed. Organisational responsibility and accountability for the implementation of corrective action resides with the department cited in the report identifying the finding.

4.8.4 The Accountable Manager has the ultimate responsibility for resourcing the corrective action and ensuring, through the Quality Manager, that corrective action has re-established compliance with the standard required by the BCAA, and any additional requirements defined by the operator.

4.8.5 Corrective action

a. Subsequent to the quality inspection/audit, the operator must establish at least the following:

i. The seriousness of any findings and the need for immediate corrective action;

ii. The origin of the finding;

iii. What corrective actions are required to ensure that the non-compliance does not recur;

iv. A schedule for corrective action;

v. The identification of individuals or departments responsible for implementing corrective action; and

vi. Allocation of resources by the Accountable Manager, where appropriate.

4.8.6 The Quality Manager(s) must:

a. Verify that corrective action is taken by the manager responsible in response to any finding of non-compliance;

b. Verify that corrective action includes the elements outlined in paragraph 4.8.5 above;

c. Monitor the implementation and completion of corrective action;

d. Provide management with an independent assessment of corrective action, implementation and completion;

e. Evaluate the effectiveness of corrective action through the follow-up process.

4.9 Management Evaluation

4.9.1 A management evaluation is a comprehensive, systematic documented review by the management of the quality system, operational policies and procedures, and must consider:

a. The results of quality inspections, audits and any other indicators; and

b. The overall effectiveness of the management organisation in achieving stated objectives.

4.9.2 A management evaluation must identify and correct trends, and prevent, where possible, future non-conformities. Conclusions and recommendations made as a

result of an evaluation must be submitted in writing to the responsible manager for action. The responsible manager must be an individual who has the authority to resolve issues and take action.

4.9.3 The Accountable Manager must decide upon the frequency, format, and structure of internal management evaluation activities. It is considered unlikely that a period greater than 12 months would be acceptable for these management evaluation activities.

4.10 Recording

4.10.1 Accurate, complete, and readily accessible records documenting the results of the Quality Assurance Programme must be maintained by the operator. Records are essential data to enable an operator to analyse and determine the root causes of non-conformity, so that areas of non-compliance can be identified and subsequently addressed.

4.10.2 The following records must be retained for a period of 5 years:

a. Audit schedules;

b. Completed audits status as compared to the scheduled audits;

c. Quality inspection and Audit reports;

d. Responses to findings;

e. Corrective action reports;

f. Follow-up and closure reports; and

g. Management Evaluation reports.

5 Quality Assurance Responsibility for Sub-Contractors

5.1 Operators may decide to sub-contract out certain activities to external agencies for the provision of services related to areas such as:

a. Ground De-icing/Anti-icing

b. Maintenance;

c. Ground handling;

d. Flight Support (including Performance calculations, flight planning, navigation data base and despatch);

e. Training;

f. Manual preparation; and

g. Quality Inspections/Audits Pools (ref. JAA AGM Section 4, Part 3, T.G. Leaflet N° 21).

5.2 The ultimate responsibility for the quality of the product or service provided by the sub-contractors always remains with the operator. A written agreement must exist

between the operator and the sub-contractor clearly defining the safety related services and quality to be provided. The sub-contractor's safety related activities relevant to the agreement must be included in the operator's Quality Assurance Programme.

5.3 The operator must ensure that the sub-contractor has the necessary authorisation/ approval when required, and commands the resources and competence to undertake the task. If the operator requires the sub-contractor to conduct activity which exceeds the sub-contractor's authorisation/approval, the operator is responsible for ensuring that the sub-contractor's quality assurance takes account of such additional requirements.

6 Quality Manpower Resources and Training Policy

6.1 Manpower Resources

The number of people dedicated to the performance of the Quality Management activity must be adapted to the size and complexity of the operator's organisation. This number must be shown in the Quality Manual of the operator. This could be presented as follows:

The number of employees dedicated to the performance of the Quality Management is the following:

Function	*Number*	*Full time equivalent*
Quality Manager(s)		
Full time internal quality auditor(s)		
Part time internal quality auditor(s)		
External auditor(s)		
Pool of auditors		
Total		

6.2 Training Policy

6.2.1 An operator must establish effective, well planned, and resourced quality related briefing for all personnel.

6.2.2 The Quality Manager(s) and auditors must receive training covering :

a. An introduction to the concept of Quality System;
   - Purpose of a Quality System;
   - Responsibility of the Accountable Manager;
   - Role and responsibility of the Quality Manager;
   - Responsibility and accountability of the Nominated Post holders.

b. Quality management;

- Development;
- Implementation.

c. Concept of Quality Assurance;

d. Quality manuals;
- Manual development;
- Procedures development;
- OPS Part 1 or JAR OPS 3 procedures;
- Quality assurance program development.

e. Audit techniques;
- Audit types;
- Subcontractors assessment and audit.

f. Reporting and recording;
- Quality records;
- Quality forms use and development.

g. The way in which the quality system must function in the company.

