

APPENDIX 1

Establishing the list of major and minor differences between French OPS 3 and regulation 965/2012 and associated Agency decisions (AMC/GM)

For comprehensive comparison, see appendix 2 and appendix 3 upon which appendix 1 has been based

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APPLICABLE REGULATION

The following document establishes a list of major/minor differences between French OPS 3 and regulation 965/2012 and associated Agency decisions (AMC/GM).

For comprehensive comparison, see xls files on which this doc has been based.

French OPS 3¹ is based on JAR OPS3 section 1.

French instruction² is based on JAR OPS3 section 2.

When OPS 3 is mentioned, it refers to the French transposition of the European JAR OPS 3, amendment 5.

When provisions of the current French instruction (that is to say at the AMC/ACJ/IEM level) are upgraded to become an implementing rule of regulation 965/2012 and when both texts are drafted the same way, it is considered that there is no difference between French and European provision for the purpose of this comparison between the French and the European regulation.

1. PART ORO

ORO.CC and ORO.TC are not currently used in France.

Hence, in the following paragraphs, comparison is drawn only between ORO.GEN, ORO.AOC, ORO.MLR, ORO.SEC and ORO.FC on the one hand and requirements laid down in OPS 3 and corresponding AMC/IEM/ACJ on the other hand.

1.1 ORO.GEN

General statement

French regulations other than OPS 3 address some elements of ORO.GEN, in particular the Safety Management System :

- « Arrêté du 22 décembre 2008 relatif à la mise en œuvre des systèmes de gestion de la sécurité pour les entreprises de transport aérien public et les organismes de maintenance³ » (arrêté of December 22d, 2008 concerning the implementation of the safety management system for public air transport operators and maintenance organisations)
- « Instruction du 22 décembre 2008 relative à la prise en application de l'arrêté du 22 décembre 2008 relatif à la mise en oeuvre des systèmes de gestion de la sécurité pour les entreprises de transport aérien public et les organismes de maintenance⁴ » (instruction of December 22d, 2008 relative to the application of the arrêté of December 22d, 2008 concerning the implementation of the safety management system for public air transport operators and maintenance organisations).

Instruction 11/1005 du 4 mai 2011 relative aux conditions d'exercice de la surveillance continue des entreprises de transport aérien public par les autorités compétentes (Instruction *11/100 of May 4th, 2011 relative to the conditions of exercise of the continuous monitoring of public air transport operators by competent authorities.*)

¹ Arrêté du 21 mars 2011 relatif aux conditions techniques d'exploitation d'hélicoptères par une entreprise de transport aérien public (OPS 3) (<http://www.legifrance.gouv.fr/affichTexte.do?cidTexte=JORFTEXT000024027862>)

² Instruction du 21 mars 2011 relative aux conditions techniques d'exploitation d'hélicoptères par une entreprise de transport aérien public (OPS3)

(http://www.bulletin-officiel.developpement-durable.gouv.fr/fiches/BO201111/met_20110011_0100_0040.pdf)

³ http://www.developpement-durable.gouv.fr/IMG/pdf/arrete_22_12_08_SGS-2.pdf

⁴ http://www.bulletin-officiel.developpement-durable.gouv.fr/fiches/BO20091/met_20090001_0100_0016.pdf

⁵ http://www.developpement-durable.gouv.fr/IMG/pdf/Instruction_de_surveillance_DSAC_-_exploitants_d_aeronefs.pdf

Major changes

1. Alternative AMC (ORO.GEN.120)

Alternative AMC process is described in ORO.GEN.120 (notification/approval). It requires performance of a risk assessment (see associated AMC1).

2. Expiry date of AOCs (ORO.GEN.135)

There is no expiry date of air operator certificates.

3. Management system (ORO.GEN.200 / arrêté and instruction of December 22d, 2008)

Management system supersedes quality system (ORO.GEN.200). This brings other changes, e.g. management system documentation supersedes quality system documentation (AMC1 and AMC2 to ORO.GEN.200(a)(5)) or the compliance monitoring function/programme required under the management system (AMC1 to ORO.GEN.200(a)(6)) supersedes the quality assurance programme/quality manager provisions

The following element should be highlighted though: some of the requirements of ORO.GEN.200 concern safety management system (SMS), which is already implemented in France (arrêté and instruction of December 22d, 2008 have been applicable from January 1st, 2012, after a period of transition).

Minor changes

4. OPS Manual to be completed (ORO.GEN.110(i))

The following requirement is new:

“The operator shall specify flight planning procedures to provide for the safe conduct of the flight based on considerations of aircraft performance, other operating limitations and relevant expected conditions on the route to be followed and at the aerodromes or operating sites concerned. These procedures shall be included in the operations manual.”

5. Compliance demonstration and procedure for notified changes (not requiring prior approval) ORO.GEN.115(b))

The following requirement is new:

“Applicants for an initial certificate shall provide the competent authority with documentation demonstrating how they will comply with the requirements established in Regulation (EC) No 216/2008 and its Implementing Rules. Such documentation shall include a procedure describing how changes not requiring prior approval will be managed and notified to the competent authority.”

6. Changes requiring prior approval (GM3 to ORO.GEN.130(a) / OPS 3.1040(b) - §(3))

Changes that need prior approval by the competent authority are redefined : they concern AOC, OPS SPEC and change in management system (ORO.GEN.130(a))

Compared to OPS 3, ORO introduces new elements that need prior approval (GM3 to ORO.GEN.130(b)):

- alternative AMCs
- procedures regarding items notified to the authority
- leasing agreements
- non commercial operations by AOC holders
- Fuel policy

- for helicopters ops : airborne radar approaches, ops over a hostile environment outside a congested area, selection of off-shore alternates, use of public interest sites, ops without a safe forced landing
 - approach flight technique (CDFA...)
7. Corrective action plan to address the effects of the non-compliance, as well as its root-cause (AMC1 to ORO.GEN.150(b)). This is made more explicit compared to instruction 11-100 of May 4th, 2011.
8. Occurrence reporting (ORO.GEN.160)(a) and (e) / OPS 3.420(b)(2) and (b)(3))
- The operator shall report to the competent authority, and to any other organisation required by the State of the operator to be informed any accident, serious incident and occurrence... (ORO.GEN.160 (a))
In OPS 3, it is a theoretically a pilot responsibility (3.420(b)(2)). Besides, such information shall also be reported to any other organisation required by the State of the operator.
 - Where relevant, the operator shall produce a follow-up report to provide details of actions it intends to take to prevent similar occurrences in the future... (ORO.GEN.160 (e))
9. Management system (ORO.GEN.200 / OPS 3.035, 3.037, 3.175 (g)(2), arrêté SMS 22 12 2008 Instruction SMS 22 12 2008)
- For non-complex operators:
 - The criteria for those operators remains unchanged : Full Time Equivalent threshold is 20. Yet, no definition for 'very small operator' nor Full Time Equivalent are provided (AMC1 to ORO.GEN.200(b) / AMC to OPS 3.035 -§7.2)
 - Concerning safety management system for non complex operators, two additional requirements, not explicit in French regulation, appear (AMC1 to ORO.GEN.200 (a)(1);(2);(3);(5) - (e) and (d)) :
 - (d) Responsibilities should be identified for hazard identification, risk assessment and mitigation.
 - (e) Safety policy should include a commitment to improve towards the highest safety standards
 - An example included of a possible checklist that might be used by non-complex operators to document their audits and inspections (GM3 ORO.GEN.200(a)(6) / AMC to OPS 3.035 -§7).
 - For complex operators:
 - Safety manager functions are described in detail (AMC1 to ORO.GEN.200(a)(1) - (a)(2) / AMC to OPS 3.035 - §2.4, §4.9)
 - The “management evaluation” requirement previously in OPS 3 (AMC to 3.035, §4.9) is superseded by safety review board committee related to the management system and that should consider matters of strategic safety (AMC1 to ORO.GEN.200(a)(1) - (b) to (d))
 - Details are given about what the safety performance monitoring and measurement should include (safety reporting, safety studies, safety reviews, safety audits and safety surveys) (AMC1 to ORO.GEN.200(a)(3) -(d) / arrêté SMS (art. 4 (a)(3)) and instruction SMS (§3.1))
 - All personnel should receive safety training as appropriate for their safety responsibilities and adequate records of all safety training provided should be kept (AMC1 to ORO.GEN.200(a)(4) - (a)). No direct/explicit requirement was included in OPS 3.

10. Contracted activities (ORO.GEN.205).

It is made explicit that the contractor works under the approval of the operator (unless it is itself approved) and that the competent authority is given access to the contracted organisation.

Other comments

Many other minor differences exist between ORO and OPS 3.
See detailed comparison in relevant table.

1.2 ORO.AOC

General statement

French regulations other than OPS 3 address some elements of ORO.AOC.

- L. 6412-2 of the Transport Code (Law)
- R. 330-1 of the Civil Aviation Code (Decree) and OPS 3 (art. 1)
- « Arrêté du 30 août 2006 relatif à l'autorisation des opérations d'affrètement, de franchise et de partage de codes des entreprises françaises de transport aérien pris en application de l'article R. 330-9 du code de l'aviation civile⁶ » (arrêté of August 30th, 2006 concerning the authorization of wet lease-in, franchising and code sharing of French air transport operators, taken in application of the article R. 330-9 of the civil aviation code).

Major changes

1. Conditions for dry leasing in (ORO.AOC.110(d) / OPS 3.165(c)(1))

Dry lease in is possible on the conditions that :

- an operational need exists (no EU registered aircraft available)
- the aircraft is leased in less than 7 month in any 12 months
- Compliance with 2042/2003 is assured

Besides the OPS 3 requirement regarding notification and approval of differences from the provisions of sub parts K, L and JAR 26 in case of dry lease-in has been deleted from ORO as all EU operators shall comply with IR OPS, whatever their aircraft registration (be it EU or not).

2. Dry lease-out (ORO.AOC.110(e) / OPS 3.165(c)(3)).

An EU operator intending to dry lease-out shall apply for it and accompany its application by copies of the intended lease agreement or description of the lease provisions, except financial arrangements.

3. Wet lease-out (ORO.AOC.110(f))

A new provision requires the operator to notify the competent authority of a wet lease-out.

4. Non commercial operations of an helicopter used under an AOC (ORO.AOC.125)

The following requirement is new.

In case the helicopter listed in the operations specifications is used in for non commercial operations, a clear identification of:

- applicable requirements shall be made,
- Differences between operating procedures (for CAT and non commercial operations)...

5. Differences mentioned above shall be approved. Experience/Qualification of nominated persons (GM2 to ORO.AOC.135(a) / ACJ to OPS 3.175(i))

- Nominated persons should have 5 years of relevant work experience of which at least 2 years should be from the aeronautical industry in an appropriate position. (GM2 to ORO.AOC.135(a) - (b)(5) / ACJ to 3.175 (i) - §1.2).

⁶http://www.legifrance.gouv.fr/jopdf/common/jo_pdf.jsp?numJO=0&dateJO=20061115&numTexte=25&pageDebut=17196&pageFin=17198

- Flights operations : the provisions 2.1 and 2.2 of ACJ to OPS 3.175(i) referring to ATPL and CPL have not been transposed. In GM2 to ORO.AOC.135(a)-(c): "...the nominated person should hold or have held a valid flight crew licence and the associated ratings appropriate to a type of operation conducted under the operator certificate".

On the contrary, §(c) of GM2 to ORO.AOC.135(a) indicates:

"(c) Flight operations... In case the nominated person's licence and ratings are not current, his/her deputy should hold a valid flight crew licence and the associated ratings."

- Continuing airworthiness: ORO only refers to experience requirements related to aircraft continuing airworthiness as detailed in Part-M (GM2 to ORO.AOC.135(a) - (f)).
§4 of ACJ to OPS 3.175(i) referred to the same kind of experience but also included an engineering degree.

Minor changes

6. Lease-in and operating ban

The operator certified in accordance with this Part shall only wet lease-in aircraft from an operator that is not subject to an operating ban pursuant to Regulation (EC) No 2111/2005. This requirement is important but does not bring any real change.

7. Conditions part of the lease-in approval (ORO.AOC.110(a) and (c) / OPS 3.165 (b)(2)(i) and (c)(1)(i))

The requirement according to which "any conditions which are part of the lease-in approval must be included in the lease agreement" that is included in OPS 3.165 (b)(2)(i) and (c)(1)(i) is not considered necessary in ORO.AOC.110(a) and (c) because Member States are not allowed to impose additional safety-related conditions to the lease agreement.

8. Code share (AMC1 and AMC2 to ORO.AOC.115(b) / Arrêté du 30 août 2006)

AMC1 to ORO.AOC.115(b) gives details about the audit program that the operator has to perform to check the third country operator compliance with ICAO standards (AMC1 to ORO.AOC.115 (b)). It is more comprehensive than the French rule.

Such audits, be they initial or not, may be performed by third country operators. Conditions are set in AMC2 to ORO.AOC.115 (b). They are more comprehensive than the current French rule.

9. The possibility for one person to hold more than one of the nominated posts is independent in ORO from the number of Full Time Equivalent or FTE (in OPS 3, at least 2 persons were required over 20 FTE) ((ORO.AOC.135(a)).

1.3 ORO.MLR

Major changes

1. Acceptability/approval of the OPS manual (OPS 3.1040(b))

This concept is not included in ORO for which specific operations addressed in the OPS manual shall be approved, which does not mean OPS manual approval.

2. Content of the OPS manual (AMC3 to ORO.MLR.100 / appendix 1 to 3.1045, §D)

See detail in Minor changes.

3. Minimum equipment list (ORO.MLR.105 and associated AMC/GM)

ORO.MLR.105 and associated AMC/GM transpose JAR-MMEL/MEL material. JAR MMEL/MEL 1 is already in force in France, transposed by MCT-TP Chapitre IV, sous-chapitre IV.5, annexe 1.2 "Guide d'approbation d'une liste minimale d'équipement" promulgated by DSAC.

Minor changes

4. Communication of the OPS manual to personnel (ORO.MLR.100(f) / OPS 3.1040(f) and (h))

Communication of the OPS manual to crew members by the operator is not restricted to Parts A and B in ORO (ORO.MLR.100(f))

5. Revision process of the OPS manual (AMC1 to ORO.MLR.100 - (d))

The following requirement is new.

The OPS manual should include a description of its amendment and revision process specifying the person(s) who may approve amendments or revisions (similar requirement in OPS 3: see content of the OPS manual (A.0.2 (a))); the conditions for temporary revisions and/or immediate amendments or revision required in the interest of safety; and the methods by which operator personnel are advised of the changes.

6. Content of the OPS manual (AMC3 to ORO.MLR.100 / appendix 1 to OPS 3.1045)

- A.3 "Quality system" of OPS 3 has been changed to "management system" in ORO to reflect the new rules on management systems. It is accompanied by other changes (AMC3 to ORO.MLR.100 - A3).

- A.7 Conditions under which flight and duty time may be exceeded or rest periods may be reduced, and the procedures used to report these modifications are too be included in the OPS manual. It was not the case in the OPS manual according to OPS 3 (AMC3 to ORO.MLR.100 – A7).

- A.8 : AMC3 to ORO.MLR.100 – A8 should include additional elements compared to OPS 3:

- 8.3.5 Procedures and instructions required for the avoidance of controlled flight into terrain, including limitations on high rate of descent near the surface. It was not the case in the OPS manual according to OPS 3.
- 8.3.15 Cabin Safety Requirements. Procedures should cover the carriage of special categories of passengers and the handling of suspected infectious diseases.
- 8.3.18 Policy on the use of autopilot and autothrottle for aircraft fitted with these systems
- 8.7 For non-commercial operations by AOC holders, a description of the differences to commercial operations.

- A.9 (9.1) concerning information, instructions and general guidance on the transport of dangerous, special notification requirements in the event of an accident or occurrence when dangerous goods are being carried are included (no such mention in OPS 3).
- A13 : “Code share” has been added to “Leasing” to reflect the new OPS AOC rules (no such mention in OPS 3).
- B. ORO does not address the “Command failure of the tail rotor” among the abnormal/emergency procedures (AMC3 to ORO.MLR.100 - B3). Though, it was the OPS manual according to OPS 3.
- C. Instructions and information relating to communications, navigation and aerodromes/operating sites... should be included in the OPS manual including the “(k) aerodrome/operating site categorisation for flight crew competence qualification (AMC3 to ORO.MLR.100 - C) (no such mention in OPS 3).
- D. References to technical crew training have been added (§2.3) to reflect the new OPS TC rules.

7. Journey log (ORO.MLR.110 / OPS 3.1055(a) and OPS 3.415)

The information may be recorded in a form other than on printed paper. Accessibility, usability and reliability should be assured.

1.4 ORO.SEC

General statement

All requirements dealt with in regulation 300/2008 have not been transposed in ORO.SEC (no transposition of OPS 3.1235 to OPS 3.1250).

Major changes

None

Minor changes

None

1.5 ORO.FC

General statement

A change in sub part N will be implemented to stick to JAR OPS3 in early 2013.

Major changes

1. Recurrent training and checking (ORO.FC.130 and 230 / OPS 3.965)

- OPS 3.965(a) specifies that each flight crew member shall complete annual recurrent training and checking whereas ORO specifies the annual recurrent training is relevant to the type or variant of aircraft on which he/she operates, including training on the location and use of all emergency and safety equipment carried. (ORO.FC.130 / OPS 3.965(a)(1))
- ORO.FC.230(b)(4) gives a possibility to group helicopter types for the purpose of the operator proficiency check (OPC). Yet, this possibility is limited to crew members involved in operations by day and over routes navigated by reference to visual landmarks with an other-than-complex motor-powered helicopter, in which case, the OPC may be performed in only one of the relevant types held.

Grouping criteria was slightly different in OPS 3.965(b)(3) and (b)(4) as they:

- concerned all one engine piston helicopters (except R22 and R44),
- concerned all one engine turbine helicopters of less than 3175kg,
- were independent of the type of operations.

However, as single engine helicopters are only used by day and over routes navigated by reference to visual landmarks, ORO.FC.230(b)(4) has no real impact on French operators.

- OPS 3.965 (c)(2) gives a possibility to group helicopter types for the purpose of line checks (not implemented in either ORO.FC.230 (c) nor associated AMC). According to OPS 3, the flight crew member holding qualifications in more than one type of helicopter may complete the line check in only one of the relevant types held. The line check shall be conducted on the most significant type of helicopter (based on the following criteria : characteristics of engines, performances, complexity of the systems, MTOM, the complexity of the helicopter). Yet, ORO.FC 140(a) gives a potential alleviation: experience/training and checking on other type/variant may be credited depending upon operational suitability data (=OSD pursuant to Regulation (EC) No 1702/2003).
- The use of commanders for operator proficiency check OPC is allowed: for operations of other-than-complex motor-powered helicopters by day and over routes navigated by reference to visual landmarks... the check may be conducted by a suitably qualified commander nominated by the operator, trained in CRM concepts (ORO.FC.230 (b)(5) / no equivalent provision in OPS 3)).

2. CRM

This is not a major change per se. Yet, there are many clarifications and additional requirements as described below (see “minor changes”).

3. Deletion of additional experience and training requirements for specific helicopter types (RH44 and RH22) (no provision in ORO / App.1 to OPS 3.960)

App. 1 to OPS 3.960 requires that to act as a commander of CAT flights operated with:

- Robinson RH22, a pilot shall have 150 hours of flight time on RH22 as a pilot-in-command
- Robinson RH22 and RH44, a pilot shall follow a safety training developed by Robinson and approved by the French civil Authority

No such requirement is included in ORO.

4. Other changes

- o Acting as a commander requires (ORO.FC.H.250(a)(2) / OPS3.960(a)(2)(i)):
 - In IFR,..., a minimum of 300 hours as pilot-in-command (and additional conditions). OPS3 also counts all hours flown as a pilot-in-command under supervision of a commander approved by the Authority for the purpose of these 300h (3.960(a)(2)(i)).
 - In VMC at night, a minimum of...100 hours as pilot-in-command. OPS 3 sets this value to 150h and counts all hours flown as a pilot-in-command under supervision of a commander approved by the Authority for the purpose of these 150h (3.960(a)(2)(i)).
- o New provision concerning training programmes (ORO.FC.145(b)): when establishing the training programmes and syllabi, operators shall include the mandatory elements for the relevant type as defined in the data established in accordance with Regulation (EC) No 1702/2003 (OSD in other terms).