6.2.3 In addition to the requirements stated in paragraph 6.2.2 above, the Quality Manager must have a comprehensive knowledge of :

a. The OPS Part 1 or JAR OPS 3 (as applicable) and associated requirements and procedures;

b. The Annex I (Part M) of the Commission Regulation (EC) N° 2042/2003, as amended by. Commission Regulation (EC) N° 707/206, Commission Regulation (EC) N° 376/2007 and Commission Regulation (EC) N° 1056/2008.

c. The JAR FCL and associated requirements and procedures;

c. The AOC holder's Quality Manual;

c. The procedures developed in the AOC holder's Operations Manual and Maintenance Management Exposition;

c. The AOC holder's organisational structure.

6.2.4 The Quality Manager must satisfy the BCAA that he possess the appropriate experience in the application of aviation safety standards and safe operating practices.
He must at least be able to demonstrate that he satisfy to the requirements of ACJ OPS 1.175(i) para.2.

6.2.5 Time must be provided to train every individual involved in quality management and for briefing the remainder of the employees. The allocation of time and resources must be governed by the size and complexity of the operation concerned.

6.3 Sources of Training

Quality management courses are available from the various National or International Standards Institutions. An operator will consider whether to offer such courses to those likely to be involved in the management of Quality Systems. Operators with sufficient appropriately qualified staff will consider whether to carry out in-house training.

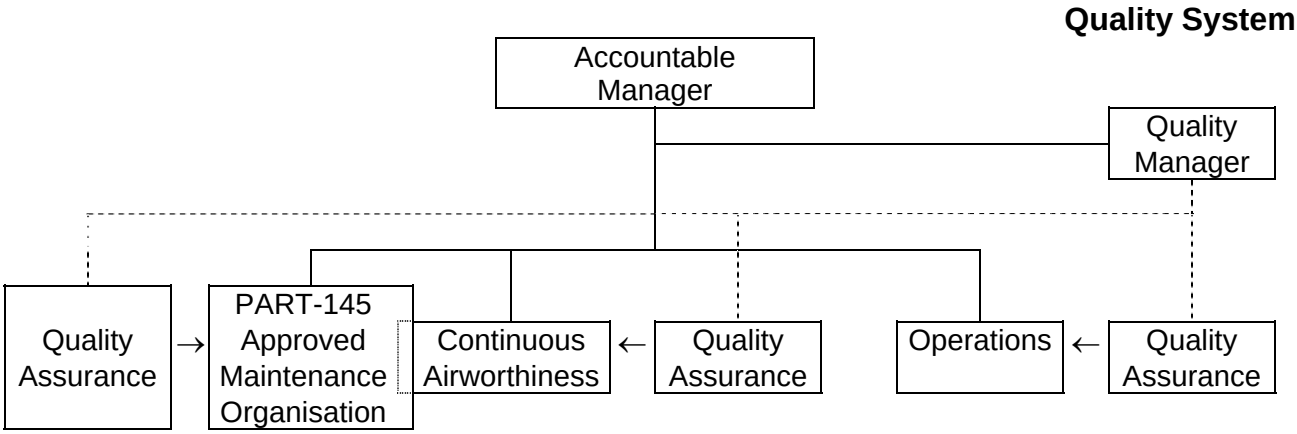
7 Quality Systems for small/very small Operators