Non-mandatory training elements should also be included in the programmes as per AMC.

Note: Other OSD may allow alleviation/additional possibilities to comply with given requirements (e.g. AMC1 to ORO.FC.200(a) - (d)(4))

- o New provision concerning aerodrome knowledge (AMC1 to ORO.FC.105(b)(2);(c) - (b)(2), (b)(3) and (c)): ORO introduces a categorisation of aerodromes (A, B and C)
A list of aerodromes categorised B and C (most demanding aerodromes) shall be provided in the OPS manual.
- o For multi pilot operations, flight crew members should be trained to recognise and handle a flight crew member incapacitation (AMC1 to ORO.FC.230, §(c)). This is not directly required in OPS 3. It mentioned though in Appendix 1 to OPS 3.1045, §A 4.4 and A 8.3.14.

Minor changes

5. Concerning CRM

- o Minimum duration of initial CRM training: 1 or 2 days (ORO.FC.115&.215(b)(1) / no equivalent provision in ACJ1 to OPS 3.943, §2.1).
- o Alternative qualifications for CRM trainer AMC1.1 to ORO.FC.115&.215 are allowed (new provision not contained in OPS 3)
- o The CRM trainer should have completed initial CRM training (AMC1 to ORO.FC.115&.215 - (b)(2)(iv) / no equivalent provision in ACJ1 to OPS 3.943, §2.2)
- o Assessment of CRM skills should serve to identify retraining where needed and be used to improve the CRM training system (AMC1 to ORO.FC.115&.215 - (h)(3) / no equivalent provision in ACJ2 to OPS 3.943, §4.1)
- o Principles of CRM skills assessment are established in AMC1 to ORO.FC.115&.215 - (h)(5)(iii) and (6) to (8) (no equivalent provision in OPS 3)
- o According to ORO.FC.230(c)(2) and OPS 3.965(a)(4)(ii), line checks may be conducted by a suitably qualified commander nominated by the operator. ORO.FC additionally provides that this commander shall be trained in CRM concepts and assessment of CRM skills.

Assessment of CRM skills should be based on a methodology described in the operations manual and provide feedback for retraining purposes (AMC1 to OR.FC230(b)(3)(ii) / appendix 1 to OPS 3.965, §(b)(3)(ii)). See 2 bullets above also.

- Procedures to update the CRM training programme are required (on a 3 year basis) (AMC1 to ORO.FC.230 - (a)(3)(iii) / no equivalent provision in OPS 3).

6. Operational medical limitation in a multi-pilot environment (AMC1 to ORO.FC.100(c) / no equivalent provision in OPS 3)

Pilots with an OML may operate aircraft in multi-pilot operations considering the relevant restrictions (the other pilot is fully qualified, has no OML and is less than 60)

7. FSTD characteristics(ORO.FC.145(d) and (e) / no equivalent provision in OPS 3)

When used, FSTD shall replicate the aircraft used by the operator, as far as practicable. Changes to FSTD shall be monitored.

8. Line training under supervision (so as to upgrade to commander) (ORO.FC.205 / appendix 1 to OPS 3.955, §(a)(1))

ORO.FC, contrarily to OPS3, specifies the minimum number of flight hours and sectors.

9. The procedures or operational restrictions for operation on more than one type or variant... shall cover the minimum experience level on one type or variant before beginning training for and operation of another type or variant (ORO.FC.240(a)(1), (2) and (3)). In OPS3, that minimum experience is only addressed for helicopters with MCTOM>5,7t or MOPSC > 19 (in AMC to 3.980, 2.d.ii)

10. Acceptability/Approval by the Authority : ORO brings a few amendments. See relevant table comparing IR OPS and OPS 3.

Other comments

Many other minor differences exist between ORO and OPS 3.
See detailed comparison in relevant table.

2. PART CAT

2.1 CAT.GEN

Major changes

None

Minor changes

11. Crew responsibilities (CAT.GEN.MPA.100 / OPS 3.085)

- CAT.GEN.MPA.100 introduces new elements compared to OPS 3.085, among which :
 - (b) (1) : a crew member shall report to the commander any fault, failure, malfunction or defect which the crew member believes may affect the airworthiness or safe operation of the aircraft including emergency systems, if not already reported by another crew member;"
 - (b)(4) and (b)(5) : these paragraphs require the crew member to comply with flight time limitations and provide necessary data to each operator so as to allow said operator to compute flight time limitations and rest requirements.
- In AMC1 to CAT.GEN.MPA.100(c)(1), the blood alcohol level at the start of a flight duty period is set to 0.2 per thousand or less;

12. Responsibilities of the commander (CAT.GEN.MPA.105(a) / OPS 3.085)

- In (a)(1), the commander is responsible for the safety of all crew members, passengers and cargo on board as soon as he arrives on board until he leaves the aircraft at the end of the flight;
OPS 3.085(e)(1) limited the responsibility of the commander to the flight time period (rotors turning)
- CAT.GEN.MPA.105(a)(10) and OPS3.085(e)(9) both require that the commander ensure a correct handling of flight recorders concerning disabling, erasing, deactivation. The following requirement is new though : "The commander shall ensure that flight recorders are reactivated only with the agreement of the investigating authority;"

13. GM1 to CAT.GEN.MPA.130 specifies situations where rotor engagement is allowed (no equivalent provision in OPS 3) :

- for the purpose of flight (then the pilot should not leave the control...) and
- for the purpose of maintenance: the IR does not prevent ground runs being conducted by qualified personnel other than pilots for maintenance purposes. Applicable conditions are described in the Guidance Material.

14. AMC1 to CAT.GEN.MPA.135(a)(3) contains a possibility to carry passengers on the second pilot station on single pilot operations

§(d)(1) of appendix 1 to OPS 3.005 (f) contains similar possibilities except for eligibility: in OPS 3, this possibility only concerns single pilot operations under VFR by day (over routes navigated by reference to visual landmarks) with helicopters with $MCTOM \leq 3175\text{kg}$ and $MOPSC \leq 9$ whereas in IR OPS it concerns all day VFR single pilot operations (whatever the MCTOM and MOPSC).

15. Portable Electronic Device (AMC1 to CAT.GEN.MPA.140 / no equivalent provision in OPS 3) :

A new AMC provides means to prevent that portable electronic devices (PEDs) on board aircraft adversely affect the performance of the aircraft's systems and equipment. This AMC addresses operation of PEDs in the different aircraft zones – passenger compartment, flight compartment, and cargo compartments. Furthermore, it addresses the specific case of PEDs qualified and under configuration control by the operator - controlled PEDs (C-PEDs) - for which the operator gives some credit.

Finally, EFB are also addressed in this AMC : the operator may allow the use of PEDs, e.g. to assist the flight crew in their duties, if procedures are in place (NPA 2012-02 to further regulate EFB).

16. Documents, manuals and information to be carried (CAT.GEN.MPA.180 (a)/ OPS 3.125, 3.130, 3.135, 3.1055)

The following elements differ :

- In CAT.GEN.MPA.180(a)(1), the flight manual or equivalent shall now be carried on each flight (OPS 3.130(a)(3) allowed to not carry the flight manual if the OPS manual contained the relevant information)
- In CAT.GEN.MPA.180(a)(4) the noise certificate (if provided), including an English translation, are required.

In OPS 3.125 (a)(3), a copy was sufficient and no English translation was required

- In CAT.GEN.MPA.180(a)(5), a certified true copy of the air operator certificate (AOC) is required whereas OPS 3.125(a)(4) mentioned an original or copy of the AOC.
- In CAT.GEN.MPA.180(a)(6), the operations specifications relevant to the aircraft type, issued with the AOC are required (no equivalent provision in OPS 3) :
- In CAT.GEN.MPA.180(a)(13), procedures and visual signals information for use by intercepting and intercepted aircraft are required to be onboard. This is not included in subpart B of OPS 3. Yet, it is mentioned in the OPS manual content (app. 1 to 3.1045, §A.12 concerning rules of the Air).
- In CAT.GEN.MPA.180(a)(13) is added the requirement to carry the MEL onboard.

Alleviations

Concerning the necessity to carry documents/manual and logs onboard, alleviations are provided under CAT.GEN.MPA.180(b). The scope of alleviations in 3.005 (f) and CAT.GEN.MPA.180(b) is very similar (MCTOM < 3 175 kg or less; MOPSC =< 9, VFR by day, local area...) except for the fact that OPS 3.005 (f), unlike CAT.GEN.MPA.180 (b), may also concern multipilot operations (theoretically).

Besides, in appendix 1 to OPS 3.005 (f), all alleviations but the carriage of the operational flight plan concern A to A flights (carriage of the flight plan is not necessary even for local A to B flights)

Eventually, alleviations in CAT.GEN.MPA.180 (b) are expanded compared to OPS 3; the list of documents that can be retained on ground additionally contains:

- noise certificate
- aircraft radio license
- journey log, or equivalent
- mass and balance documentation

One should note the possibility to retain documentation on the ground for aircraft complying with the conditions of 3.005 (g) (MCTOM > 3 175 kg or less; MOPSC < 9, VFR by day, local area...) has not been transposed.

17. Preservation, production and use of flight recorder recordings (CAT.GEN.MPA.195/ OPS 3.160)

A new requirement has been introduced in IR OPS: the operator shall conduct operational checks and evaluations of flight data recorder (FDR) recordings, cockpit voice recorder (CVR) recordings and data link recordings to ensure the continued serviceability of the recorders.
The associated AMC1 clarifies when operational checks are required.

18. Transport of dangerous goods (CAT.GEN.MPA.200/ OPS 3.1155)

Requirements in CAT.GEN address the circumstances under which dangerous goods might be carried without holding an approval in accordance with SPA.DG.

A Reference to the Annex 18 of the Chicago Convention and its attached Technical Instructions (ICAO Doc 9284-AN/905) is introduced.

2.2 CAT.OP

General statement

Operators conducting IFR operations do not use minima requiring a SPA approval.

Major changes

1. Use of aerodromes and operating sites (AMC1 to CAT.OP.MPA.105)

In paragraphs (a) to (c), elements of the AMC are new. This AMC defines what is considered an adequate site. It also provides that operators should have procedures for the survey of sites by a competent person. Sites that are pre-surveyed should be specifically specified in the operations manual and operations to non pre-surveyed sites by night (except in accordance with SPA.HEMS.125 (b)(4)) should not be permitted.

Paragraph (d) indicates that for sites that are not pre-surveyed, the operator should have in place a procedure that enables the pilot to make, from the air, a judgment on the suitability of a site. All helicopters are concerned by this provision. Currently, in OPS 3, this is only applicable to small helicopters under OPS 3.005(f) [MCTOM \leq 3 175 kg, MOPSC \leq 9, VFR by day over routes navigated by reference to visual landmarks] or local area operations under 3.005 (g) [MCTOM \geq 3 175 kg, MOPSC \leq 9, VFR by day over routes navigated by reference to visual landmarks, local area and A to A (except provided otherwise by the Authority) on the same day]

§(e) is new : it forbids operations to non-pre-surveyed sites by night (except in accordance with SPA.HEMS.125 (b)(4)).

2. IFR procedures

French regulation specifies that, at an aerodrome where instrument approach procedures exist, if no specific approach procedures were designed for helicopters, the operator shall use the procedures defined for category A aeroplanes (no equivalent provision in CAT.OP)

Concerning IFR procedures without ATS : paragraph (j) of appendix 1 to OPS 3.430 has not been transposed in AMC1 to CAT.OP.MPA.110. One element to be noted is that (j)(2) allows the instrument approach procedures to be performed in the absence of ATS if there is a station providing QNH (this may be a distant QNH) or an automatic system that transmits the required parameters.

3. Fuel policy (CAT.OP.MPA.150/ OPS 3.255)

The fuel policy and any change to it require now prior approval by the authority.

In AMC3 to CAT.OP.MPA.150 and AMC to OPS 3.255, provisions for alternate fuel are identical except for helidecks : additional fuel is required under CAT.OP.MPA.150.

4. Carriage of special categories of passengers (SCPs) (CAT.OP.MPA.155/ OPS 3.260 3.261 3.262 3.265 and IEM to OPS 3.260)

All requirements concerning persons with reduced mobility in OPS 3 are, under CAT.OP, also applicable to infants, unaccompanied children, deportees, inadmissible passengers and prisoners in custody : seat allocation, establishment of procedures for SCPs in particular.

5. Meteorological conditions – helicopters

CAT.OP.MPA.247 specifies new rules (not included in French OPS 3 although present in JAR OPS 3):

- (a) On VFR flights overwater out of sight of land with helicopters, the commander shall only commence take-off when the appropriate weather reports and/or forecasts indicate that the cloud ceiling will be above 600 ft by day or 1 200 ft by night
- (b) Notwithstanding (a), when flying between helidecks located in class G airspace where the overwater sector is less than 10 NM, VFR flights may be conducted when the limits are at, or better than, the following: see table 1 “Minima for flying between helidecks located in class G airspace” (values depending upon Day/Night single/multi pilot.)

6. Use of supplemental oxygen (CAT.OP.MPA285)

For small helicopter operations (VFR day only), the following alleviation contained in OPS 3.005 (f) (appendix 1) is not transposed in CAT.OP.MPA285 : “Non pressurised helicopters. With prior approval of the Authority, excursions of a short duration between 10000ft and 16000ft may be undertaken without supplemental oxygen), in accordance with procedures contained in the OPS manual”.

An exemption is given under strict conditions and with prior approval of the competent authority for Part-SPO only.

Minor changes

7. Effect on landing minima of temporarily failed or downgraded ground equipment (AMC11 to CAT.OP.MPA.110 / AMC to OPS 3.430(b)(4))

Table 9 of AMC11 to CAT.OP.MPA.110 and tables 1A/1B of AMC to OPS 3.430(b)(4) slightly differ (e.g. – in case of “failure of approach lights except the last 210m”: OPS3 specifies applicable minima are those when no approach lighting system exist whereas IR-OPS indicate applicable minima are those for basic approach lighting system...). For details see, comparison tables.

8. Decision range fo ARA approaches

According to AMC1 to CAT.OP.120 the decision range of airborne radar approaches should not be less than $\frac{3}{4}$ NM. Lesser values would need a derogation. Currently, paragraph (i) of appendix 1 to OPS 3.430 allows the operator to use a lesser decision range if an acceptable level of safety has been demonstrated.

9. Carriage of special categories of passengers (SCPs) (AMC1 to CAT.OP.MPA.155/ OPS 3.260 3.261 3.262 3.265 and IEM to OPS 3.260)

Special Categories of Passengers’ procedures as per AMC1 to CAT.OP.MPA.155(b) should take account of elements that are not currently and explicitly included in OPS 3 :

- the aircraft type and cabin configuration
- the total number of passengers carried on board
- any other factor(s) or circumstances possibly impacting on the application of emergency procedures by the operating crew members

10. Passenger seating (AMC1 to CAT.OP.MPA.165/ ACJ1 to OPS 3.280)

Seat allocation requirements associated to emergency exits may not apply according to OPS 3.280 ACJ1, §2: according to the French ACJ, the requirement on seat allocation with access to emergency exits does not apply to helicopters which normal exit door also serves as emergency exit. However, in such circumstances, the allocation of seats close to normal exits is left with the operator's discretion who has to make sure that the evacuation will not be hampered in case of emergency.

Alleviation authorising not to establish procedures for passenger seating allocation has not been transposed either: for operations with non-complex helicopter, such procedures, although adapted to the scope of operations, shall be established

11. Passenger briefing (AMC1 to CAT.OP.MPA.170 / OPS 3.285 (b) to (f))

The only new element in CAT.OP compared to OPS 3 consists in including in the passenger briefings mention of the safety benefits of having safety belts fastened when seated irrespective of seat belt sign illumination.

12. Flight preparation - Operational flight plan (CAT.OP.MPA.175(c)(2))

CAT.OP.MPA.175(c)(2) contains an alleviation for local operations : the operational flight plan is not required for helicopters with a MCTOM of 3175kg or less, operated by day over routes navigated by reference to visual landmarks

AMC 1 CAT.OP.MPA.175(c)(2) states that an operational flight plan may be established in a simplified form relevant to the kind of operation for operations with other-than-complex motor-powered aircraft as well as local operations with any aircraft.

Local helicopter operations according to regulation 965/2012 encompass more operations than those described in 3.005 (g) as regulation 965/2012 does not require operations to start and end at the same location on the same day.

As a consequence, alleviations provided by AMC 1 CAT.OP.MPA.175(c)(2) for operational flight plan go further than those included in OPS 3.

13. Selection of aerodromes and operating sites – helicopters (CAT.OP.MPA.181/OPS 3.295)

Text in OPS 3 and in IR OPS are quite different. Text in OPS 3 specifies:

“(b) For IFR flights or when flying under VFR and navigating by means other than by reference to visual landmarks, the commander shall specify at least one destination alternate aerodrome in the operational flight plan unless:

(1) the destination is a coastal aerodrome and the helicopter is routing from offshore [text in blue not included in OPS 3];

(2) for a flight to any other land destination, the duration of the flight and the meteorological conditions prevailing are such that, at [in OPS3, instead of "at" : "for the period from 1 hour before until 1 hour after"] the estimated time of arrival at the site of intended landing :

- in CAT.OP : "an approach and landing is possible under visual meteorological conditions (VMC); or..."

- in OPS 3 : "visibility is above 5km and ceiling above :

(i) in IFR, max [2000 ft; circling MDH+500ft]

(ii) in VFR, 2000 ft ; or..."

14. Refuelling/Defueling with passengers embarking and disembarking (CAT.OP.MPA.195(d)/ App. 1 to OPS 3.305)

OPS 3 contains more details and requirements than IR OPS: in particular the following provisions have not been transposed :

- procedures shall address the cases of rotors stopped and rotors turning (such element is not specified in IR OPS)
- The "fasten seat belt" sign shall be switched off.

15. Ice and other contaminants - flight procedures (CAT.OP.MPA.195/ OPS 3.305)

Addition of a new requirement: if icing exceeds the intensity of icing for which the aircraft is certified or if an aircraft not certified for flight in known icing conditions encounters icing, the commander shall exit the icing conditions without delay, by a change of level and/or route, if necessary by declaring an emergency to ATC.

16. Ice and other contaminants - ground procedures (CAT.OP.MPA.250/ OPS 3.345)

Implementing rule CAT.OP.MPA.250 and OPS 3.345 are identical but guidance material associated to procedures described in CAT.OP.MPA.250 is new (guidance material initially implemented for aeroplanes has been extended to helicopters).

It introduces new provisions, most notably the fact that during conditions conducive to aircraft icing on the ground or after de-icing and/or anti-icing, the aircraft is not dispatched for departure unless it has been given a contamination check or a post-treatment check by a trained and qualified person.

17. In-flight fuel management – helicopters (AMC1 to CAT.OP.MPA.281 / §(d)(14) of appendix 1 to 3.005 (f) and (c)(12) of appendix 1 to OPS 3.005 (g))

AMC1 to CAT.OP.MPA.281 contains provisions addressing in flight fuel management for complex motor powered helicopters other than local operations, which means that other than complex motor powered helicopters and local operations (with complex or other than complex motor powered helicopters) are not concerned.

A similar alleviation exists in both §(d)(14) of appendix 1 to 3.005 (f) and (c)(12) of appendix 1 to OPS 3.005 (g). Yet the scope is different as:

- Non complex helicopters operations according to basic regulation 216/2008, contrarily to 3.005 (f):
 - encompass IFR or VFR by night
 - exclude helicopters certified for multi pilot operations.
- Local helicopter operations according to regulation 965/2012 encompass more operations than those described in 3.005 (g) as regulation 965/2012 does not require operations to start and end at the same location on the same day

18. Ground proximity detection (CAT.OP.MPA.290/ OPS 3.395)

A new GM is implemented concerning the flight crew training programmes. It transposes the TGL 27 with minor amendments.

19. Use of ACAS (CAT.OP.MPA.295/ OPS 3.398)

The operator shall establish operational procedures and training programmes concerning the use of ACAS based on TGL 11 which was already the case in OPS3. However, now, when ACAS II is used, such procedures and training shall be in accordance with Commission Regulation (EU) No 1332/2011.

20. Commencement and continuation of approach (CAT.OP.MPA.305/OPS 3.405)

The reference to the outer marker is replaced by 1 000 ft or the final approach segment where the DH/MDH is more 1 000 ft above the aerodrome height.