Refer to Appendix A for additional guidance

II QUALITY SYSTEM - ORGANISATION EXAMPLES

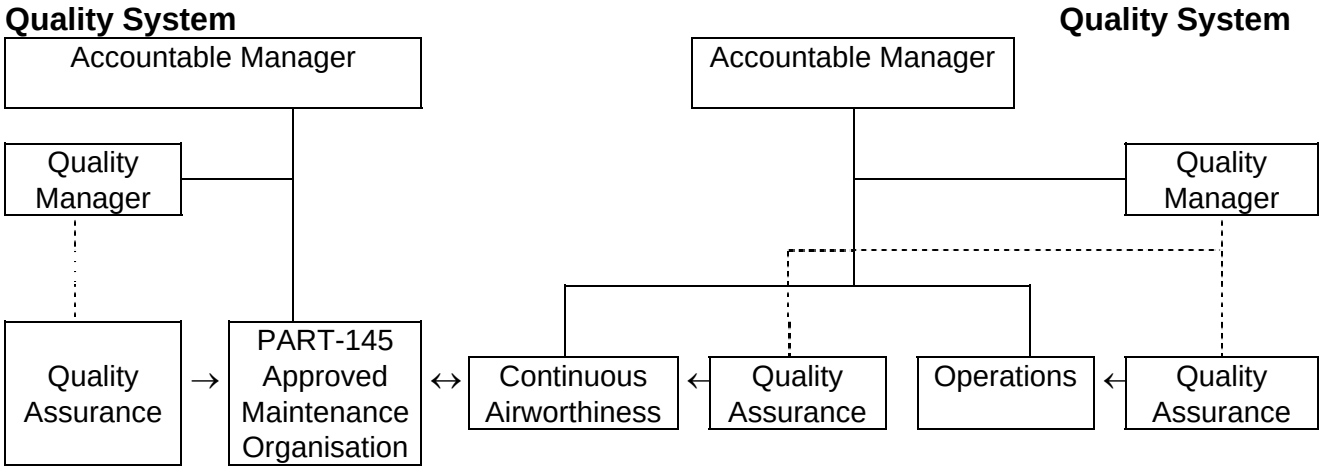
The following diagrams illustrate two typical examples of Quality organisations.

1. Quality System within an AOC holder's organisation when the AOC holder also holds a Part-145 approval.



2. Quality Systems related to an AOC holder's organisation where aircraft maintenance is contracted out to a Part-145 approved organisation which is not integrated with the AOC holder:

JAR-145 Approved Maintenance Organisation AOC Holder Organisation



Note: The Quality System and Quality Audit Programme of the AOC holder must assure that the maintenance carried out by the Part-145 approved organisation is in accordance with requirements specified by the AOC holder.

APPENDIX A: ADDITIONAL GUIDANCE FOR SMALL AND VERY SMALL OPERATORS

1. PURPOSE OF THE QUALITY ASSURANCE PROGRAMME

The purpose of the Quality Assurance Programme (QAP) is to provide confidence that all operations and maintenance are conducted in accordance with all applicable requirements, standards and operational procedures in order to ensure safe operations and airworthy aircraft.

Complex quality systems could be inappropriate for *small* or *very small* operators and the clerical effort required to draw up manuals and quality procedures for a complex system may stretch their resources. It is therefore accepted that such operators tailor their quality systems to suit the size and complexity of their operation and allocate resources accordingly.

2. RESPONSIBILITIES

2.1. Accountable Manager

The Accountable Manager has the overall responsibility for ensuring that the QAP is implemented and maintained, and has the ultimate responsibility for resourcing the corrective action and ensuring that the corrective action has re-established compliance with the standard required by the BCAA, and any additional requirements defined by the operator.

2.2. Quality Manager

The primary role of the Quality Manager is to verify that the standards required by the Authority, and any additional requirements defined by the operator, are being carried out under the supervision of the relevant Nominated Post holder.

- The Quality Manager is, on behalf of the Accountable Manager, responsible for ensuring that the Quality Assurance Program is properly established and maintained.
- The Quality Manager is responsible for that quality inspections are carried out within the proper timescale.
- The Quality Manager function reports directly to the Accountable Manager, and has access to all parts of the organisation, including relevant part of any sub-contractors organisation.
- The Quality Manager may not be one of the nominated post holders, except as specified in Part I, paragraph 2.5.6 above.

The Quality Manager must have relevant knowledge on quality assurance / quality systems, and must be acceptable to the BCAA.

In the case of small/very small operators, the posts of the Accountable Manager and the Quality Manager may be combined. However, in this event, quality audits must be conducted by independent personnel. In accordance with the requirements specified

above, it may not be possible for the Accountable Manager to be one of the nominated post holders, except as specified in Part I, paragraph 2.5.6 above.