Hence, 1000 ft (or flight into the final approach segment) is the height below which the pilot shall discontinue the approach if the reported RVR/visibility is less than the applicable minimum.

The reference to “1000 ft” in AMC11 to CAT.OP.MPA.110 - §(a) also replaces a reference to the “outer marker” in the corresponding chapter of OPS 3 (AMC to OPS 3.430, §2).

2.3 CAT.POL.H

Major changes

1. Use of PIS in the context of CAT rules (CAT.POL.H.225 / OPS 3.003 Definition (14) and 3.005 (i) and associated appendix 1)
 - The use of public interest sites (PIS) as per OPS 3.003 Definition (14) is not possible outside operations conducted with a HEMS approval according to the current French regulation. In IR OPS, the use of PIS is regulated by CAT.POL.H.225, which means not limited to HEMS operations in the European context.
 - Operations to/from a PIS may be conducted in performance class 2 provided some conditions are met (see CAT.POL.H.225). These conditions and the ones set in OPS 3 except for the following one: the PIS must have been in use before 1st July 2002 in IR OPS (CAT.POL.H.225(a)(1)); the date in French regulation is 1st January 2004 (appendix 1 to 3.005 (i) - § (c)(iii))
2. Operations without an assured safe forced landing capability during the take-off and landing phases (PC2) (CAT.POL.H.310(c)(2) / OPS 3.520(a)(3) and CAT.POL.H.325(c)(2) / OPS 3.535 (a)(3)).
 - For take off, the take-off mass shall not exceed the maximum mass specified for a rate of climb of 150 ft/min at 1 000 ft above the level of the aerodrome or operating site with the critical engine inoperative and the remaining engine(s) operating at an appropriate power rating (same requirement in OPS 3 and in IR OPS). Yet, IR OPS introduces the following element that was due only in 2015 in French OPS 3 and limited to a hostile environment outside a congested area: for operations from a helideck, the take-off mass shall take into account: the procedure; deck-edge miss and drop down appropriate to the height of the helideck with the critical engine(s) inoperative and the remaining engines operating at an appropriate power rating (CAT.POL.H.310 (c)(2)(ii)).
 - For landing, the landing mass shall not exceed the maximum mass specified for a rate of climb of 150 ft/min at 1 000 ft above the level of the aerodrome or operating site with the critical engine inoperative and the remaining engine(s) operating at an appropriate power rating (same requirement in OPS 3 and in IR OPS). Yet, IR OPS introduces the following element that was due only in 2015 in French OPS 3 and limited to a hostile environment outside a congested area: for operations from a helideck, the landing mass shall take into account the procedure and drop down appropriate to the height of the helideck with the critical engine inoperative and the remaining engine(s) operating at an appropriate power rating.
3. Operations over a non-congested hostile environment without a safe forced landing capability (CAT.POL.H.420 / OPS 3 (3.005 (e) and associated appendix 1)

Conditions for carrying out operations over a non-congested hostile environment without a safe forced landing capability are similar in CAT.POL.H.420 and in OPS 3 (3.005 (e) and associated appendix 1): they concern turbine-powered helicopters with an MOPSC of six or less and shall only be conducted if the operator has been granted an approval by the competent authority.

Yet two additional conditions are set in CAT.POL.H.420 (a) :

- requirement for a safety risk assessment performed by the operator [also addressed through CAT.POL.H.420(b)(4) where compliance with CAT.POL.H.305 (b) is required, in which (b)(1) implements a risk assessment indeed. Appendix 1 to OPS 3.005 (e) - §(d)(1) requires compliance with appendix 1 to OPS 3.517(a) - §(a)(2)(i) & (ii), which means

implementation of set of conditions and a usage monitoring system, as in CAT.POL.H.305 (b)(2) and (3) but no explicit risk assessment as in CAT.POL.H.305(b)(1)].

GM1 to CAT.POL.H.420 addresses the elements of the risk assessment

- endorsement by another Member State if applicable (see minor changes below).

IR OPS specifies that the operator shall conduct over a non-congested hostile environment without a safe forced landing capability in the areas and under the conditions specified in the approval:

- In AMC1 to CAT.POL.H.420 - (a), two cases that are deemed to be acceptable for the alleviation under the conditions of CAT.POL.H.420 according to: flights over mountainous areas and remote areas (same statement is made in ACJ to App.1 to 3.005 (e) although mountainous operations definition are not specified the same way).
- AMC1 to CAT.POL.H.420 - (b) deals with "Other areas of operation" (meaning other than mountainous or remote areas): "For other areas of operations to be considered for the operational approval, a risk assessment should be conducted by the operator that should, at least, consider the following factors..."

A similar, yet more specific, possibility is implemented in OPS 3: according to appendix 1 to 3.005 (e) - §(b)(2), the flight over hostile environment outside congested area is allowed if limited in time as specified in (d) of appendix 1 to 3.005(e). Indeed, this paragraph specifies in (d)(2): when the cumulative flight time over hostile environments outside congested areas is less than half the total flight time, with no portion of flight exceeding 5 consecutive minutes over such areas, helicopters may operate in PC3 and be exempted from complying with OPS 3.240 (a) (5) (equivalent to CAT.OP.MPA.137 requiring, for PC3 operations, surfaces that permit a safe forced landing to be executed). For these operations, the operator shall comply with (a)(1) and (a)(2) of appendix 1 to OPS 3.517 (a) (meaning a risk assessment, implementation of a set of conditions and of a UMS as in CAT.POL.H.420).

IR OPS also specifies that operations over non-congested hostile environment without a safe forced landing capability are prohibited under a HEMS approval (CAT.POL.H.420(b)(2)). This is not currently the case in OPS 3: 3.005 (e) indicates that appendix 1 to OPS 3.005(e) does not apply to special HEMS operations conducted in accordance with appendix 1 to OPS 3.005(d) but is applicable to basic HEMS operations (basic HEMS operations being those for which "normal" CAT minima are applied. See part SPA). This possibility was given to the operators in order to deal with mountain rescue (as in France an emergency flight has to be performed under 3.005 (d) even if no minima reduction is needed).

The alleviation concerning operations over a hostile environment located outside a congested area only applies to PC3 in IR OPS, not PC2 (appendix 1 to 3.005 (e) - §(c) applicable to PC2 operations has not been transposed)

Minor changes

4. Endorsement by another Member State of operations to/from Public Interest Sites (PIS) (CAT.POL.H.225(a)(6) / appendix 1 to OPS 3.005 (i) - §(a))

Currently, operators intending to conduct operations to/from PIS shall, as per appendix 1 to OPS 3.005 (i) - §(a), be approved by the Authority issuing the AOC on the one hand and, if applicable, the Authority of the State in which those operations will be performed on the other hand. This second approval is replaced by an endorsement in CAT.POL.H.225(a)(6). The framework of this endorsement is described in the associated guidance material (GM1).

5. Endorsement by another Member State of operations over a hostile environment outside a congested area (CAT.POL.H.420(a) / appendix 1 to OPS 3.005 (i) - §(a))

For operations over a hostile environment outside a congested area, the same changes have been implemented: currently, as per appendix 1 to OPS 3.005 (e) - §(a), operators intending to conduct such operations shall be approved by the Authority issuing the AOC on the one hand and, if applicable, the Authority of the State in which those operations will be performed on the other hand. This second approval is replaced by an endorsement in CAT.POL.H.420(a) (see also associated GM2).

6. List of PIS and types of helicopters/operations concerned (ARO.OPS.220 / appendix 1 to OPS 3.005(i) – §(a))

According to appendix 1 to OPS 3.005(i) – §(a) an operator wishing to conduct operations to/from PIS must have an prior approval that shall specify: the public interest site(s), the type(s) of helicopter and the type of operation. ARO.OPS.220 only requires the operator to provide a list of the public interest site(s) to which the approval applies. Yet, the type(s) of helicopter and the type of operation are implicit (e.g. the type of helicopter is necessary in IR OPS, even if not mentioned, so as to justify that the MOPSC is less than 6...).

7. Improvement program of the characteristics of the PIS (GM1 to CAT.POL.H.225 / appendix 1 to 3.005 (i) - § (c)(iv))

Currently, in appendix 1 to 3.005 (i) - § (c)(iv), the use of PIS is only allowed if a program aiming at improving the characteristics of the PIS has been implemented so as to allow operation in accordance with requirements of subpart G (performance class 1). This requirement has not been transposed in IR OPS: as justified by the Agency, “these sites fall outside the scope of the Agency remit...”. Yet GM1 to CAT.POL.H.225 contains such elements, expanding the problems associated with such sites and exposing a long term solution. This GM1 is very similar to ACJ to appendix 1 to JAR OPS 3.005(i) which was not transposed in French OPS 3.

8. Operations without an assured safe forced landing capability during the take-off and landing phases (PC2) (CAT.POL.H.405 (b) / appendix 1 to 3.517(a))
 - o Operations without an assured safe forced landing capability during the take-off and landing phases shall only be conducted if the operator has been granted an approval by the competent authority. The regulatory requirements are laid down in CAT.POL.H.405 (b). The conditions are the same as in appendix 1 to 3.517(a).

Yet, the set of conditions described in CAT.POL.H.305(b)(2) (helicopter/engine modification standard, preventive maintenance actions, take-off and landing procedures, flight crew training, reporting of loss of power, engine shutdown or engine failure events) are referred to at the ACJ level in OPS 3 (ACJ2 to appendix 1 to 3.517(a)) with a slight difference :

“(c) The usage monitoring system should fulfil at least the following (AMC2 to CAT.POL.H.305 (b)):...

(5) The analysis of parameters gathered by the usage monitoring system, the frequency of such analysis ...” (in ACJ2 to appendix 1 to OPS 3.517(a), text in blue does not appear).

9. The parameters referred in (c)(1) of AMC2 CAT.POL.H.305(b) should be recorded (as per OPS 3 and IR OPS). According to GM 1 to CAT.POL.H.305 (b), which is new, a FADEC may be used to record some of these parameters.

2.4 CAT.POL.MAB

Major changes

None

Minor changes

1. Period of establishment of mass and CG limits (CAT.POL.MAB.00 (b))

CAT.POL.MAB.100 (b) contains text in blue font, not included in 3.605 (b) :

“(b) The operator shall establish the mass and the CG of any aircraft by actual weighing prior to initial entry into service and thereafter at intervals of 4 years if individual aircraft masses are used, or 9 years if fleet masses are used.”

2. CG limits (AMC3 to CAT.POL.MAB.100 (b) - §(a) / OPS 3.605 (IEM to appendix 1 - §(d))

In AMC3 to CAT.POL.MAB.100 (b) - §(a): “In the Certificate Limitations section of the AFM, forward and aft CG limits are specified. These limits ensure that the certification stability and control criteria are met”.

In OPS 3 (additional text in blue font): “In the Certificate Limitations section of the Helicopter Flight Manual, forward and aft centre of gravity (CG) as lateral left and right limits are specified”.

3. Distribution of passengers in the cabin (AMC3 to CAT.POL.MAB.100 (b) - §(b)(1))

In AMC3 to CAT.POL.MAB.100 (b) - §(b)(1):

“(b) Defining and applying operational procedures in order to:
(1) ensure an even distribution of passengers in the cabin;”

No such requirement has been included in OPS 3.

4. Omission of data from the mass and balance documentation (CAT.POL.MAB.105 (a) / appendix 1 to 3.625 - (a)(1)(ii))

In part CAT : “The information above [mass and balance documentation] shall be available in flight planning documents or mass and balance systems.

Some of this information may be contained in other documents readily available for use.”

OPS 3.625 (a) specifies that an operator shall establish mass and balance documentation prior to each flight specifying the load and its distribution (same as in IR OPS) and 3.625 (b) that, subject to the approval of the Authority, an operator may use an alternative to the procedures required by paragraphs (a) and (b). Besides appendix 1 to 3.625 (§(a)(1)(ii)) provides that "subject to the approval of the Authority, an operator may omit some of this Data from the mass and balance documentation."

No such approval has been included in IR OPS.

5. Electronic signing (CAT.POL.MAB.105(c))

The following provisions have been included in CAT.POL.MAB.105(c) (no equivalent provision in OPS 3) :

“Where a signature by hand is impracticable or it is desirable to arrange the equivalent verification by electronic means, the following conditions should be applied in order to make an electronic signature the equivalent of a conventional hand-written signature:

(a) electronic ‘signing’ by entering a PIN code with appropriate security etc.;

(b) entering the PIN code generates a print-out of the individual's name and professional capacity on the relevant document(s) in such a way that it is evident, to anyone having a need for that information, who has signed the document;

(c) the computer system logs information to indicate when and where each PIN code has been entered;

(d) the use of the PIN code is, from a legal and responsibility point of view, considered to be fully equivalent to signature by hand;

(e) the requirements for record keeping remain unchanged; and.

(f) all personnel concerned are made aware of the conditions associated with electronic signature and this is documented.”

6. On-board mass and balance systems (CAT.POL.MAB.105 (e) / appendix 1 to 3.625 - §(c))

Last sentence of (e) of part.CAT POL.MAB.105 (e) (blue font) was not included in OPS 3:

“The operator shall obtain approval by the competent authority if he/she wishes to use an onboard integrated mass and balance computer system or a stand-alone computerised mass and balance system as a primary source for dispatch. The operator shall demonstrate the accuracy and reliability of that system.”

2.5 CAT.IDE

Major changes

1. IFR operations with a single pilot (CAT.IDE.H.135 / AMC to OPS 3.655)

AMC to OPS 3.655 allowing IFR operations with a single pilot without an autopilot was included in OPS 3 and has not been transposed in CAT.IDE.H.135.

2. Radio altimeters (AMC1 to CAT.IDE.H.145 / OPS 3.660)

The audio warning associated to radio altimeters required should be a voice warning (AMC1 to CAT.IDE.H.145) whereas in OPS 3, it could be a voice warning or any other equivalent means acceptable to the Authority (end of OPS 3.660).

3. Supplemental oxygen (CAT.IDE.H.240 / appendix 1 to OPS 3.005 (f))

For small helicopter operations (VFR day only), the following alleviation contained in OPS 3.005 (f) (appendix 1) is not transposed:

“Non pressurised helicopters. With prior approval of the Authority, excursions of a short duration between 10000ft and 16000ft may be undertaken without supplemental oxygen), in accordance with procedures contained in the OPS manual”

Yet, CAT.IDE.H.240 Table 2 contains a different alleviation for non complex helicopters:

- For any period exceeding 30 minutes between 10 000ft and 13 000ft : oxygen supply shall be available for all occupants of flight crew compartment seats on duty, crew members assisting flight crew in their duties, required cabin crew members and 10% of passengers
- Above 13 000ft, oxygen supply supply shall be available for all occupants of the helicopter (FC, CC and TC members and 100% of passengers)

For local area helicopter operations (VFR day only), the following alleviation contained in OPS 3.005 (f) (appendix 1) is not transposed at all:

“Non-pressurised helicopters. With prior approval of the Authority, excursions of a short duration between 10000ft and 16000ft may be undertaken without supplemental oxygen), in accordance with procedures contained in the OPS manual”

4. Navigation equipment (AMC2 to CAT.IDE.345 – (a)(1) and (a)(2) / OPS 3.865©)

In AMC2 to CAT.IDE.345:

“(a) An acceptable number and type of communication and navigation equipment is:

- (1) Two VHF omnidirectional radio range (VOR) receiving systems on any route, or part thereof, where navigation is based only on VOR signals;
- (2) Two automatic direction finder (ADF) systems on any route, or part thereof, where navigation is based only on non-directional beacon (NDB) signals;
- (3) Area navigation equipment when area navigation is required for the route being flown (e.g. equipment required by Part-SPA).”

Whereas in OPS 3.865, instead of (a)(1) and (a)(2) above, requirement is:

“Navigation equipment:

(1) Comprises not less than

- (i) 2 independent Nav aids appropriate to the route/area to be flown

- (ii) An approach aid suitable for the destination and alternate aerodrome
- (iii) an RNAV system where RNAV is required for the route/area to be flown
- (iv) an additional VOR for any route or part thereof where navigation is based only on VOR signals
- (v) an additional ADF for any route or part thereof where navigation is based only on NDB signals"

(2) Complies with RNP Type for operation in the airspace concerned

5. Equipment unserviceability (CAT.IDE.H.345(a) / OPS 3.865 (f))

In OPS 3.865 (f):

“Where no more than one item of equipment specified in (a) (corresponding to CAT.IDE.H.345(a)), is unserviceable when the helicopter is about to begin the flight, the helicopter may take off if :

- (1) It is not reasonably practical to repair that item before the commencement of the flight*
- (2) the helicopter has not made more than one flight since the item was found to be unserviceable*
- (3) The commander has satisfied...that the flight can be made safely...”*

In CAT.IDE, operations with inoperative equipment are dealt with at MEL level only

Minor changes

6. Equipment not requiring to be approved

Child restraint devices (CRD) have been added to the list of equipment not requiring approval (CAT.IDE.H.100(a))

7. Public address system - Alleviation (CAT.IDE.H.180(b))

CAT.IDE introduces an alleviation from OPS 3: helicopters with an MOPSC of more than 9 and less than 20 are exempted from having a public address system, if the helicopter is designed without a bulkhead between pilot and passengers and the operator is able to demonstrate that when in flight, the pilot’s voice is audible and intelligible at all passengers’ seats (CAT.IDE.H.180(b))

8. New provisions for FDR, CVR, data link recording (CAT.IDE.H.185/190/195/200)

For helicopters first issued with an individual Certificate of Airworthiness on or after 01 January 2016 :

- For helicopters of more than 3175 kg : the CVR shall be capable of retaining the data recorded during at least two hours (CAT.IDE.H.185(b)(1)). Operational performance requirements for CVR should be those laid down in EUROCAE Document ED-112 (AMC1 to CAT.IDE.H.185(b))
- For helicopters of more than 3175 kg : the FDR shall record the parameters required to determine accurately the flight path, speed, attitude, engine power, operation and configuration and be capable of retaining the data recorded during at least the preceding 10 hours (CAT.IDE.H.190(b)(1)). Operational performance requirements for flight data recorders (FDRs) should be those laid down in EUROCAE Document ED-112 (AMC1 to CAT.IDE.H.190)
- Helicopters first issued with an individual CofA on or after 8 April 2014 that have the capability to operate data link communications and are required to be equipped with a CVR, shall record data link communication (CAT.IDE.H.195). A flight data and cockpit voice

combination recorder may record data link communication messages and related information required (AMC1 to CAT.IDE.H.200)

For helicopters with a MCTOM of more than 3175kg and first issued with a CofA after 1 August 1999, individual parameters that can be derived by calculation from the other recorded parameters need not to be recorded, if agreed by the competent authority (AMC2 to CAT.IDE.H.190 - (c))

9. Acceptable Child Restraint Device (CRD) (AMC1 to CAT.IDE.H.205)

AMC1 to CAT.IDE.H.205 introduces new elements on CRD:

- what is an acceptable CRD
- possible standards meeting the objectives of a CRD
- location, installation and operation of CRDs

10. Replacement of ELT(S) by ELT(AP) (AMC1 to CAT.IDE.H.300(b)(3)&CAT.IDE.H.305(b))

An ELT(AP) may be used to replace one required ELT(S) provided that it meets the ELT(S) requirements. A water-activated ELT(S) is not an ELT(AP).

3. PART SPA

Most specific approvals are not currently needed in France. Those being used concern:

- Dangerous goods
- HEMS operations

Hence, in the following paragraphs, comparison is drawn between SPA.GEN, SPA.DG, SPA.HEMS on the one hand and requirements laid down in OPS 3 and corresponding AMC/IEM/ACJ on the other hand.

3.1 SPA.GEN

All requirements are new.