2.3. Quality Auditor

The Auditor is, on behalf of the Quality Manager, responsible for performing quality audits of defined areas of the organisation, as described in item 5: Quality Audit.

Auditor may not have any day-to-day involvement in the activity to be audited, and must, as a part of performing audits:

- Prepare and maintain audit checklists, relevant to the activity to be audited,
- Identify and record any concern or finding, and the evidence necessary to substantiate such concerns or findings,
- Initiate or recommend solutions to concerns or findings,
- Prepare and submit an audit report after each audit, as defined in item 5 Quality Audit,

The Auditor must, based on the size and complexity of the operation, have relevant knowledge and experience as an auditor. The Auditor reports directly to the Quality Manager.

2.4 Quality Systems

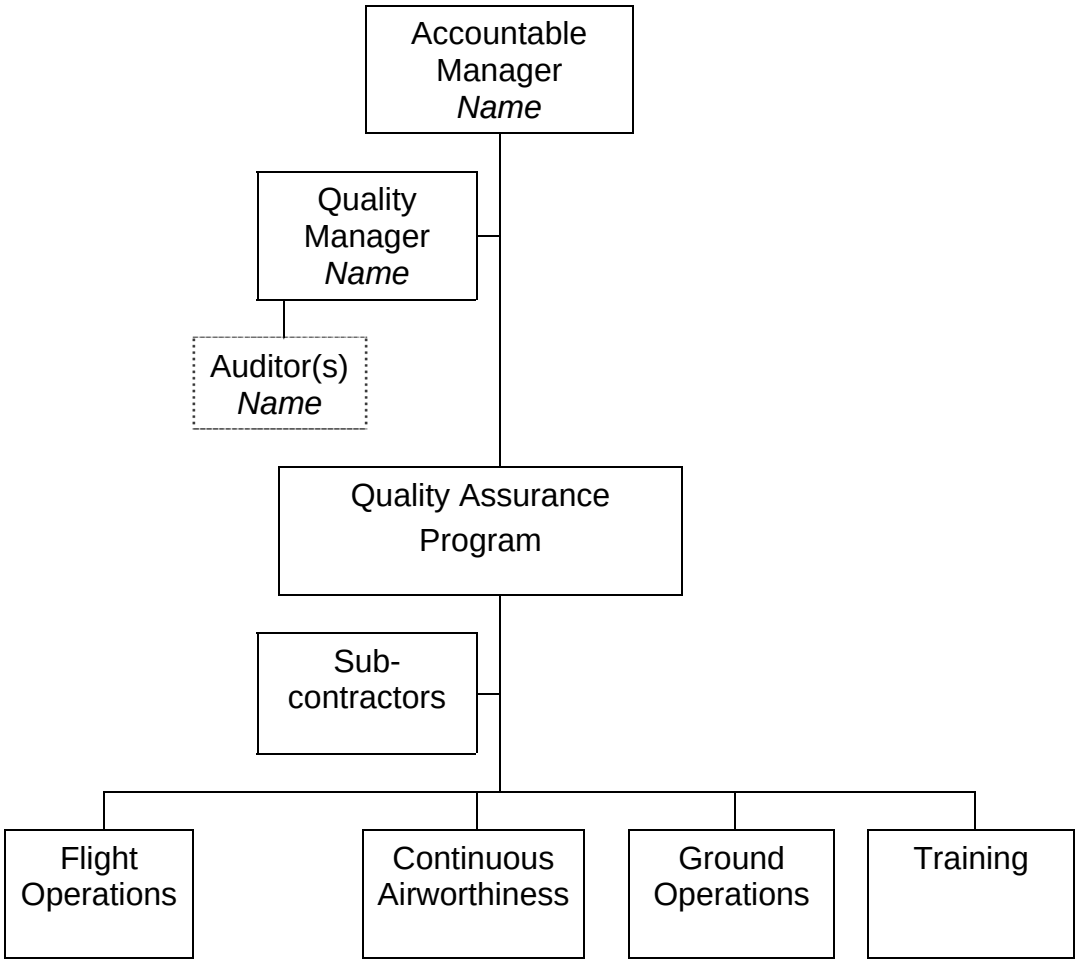
2.4.1 For "*small*" and "*very small"* operator it may be appropriate to develop a Quality Assurance Programme that employs a checklist. The checklist must have a supporting schedule that requires completion of all checklist items within a specified timescale, together with a statement acknowledging completion of a periodic review by top management. An occasional independent overview of the checklist content and achievement of the Quality Assurance must be undertaken.