Yet, they implement general and logical principles (definition of Competent Authority, privileges associated to, changes to and continued validity of specific approval)

3.2 SPA.DG

Major changes

None

Minor changes

1. Elements are now explicitly to be included in the OPS manual :
 - Actions to take in the event of an aircraft accident or incident when dangerous goods are being carried (SPA.DG.105 (b)(3) / no equivalent explicit provision in OPS 3.1215(c)).
 - Removal possible contamination (SPA.DG.105 (b)(5)). The requirement also exists in OPS 3.1205(a)(1) but its inclusion in the OPS manual is not dealt with explicitly.
 - Inspection for damage, leakage, contamination (SPA.DG.105 (b)(7) / OPS 3.1200(a)(1) to (4)). The requirement also exists in OPS 3 but its inclusion in the OPS manual is not dealt with.
 - Incident/accident reporting (SPA.DG.105 (b)(8)). The requirement also exists in OPS 3.1225 but its inclusion in the OPS manual is not dealt with.
2. Information to be provided by the pilot in case of an in-flight emergency shall be summarised by the operator if information is impracticable (in case too many information needs to be forwarded) (AMC1 to SPA.DG.110 (a) / no equivalent provision in OPS 3)
3. Information and documentation
The operator shall:
 - ensure that a copy of the information to the pilot-in-command/commander is retained on the ground and that this copy, or the information contained in it, is readily accessible to the aerodromes of last departure and next scheduled arrival, until after the flight to which the information refers (SPA.DG.110 (e) / no equivalent provision in OPS 3)
 - accept dangerous goods on the condition that it is accompanied by 2 copies of DG transport document (or doc in electronic form) (AMC1 to SPA.DG.110(b) - §(a)(2) / nothing in OPS 3)
 - An alleviation is possible: dangerous goods document may be provided in electronic form (SPA.DG.110 (c))/ no equivalent provision in OPS 3)

Other comments

Many of the elements included in OPS3 and associated AMC/IEM/ACJ are not included in SPA.DG so as not to repeat the content of technical instructions : OPS 3.1170, 3.1175, 3.1180 or IEM 3.1160(b)(3), 3.1160(b)(4), 3.1160(b)(5) or AMC 3.1175...

3.3 SPA.HEMS

Major changes

1. SPA.HEMS.100 – crewing requirements

OPS 3.005 (d) introduces requirements for HEMS operations.

Specificity of 3.005 (d) is that it refers to two different appendixes. The operator has to comply with either Appendix 1 or Appendix 2 (operator's choice).

a/ In appendix 1, crewing requirements are based on either one single pilot (no HEMS crew member) or two pilots :

- If operations are conducted under VFR and the minima applied are the same as those for CAT operations, one pilot is required (no additional crew member). Such operations are called "**basic HEMS**" (see definition in 3.003 (a)(9))
- For VFR operations needing lower minima, two pilots are required ; requirements for such operations differ from the ones set for "basic HEMS"; in particular, applicable minima can be found in 3.005 (d) - appendix 1, §(c)(4)(ii)(B) and are the same as those included in SPA.HEMS.120, Table 1. Such operations are called "**special HEMS**" (see 3.003 (a)(10))

b/ In appendix 2, crewing requirements are the same as those contained in JAR OPS 3 (one pilot + one additional crew member, either a HEMS crew member or another pilot).

Other requirements of appendix 2 are also the same as those set in JAR OPS 3.

All French operators comply with appendix 1 and perform "basic HEMS".

2. SPA.HEMS120 (a) – applicable minima – specific equipment required in OPS 3

SPA.HEMS.120 (a) minima in table 1 and minima set in 3.005 (d) - appendix 1, (c)(4)(ii)(B) are exactly the same but their scope differs : in France these minima are only applicable to VFR operations performed under "special HEMS".

Operations are actually conducted under "basic HEMS" (only one pilot), which means:

- Applicable minima are not lower than those applicable during CAT operations (see 3.005(d) - appendix 1, (c)(4)(ii)(A))
- Specific conditions are introduced to mitigate the single pilot crewing : 3.005 (d) - appendix 1, §(d)(2)(i) specifies that helicopters used in HEMS shall be equipped with:
 - o a radio-altimeter (aural and visual alerts),
 - o a navigation system supplying immediate position by direct reading
 - o for night operations, a system augmenting stability on three axes or an autopilot

3. SPA.HEMS. 125

a/ SPA.HEMS. 125 (a) prohibits Performance Class 3 (PC 3) HEMS operation over a hostile environment.

This differs from OPS3 which specifies that PC3 "basic HEMS" operations may be conducted over a hostile environment outside congested areas (in compliance with 3.005 (e) - appendix 1; 3.005 (e) - appendix 1 §(d)(1) "equivalent to" CAT.POL.H420 with a major difference as CAT.POL.H.420 excludes HEMS OPS over a hostile environment outside congested areas)

Note : PC3 HEMS is possible under 3.005 (e) - appendix 1 §(d)(1), if operators comply with (a)(2)(i) and (ii) of App. 1 to 3.517 (a) and associated ACJ (CAT.POL.H420 required compliance with CAT.POL.H.305 (b)) It has been allowed for mountain rescue on ski resorts: as it is considered as HEMS flight in France, it has to be performed under 3.005(d).

b/ SPA.HEMS. 125 (b)(1) and (2) requires Performance Class 1 (PC1) for operations to/from a FATO located in a congested hostile environment except if the FATO is a public interest site, PIS (operations shall comply with CAT.POLH.225).

SPA.HEMS differs from OPS 3:

- under SPA.HEMS, in a congested hostile environment, PC1 is required at the operating base (even if it is classified as a PIS). PC2 is possible when applying OPS 3.
- under SPA.HEMS, in a hostile environment outside a congested area, PC2 is required (CAT.POL.H.100 + SPA.HEMS.125 (a)). PC3 is possible when applying OPS 3 (see § above).

Note: for comprehensive analysis, see comparison between OPS 3 and part CAT for PIS use. In particular, SIP may only be used under HEMS approval according to OPS3.

c/ SPA.HEMS. 125 (b)(3) requires Performance Class 2 (PC2) for operations to/from operating sites located in a hostile environment . Yet, they may be exempt from the approval required by CAT.POL.H.305(a), provided compliance is shown with CAT.POL.H.305(b)(2) and (b)(3)."

In OPS 3, for such operations in such an environment, OPS3 “only” specifies that operations shall be conducted under PC1 as far as possible and that he should minimise exposure time. This means CP2 or CP3.

4. Training and checking - Content of the OPS manual and syllabi approval

This inclusion of HEMS procedures for operational training (SPA.HEMS.130 (c)) in the OPS manual and the approval by the competent authority of the training and checking syllabus (SPA.HEMS.130 (f)(1)) were not included in corresponding 3.005(d) - Appendix 1, (c)(3)(ii)(D) and 3.005(d) - Appendix 1, (e).

Minor changes

- As far as recency is concerned (SPA.HEMS.130 (d)) SPA and OPS 3 are identical except for text in blue font : “(d) Recency. All pilots conducting HEMS operations shall have completed a minimum of 30 minutes’ flight by sole reference to instruments in a helicopter or in an FSTD [STD in OPS 3] within the last six [seven in OPS3] months.”
- As far as technical crew composition is concerned, OPS 3 does not include elements of SPA.HEMS.130(e) nor associated AMC1 neither GM as long as technical HEMS crew member is not used in appendix 1 to 3.005 (d), §(c)(3)(iv). Requirements of SPA.HEMS.130 (e) are only present in appendix 2 to 3.005 (d), §(c)(3)(iv).
- OPS manual as per SPA.HEMS.140 is more detailed in OPS 3.005(d), appendix 1 §(b) (added text in blue font):
“(a) The operator shall ensure that, as part of its risk analysis and management process, risks associated with the HEMS environment are minimised by specifying in the operations manual: selection, composition and training of crews; levels of equipment and dispatch criteria; and operating procedures and minima, such that normal and likely abnormal operations are described and adequately mitigated.”
- It should also include the following elements not included in 3.005(d) – App.(b) and (d)(1)(i):
 - o b) guidance on take-off and landing procedures at previously unsurveyed HEMS operating sites; (AMC1 to SPA.HEMS.140 §(b))

- Training programmes also, although not mentioned in AMC1 to SPA.HEMS.140 (but required in SPA.HEMS.130 (c) an (f)(1))

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Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3/OPS3R équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
IR	ORO.GEN.005	Scope		New			Cat operators shall comply with part ORO
IR	ORO.GEN.105	Competent authority		Modif.	Civil Aviation Code (R. 133-5)	C	Members States of principle place of business of an operator shall designate the competent authority
IR	ORO.GEN.110(a)	Operator responsibilities		NIL	3.175(a)	C	
IR	ORO.GEN.110(b)	Operator responsibilities		NIL	3.175(l)	C	
IR	ORO.GEN.110(c)	Operator responsibilities	Operational control	NIL	3.195	C	In OPS 3, The operational control method shall be approved. This is not the case in ORO.
AMC1	ORO.GEN.110(c)	Operator responsibilities		NIL	3.195 (ACJ, §2)	D	
GM1	ORO.GEN.110(c) - (a)	Operator responsibilities OPERATIONAL CONTROL		NIL	3.195 (ACJ, end of §1)	D	
GM1	ORO.GEN.110(c) - (b)	Operator responsibilities OPERATIONAL CONTROL		Modif.	3.195 (ACJ)	D	Reference to ICAO Doc 7192 added for the training of flight operations officers
IR	ORO.GEN.110(d)	Operator responsibilities		NIL	3.175(n)	C	
IR	ORO.GEN.110(e)	Operator responsibilities		NIL	3.205	D	
IR	ORO.GEN.110(f) (1st sentence)	Operator responsibilities		NIL	3.210(a)	D	
IR	ORO.GEN.110(f) (2d sentence)	Operator responsibilities		NIL	3.210(c)	D	
IR	ORO.GEN.110(g)	Operator responsibilities		NIL	3.020	B	
IR	ORO.GEN.110(g)	Operator responsibilities		NIL	3.020(a)(1)	B	
IR	ORO.GEN.110(h)	Operator responsibilities	Checklist system	Modif.	3.210(b)	D	The checklist system excludes reference to CRM principles and includes extra text on the need to take due account of the requirement to manufacturers' documents update
AMC1	ORO.GEN.110(f)(h) - (a)	Operator responsibilities ESTABLISHMENT OF PROCEDURES		Modif.	3.210(a)	D	Procedures to be established for cabin crew members addressing 5 elements. No cabin crew members within French helicopters operators
AMC1	ORO.GEN.110(f)(h) - (b)	Operator responsibilities ESTABLISHMENT OF PROCEDURES		Modif.	3.210(b)	D	Content of the checklist system for cabin crew slightly amended No cabin crew members within French helicopters operators
AMC1	ORO.GEN.110(f)(h) - (c)	Operator responsibilities ESTABLISHMENT OF PROCEDURES		NIL	3.210(c)	D	

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3/OPS3R équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
IR	ORO.GEN.110(i)	Operator responsibilities		New			Transposition of Annex 6 Part II, paragraph 3.4.3.3 : "The operator shall specify flight planning procedures to provide for the safe conduct of the flight based on considerations of aircraft performance, other operating limitations and relevant expected conditions on the route to be followed and at the aerodromes or operating sites concerned. These procedures shall be included in the operations manual."
IR	ORO.GEN.110(j)	Operator responsibilities		NIL	3.1220	R	Requirement not linked to a dangerous goods approval for clarity. Future requirement is fundamentally the same
IR	ORO.GEN.115(a)	Application for an operator certificate		Modif.	3.185	C	"(a) The application for an operator certificate or an amendment to an existing certificate shall be made in a form and manner established by the competent authority, taking into account the applicable requirements of Regulation (EC) No 216/2008 and its Implementing Rules." Application should be made according to what has been defined by the competent authority.
IR	ORO.GEN.115(b)	Application for an operator certificate Access		New	3.180(b)	C	"(b) Applicants for an initial certificate shall provide the competent authority with documentation demonstrating how they will comply with the requirements established in Regulation (EC) No 216/2008 and its Implementing Rules. Such documentation shall include a procedure describing how changes not requiring prior approval will be managed and notified to the competent authority."
IR	ORO.GEN.120	Means of compliance		New			AMC process not addressed in JAR OPS3 In ORO.GEN : - a) deals with possibility to use alternative AMC - b) deals with prior notification of alternative AMC to the competent authority and approval of said alternative AMC
AMC1	ORO.GEN.120(a)	Means of compliance DEMONSTRATION OF COMPLIANCE		New			Requirement to carry out a risk assessment related to the use of alternative means of compliance
IR	ORO.GEN.125	Terms of approval and privileges of an operator		NIL	3.175(a) and 3.005 (c)	C and A	
AMC1	ORO.GEN.125	Terms of approval and privileges of an operator MANAGEMENT SYSTEM DOCUMENTATION		New			New AMC requiring to have the privileges and detailed scope of activities integrated in the management system documentation.

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3/OPS3R équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
IR	ORO.GEN.130	Changes		Modif.	3.180(b)	C	A clear distinction is introduced for items requiring a prior approval : a) : prior approval for changes in scope of certificate and OPS SPECS or in Mangement System b) : application for changes, related docs, formal approval c) : changes not requiring prior approval to be managed and notified to the competent authority
AMC1	ORO.GEN.130 - (a)	Changes APPLICATION TIME FRAMES		NIL	3.185(d)	C	Included as AMC
AMC1	ORO.GEN.130 - (b)	Changes APPLICATION TIME FRAMES		NIL	3.185(f)	C	Included as AMC
AMC1	ORO.GEN.130 - (c)	Changes APPLICATION TIME FRAMES		New	3.185(f)	C	Time frames may be changed in unforeseen circumstances for amendment of an AOC or change of a nominated person
GM1	ORO.GEN.130(a) - (a)	Changes GENERAL		Modif.	3.185(a)	C	Examples of changes that may affect the AOC. Included as a GM. More details are given in GM to ORO than in 3.185 (a)
GM1	ORO.GEN.130(a) - (b) and (c)	Changes GENERAL		New			ORO...130 (b) : Prior approval is required for any changes to the operator's procedure describing how changes not requiring prior approval ae managed... ORO...130 (c) : Changes requiring prior approval may only be implemented upon receipt of formal approval..
GM2	ORO.GEN.130(a)	Changes CHANGE OF NAME		New			New guidance introduced in the case of a modification of the operator's name
GM3	ORO.GEN.130(b)	Changes CHANGES REQUIRING PRIOR APPROVAL		Modif.	3.1040(b), §3	P	Edited in line with drafting principles and now includes all items that need to be approved and not only those contained in the OM. Compared to OPS 3, ORO introduces in particular : - alternative AMCs - procedures regarding items notified to the authority - leasing agreements - non commercial ops by AOC holders - Fuel policy - for helicopters ops : airborne radar approaches, ops over a hostile environment outside a congested area, slection of off-shore alternates, use of public interest sites, ops without a safe forced landing - approach flight technque (CDFA...)
IR	ORO.GEN.135	Continued validity		Modif.	3.180 and 3.175 (e)	C	Conditions for continued validity of certificate
IR	ORO.GEN.140 (a)	Access		NIL	3.150(a)(1) and 3.175(e)	C	

Appendix 2 - Comparison IR OPS and OPS3 - ORO 130306.xls

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3/OPS3R équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
IR	ORO.GEN.140 (b)	Access		NIL	3.145	C	
IR	ORO.GEN.150	Findings		NIL	L6411-1 and Instruktion 11-100 (§5 in particular) May 2011, 4th		Rule already in French regulation: http://www.developpement-durable.gouv.fr/IMG/pdf/Instruction_de_surveillance_DSAC_-_exploitants_d_aeronefs.pdf Identification of root cause of non compliance by the operator (ORO.GEN.150 (a)) not explicitly addressed in Fench text
AMC1	ORO.GEN.150(b)	Findings GENERAL		New			Corrective action plan to address the effects of the non-compliance, as well as its root-cause
GM1	ORO.GEN.150	Findings GENERAL		New			Distinction between corrective and preventive actions
IR	ORO.GEN.155 (a)	Immediate reaction to a safety problem		NIL	L6411-1 and Instruktion 11-100 (§5 in particular) May 2011, 4th		Rule already in French regulation. Nevertheless, references of ORO are changed : "(a) any safety measures mandated by the competent authority in accordance with ARO.GEN.135(c);"
IR	ORO.GEN.155 (b)	Immediate reaction to a safety problem		Modif	3.890(a)(5)		(b) any relevant mandatory safety information issued by the Agency, including airworthiness directives. The only difference is the reference to the Agency
IR	ORO.GEN.160 (a)	Occurrence reporting		Modif.	3.420 (b)(2)	D	Partially transferred - considers Reg. 996/2010 and Directive 2003/42 - Definitions not transferred (see Reg. 996/2010) ORO.GEN and OPS 3 are identical except for the following differences : "(a) The operator [or the pilot in command in OPS 3] shall report to the competent authority, and to any other organisation required by the State of the operator to be informed [text in blue not included in OPS 3], any accident, serious incident and occurrence..."
IR	ORO.GEN.160 (b)	Occurrence reporting		Modif.	3.420(b)(4) and (b)(5)	D	ORO.GEN and OPS 3 are identical except for the fact in OPS 3, the pilot in command is also in charge of reporting. In ORO, it is always incumbent on the operator.
IR	ORO.GEN.160 (c)	Occurrence reporting		New			"...the reports referred in paragraphs (a) and (b) shall be made in a form and manner established by the competent authority and contain all pertinent information about the condition known to the operator."
IR	ORO.GEN.160 (d)	Occurrence reporting		NIL	3.420(b)(3)	D	ORO.GEN and OPS 3 are identical except for the fact in OPS 3, the pilot in command is also in charge of reporting. In ORO, it is always incumbent on the operator.
IR	ORO.GEN.160 (e)	Occurrence reporting		New	3.420(b)(3)	D	"Where relevant, the operator shall produce a follow-up report to provide details of actions it intends to take to prevent similar occurrences in the future..."

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3/OPS3R équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
AMC1	ORO.GEN.160 - (a)	Occurrence reporting GENERAL		Modif.	3.420 (partially)	D	The list of occurrences to be reported, which was at implementing rule level, has been downgraded to an AMC and replaced by a reference to Directive 2003/43/EC
AMC1	ORO.GEN.160 - (b)	Occurrence reporting GENERAL		NIL	3.420(d)(6)	D	Volcanic ash reports
IR	ORO.GEN.200	Management system		Modif.	3.035	B	Management system supersedes quality system Yet, For French operators, two texts are addressing a subset of the management system, the SMS : "arrêté" and "instruction" dated 22 December 2008 : http://www.developpement-durable.gouv.fr/IMG/pdf/arrête_22_12_08_SGS-2.pdf http://www.bulletin-officiel.developpement-durable.gouv.fr/fiches/BO20091/met_20090001_0100_0016.pdf referred to as arrêté SMS and instruction SMS in the following cells
IR	ORO.GEN.200(a)(1) to (a)(6)	Management system		NIL	3.035, 3.037, 3.175 (g)(2), Arrêté SMS 22 12 2008 Instruction SMS 22 12 2008	B C	ORO...200(a)(1) : arrêté SMS [art. 5 (2)] and instruction SMS [§1.1 (ii) and (2)] ORO...200(a)(2) : arrêté SMS [art. 4 (a)(1)] and instruction SMS [§1.1 (iv)] ORO...200(a)(3) : 3.037 and arrêté SMS [art. 4 (a)(2)] ORO...200(a)(4) : arrêté SMS [art. 4 (a)(4)] and instruction SMS [§4] ORO...200(a)(5) : 3.035(d) and arrêté SMS [art. 6] and instruction SMS [§6] ORO...200(a)(6) : 3.035(a) and (b), 3.175(g)(2) and instruction SMS [§2]
IR	ORO.GEN.200(a)(7)	Management system		New			"any additional requirements that are prescribed in the relevant Subparts of this Annex or other applicable Annexes."
AMC1	ORO.GEN.200(a)(1);(2);(3);(5) - (a), (b), (c) and (f)	Management system NON-COMPLEX OPERATORS - GENERAL		NIL	3.035 (AMC, §7.3.1) Arrêté SMS 22 12 2008 Instruction SMS 22 12 2008	B	Provisions covered by French texts : - ORO.GEN.200(a)(1);(2);(3);(5) - (a) = 3.035 (AMC, §7.3.1). This § is an alleviation to the SMS arrêté and instructions - ORO.GEN.200(a)(1);(2);(3);(5) - (b) = arrêté SMS [art. 4. (a)(3)] and instruction SMS [§3.2] - ORO.GEN.200(a)(1);(2);(3);(5) - (c) = instruction SMS [§1.3] - ORO.GEN.200(a)(1);(2);(3);(5) - (f) = arrêté SMS [art. 4. (a)(1)] and instruction SMS [§1.5]
AMC1	ORO.GEN.200(a)(1);(2);(3);(5) - (e) and (d)	Management system NON-COMPLEX OPERATORS - GENERAL		New			ORO.GEN.200(a)(1);(2);(3);(5) - (d) and (e) are not explicitly addressed in the French regulation : (d) : responsibilities should be identified for hazard identification, risk assessment and mitigation. (e) : safety policy should include a commitment to improve towards the highest safety standards

Appendix 2 - Comparison IR OPS and OPS3 - ORO 130306.xls

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3/OPS3R équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
AMC1	ORO.GEN.200(a)(1) Intro	Management system COMPLEX OPERATORS - ORGANISATION AND ACCOUNTABILITIES		NIL	3.035 (AMC, §4.9) and instruction SMS (§1.3)	B	
AMC1	ORO.GEN.200(a)(1) - (a)(1)	Management system COMPLEX OPERATORS - ORGANISATION AND ACCOUNTABILITIES		NIL	arrêté SMS (art. 5) and instruction SMS (\$1.3)	B	
AMC1	ORO.GEN.200(a)(1) - (a)(2)	Management system COMPLEX OPERATORS - ORGANISATION AND ACCOUNTABILITIES		Modif.	3.035 (AMC, §2.4, §4.9)	B	Safety manager functions described in detail. Not explicitly addressed in French SMS arrêté and instruction
AMC1	ORO.GEN.200(a)(1) - (b) to (d)	Management system COMPLEX OPERATORS - ORGANISATION AND ACCOUNTABILITIES		Modif.	3.035 (AMC, §4.9) (partially)	B	Management evaluation superseded by safety review board committee related to the management system
GM1	ORO.GEN.200(a)(1)	Management system SAFETY MANAGER		Modif.	3.035 (AMC, §2.4)	B	Additional guidance related to the Safety manager (superseding quality manager function) required under the management system
GM2	ORO.GEN.200(a)(1)	Management system COMPLEX ORGANISATIONS SAFETY ACTION GROUP		New			New guidance on the safety action group that can be established to support the safety review board as part of the management system
AMC1	ORO.GEN.200(a)(2) - (a)(1) and (a)(2)	Management system COMPLEX OPERATORS - SAFETY POLICY		NIL	arrêté SMS (art. 5 (2)) and instruction SMS (\$1.2)		
AMC1	ORO.GEN.200(a)(2) - (a)(3)	Management system COMPLEX OPERATORS - SAFETY POLICY		NIL	3.037 (2) and arrêté SMS (art. 4 (a)(3) and (a)(4)) instruction SMS (§1.1 and §4.2)	B	
AMC1	ORO.GEN.200(a)(2) - (a)(4)	Management system COMPLEX OPERATORS - SAFETY POLICY		NIL	3.037 (1) arrêté SMS (art. 4 (a)(2)) instruction SMS (§2.1)	B	
AMC1	ORO.GEN.200(a)(2) - (b) and (c)	Management system COMPLEX OPERATORS - SAFETY POLICY		Modif.	3.035 (AMC, §2.2) instruction SMS (§1.1)	B	Commitment to improve safety, comply with regulation, provide adequate resources... partially addressed in current regulation Instruction SMS quoted as it introduces non punitive reporting concept

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3/OPS3R équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
GM1	ORO.GEN.200(a)(2)	Management system SAFETY POLICY		NIL	arrêté SMS instruction SMS		
AMC1	ORO.GEN.200(a)(3) -(a)	Management system COMPLEX OPERATORS - SAFETY RISK MANAGEMENT		NIL	arrêté SMS (art. 4 (a)(2)) instruction SMS (§2.1)		
AMC1	ORO.GEN.200(a)(3) -(b)	Management system COMPLEX OPERATORS - SAFETY RISK MANAGEMENT		NIL	arrêté SMS (art. 4 (a)(2)) instruction SMS (§2.2)		
AMC1	ORO.GEN.200(a)(3) -(c)	Management system COMPLEX OPERATORS - SAFETY RISK MANAGEMENT		Modif.			"(c) Internal safety investigation : (1) The scope of internal safety investigations should extend beyond the scope of occurrences required to be reported to the competent authority." Not explicitly addressed in SMS arrêté and instruction
AMC1	ORO.GEN.200(a)(3) -(d)	Management system COMPLEX OPERATORS - SAFETY RISK MANAGEMENT		Modif.	arrêté SMS (art. 4 (a)(3)) instruction SMS (§3.1)		In ORO, details are given about what the safety performance monitoring and measurement should include
AMC1	ORO.GEN.200(a)(3) -(e)	Management system COMPLEX OPERATORS - SAFETY RISK MANAGEMENT		NIL	arrêté SMS (art. 4 (a)(3)) instruction SMS (§3.2)		
AMC1	ORO.GEN.200(a)(3) -(f)	Management system COMPLEX OPERATORS - SAFETY RISK MANAGEMENT		NIL	arrêté SMS (art. 4 (a)(3)) instruction SMS (§3.3)		In ORO, details are given about continuous improvement
AMC1	ORO.GEN.200(a)(3) -(g)	Management system COMPLEX OPERATORS - SAFETY RISK MANAGEMENT		NIL	arrêté SMS (art. 4 (a)(1)) instruction SMS (§1.5)		
GM1	ORO.GEN.200(a)(3)	Management system INTERNAL OCCURRENCE REPORTING SCHEME		NIL	3.037(a)(2) (ACJ)	B	
AMC1	ORO.GEN.200(a)(4) - (a)	Management system TRAINING AND COMMUNICATION ON SAFETY		New			In ORO : "(a) Training (1) All personnel should receive safety training as appropriate for their safety responsibilities. (2) Adequate records of all safety training provided should be kept."
AMC1	ORO.GEN.200(a)(4) - (b)	Management system TRAINING AND COMMUNICATION ON SAFETY		NIL	instruction SMS (§4.2)		

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Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3/OPS3R équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
GM1	ORO.GEN.200(a)(4)	Management system TRAINING AND COMMUNICATION ON SAFETY		New			Additional guidance on the means that can be used for the safety training (e-learning...)
AMC1	ORO.GEN.200(a)(5)	Management system MANAGEMENT SYSTEM DOCUMENTATION - GENERAL		Modif.	3.035 (AMC, §3.3)	B	Quality system documentation superseded by management system documentation
AMC2	ORO.GEN.200(a)(5)	Management system COMPLEX OPERATORS – ORGANISATION'S SAFETY MANAGEMENT MANUAL		Modif.	3.035 (AMC, §3.3) and instruction SMS (§1.5)	B	Quality system documentation superseded by management system documentation
GM1	ORO.GEN.200(a)(5)	Management system MANAGEMENT SYSTEM DOCUMENTATION - GENERAL		Modif.	3.035 (AMC, §3.3.1)	B	The provisions related to the possibility to have separate manual/procedures or to have the content included in other manuals have been further enhanced.
AMC1	ORO.GEN.200(a)(6)	Management system COMPLIANCE MONITORING - GENERAL		Modif.	3.035 (AMC, §2.4, 3.3.2, 4.6)	B	The quality assurance programme/quality manager provisions under the quality system are superseded by the compliance monitoring function/programme required under the management system
AMC1	ORO.GEN.200(a)(6)	Management system COMPLIANCE MONITORING - GENERAL		Modif.	3.035 (AMC, §3)	B	Management system supersedes the quality system
GM1	ORO.GEN.200(a)(6)	Management system COMPLIANCE MONITORING - GENERAL		Modif.	3.035 (AMC, §4.4, 4.5)	B	Provisions related to auditors have been further enhanced, especially when external auditors are used.
GM2	ORO.GEN.200(a)(6)	Management System COMPLEX OPERATORS - COMPLIANCE MONITORING PROGRAMME		Modif.	3.035 (AMC, §4.2.2, 4.6.1)	B	Included as GM - items related to maintenance and continuing airworthiness management, training and auditing have been deleted
GM3	ORO.GEN.200(a)(6)	Management System NON-COMPLEX OPERATORS - COMPLIANCE MONITORING PROGRAMME		Modif.	3.035 (AMC, §7)	B	An example included of a possible checklist that might be used by non-complex operators to document their audits and inspections.
GM4	ORO.GEN.200(a)(6)	Management system AUDIT AND INSPECTION		NIL	3.035 (AMC, §4.2.1, 4.3.1)	B	These two definitions have been reworded.

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3/OPS3R équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
IR	ORO.GEN.200(b)	Management system		NIL	3.035 (AMC, §7.2.2)	B	"The management system shall correspond to the size of the operator and the nature and complexity of its activities..." Provisions were only at AMC level before in 3.035 (AMC1, §7)
AMC1	ORO.GEN.200(b)	Management system SIZE, NATURE AND COMPLEXITY OF THE ACTIVITY		Modif.	3.035 (AMC, §7.2)	B	Additional criteria have been added - FTE threshold is 20 (no definition for 'very small operator') ; no definition for FTE provided.
IR	ORO.GEN.205	Contracted activities		Modif.	3.035	B	ORO.GEN and OPS 3 both refer to contracted activities. Requirements in ORO are more precise yet : a) Definition of contracted activities b) Contractor to word under the approval of the operator (unless it is itself approved) - competent authority is given access to the contracted organisation
AMC1	ORO.GEN.205	Contracted activities RESPONSIBILITY WHEN CONTRACTING ACTIVITIES		Modif.	3.035 (AMC, §5.1.2, 5.1.3)	B	Second part of 5.1.3 (activity exceeds authorisation) not transposed
GM1	ORO.GEN.205	Contracted activities CONTRACTING - GENERAL		NIL	3.035 (AMC, §5.1.1, 5.1.2)	B	Item 'maintenance' has been deleted (covered under Part-M) Very minor difference, hence ORO considered similar OPS 3
GM2	ORO.GEN.205	Contracted activities RESPONSIBILITY WHEN CONTRACTING ACTIVITIES		Modif.	instruction SMS (§2) (partially addresses GM2 to ORO.GEN.205)		In (a), contracted activities that should be subject to hazard identification and risk management and this provision is included in instruction SMS [§2] in (b), contracted activities performed by a certified organisation
IR	ORO.GEN.210	Personnel requirements		Modif.	3.175 (h) and 3.175, appendix 2	C	ORO..200 (a) =3.175 (h) (partially) ORO..200 (b) and (c) = 3.175, appendix 2, §(a) and (c) (partially)
IR	ORO.GEN.215	Facility requirements		Modif.	3.175(m) and (q)	C	Reworded in a more general way to address facility requirements for all tasks and activities in the scope of the operator activity
IR	ORO.GEN.220	Record-keeping		Modif.	3.035 (AMC, §4.10.1)	B	Provisions were only at AMC level and addressed quality system records. A new requirement at implementing rule level for management system records has been introduced.
AMC1	ORO.GEN.220(b)	Record-keeping GENERAL		Modif.	3.035 (AMC, §4.10.1)	B	Initial provisions further enhanced, specifically addressing paper-based and electronic records.
GM1	ORO.GEN.220(b)	Record-keeping RECORDS		New			New provisions related to microfilming and optical storage.

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Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3/OPS3R équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
IR	ORO.AOC.100(a)	Application for an air operator certificate		NIL	L. 6412-2 of the Transport Code (Law) R. 330-1 of the Civil Aviation Code (Decree) and OPS 3 (art. 1)		
IR	ORO.AOC.100(b)(1) to (b)(6)	Application for an air operator certificate		NIL	3.185(a) 3.175 (p) for ORO.AOC (b)(6)	C	Reference to ORO.MLR in ORO.AOC.100(b)(6)
IR	ORO.AOC.100(b)(7)	Application for an air operator certificate		New			Statement that all the documentation sent to the competent authority have been verified by the applicant and found in compliance with the applicable requirements
IR	ORO.AOC.100(c)(1)	Application for an operator certificate		Modif	arrêté dated 21 june 2011, implementing OPS 3		For applicants, compliance with part CAT and part V if applicable In arrêté dated 21 june 2011, similar statement for compliance with OPS 3
IR	ORO.AOC.100(c)(2)	Application for an air operator certificate		NIL	3.180(a)(1)	C	
IR	ORO.AOC.100(c)(3)	Application for an air operator certificate		NIL	3.175(g)(1)	C	
AMC1	ORO.AOC.100	Application for an air operator certificate (AOC) APPLICATION TIME FRAMES		NIL	3.185(c)		Application for an AOC : 90 days before operations starts OPS manual submitted no later than 60 days before
IR	ORO.AOC.105	Operations specifications and privileges of an AOC holder		NIL	MCT TP III - 1.4		Privileges included in the operational specifications of the AOC certificate MCT TP stands for Technical Control Manal for Public Transport
IR	ORO.AOC.110(a)	Leasing agreement		Allev.	3.165(b)(2)(i)	B	The reference to 'any conditions which are part of this approval must be included in the lease agreement' in 3.165 (B)(2)(i) is not considered necessary because Member States are not allowed to impose additional safety-related conditions to the lease agreement.
AMC1	ORO.AOC.110	Leasing agreement GENERAL		New			Information to be provided to the competent authority by the operator. Statement by both parties that they understand their responsibilities
IR	ORO.AOC.110(b)	Leasing agreement		New			"The operator certified in accordance with this Part shall only wet lease-in aircraft from an operator that is not subject to an operating ban pursuant to Regulation (EC) No 2111/2005."

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3/OPS3R équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
IR	ORO.AOC.110(c)	Leasing agreement	Wet lease in (prise en location avec équipage)	Allev.	3.165(c)(2)		Regarding item (1) :OPS 3 indicates (in 3.165 (c)(2)(ii)(B)) that the third country operator should be delivered by an ICAO contracting State. In ORO, compliance with Annex 6 is directly referred to. Regarding item (2) :OPS 3 indicates (in 3.165 (c)(2)(ii)(A)) that safety standards of the third country operator with regard to continuing airworthiness shall be equivalent to the provisions foressen in OPS 3 (and 2042/2003 is referred to in sub part M) The reference to 'any conditions which are part of this approval must be included in the lease agreement' (in 3.165 (c)(2)(ii)(D))is not considered necessary because Member States are not allowed to impose additional safety-related conditions to the lease agreement.
AMC1	ORO.AOC.110(c)	Leasing agreement WET LEASE-IN	Applicable standards	New			AMC1 identifies applicable standards (partially part ORO, part CAT, SPA, part-M, part 145, FTL...)
AMC2	ORO.AOC.110(c)	Leasing agreement WET LEASE-IN	Records	NIL	Arrêté du 30 août 2006 relatif à l'autorisation des opérations d'affrètement, de franchise et de partage de codes (art. 10)		The arrêté dated 30 08 2006 encompasses wet lease in and code share. Records of occasions when lessors are used should be kept
GM1	ORO.AOC.110(c)	Leasing agreement SHORT TERM WET LEASE-IN		NIL	Arrêté du 30 août 2006 relatif à l'autorisation des opérations d'affrètement, de franchise et de partage de codes (art. 9)		The arrêté dated 30 08 2006 encompasses wet lease in and code share. Possibility to use a framework agreement to facilitate short term wet lease-in

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3/OPS3R équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
IR	ORO.AOC.110(d)	Leasing agreement	Dry lease in (prise en location sans équipage c à d sur CTA du preneur) - third country aircraft	Modif	3.165(c)(1)		<p>Dry lease in is possible on the conditions that :</p> <ul style="list-style-type: none"> - an operational need exists (no EU registered aircraft available) - the aircraft is leased in less than 7 month in any 12 months - Compliance with 2042/2003 is assured <p>The reference to 'any conditions which are part of this approval must be included in the lease agreement' is not considered necessary because Member States are not allowed to impose additional safety-related conditions to the lease agreement.</p> <p>3.165(c)(1)(ii) (compliance of helicopter equipment with OPS 3) is not relevant in IR OPS because all aircraft shall comply with part CAT regardless of whether they are using aircraft registered in the EU or registered outside the EU.</p>
IR	ORO.AOC.110(e)	Leasing agreement	Dry lease out (mise en location sans équipage c à d sur CTA de preneur)	Modif	3.165(c)(3)		The operator shall apply for prior approval. The application shall be accompanied by copies of the intended lease agreement or description of the lease provisions, except financial arrangements...
IR	ORO.AOC.110(f)	Leasing agreement	Wet lease out (Mise en location avec équipage)	New	3.165(c)(4)		OPS 3 indicated that the operator wet leases out under its AOC this being obvious, ORO does not mention this but require that the authority be informed
AMC1	ORO.AOC.110(f)	Leasing agreement WET LEASE-OUT		New			Information to be provided to the competent authority by the operator when wet lease-out is notified
IR	ORO.AOC.115	Code-share agreements		NIL	Arrêté du 30 août 2006 relatif à l'autorisation des opérations d'affrètement, de franchise et de partage de codes (Annexe)		Item (c) of ORO.AOC.115 is not explicitly mentioned (no code share with an operator subject to a ban) but addressed
AMC1	ORO.AOC.115(a)(1)	Code share agreements INITIAL VERIFICATION OF COMPLIANCE		NIL	Arrêté du 30 août 2006 relatif à l'autorisation des opérations d'affrètement, de franchise et de partage de codes (art. 8.1.2 and Annexe)		The arrêté dated 30 08 2006 implements performance by the operator of audits of the third country operator

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3/OPS3R équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
AMC1	ORO.AOC.115(b)	Code share arrangements CODE-SHARE AUDIT PROGRAMME		Modif	Arrêté du 30 août 2006 relatif à l'autorisation des opérations d'affrètement, de franchise et de partage de codes (art. 8.1.2 and Annexe)		AMC1 to ORO.AOC.115(b) gives details about the audit program that the operator has to perform. It is more comprehensive than the current French rule
AMC2	ORO.AOC.115(b)	Code share agreements THIRD PARTY PROVIDERS		Modif	Arrêté du 30 août 2006 relatif à l'autorisation des opérations d'affrètement, de franchise et de partage de codes (Annexe)		The current French rule stipulates that the audit can be carried out by a third party (instead of the operator intending to conclude a code share itself) AMC2 is far more comprehensive than the current French rule
IR	ORO.AOC.120	Approvals to provide cabin crew training and to issue cabin crew attestations		New			a) Operators intending to train cabin crew shall be approved. ORO gives details about information the operator shall provide : facilities, name and qualification of instructors, programmes... b) conditions the operator shall comply with to issue CC attestations. Not used among French operators
IR	ORO.AOC.125	Non-commercial operations of aircraft listed in the operations specifications by the holder of an AOC		New			In case the helicopter listed in the operations specifications is used in for non commercial operations, a clear identification of : - applicable requirements shall be made, - differences between operating procedures (for CAT and non commercial operations)... Differences mentioned above shall be approved.
IR	ORO.AOC.135(a)	Personnel requirements	Requirement to nominate persons	NIL	3.175(i)		
IR	ORO.AOC.135(b)	Personnel requirements	Adequacy and competence of personnel	NIL	3.175 - App. 2, (c)(1) 3.175 (App. 2, (c)(2)(i) 3.040		
IR	ORO.AOC.135(c)	Personnel requirements	Supervision of personnel	NIL	3.175 - Appendix 2, (c)(3)		ORO.AOC.135 (c)(1) = 3.175 - Appendix 2, (c)(3)(i) ORO.AOC.135 (c)(2) = 3.175 - Appendix 2, (c)(3)(ii) ORO.AOC.135 (c)(3) = 3.175 - Appendix 2, (c)(3)(iii)
IR	ORO.AOC.140(a)	Facility requirements		NIL	3.175(m)		