2.4.2 The "small" operator may decide to use internal or external auditors or a combination of the two. In these circumstances it would be acceptable for external specialists and or qualified organisations to perform the quality audits on behalf of the Quality Manager.

2.4.3 If the independent quality audit function is being conducted by external auditors the audit schedule must be shown in the relevant documentation.

2.4.4 Whatever arrangements are made, the operator retains the ultimate responsibility for quality system and especially the completion and follow-up of corrective actions.

2.5. Quality System Diagram



3. QUALITY POLICY

An operator must establish a formal written Quality Policy Statement that is a commitment by the Accountable Manager as to what the Quality System is intended to achieve. The Quality Policy must reflect the achievement and continued compliance with JAR-OPS 1/3 together with any additional standards specified by the operator.

4. QUALITY INSPECTIONS

The primary purpose of the quality inspection is to observe a particular subject in order to verify whether established procedures and requirements are adhered to, and whether the required standard is achieved.

Quality inspections must be performed at the following subjects:

- Flight operations
- Ground handling
- Mass & Balance
- Maintenance system

- Training
- Documentation

A quality inspection must be performed on each subject at regular intervals not exceeding 12 months. The Quality Manager is responsible for that the required quality inspections are performed, properly documented, and that any findings as a result of the inspections are recorded. Quality inspections must be documented on a "Quality Inspection Checklist", and any findings must be recorded on a "Deviation Report".

Quality Inspections Plan (examples)

Area	Date
Flight Operations	1st quarter
Ground Handling	2nd quarter
Mass & Balance	2nd quarter
Maintenance System	3rd quarter
Training	4th quarter
Documentation	4th quarter

5. QUALITY AUDIT

The primary purpose of the quality audit is to perform a systematic and objective review of the Quality Assurance Programme, in order to verify its function and effectiveness, and that the required standard is achieved. A quality audit must review all elements of the Quality Assurance Programme, and must be performed each year, at intervals not exceeding 12 months. Normally, the Auditor, as defined in item 2.4, must perform the quality audit. An audit report must be submitted to the Quality Manager not later than 3 days after the audit was performed. Findings (non-conformities) must be recorded on a "Deviation Report," and the Quality Manager must set the time limits for corrective action.

Non-conformities identified on quality audits performed by Customers or the BCAA, must also be recorded on a "Deviation Report" by the Quality Manager, who also will set the company time limits for corrective action.

6. REPORTING OF IRREGULARITIES

Any employee of (operator) has an obligation to report any irregularity they may observe while performing their duties in the company:

Such irregularities may include (but are not limited to) faulty, missing or inadequate:

- Flight or maintenance documentation
- Operating or maintenance procedure
- Training or qualification requirements
- Ground handling procedures
- Company documentation and manuals facilities
- Tools and equipment

Reporting of such non-conformities to the required standard must be reported on a "Deviation Report" and sent to the Quality Manager for follow-up. The Quality Manager will determine what person will be responsible for corrective actions, and the time limit for such actions, as appropriate.

Note! ! Air accidents and incidents which require a report to the BCAA must be reported on the appropriate forms, as defined in the Operations Manual (OM).