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Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3/OPS3R équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
IR	ORO.AOC.140(b)	Personnel requirements		NIL	3.175(q)		
IR	ORO.AOC.140(c)	Facility requirements		NIL	3.175 - Appendix 2, (d)(1)		
IR	ORO.AOC.150(a)	Documentation requirements		NIL	3.175 - Appendix 2, (e)		
IR	ORO.AOC.150(b)	Documentation requirements		NIL	3.175 - Appendix 2, (d)(2)		
AMC1	ORO.AOC.135(a)	Personnel requirements		Allev.	3.175(j) and (k)		Possibility for 1 person to hold more than one of the nominated posts independant from the number of FTE, full time equivalent, (in OPS 3, at least 2 persons over 20 FTE)
AMC1	ORO.AOC.135(a)	Personnel requirements NOMINATED PERSONS		NIL	3.175 - Appendix 2, (b)(1)		
AMC1	ORO.AOC.135(a)	Personnel requirements NOMINATED PERSONS		NIL	3.175 - Appendix 2, (b)(2)		
AMC1	ORO.AOC.135(a)	Personnel requirements NOMINATED PERSONS		NIL	3.175 - Appendix 2, (b)(3)		
AMC1	ORO.AOC.135(a)	Personnel requirements		NIL	3.175 - Appendix 2, (b)(4)		
AMC2	ORO.AOC.135(a)	Personnel requirements COMBINATION OF NOMINATED PERSONS RESPONSIBILITIES		NIL	3.175(j)		
AMC2	ORO.AOC.135(a)	Personnel requirements COMBINATION OF NOMINATED PERSONS RESPONSIBILITIES		NIL	3.175(j) and (k)		Possibility for 1 person to hold more than one of the nominated posts independant from the number of FTE, full time equivalent, (in OPS 3, at least 2 persons over 20 FTE) No definition of full time equivalent is given in the rule nor AMC/GM
GM1	ORO.AOC.135(a)	Personnel requirements NOMINATED PERSONS		New			Smallest organisation = 1 person hodling all nominates posts
GM2	ORO.AOC.135(a) - (a)	Personnel requirements COMPETENCE OF NOMINATED PERSONS	General competence	NIL	3.175 (i) (ACJ, §1.1)		In exceptional cases where nominated persons do not have the competence needed, comparable experience is required

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Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3/OPS3R équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
GM2	ORO.AOC.135(a) - (b)	Personnel requirements COMPETENCE OF NOMINATED PERSONS	Knowledge and experience	New	3.175 (i) (ACJ, §1.2)		The following provision does not exist in OPS 3 : " (b) Nominate persons should have : (5) 5 years of relevant work experience of which at least 2 years should be from the aeronautical industry in an appropriate position."
GM2	ORO.AOC.135(a) - (c)	Personnel requirements COMPETENCE OF NOMINATED PERSONS	Flight operations	New	3.175 (i) (ACJ, §2)		The provisions 2.1 and 2.2 for OPS 3 referring to ATPL and CPL have not be transposed. In GM2 ORO.AOC.135(a)(3) the following more general reference is made: '...the nominated person should hold or have held a valid flight crew licence and the associated ratings appropriate to a type of operation conducted under the operator certificate'. The following provision does not exist in OPS 3 : "(c) Flight operations... In case the nominated person's licence and ratings are not current, his/her deputy should hold a valid flight crew licence and the associated ratings."
GM2	ORO.AOC.135(a) - (d)	Personnel requirements COMPETENCE OF NOMINATED PERSONS	Crew training	NIL	3.175 (i) (ACJ, §5)		
GM3	ORO.AOC.135(a) - (e)	Personnel requirements COMPETENCE OF NOMINATED PERSONS	Ground operations	NIL	3.175 (i) (ACJ, §6)		
GM2	ORO.AOC.135(a) - (f)	Personnel requirements COMPETENCE OF NOMINATED PERSONS	Continuing airworthiness	Allev.	3.175 (i) (ACJ, §4)		The provision on maintenance experience has been reduced. The text only refers to experience requirements related to aircraft continuing airworthiness as detailed in Part-M. OPS 3 referred to the same kind of experience but encompassed an engineering degree

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Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3/OPS3R équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
IR	ORO.MLR.100(a)	Operations manual - general	Establishment of the OPS manual (OM)	Modif.	3.1040(a) and 3.200	P D	Reference to Reg. (EC) N° 216/2008 is introduced Regulation n°216/2008 refers to additional elements compared to OPS 3 : limitations applicable to flight time, compliance with the approved flight manual Minor change because other provisions of OPS 3 imply the same.
IR	ORO.MLR.100(b)	Operations manual - general	Content of the OM	Modif.	3.1040(b)	P	ORO logically refers to applicable regulations part Cat and SPA Amendments or revisions are addressed in OPS 3.1040 (b) They are not addressed in ORO but in regulation 216 (Annexe IV, 8.b) Acceptability/approval of the OPS manual is included in OPS 3 but not mentioned in ORO
IR	ORO.MLR.100(c)	Operations manual - general	OM in separate parts	NIL	3.1040(e)	P	
IR	ORO.MLR.100(d)	Operations manual - general	Access to the OM	NIL	3.1040(f)	P	
IR	ORO.MLR.100(e)	Operations manual - general	Update of the OM	NIL	3.1040(g)	P	
IR	ORO.MLR.100(f)	Operations manual - general	Communication of the OM	Modif.	3.1040(f) and (h)	P	Communication of the OM to crew member is not restricted to Parts A and B in ORO.
IR	ORO.MLR.100(g), (h)	Operations manual - general	Notification or approval of changes to the OM	Modif.	3.1040(i)	P	OPS 3 requires amendments to be supplied before the effective date and that amendments be obtained before effective date when amendments concern parts of the OM that shall be approved. In ORO, amendments requiring notification only shall be supplied before the effective date. In ORO, for amendments to procedures associated with prior approval , approval shall be obtained before the amendment becomes effective
IR	ORO.MLR.100(i)	Operations manual - general	Modif/revisions required by the Authority	NIL	3.1040(j)	P	
IR	ORO.MLR.100(j)	Operations manual - general		NIL	3.1040(k)	P	ORO excludes the wording "and that the OM contains no information contrary to any approved documentation" that was included in OPS 3
IR	ORO.MLR.100(k) (1st sentence)	Operations manual - general		NIL	3.025(b)	P	
IR	ORO.MLR.100(k) (2d sentence)	Operations manual - general		NIL	3.1040(l)	P	

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Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3/OPS3R équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
IR	ORO.MLR.100(k) ("k" to replace "h")	Operations manual - general	HUMAN FACTORS PRINCIPLES	New			"HUMAN FACTORS PRINCIPLES Guidance material on the application of human factors principles can be found in the ICAO Human Factors Training Manual (Doc 9683)."
AMC1	ORO.MLR.100 - (a)	Operations manual - general GENERAL		New			"(a) The operations manual (OM) may vary in detail according to the complexity of the operation and of the type and number of aircraft operated."
AMC1	ORO.MLR.100 - (b)	Operations manual - general GENERAL		NIL	3.1040(m)	P	
AMC1	ORO.MLR.100 - (c)	Operations manual - general GENERAL		New			"(c) The OM should be such that: (1) all parts of the manual are consistent and compatible in form and content; (2) the manual can be readily amended; and (3) the content and amendment status of the manual is controlled and clearly indicated."
AMC1	ORO.MLR.100 - (d)	Operations manual - general GENERAL		New			"(d) The OM should include a description of its amendment and revision process specifying: (1) the person(s) who may approve amendments or revisions; [similar requirement in OPS 3 : see content of the OPS manual (A.0.2 (a))] (2) the conditions for temporary revisions and/or immediate amendments or revision required in the interest of safety; and (3) the methods by which operator personnel are advised of the changes."
AMC1	ORO.MLR.100 - (e)	Operations manual - general GENERAL		New			(e) The OM content may be based on, or may refer to, industry codes of practice.
AMC1	ORO.MLR.100 - (f)	Operations manual - general GENERAL		NIL	3.1045 (AMC, §1, 2d and 3d sentences)	P	
AMC1	ORO.MLR.100 - (g)	Operations manual - general GENERAL		NIL	3.1045 (AMC, §1, last sentence)	P	
AMC1	ORO.MLR.100 - (h)	Operations manual - general HUMAN FACTORS PRINCIPLES		NIL	3.1045 (AMC, §2)		
AMC1	ORO.MLR.100 - (i)	Operations manual - general GENERAL		Modif.	3.1045 (AMC, §3)		ORO contains additional text compared to OPS 3 : "Any material received from an external source should be given its status by a statement in the OM."

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Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3/OPS3R équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
AMC3	ORO.MLR.100 - A0	Operations manual – general CONTENTS – COMMERCIAL AIR TRANSPORT OPERATIONS	ADMINISTRATION AND CONTROL OF OPERATIONS MANUAL	NIL	3.1045 - Appendix 1, A.0.	P	
AMC3	ORO.MLR.100 - A1	Operations manual – general CONTENTS – COMMERCIAL AIR TRANSPORT OPERATIONS	ORGANISATION AND RESPONSIBILITIES	Modif.	3.1045 - Appendix 1, A.1.	P	<p>“Nominated postholder” included 1.2 of OPS 3 but changed to “nominated persons” in ORO in keeping with the new rules on management systems.</p> <p>§1.4 in ORO introduces terms not included in OPS 3 (see text in red font) :</p> <p>"Authority, duties and responsibilities of the pilot-in-command/commander. A statement defining the authority, duties and responsibilities of the pilot-in-command/commander."</p>
AMC3	ORO.MLR.100 - A2	Operations manual – general CONTENTS – COMMERCIAL AIR TRANSPORT OPERATIONS	OPERATIONAL CONTROL AND SUPERVISION	Modif.	3.1045 - Appendix 1, A.2.	P	<p>In OPS 3, there is an additional paragraph not included in ORO concerning accident prevention and safety of flights (" 2.3 Prévention des accidents et sécurité des vols - Description des principaux aspects du programme de sécurité des vols.")</p> <p>§2.2, §1.4 in ORO introduces terms not included in OPS 3 (see text in red font) :</p> <p>"System and responsibility for promulgation of additional operational instructions..."</p>
AMC3	ORO.MLR.100 - A3	Operations manual – general CONTENTS – COMMERCIAL AIR TRANSPORT OPERATIONS	MANAGEMENT SYSTEM	Modif.	3.1045 - Appendix 1, A.3.	P	<p>“quality system” of OPS 3 changed to “management system” in ORO, plus other changes to reflect the new rules on management systems.</p> <p>ORO : "A description of the management system, including at least the following:</p> <ul style="list-style-type: none"> (a) safety policy; (b) the process for identifying safety hazards and for evaluating and managing the associated risks; (c) compliance monitoring system; (d) allocation of duties and responsibilities; (e) documentation of all key management system processes." <p>OPS 3 :</p> <p>"SYSTEME QUALITE Description du système qualité adopté y compris au moins :</p> <ul style="list-style-type: none"> (a) politique de la qualité ; (b) description de l'organisation du système qualité ; (c) et répartition des tâches et responsabilités."

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Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3/OPS3R équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
AMC3	ORO.MLR.100 - A4	Operations manual – general CONTENTS – COMMERCIAL AIR TRANSPORT OPERATIONS	CREW COMPOSITION	NIL	3.1045 - Appendix 1, A.4.	P	
AMC3	ORO.MLR.100 - A5	Operations manual – general CONTENTS – COMMERCIAL AIR TRANSPORT OPERATIONS	QUALIFICATION REQUIREMENTS	Modif.	3.1045 - Appendix 1, A.5.	P	“Pilot relieving the co-pilot” as well as “system panel operaor included respectively in 5.2 (d) and 5.2 (f) of ORO to reflect the new flight crew rules. Not included in OPS 3 Additional detail included in 5.5 for clarification (“(including technical crew and crew members other than flight, cabin and technical crew)).
AMC3	ORO.MLR.100 - A6	Operations manual – general CONTENTS – COMMERCIAL AIR TRANSPORT OPERATIONS	CREW HEALTH PRECAUTIONS	NIL	3.1045 - Appendix 1, A.6.	P	
AMC3	ORO.MLR.100 - A7.1	Operations manual – general CONTENTS – COMMERCIAL AIR TRANSPORT OPERATIONS	FLIGHT TIME LIMITATIONS	NIL	3.1045 - Appendix 1, A.7.1	P	
AMC3	ORO.MLR.100 - A7.2	Operations manual – general CONTENTS – COMMERCIAL AIR TRANSPORT OPERATIONS	FLIGHT TIME LIMITATIONS	New	3.1045 - Appendix 1, A.7.2	P	Present text in ORO not included in OPS 3 : "Exceedance of flight and duty time limitations and/or reductions of rest periods. Conditions under which flight and duty time may be exceeded or rest periods may be reduced, and the procedures used to report these modifications."

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3/OPS3R équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
AMC3	ORO.MLR.100 - A8 (until 8.3.14)	Operations manual – general CONTENTS – COMMERCIAL AIR TRANSPORT OPERATIONS	OPERATING PROCEDURES	Modif.	3.1045 - Appendix 1, A.8.	P	A few differences between ORO and OPS 3 (text in red font) - "8.2.2 Aircraft, passengers and cargo handling procedures related to safety. A description of the handling procedures to be used when allocating seats, embarking and disembarking passengers and when loading and unloading the aircraft [in ORO : " with rotor engaged or not"]..." - "8.3.3 Altimeter setting procedures, including, where appropriate, use of: (a) metric altimetry and conversion tables; and (b) QFE operating procedures. [Text in red not in OPS 3]" - "8.3.5 Ground proximity warning system (GPWS)/terrain avoidance warning system (TAWS), for aeroplanes. Procedures and instructions required for the avoidance of controlled flight into terrain, including limitations on high rate of descent near the surface [Text in red not in OPS 3]"
AMC3	ORO.MLR.100 - A8 (from 8.3.15)	Operations manual – general CONTENTS – COMMERCIAL AIR TRANSPORT OPERATIONS	OPERATING PROCEDURES	Modif.	3.1045 - Appendix 1, A.8.	P	A few differences between ORO and OPS 3 (text in red font) - "8.3.15 Cabin Safety Requirements. Procedures: (e) covering the carriage of special categories of passengers; (g) covering the handling of suspected infectious diseases. [Text in red not in OPS 3]" - New (not in OPS 3) : "8.3.18 Policy on the use of autopilot and autothrottle for aircraft fitted with these systems." - Under 8.4 "AWO" changed to "LVO" to reflect the new terminology used. - "8.7 Non-revenue flights. Procedures and limitations, for example, for the following: (a) non-commercial operations by AOC holders, a description of the differences to commercial operations,"
AMC3	ORO.MLR.100 - A9	Operations manual – general CONTENTS – COMMERCIAL AIR TRANSPORT OPERATIONS	DANGEROUS GOODS AND WEAPONS	Modif.	3.1045 - Appendix 1, A.9.	P	There is one difference between ORO and OPS 3 (text in red font) : "9.1 Information, instructions and general guidance on the transport of dangerous : (c) special notification requirements in the event of an accident or occurrence when dangerous goods are being carried;"
AMC3	ORO.MLR.100 - A10	Operations manual – general CONTENTS – COMMERCIAL AIR TRANSPORT OPERATIONS	SECURITY	Modif.	3.1045 - Appendix 1, A.10.	P	Changes made to avoid conflict with Regulation (EC) No 300/2008.

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Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3/OPS3R équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
AMC3	ORO.MLR.100 - A11	Operations manual – general CONTENTS – COMMERCIAL AIR TRANSPORT OPERATIONS	HANDLING, NOTIFYING AND REPORTING ACCIDENTS, INCIDENTS AND OCCURRENCES	NIL	3.1045 - Appendix 1, A.11.	P	
AMC3	ORO.MLR.100 - A12	Operations manual – general CONTENTS – COMMERCIAL AIR TRANSPORT OPERATIONS	RULES OF THE AIR	NIL	3.1045 - Appendix 1, A.12.	P	
AMC3	ORO.MLR.100 - A13	Operations manual – general CONTENTS – COMMERCIAL AIR TRANSPORT OPERATIONS	LEASING / CODE-SHARE	Modif.	3.1045 - Appendix 1, A.13.	P	"Codeshare" added to reflect the new OPS AOC rules
AMC3	ORO.MLR.100 - B0	Operations manual – general CONTENTS – COMMERCIAL AIR TRANSPORT OPERATIONS		NIL	3.1045 - Appendix 1, B.0.	P	
AMC3	ORO.MLR.100 - B1	Operations manual – general CONTENTS – COMMERCIAL AIR TRANSPORT OPERATIONS	LIMITATIONS	NIL	3.1045 - Appendix 1, B.1.	P	
AMC3	ORO.MLR.100 - B2	Operations manual – general CONTENTS – COMMERCIAL AIR TRANSPORT OPERATIONS	NORMAL PROCEDURES	NIL	3.1045 - Appendix 1, B.3.	P	
AMC3	ORO.MLR.100 - B3	Operations manual – general CONTENTS – COMMERCIAL AIR TRANSPORT OPERATIONS	ABNORMAL AND/OR EMERGENCY PROCEDURES	Modif.	3.1045 - Appendix 1, B.2.	P	ORO does not include the following element which was in OPS 3 : "Command failure of the tail rotor"

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Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3/OPS3R équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
AMC3	ORO.MLR.100 - B4	Operations manual – general CONTENTS – COMMERCIAL AIR TRANSPORT OPERATIONS	PERFORMANCE	Modif.	3.1045 - Appendix 1, B.4.	P	A few differences between ORO and OPS 3 (text in red font): In ORO : "If performance data, as required for the appropriate performance class, is not available in the AFM, then other data [in OPS 3 : "acceptable to the Authority"] should be included. The OM may contain cross-reference to the data [in OPS 3 : "approved data"] contained in the AFM..." No need to specify "approved" aircraft flight manual in 4.1.2 (as was the case in OPS 3) , as the requirement for the AFM to be approved is covered in airworthiness legislation.
AMC3	ORO.MLR.100 - B5	Operations manual – general CONTENTS – COMMERCIAL AIR TRANSPORT OPERATIONS	FLIGHT PLANNING	NIL	3.1045 - Appendix 1, B.7.	P	
AMC3	ORO.MLR.100 - B6	Operations manual – general CONTENTS – COMMERCIAL AIR TRANSPORT OPERATIONS	MASS AND BALANCE	NIL	3.1045 - Appendix 1, B.5.	P	
AMC3	ORO.MLR.100 - B7	Operations manual – general CONTENTS – COMMERCIAL AIR TRANSPORT OPERATIONS	LOADING	NIL	3.1045 - Appendix 1, B.6.	P	
AMC3	ORO.MLR.100 - B8	Operations manual – general CONTENTS – COMMERCIAL AIR TRANSPORT OPERATIONS	CONFIGURATION DEVIATION LIST	NIL	3.1045 - Appendix 1, B.8.	P	
AMC3	ORO.MLR.100 - B9	Operations manual – general CONTENTS – COMMERCIAL AIR TRANSPORT OPERATIONS	MINIMUM EQUIPMENT LIST (MEL)	Modif.	3.1045 - Appendix 1, B.9.	P	ORO includes text that was not in OPS 3 (text in red font) : "The MEL for each aircraft type or variant operated and the type(s)/area(s) of operation. The MEL should also include the dispatch conditions associated with operations required for a specific approval..." Consideration should be given to using the ATA number system when allocating chapters and numbers."

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Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3/OPS3R équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
AMC3	ORO.MLR.100 - B10	Operations manual – general CONTENTS – COMMERCIAL AIR TRANSPORT OPERATIONS	SURVIVAL AND EMERGENCY EQUIPMENT INCLUDING OXYGEN	Modif.	3.1045 - Appendix 1, B.10.	p	"The information provided must be in a form in which it can be used without difficulty" deleted from 10.2, as this is addressed by the generic requirement on provision of instructions that can be easily understood. The text is also not in JAR-OPS 3
AMC3	ORO.MLR.100 - B11	Operations manual – general CONTENTS – COMMERCIAL AIR TRANSPORT OPERATIONS	EMERGENCY EVACUATION PROCEDURES	NIL	3.1045 - Appendix 1, B.11.	p	
AMC3	ORO.MLR.100 - B12	Operations manual – general CONTENTS – COMMERCIAL AIR TRANSPORT OPERATIONS	AIRCRAFT SYSTEMS	Modif.	3.1045 - Appendix 1, B.12.	p	ORO includes text that was not in OPS 3 (text in red font) : "A description of the aircraft systems, related controls and indications and operating instructions. Consideration should be given to using the ATA number system when allocating chapters and numbers. "
AMC3	ORO.MLR.100 - C	Operations manual – general CONTENTS – COMMERCIAL AIR TRANSPORT OPERATIONS	ROUTE/ROLE/AREA AND AERODROME/OPERATING SITE INSTRUCTIONS AND INFORMATION	Modif.	3.1045 - Appendix 1, C.	p	ORO includes text that was not in OPS 3 (text in red font) : "Instructions and information relating to communications, navigation and aerodromes/operating sites including minimum flight levels and altitudes for each route to be flown and operating minima for each aerodrome/operating site planned to be used, including the following: (k) aerodrome/operating site categorisation for flight crew competence qualification; "
AMC3	ORO.MLR.100 - D	Operations manual – general CONTENTS – COMMERCIAL AIR TRANSPORT OPERATIONS	TRAINING	Modif.	3.1045 - Appendix 1, D.	p	References to technical crew training added (§2.3) to reflect the new OPS TC rules. Page 64 : grandfathering provision to JAR-OPS 3 Amt 5 OMs : "Notwithstanding 1, an OM that is compiled in accordance with JAR-OPS 3 amendment 5 may be considered to be compliant." Is it valid for the whole OM or only chapter D???
GM1	ORO.MLR.100	Operations manual – general CONTENTS	Paragraph numbering of the OPS manual	New			"If there are sections that, because of the nature of the operation, do not apply, it is recommended that operators maintain the numbering system described in ORO.MLR.101 and AMC3 ORO.MLR.100 and insert 'Not applicable' or 'Intentionally blank' where appropriate."
IR	ORO.MLR.101	Operations manual – structure for commercial air transport		NIL	3.1045(a)	p	Added reference to Regulation (EC) No 216/2008 and data established in accordance with Reg. (EC) No 1702/2003

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IR	ORO.MLR.105(a), (b)	Minimum equipment list		Modif.	3.030(a)	B	Establishment of MEL [ORO.MLR.100 (a)]+Annexe IV of reg. N°216/2008, 8.a.3 (iii)=3.030 (a) (2d sentence) (besides, establishment of the MEL shall comply with operational suitability data) In addition, Annexe IV of reg. N°216/2008, 8.a.3 specifies that : - (ii) the document must provide for the operation of the aircraft, under specified conditions, with particular instruments, items of equipment or functions inoperative at the commencement of the flight; - (ii) the document must be prepared for each individual aircraft... ORO also indicates that the MEL shall be kept up to date
IR	ORO.MLR.105(c) - (j)	Minimum Equipment List		New			Transposing parts of JAR-MMEL/MEL
GM1	ORO.MLR.105(a)	Minimum equipment list GENERAL	NON-SAFETY RELATED EQUIPMENT	New			Transposing parts of JAR-MMEL/MEL
AMC1	ORO.MLR.105(c)	Minimum equipment list	AMENDMENTS TO THE MEL FOLLOWING CHANGES TO THE MMEL – APPLICABLE CHANGES AND ACCEPTABLE TIMESCALES	New			Transposing parts of JAR-MMEL/MEL
AMC2	ORO.MLR.105(d)(3)	Minimum equipment list	EXTENT OF THE MEL	New			Transposing parts of JAR-MMEL/MEL
GM1	ORO.MLR.105(e);(f)	Minimum equipment list	RECTIFICATION INTERVAL (RI)	New			Transposing parts of JAR-MMEL/MEL
AMC1	ORO.MLR.105(f)	Minimum equipment list	RECTIFICATION INTERVAL EXTENSION (RIE) - OPERATOR PROCEDURES FOR THE APPROVAL BY THE COMPETENT AUTHORITY AND NOTIFICATION TO THE COMPETENT AUTHORITY	New			Transposing parts of JAR-MMEL/MEL
GM1	ORO.MLR.105(f)	Minimum equipment list	RECTIFICATION INTERVAL EXTENSION (RIE)	New			Transposing parts of JAR-MMEL/MEL
AMC1	ORO.MLR.105(g)	Minimum equipment list	OPERATIONAL AND MAINTENANCE PROCEDURES	New			Transposing parts of JAR-MMEL/MEL

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Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3/OPS3R équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
GM1	ORO.MLR.105(g)	Minimum equipment list	OPERATIONAL AND MAINTENANCE PROCEDURES	New			Transposing parts of JAR-MMEL/MEL
AMC1	ORO.MLR.105(h)	Minimum equipment list	OPERATIONAL AND MAINTENANCE PROCEDURES - APPLICABLE CHANGES	New			Transposing parts of JAR-MMEL/MEL
AMC1	ORO.MLR.105(j)	Minimum equipment list	OPERATION OF AN AIRCRAFT WITHIN THE CONSTRAINTS OF THE MMEL - OPERATOR'S PROCEDURES FOR THE APPROVAL BY THE COMPETENT AUTHORITY	New			Transposing parts of JAR-MMEL/MEL
GM1	ORO.MLR.105(j)	Minimum equipment list	OPERATION OF AN AIRCRAFT WITHIN THE CONSTRAINTS OF THE MMEL - OPERATOR'S PROCEDURES FOR THE APPROVAL BY THE COMPETENT AUTHORITY	New			Transposing parts of JAR-MMEL/MEL
IR	ORO.MLR.110	Journey Log		Modif.	3.1055(a) and (b) 3.415	P D	In ORO, requirement for 'journey log or equivalent' replaces "journey log" to allow the journey log to be recorded in a form other than on printed paper. Yet, implicitly, 3.1055 (b) indicates that an equivalent to the journey log may be used This requirement is incumbent on the operator in ORO, not specifically assigned as a commander duty as in OPS 3
AMC1	ORO.MLR.110 - (a)	Journey Log GENERAL		Modif.	3.1055(a)(1) - (a)(12)	P	For the nature of flight, ORO indicates a detail not included in OPS 3 (text in red font) : "(10) nature of flight (scheduled or non-scheduled),"

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AMC1	ORO.MLR.110 - (b) to (d)	Journey Log GENERAL		New		P	"(b) The information, or parts thereof, may be recorded in a form other than on printed paper. Accessibility, usability and reliability should be assured. (c) 'Journey log, or equivalent', means that the required information may be recorded in documentation other than a log book, such as the operational flight plan or the aircraft technical log. (d) 'Series of flights', means consecutive flights, which begin and end: (1) within a 24 hour period; (2) at the same aerodrome or operating site or remain within a local area specified in the operations manual; and (3) with the same pilot-in-command/commander of the aircraft."
GM1	ORO.MLR.110	Journey Log GENERAL	SERIES OF FLIGHTS	New			"The term 'series of flights' is used to facilitate a single set of documentation."
IR	ORO.MLR.115(a)	Record-keeping		Modif.	3.1065 (App. 1, Table 6)	P	In ORO : "The records of the activities referred to in ORO.GEN.200 [=management system]shall be stored for at least five years." In OPS 3, this requirement does not concern the "management system" but the "quality system"
IR	ORO.MLR.115(b)	Record-keeping		Modif.	3.1065 and 3.1065 (App. 1, Table 1 and 2)	P	ORO addresses data that shall be stored for 3 months just as OPS 3. Yet, in OPS 3, the form of the archive shall be acceptable. It has been deleted from ORO. Furthermore, the requirement for accessibility to the Authority included in OPS 3 has not been transposed in ORO In addition, helicopter technical log deleted from ORO as this is covered in the airworthiness rules.
IR	ORO.MLR.115(c)	Record-keeping		Modif.	3.1065 and 3.1065 (App. 1, Table 3, 4 and 5)	P	Tables 3, 4 and 5 merged, to avoid duplication. Cabin crew training stored 3 years instead of 1 year Cabin crew attestation added (to be stored as long as the crew member is exercising the privileges of its attestation) Flight, duty and rest time (FTL) deleted. The fact that FTL rules will change should have not led to delete storage requirements : the need for FTL data storage is independant from the FTL underlying rule! This constitutes an error of ORO.MLR.115 (c)
IR	ORO.MLR.115(d)	Record-keeping		NIL	3.1065 (App. 1, intro and 3.985)	P	
IR	ORO.MLR.115(e)	Record-keeping		NIL	3.155(a)(1)	B	

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IR	ORO.MLR.115((f))	Record-keeping		NIL	3.155(a)(2)	B	
AMC1	ORO.MLR.115	Record-keeping TRAINING RECORDS		NIL	3.985		

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IR	ORO.SEC.100.H	Flight crew compartment security		NIL	3.1255	S	
				Not transposed	3.1235	S	Security requirements This paragraph is under the scope of Regulation 300/2008
				Not transposed	3.1240	S	Training programmes This paragraph is under the scope of Regulation 300/2008
				Not transposed	3.1245	S	Reporting acts of unlawful interference This paragraph is under the scope of Regulation 300/2008
				Not transposed	3.1250	S	Helicopter search procedure checklist This paragraph is under the scope of Regulation 300/2008

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IR	ORO.FC.005	Scope		New			The text describes the scope of Subpart ORO.FC.
IR	ORO.FC.100(a)	Composition of flight crew		Modif	3.940(a)(1)	N	IN ORO : "(a) The composition of the flight crew and the number of flight crew members at designated crew stations shall be not less than the minimum specified in the aircraft flight manual or operating limitations prescribed for the aircraft " Instead of the text in red font, previous text in OPS 3 was : "in compliance with the helicopter flight manual"
IR	ORO.FC.100(a)	Composition of flight crew	Compliance with HFM	NIL	3.940(a)(2)	N	
IR	ORO.FC.100(c)	Composition of flight crew		Modif	3.940(a)(3)	N	The text is amended taking into account regulation 1178/2011 (licences/ratings are issues/accepted in accordance with said regulation) Minor change
AMC1	ORO.FC.100(c)	Composition of flight crew OPERATIONAL MULTI-PILOT LIMITATION (OML)		New		N	This AMC describes that pilots with an OML only operate aircraft in multi-pilot operations (includes restrictions : the other pilot is fully qualified, has no OML and is less than 60)
IR	ORO.FC.100(d)	Composition of flight crew	relief of flight crew	New		N	Possibility not included in previous OPS 3
IR	ORO.FC.100(e)	Composition of flight crew	FC members on freelance or part time basis	Modif	3.940(a)(6)	N	Compared to OPS 3, additional elements have been included for consideration by the operator: - Compliance of flight crew members with part FCL (including recency) - Applicable flight time limitations
IR	ORO.FC.105(a)	Designation as pilot-in-command/commander		NIL	3.940(a)(5)	N	Text in ORO introduces reference to compliance with BR n°216/2008 and IR flight crew n°1178/2011 Philosophy is the same as in OPS 3 yet
IR	ORO.FC.105(b)(1)	Designation as pilot-in-command/commander		Modif	3.955 (b)	N	OPS 3 indicates that the minimum experience to upgrade to commander should be specified for pilots from within the company or joining it as direct entry commanders Minor change
IR	ORO.FC.105(b)(2)	Designation as pilot-in-command/commander		NIL	3.975(a)	N	OPS 3 also concerns the pilot to whom the conduct of the flight has been delegated. This case is addressed in another § in IR OPS.
IR	ORO.FC.105(b)(3)	Designation as pilot-in-command/commander		Modif	3.955 (a)	N	OPS 3 mentions the completion of an appropriate training course to upgrade to commander ORO adds that this requirement only concerns multi-crew operations

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Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
IR	ORO.FC.105(c)	Designation as pilot-in-command/commander		NIL	3.975(a) and (b) (intro of §(b))	N	(b)(1) and (b)(2) of 3.975 (b) are addressed in AMC1 ORO.FC.205 (c)
AMC1	ORO.FC.105(b)(2);(c) - (a) and (b)(1)	Designation as pilot-in-command/commander ROUTE/AREA AND AERODROME KNOWLEDGE FOR COMMERCIAL AIR TRANSPORT OPERATIONS		Modif	3.975 (AMC)	N	ORO.FC.105(b)(2);(c) - (a)(1) and (a)(2) = 3.975 (AMC) - §1 and 2 except for 1.f addressed in (b)(1) Minor change
AMC1	ORO.FC.105(b)(2);(c) - (b)(2), (b)(3) and (c)	Designation as pilot-in-command/commander ROUTE/AREA AND AERODROME KNOWLEDGE FOR COMMERCIAL AIR TRANSPORT OPERATIONS	Aerodrome knowledge	New	3.975	N	ORO introduces a categorisation of aerodromes (A, B and C) as aerodrome knowledge is concerned. A list of aerodromes categorised B and C (most demanding aerodromes) shall be provided in the OPS manual
AMC1	ORO.FC.105(c)	Designation as pilot-in-command/commander ROUTE/AREA AND AERODROME RECENCY		NIL	3.975(b) and(d)	N	
IR	ORO.FC.115	Crew resource management (CRM) training		NIL	3.943 (a) and 3.965 (e)	N	ORO and OPS 3 similar except for the fact that ORO introduces CRM training course requirement before commencing unsupervised line flying whereas OPS 3 foresees transition provisions. Yet, when transition expires (1 year), OPS 3 will be equivalent to ORO
AMC1	ORO.FC.115&.215 - (a)	Crew resource management (CRM) training CRM TRAINING – CAT OPERATIONS	General	NIL	3.943 (ACJ2 - §1 to 3)	N	
AMC1	ORO.FC.115&.215 - (b)(1)	Crew resource management (CRM) training CRM TRAINING – CAT OPERATIONS	Initial CRM training	Modif	3.943 (ACJ1 - §2.1)	N	In ORO, additional provisions compared to ACJ1 for the minimum duration of training : " The course duration should be a minimum of 1 day for single-pilot operations and 2 days for all other types of operations. It should cover all the elements indicated in (f)"

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Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
AMC1	ORO.FC.115&.215 - (b)(2)	Crew resource management (CRM) training CRM TRAINING – CAT OPERATIONS	Initial CRM training	Modif	3.943 (ACJ1 - §2.2)	N	In ORO, additional provisions compared to ACJ1 for the CRM trainer who should : - possess group facilitation skills (in (b)(2)(i)); - and have completed initial CRM training (in (b)(2)(iv));
AMC1	ORO.FC.115&.215 - (b)(3) to (b)(5)	Crew resource management (CRM) training CRM TRAINING – CAT OPERATIONS	Scope of training Third party trainer Assessment (absence of)	NIL	3.943 (ACJ1 - §2.3 to 2.5)	N	
AMC1	ORO.FC.115&.215 - (c)	Crew resource management (CRM) training CRM TRAINING – CAT OPERATIONS	Operator conversion course – CRM training	NIL	3.943 (ACJ1 - §3)	N	
AMC1	ORO.FC.115&.215 - (d)	Crew resource management (CRM) training CRM TRAINING – CAT OPERATIONS	Command course – CRM training	Modif	3.943 (ACJ1 - §4)	N	ORO and OPS 3 (ACJ) very similar except for the text in red fond included in OPS 3 but not included in ORO : "(1) The operator should ensure that elements of [initial] CRM are integrated into the command course in accordance with (f)."
AMC1	ORO.FC.115&.215 - (e)(1)(i)	Crew resource management (CRM) training CRM TRAINING – CAT OPERATIONS	Recurrent CRM training	NIL	3.965 (e)	N	
AMC1	ORO.FC.115&.215 - (e)(1)(ii)	Crew resource management (CRM) training CRM TRAINING – CAT OPERATIONS	Recurrent CRM training	Modif	3.965 (e)	N	The following provision is included in ORO, not really explicit in OPS 3 : "(ii) relevant modular CRM training is conducted by CRM trainers qualified according to (b)(2)."
AMC1	ORO.FC.115&.215 - (e)(2) et (f)	Crew resource management (CRM) training CRM TRAINING – CAT OPERATIONS	Implementation of CRM	NIL	3.943 (ACJ1 - §5.1) et 3.943 (ACJ1 - §6)	N	AMC 1 to ORO.FC.115&.215 - (e)(2) = ACJ1 to 3.943 - §5.1 AMC 1 to ORO.FC.115&.215 - (f) = ACJ1 to 3.943 - §6
AMC1	ORO.FC.115&.215 - (g)	Crew resource management (CRM) training CRM TRAINING – CAT OPERATIONS	Coordination between flight crew and cabin/technical crew training	Modif	3.943 (ACJ1 - §7)	N	ORO and OPS 3 are exactly the same except for the fact that ORO mentions "coordination between flight crew and cabin/technical crew training" whereas OPS 3 omits "technical crew" ("coordination between flight crew and cabin crew")

Appendix 2 - Comparison IR OPS and OPS3 - ORO 130306.xls

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
AMC1	ORO.FC.115&.215 - (h)(1) and (h)(2)	Crew resource management (CRM) training CRM TRAINING – CAT OPERATIONS	Assessment of CRM skills	Modif	3.943 (ACJ2 - §4.1 and 4.2)	N	ORO and OPS 3 are exactly the same except for the fact that ORO mentions, in (1), that the [assessment] methodology should, where possible, be agreed with flight crew representatives. Furthermore, ORO provides another possibility in (2) : " NOTECHS (non-technical skills evaluation) or other acceptable methods of assessment should be used " Text in red font not included in OPS 3 ACJ
AMC1	ORO.FC.115&.215 - (h)(3)	Crew resource management (CRM) training CRM TRAINING – CAT OPERATIONS	Assessment of CRM skills	Modif	3.943 (ACJ2 - §4.1)	N	ORO introduces text not included in OPS 3 (see red font) : (3) Assessment of CRM skills should: (i) provide feedback to the crew and the individual and serve to identify retraining where needed; and (ii) be used to improve the CRM training system.
AMC1	ORO.FC.115&.215 - (h)(4) et (h)(5)(i) et (ii)	Crew resource management (CRM) training CRM TRAINING – CAT OPERATIONS	Assessment of CRM skills	NIL	3.943 (ACJ2 - §4.3 a and b)	N	
AMC1	ORO.FC.115&.215 - (h)(5)(iii) and (6) to (8)	Crew resource management (CRM) training CRM TRAINING – CAT OPERATIONS	Assessment of CRM skills	New			Principles of CRM skills assessment exposed in ORO De-identified summaries of all CRM assessments to be used to provide feedback and improve CRM training Procedures to be established if training standards not achieved by personnel " If the operator proficiency check is combined with the type rating revalidation/renewal check, the assessment of CRM skills should satisfy the multi-crew cooperation requirements of the type rating revalidation/renewal. This assessment should not affect the validity of the type rating"
AMC1	ORO.FC.115&.215 - (i)	Crew resource management (CRM) training CRM TRAINING – CAT OPERATIONS	Levels of training	NIL	3.943 (ACJ2 - §4.3 a and b)	N	
AMC1	ORO.FC.115&.215 - (j)	Crew resource management (CRM) training CRM TRAINING – CAT OPERATIONS	Use of automation	NIL	3.945 (a)(9) (ACJ)	N	

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Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
AMC1.1	ORO.FC.115&.215	Crew resource management (CRM) training CRM TRAINER	CRM training	New			Alternative qualifications for CRM trainer
GM1	ORO.FC.115&.215	Crew resource management (CRM) training	CRM training General	NIL	3.943 (ACJ1 - §1)	N	
GM1	ORO.FC.115&.215	Crew resource management (CRM) training		Modif	3.943 - No. 1		This GM has been extracted from EU-OPS ACJ/AMC and describes in general terms what CRM and its objectives are.
IR	ORO.FC.120(a)	Operator conversion training		NIL	3.945(a)(2)	N	
IR	ORO.FC.120(b)	Operator conversion training	Training on the equipment installed	New			ORO provides : "The operator conversion training course shall include training on the equipment installed on the aircraft as relevant to flight crew members' roles."
IR	ORO.FC.125 (a)	Differences training and familiarisation training		NIL	3.950 (a)	N	ORO is more general and refers to regulation n°1178/2011. Yet, philosophy is the same and ORO.FC.125 (a) + associated AMC1=3.950 (a)
IR	ORO.FC.125 (b)	Differences training and familiarisation training		Modif	3.950 (a)	N	ORO omits elements that were included in OPS 3 (see red font) : "(b) The operations manual shall specify when such differences or familiarisation training is required ["and additional knowmedge that may be required" in OPS 3]
AMC1	ORO.FC.125	Differences training and familiarisation training GENERAL		NIL	3.950	N	AMC1 to ORO.FC.125 - §(a)(1) and (3) = 3.950 (a) AMC1 to ORO.FC.125 - §(b) = 3.950 (b)
IR	ORO.FC.130	Recurrent training and checking		Modif	3.965(a)(1)	N	ORO and OPS 3 text differ : In ORO : " (a) : Each flight crew member shall complete annual recurrent training relevant to the type or variant of aircraft on which he/she operates, including training on the location and use of all emergency and safety equipment carried." In OPS 3 : " (a)(1) Each flight crew member shall complete recurrent training..." (yearly training mentioned further in 3.965)

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
IR	ORO.FC.135	Pilot qualification to operate in either pilot's seat		Modif	3.968	N	In ORO : "Flight crew members who may be assigned to operate in either pilot's seat shall complete appropriate training and checking as specified in the operations manual." whereas OPS 3.968 mentions additionally that: - The differences between left- and right-hand seats may not be significant (that is also mentioned in GM1 to ORO.FC.235(f);(g) - training and checking programs should be acceptable to the Authority
IR	ORO.FC.140(a)	Operation on more than one type or variant		Allev.	3.980(a)(1)	N	ORO and OPS very similar in that operation on more than one type or variant requires competence to do so. Yet, a potential alleviation exists : experience/training and checking on other type/variant may be credited depending upon operational suitability data (=OSD pursuant to Regulation (EC) No 1702/2003).
IR	ORO.FC.140(b)	Operation on more than one type or variant		NIL	3.980(a)(2)	N	
IR	ORO.FC.145(a)(1)	Provision of training		NIL	3.965(a)(2) and 3.945(a)(3)	N	
IR	ORO.FC.145(a)(2)	Provision of training		NIL	3.965(a)(3) and 3.945(a)(3)	N	
IR	ORO.FC.145(b)	Provision of training		New			ORO states : "When establishing the training programmes and syllabi, the operator shall include the mandatory elements for the relevant type as defined in the data established in accordance with Regulation (EC) No 1702/2003" Those data = OSD
AMC1	ORO.FC.145(b)	Provision of training NON-MANDATORY (RECOMMENDATION) ELEMENTS		New			This AMC describes that OSD non-mandatory training elements for the relevant type should be included.
IR	ORO.FC.145(c)	Provision of training		Modif	3.965(a)(2)	N	ORO and OPS similar except for the text in red font, not included in OPS 3 : "Training and checking programmes, including syllabi and use of individual flight simulation training devices (FSTDs), shall be approved by the competent authority."