7. MONITORING AND CORRECTIVE ACTION

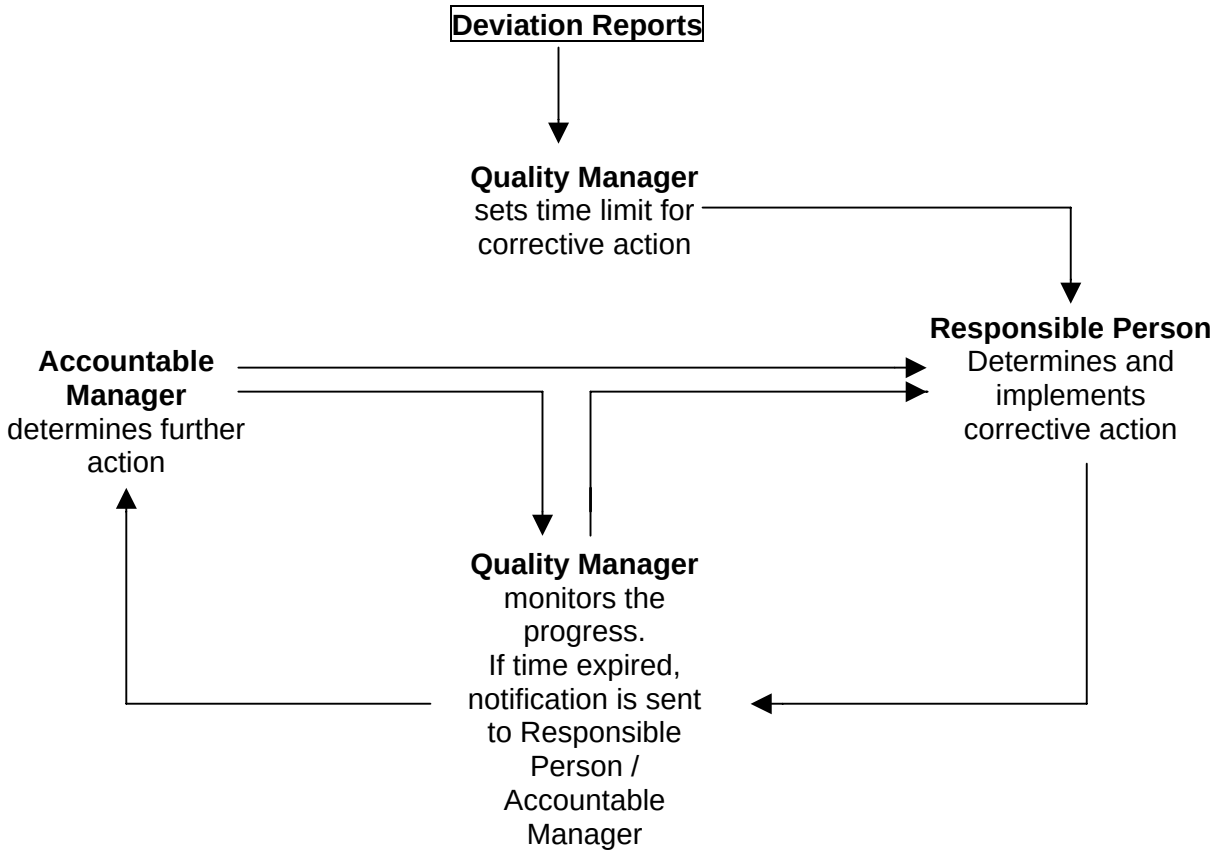
The Quality Manager must monitor the status and progress of all required corrective actions, as requested by:

- Quality inspections
- Quality audits
- Report of irregularities

Each "Deviation Report" requiring a corrective action is identified by a unique reference number, the person responsible for the action, and the time limitation.

If a corrective action has not been accomplished within the defined time limit, the Quality Manager must request corrective action from the responsible person, within a reasonable timeframe. If corrective action has still not been accomplished within the extended time limit, the condition must be reported to the Accountable Manager, who will determine further action.

Illustration of the monitoring and follow-up process;



8. MANAGEMENT EVALUATION

The purpose of the management evaluation is to identify and correct trends, and prevent, where possible, future non-conformities. A management evaluation meeting is held once a year, normally in conjunction with the annual quality audit post-meeting. The Accountable Manager, Quality Manager and the Auditor must attend the meeting; other relevant personnel may attend as defined by the Accountable Manager.

The meeting must address the following subjects:

- The Quality Managers annual summary of all deviation reports recorded as a result of the quality inspections, customer / authority audits and staff reporting, including any trends,
- Non-conformities identified at the last quality audit,
- Any relevant information of type-related incidents experienced by other operators,
- A review of the Quality Assurance Programme (QAP) effectiveness as expressed by the Auditor,
- A review of the corrective action follow-up process as expressed by the Quality Manager,

- A review of the QAP system as expressed by the Accountable Manager,
- The need for improvements of the QAP or parts thereof

If the meeting identifies improvements of elements of the QAP, the required corrective action(s) must be recorded on Deviation Report(s), for which the Accountable Manager must set the time limit and responsible person.

A written summary of the meeting, including all relevant supporting documents, must be recorded and retained. (Management Evaluation Report).

9. RECORDING

Records are essential data in order to analyse and determine the root causes of irregularities, so that non-conformity can be identified and addressed.

The Quality Manager must retain the following quality records, for a period of minimum 5 years:

- Quality Inspection Checklists
- Audit Reports
- Deviation Reports
- Management Evaluation Reports

10. TRAINING POLICY

Refer to paragraph 6.2 on pages 17 and 18 of this Circular.

11. The documentation, included in the next 3 pages, is meant as **guidance to how the different documents could be formed.**

QUALITY INSPECTION CHECKLIST – Year:			
Subject	Date checked	Checked by	Comments / Deviation Report No.
Flight Operations			
Aircraft checklists checked for accuracy and validity.			
Minimum 5 flight plans checked and verified for proper and correct information.			
Flight planning facilities checked for updated manuals, documents and access to relevant flight information.			
Incidents reports evaluated and reported to the appropriate Authorities			
Ground Handling			
Contracts with ground handling organisations established and valid			
Instructions regarding fuelling and de-icing issued			
Instructions regarding Dangerous Goods issued and known by all relevant personnel			
Weight & Balance			
Minimum 5 load sheets checked and verified for proper and correct information.			
Aircraft fleet checked for valid weight check			
Minimum one check per aircraft of correct loading and distribution			
Continuous Airworthiness			
Minimum one Technical Log per aircraft checked for proper documentation of defects and corrective actions			
Maintenance status of aircraft fleet updated			
Contracts with maintenance organisations checked for validity and correct scope of work			
Minimum Equipment List (MEL) checked for accuracy			
Maintenance programme checked for applicability			
Training			
Training records updated and accurate			
All pilot licenses checked for currency, correct ratings and valid medical check			
All pilots received recurrent training			
Training facilities & Instructors approved			
All pilots received Daily Inspection (D.I.) training			
Documentation			
All issues of OM checked for correct amendment status			
AOC checked for validity and appropriate Operations Specifications			
Aviation Requirements applicable and updated			
Crew flight and duty time record updated			
Flight documents record checked and updated			
Quality records checked and updated			

DEVIATION REPORT No:		
To **QUALITY MANAGER**	Reported by:	Date :
Category: Flight Operations ☐ Ground Handling ☐ Weight & Balance ☐ Maintenance ☐ Training ☐ Documentation ☐ Other ☐		
Description:		Reference:
Suggested solution:		
Quality Manager : ☐ Corrective action required ☐ Corrective action not required		
Responsible Person:		Time limitation:
Corrective action:		Reference:
Signature Responsible Person:		Date:
Quality Manager: ☐ Corrective action verified		☐ Report closed
Signature Quality Manager:		Date:

MANAGEMENT EVALUATION REPORT

Date:	Attendees:

Number of Deviation reports recorded during the period
from ..... to .....

Flight Operations	Ground Handling	Weight & Balance	Maintenance	Training	Documents	Other	**Total**

Significant changes of trend compared with previous evaluation: ☐ No ☐ Yes

Auditors objective review of the QAP effectiveness:

General comments:

Improvements of QAP or parts thereof regarded as necessary:

☐ No ☐ Yes, ref. Deviation Report(s) No .....

.....

.... **Sign. Quality Manager**	.... **Sign. Accountable Manager**	.... **Sign. Auditor**

APPENDIX B: ACTION TO BE TAKEN FOR NON-COMPLIANCE FINDINGS ISSUED BY THE BELGIAN CAA

1. INTRODUCTION

There will be occasions when during an audit of an operator or other circumctances, evidence of non-compliance with the Commission Regulation (EC) N° 859/2008 (EU-OPS) or the JAR-OPS 3 regulations will be found.

BCAA findings are categorised into 2 groups: level 1 and level 2.

When evidence is found showing non-compliance with the regulations, the BCAA will confirm in writing to the AOC holder concerned all the findings raised and will take action as indicated in the paragraphs 2 and 3 below.

2. LEVEL 1 FINDINGS

A level 1 finding is any significant non-compliance with OPS Part 1 or JAR-OPS 3 requirements which would lowers the safety standard and probably hazards the flight safety.

Repetitive non-compliances with these requirements are also deemed to be level 1 findings.

The BCAA shall require immediate and appropriate corrective action to be taken.

If not corrected, the AOC should be limited, varied or revoked in whole or in part as appropriate.

In the case of ***initial*** issue or ***renewal*** of an AOC, such issue or renewal may not be granted until corrective action has been completed to the satisfaction of the BCAA.

3. LEVEL 2 FINDINGS

A level 2 finding is any non-compliance with OPS Part 1 or JAR-OPS 3 requirements that could lower the safety standard and possibly hazard the flight safety.

An ***initial*** issue of an AOC may not be granted until corrective action has been completed.

In the case of ***variation*** of an existing AOC, that variation may not be granted until corrective action, specific to that variation, has been completed.

In the case of ***renewal*** of an AOC, the AOC holder shall define a corrective action plan and demonstrate corrective action to the satisfaction of the BCAA.

The corrective action period granted by the BCAA must be appropriate to the nature of the finding but in any case initially not more than 3 months.

In certain circumstances and subject to the nature of the finding, the BCAA may extend the three-month period, provided a satisfactory corrective action plan is being in place.

This corrective action plan must be submitted to the acceptance of the BCAA before the initially grantedperiod expiry.

In case of failure to comply within the timescale granted by the BCAA, action might be taken by the BCAA to ***suspend*** the AOC, in whole or in part.

4. OBSERVATIONS

Observations are intended to give background information. They must not include information suggesting non-compliance with OPS Part 1 or the JAR-OPS 3 requirements. The aim of such observations is to introduce suggestions to improve identified trends and prevent, where possible, future non-conformities.

5. ACKNOWLEDGEMENT OF THE BCAA FINDINGS

5.1 Level 1 findings

As soon as the finding notification has been received from the BCAA, the AOC holder must get in contact with the BCAA, preferably his designated coordinator, to propose a corrective action and obtain the BCAA approval for this corrective action. Once the corrective action is completed, the AOC holder needs to confirm it to the BCAA.

5.2 Level 2 findings

After receipt of notification of findings, the AOC holder must acknowledge its receipt within 15 calendar days. He shall define a corrective action plan and demonstrate corrective action to the satisfaction of the BCAA within the period granted by the BCAA.

5.3 Corrective actions

The corrective actions will include the appropriate measures to prevent reoccurrence of the findings and their root causes.

5.4 Integration of the BCAA findings

The BCAA findings must be integrated in the AOC holder's Quality System records.

APPENDIX C: SAFA PROCEDURE FOR BELGIAN OPERATORS

1. INTRODUCTION

SAFA inspections are part of a European Community safety programme.

If during the Ramp Check a deviation from the Standards is found, it is considered a finding.

The findings are divided in three different categories, depending on the influence the finding has on the safety of the aircraft and/or its occupants.

Based on the outcome of the inspection and subsequent categorisation, follow-up actions and classifications have been defined.

2. CATEGORISATION

If during the inspection it is established that a certain situation is not in compliance with the relevant standards, this is then considered a finding.

For each inspection item, 3 categories of possible deviations from the standards have been defined. The findings are categorised according to the perceived influence on flight safety. This means that a category 1 finding is considered to have a minor influence on safety. A category 2 finding may have a significant influence and a category 3 finding may have a major influence on safety.

Note: Any other safety relevant issues identified during a SAFA inspection, although not constituting a finding, can be reported as a General Remark (Cat G) under each inspection item, for example: an electrical torch missing or unserviceable during a flight conducted entirely in daylight.

3. PROCEDURE

Where SAFA inspections are performed on aircraft of Belgian AOC holders, the following procedure shall apply.

(a) A copy of any SAFA report or proof of inspection, including those without finding, received by a Belgian AOC holder shall be transmitted to the BCAA (responsible coordinator).

(b) When a Belgian AOC holder receives from a foreign authority a SAFA report with category 1, 2 and/or 3 findings, the operator shall integrate the findings in his quality system.

(c) The operator shall develop a corrective action plan (CAP).

(d) This CAP shall be transmitted to the operator's Safety Manager for risk assessment, to the operator's Quality Manager and to the BCAA for evaluation.

(e) If the proposed CAP is acceptable, the BCAA will advise the operator of the acceptance of the proposed CAP.

(f) If the proposed CAP is not acceptable, the BCAA will ask the operator to develop a new CAP and restart at to the item (b) of this procedure.

(g) The operator shall send the proposed CAP to the foreign authority which raised the finding(s) but not before its acceptance by the BCAA.

(h) The operator shall implement the accepted CAP

(i) When it is applicable, the operator shall develop preventive actions.

(j) The Quality Manager of the operator shall monitor the corrective action(s) and the preventive action(s) implementation and completion.

(k) Finally, the finding(s) may be closed.

(l) The Quality Manager shall evaluate the effectiveness of corrective action through the follow-up process.

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