Appendix 2 - Comparison IR OPS and OPS3 - ORO 130306.xls

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
IR	ORO.FC.145(d)	Provision of training		New			The FSTD shall replicate the aircraft used by the operator, as far as practicable. Differences between the FSTD and the aircraft shall be described and addressed through a briefing or training, as appropriate.
AMC1	ORO.FC.145(d)	Provision of training FULL FLIGHT SIMULATORS (FFS)		New			This AMC states that the operator should classify any differences between the aircraft and the full flight simulator (FFS) by using the compliance levels provided in the AMC.
IR	ORO.FC.145(e)	Provision of training		New			The operator shall establish a system to adequately monitor changes to the FSTD and to ensure that those changes do not affect the adequacy of the training programmes.
IR	ORO.FC.200(a)	Composition of flight crew	Inexperienced FC member	Modif	3.940(a)(4)	N	ORO specifies : "There shall not be more than one inexperienced flight crew member in any flight crew." Whereas OPS 3 stipulates : "Acceptable procedures are established to avoid that there be more than one inexperienced FC member in any flight crew"
AMC1	ORO.FC.200(a) - (c) and (d)	Composition of flight crew CREWING OF INEXPERIENCED FLIGHT CREW MEMBERS	Inexperienced FC member	Allev.	3.940(a)(4) (AMC)	N	AMC1 to ORO.FC.200(a) - (c) and (d)(1) to (d)(3) = 3.940(a)(4) (AMC) Yet AMC1 to ORO... introduces possibility, based on credits that may be defined in the OSD (pursuant to regulation 1702/2003), to lower the number of hours above which a FC member is considered experienced.
IR	ORO.FC.200(b)	Composition of flight crew		NIL	3.940(a)(5)	N	Delegation of the conduct of the flight by the commander depends upon qualifications of the pilot to whom the conduct of the flight is delegated according to ORO. This is not explicit in OPS 3 but the delegation does not allow any alleviation => requirement in OPS 3 is the same!
IR	ORO.FC.200(d)(1)	Composition of flight crew		NIL	3.940(b)(2) and (b)(3)	N	
IR	ORO.FC.200(d)(2)	Composition of flight crew		NIL	3.940(c)	N	

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
				Modif			<p>OPS 3 contains an alleviation on requirement 3.940 (b)(2) (equivalent to ORO.FC.200(d)(1)). No such alleviation exists in ORO :</p> <p>"Pour l'application du paragraphe (b)(2) ci-dessus, à titre transitoire, les pilotes détenant une licence :</p> <ul style="list-style-type: none"> - de pilote professionnel hélicoptère délivrée conformément au paragraphe 4.3 de l'arrêté du 31 juillet 1981 relatif aux brevets, licences et qualifications de l'aéronautique civile, - ou de pilote de ligne dont les privilèges sont limités aux appareils de moins de 5700 kg, délivrée conformément au paragraphe 9.9 de l'arrêté du 31 juillet 1981 relatif aux brevets, licences et qualifications de l'aéronautique civile, <p>qui détiennent une qualification de type sur un hélicoptère à la date du présent arrêté, peuvent continuer à exploiter ce même type d'hélicoptère avec un équipage de deux pilotes en qualité de commandant de bord si l'hélicoptère est de moins de 5700 kg."</p> <p>Yet this alleviation is not used</p>
IR	ORO.FC.202	Single-pilot operations under IFR or at night		Modif	3.940(c) (App. 1)	N	<p>ORO and OPS 3 similar except for the fact that ORO introduces, among the additional requirements for a single-pilot operation :</p> <ul style="list-style-type: none"> - (a)(7): "single-pilot crew resource management." (not included in OPS 3) - (e)(3) [For helicopter operations under IFR]: <p>(i) " five IFR flights as a single pilot, including three instrument approaches, carried out on a helicopter approved ["same helicopter type" mentioned in OPS 3.940 - App.1, (a)(6)] for this purpose"</p> <p>(ii) "an IFR instrument approach check as a single pilot on the relevant type of helicopter, flight training device (FTD) or full flight simulator (FFS) [additional possibility not addressed in OPS 3]."</p>
IR	ORO.FC.205	Command course		Modif	3.955 (App.1, (a)(1))	N	<p>ORO and OPS 3 similar except for the fact that ORO introduces the following minimum values in (a)(4) :</p> <p>"(4) line training as commander under supervision, for a minimum of:</p> <ul style="list-style-type: none"> (ii) 10 hours, including at least 10 flight sectors, in the case of helicopters"

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
AMC1	ORO.FC.205	Command course COMBINED UPGRADING AND CONVERSION COURSE – HELICOPTER		NIL	3.955 (App. 1, (a)(2))	N	
IR	ORO.FC.215(a)	Initial operator's crew resource management (CRM) training		NIL	3.940(a)(3)	N	ORO and OPS 3 similar except for the fact that ORO introduces CRM training course requirement before commencing unsupervised line flying whereas OPS 3 foresees transition provisions. Yet, when transition expires (1 year), OPS 3 will be equivalent to ORO
IR	ORO.FC.215(b)	Initial operator's crew resource management (CRM) training		Modif	3.943(b)	N	ORO introduces new text in red fond compare to OPS 3 ; "Initial CRM training shall be conducted by at least one suitably qualified CRM trainer who may be assisted by experts in order to address specific areas. "
IR	ORO.FC.215(c)	Initial operator's crew resource management (CRM) training		New			InORO: "If the flight crew member has not previously received theoretical training in human factors to the ATPL level, he/she shall complete, before or combined with the initial CRM training, a theoretical course provided by the operator and based on the human performance and limitations syllabus for the ATPL as established in Annex I (Part-FCL) to Regulation (EU) No 1178/2011."
IR	ORO.FC.220(a)	Operator conversion training and checking		NIL	3.945(a)(9)	N	
IR	ORO.FC.220(b)	Operator conversion training and checking		Modif	3.945(a)(8)	N	ORO states : "Once an operator conversion course has been commenced, the flight crew member shall not be assigned to flying duties on another type or class of aircraft until the course is completed or terminated*" The terme "class" concerns aeroplanes only Besides in *, " unless otherwise approved by the Authority " was included in OPS 3 and has been deleted in ORO.
GM1	ORO.FC.220(b)	Operator conversion training and checking COMPLETION OF AN OPERATOR'S CONVERSION COURSE		New			GM indicating when a conversion course is considered started, when, after a conversion course has started, it may be acceptable that the pilot revert to the original type...
IR	ORO.FC.220(c)	Operator conversion training and checking		NIL	3.945(a)(4) and (a)(5)	N	
IR	ORO.FC.220(d)	Operator conversion training and checking		NIL	3.945(a)(6) and (a)(7)	N	

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
GM1	ORO.FC.220(d)	Operator conversion training and checking LINE FLYING UNDER SUPERVISION		NIL	3.945 (IEM)		
AMC1	ORO.FC.220 - (a)(1)	Operator conversion training and checking OPERATOR CONVERSION TRAINING SYLLABUS	General	NIL	3.945 (AMC - fin de §1.1)	N	"Checking" not directly mentioned in all items of 1.1 but required in the same AMC, a few paragraphs later, in 2.2 (ground checking), 3.5 (flight chacking) and 5.2 (line chck)
AMC1	ORO.FC.220 - (a)(2) and (a)(3) and (a)(5)	Operator conversion training and checking OPERATOR CONVERSION TRAINING SYLLABUS	General	New			"(2) When the flight crew member has not previously completed an operator's conversion course, he/she should undergo general first-aid training and, if applicable, ditching procedures training using the equipment in water. (3) Where the emergency drills require action by the non-handling pilot, the check should additionally cover knowledge of these drills. (5) The operator should ensure that the personnel integrating elements of CRM into conversion training are suitably qualified"
AMC1	ORO.FC.220 - (a)(4)	Operator conversion training and checking OPERATOR CONVERSION TRAINING SYLLABUS	General	NIL	3.945(b) and (c)	N	
AMC1	ORO.FC.220 - (b)	Operator conversion training and checking OPERATOR CONVERSION TRAINING SYLLABUS	Ground training	Modif	3.945 (AMC, §2)	N	ORO specifies in (b)(1) how ground training can be achieved: "Self-study using appropriate electronic learning aids, computer-based training (CBT) etc. may be used with adequate supervision of the standards achieved" This minor element is not included in OPS 3
AMC1	ORO.FC.220 - (c)	Operator conversion training and checking OPERATOR CONVERSION TRAINING SYLLABUS	Emergency and safety equipment training and checking	Modif	3.945 (AMC, §4)	N	ORO and OPS 3 similar except for the fact that ORO includes additional elements or elements rephrased : - "Emergency and safety equipment training should take place in conjunction with cabin/technical crew" (technical crew not mentioned in OPS 3) - (c)(2)(iii) : effect of smoke addressed differently in OPS 3 - (c)(2)(vii) : "A comprehensive drill to cover all ditching procedures where flotation equipment is carried. This should include practice of the actual donning and inflation of a life-jacket..." (not addressed in OPS 3)

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Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
AMC1	ORO.FC.220 - (d)	Operator conversion training and checking OPERATOR CONVERSION TRAINING SYLLABUS	Flight training	NIL	3.945 (AMC, §3)	N	
AMC1	ORO.FC.220 - (e)	Operator conversion training and checking OPERATOR CONVERSION TRAINING SYLLABUS	Line flying under supervision (LIFUS)	Modif	3.945 (AMC, §5)	N	Additional requirement in ORO (see red font) compared to OPS 3 : "The minimum flight sectors/hours should be specified in the operations manual and should be determined by the following: (iii) the type and area of operation "
AMC1	ORO.FC.220 - (f)	Operator conversion training and checking OPERATOR CONVERSION TRAINING SYLLABUS	Passenger handling for operations where no cabin crew is required	Modif	3.945 (AMC, §6)	N	OPS 3 mentions Dangerous goods in §6. C "6. Prise en charge des passagers. Outre une formation générale aux relations humaines, une attention plus particulière devrait être accordée aux sujets suivants : ... c. prise de conscience des catégories de marchandises dangereuses, qui peuvent ou non être transportées en cabine passagers, y compris le suivi d'un programme de formation aux marchandises dangereuses" Addressed in other paragraphs of IR OPS?
AMC1	ORO.FC.220 - (g) and (h)	Operator conversion training and checking OPERATOR CONVERSION TRAINING SYLLABUS	Discipline and responsibilities, for operations where no cabin crew is required Passenger briefing/safety demonstrations, for operations where no cabin crew is required	NIL	3.945 (AMC, §7 and 8)	N	
IR	ORO.FC.230(a)	Recurrent training and checking		Modif	3.965(a)(1) (and 3.005(f) - Appendix 1, (d)(20)???)	N	ORO and OPS 3 similar except for the fact that ORO introduces additional elements (see red font): "Each flight crew member shall complete recurrent training and checking relevant to the type or variant of aircraft on which they operate."
IR	ORO.FC.230(b)(1) and (b)(2)	Recurrent training and checking	Operator proficiency check	NIL	3.965(b)(1)	N	
IR	ORO.FC.230(b)(3), (g), (h)	Recurrent training and checking	Operator proficiency check	NIL	3.965(b)(2)	N	

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
IR	ORO.FC.230(b)(4)	Recurrent training and checking	Operator proficiency check	Modif	3.965(b)(3) and (b)(4)	N	Grouping of helicopters for the purpose of OPC : In ORO : "The flight crew member involved in operations by day and over routes navigated by reference to visual landmarks with an other-than-complex motor-powered helicopter may complete the operator proficiency check in only one of the relevant types held. The operator proficiency check shall be performed each time on the type least recently used for the proficiency check. The relevant helicopter types that may be grouped for the purpose of the operator proficiency check shall be contained in the operations manual." See next cell for conditions set in OPS 3.
				Modif			in OPS 3 : "(3) Lorsqu'un pilote est qualifié sur plusieurs types d'hélicoptères monomoteurs à pistons tels que listés dans l'appendice 1 au FCL 2.245(b)(1) de l'arrêté du 12 juillet 2005 (FCL 2), il peut ne subir qu'un contrôle hors ligne pour les différents types d'hélicoptères qu'il utilise effectivement. (4) Lorsqu'un pilote est qualifié sur plusieurs types d'hélicoptères monomoteurs à turbines de la masse maximale certifiée au décollage (MCTOM) inférieure ou égale à 3175 kg, il peut ne subir qu'un contrôle hors ligne pour les différents types d'hélicoptères qu'il utilise effectivement"
IR	ORO.FC.230(b)(5)	Recurrent training and checking	Operator proficiency check	Allev.	-		Use of commanders for OPC : "for operations of other-than-complex motor-powered helicopters by day and over routes navigated by reference to visual landmarks... the check may be conducted by a suitably qualified commander nominated by the operator, trained in CRM concepts..."
IR	ORO.FC.230(c)(1), (g), (h)	Recurrent training and checking	Line check	NIL	3.965(c)(1) and 3.965 (App. 1, (b)(3)(iv))	N	
IR	ORO.FC.230(c)(2)	Recurrent training and checking	Line check	Modif	3.965(a)(4)(ii)	N	ORO and OPS 3 similar except for the following changes (see red font) : "line checks may be conducted by a suitably qualified [instead of "acceptable to the authority" as was set in OPS 3] commander nominated by the operator, trained in CRM concepts and the assessment of CRM skills [last text in red not included in OPS 3]"

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
IR	ORO.FC.230(d), (g), (h)	Recurrent training and checking		NIL	3.965(d)	N	
IR	ORO.FC.230(e)	Recurrent training and checking		NIL	3.965(e)	N	
IR	ORO.FC.230(f), (g), (h)	Recurrent training and checking		NIL		N	Text directly included in 3.965 ©(1), (d), (f) and (g)
AMC1	ORO.FC.230 - (a)(1)	Recurrent training and checking RECURRENT TRAINING SYLLABUS	Recurrent training - Ground training	NIL	3.965 (App. 1, (a)(1)) and 3.965 (f) (last sentence)	N	AMC1 to ORO.FC.230 - (a)(1)(i) and (ii) = 3.965 (App. 1, (a)(1)) AMC1 to ORO.FC.230 - (a)(1)(iii) = 3.965 (f) (last sentence) Note : AMC1 to ORO.FC.230 - (a)(1)(i)(B) sheds a particular light on anti-icing/de-icing (aeroplanes rather concerned)
AMC1	ORO.FC.230 - (a)(2)(i) to (a)(2)(iii)(F) (1st sentence of F considered only) and (a)(2)(iii)(G)	Recurrent training and checking RECURRENT TRAINING SYLLABUS	Recurrent training - Emergency and safety equipment training	Modif	3.965 (App. 1, (a)(3))	N	ORO and OPS 3 similar except for the following changes (see red font) only implemented in ORO : "(iii) Every 3 years the programme of training should include the following: (B) demonstration of the method used to operate a slide where fitted; ... (E) actual handling of pyrotechnics, real or simulated, where applicable"
AMC1	ORO.FC.230 - (a)(2)(iii)(F) (from 2d sentence of (a)(2)(iii)(F) to the end of (a)(2)(iii)(F))	Recurrent training and checking RECURRENT TRAINING SYLLABUS	Recurrent training - Helicopter water survival training	NIL	3.965 §(a)(3)(iii)(D) of App. 1 - AMC	N	In ORO : "Where operations are predominately conducted offshore, operators should conduct 3-yearly helicopter underwater escape training at an appropriate facility" This provision is not explicitly included in AMC to §(a)(3)(iii)(D) of appendix 1 to OPS 3.965 but directly in the introduction sentences of §(a)(3)(iii) of appendix 1 to OPS 3.965.
AMC1	ORO.FC.230 - (a)(2)(iv) à (a)(2)(vi)	Recurrent training and checking RECURRENT TRAINING SYLLABUS	Recurrent training - Emergency and safety equipment training	Modif	3.965(d) (ACJ)	N	ORO and OPS 3 similar except : ORO refers to : "interaction between flight crew and cabin/technical crew " (§(a)(2)(iv)) and provides that "Emergency and safety equipment training should, as far as practicable, take place in conjunction with cabin/technical crew ..." (§(a)(2)(vi)) OPS 3 does not refer to the technical crew member but only to the
AMC1	ORO.FC.230 - (a)(3)(i) and (ii)	Recurrent training and checking RECURRENT TRAINING SYLLABUS	Recurrent training - CRM	NIL	3.965(e) and 3.943 (c)	N	AMC1 to ORO.FC.230 - (a)(3)(i) and (ii) (1st sentence) =3.965(e) AMC1 to ORO.FC.230 - (a)(3)(ii)(A) to (K)= 3.943 (c)(1) to (c)(11)

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
AMC1	ORO.FC.230 - (a)(3)(iii)	Recurrent training and checking RECURRENT TRAINING SYLLABUS	Recurrent training - CRM	New			Operators should establish procedures to update their CRM recurrent training programme. Revision of the programme should be conducted over a period not exceeding 3 years. The revision of the programme should take into account the de-identified results of the CRM assessments of crews, and information identified by the safety management system.
AMC1	ORO.FC.230 - (a)(4)(i) and (ii)(A)	Recurrent training and checking RECURRENT TRAINING SYLLABUS	Recurrent training - Aircraft/FSTD training	Modif	3.965 (App. 1, §(a)(2)) and 3.965-App1 (IEM, §4) 3.965(g) (last sentence)	N	AMC1 to ORO.FC.230 - (a)(4)(i)(D) = 3.965 (g) (last sentence) All other § : (a)(4)(i)(A) to (C) and (a)(4)(ii)(A) = 3.965 (App. 1, §(a)(2)) except that in ORO : (a)(4)(ii)(A) : "Where a suitable FSTD is available it should be used for the aircraft/FSTD training programme. If the operator is able to demonstrate, on the basis of a compliance and risk assessment , that using an aircraft for this training provides equivalent standards of training with safety levels similar to those achieved using an FSTD, the aircraft may be used for this training to the extent necessary" Just like JAR OPS 3, OPS 3 indicates that, if no STD is available, engines malfunctions should be simulated using safe airborne simulation. If such training is conducted in the helicopter, due consideration must be given to the effect of any subsequent failure and the exercise must be preceded by a comprehensive briefing. This provision is considered in AMC1 to ORO.FC.230 - (e)(3)
AMC1	ORO.FC.230 - (a)(4)(ii)(B)	Recurrent training and checking RECURRENT TRAINING SYLLABUS	Recurrent training - Aircraft/FSTD training	New			"(B) The recurrent training should include the following additional items, which should be completed in an FSTD: - settling with power and vortex ring; - loss of tail rotor effectiveness."
AMC1	ORO.FC.230 - (b)(1)(ii)(A)	Recurrent training and checking RECURRENT TRAINING SYLLABUS	Recurrent checking - Operator proficiency checks	NIL	3.965 (App.1, (b)(1)(i))	N	
AMC1	ORO.FC.230 - (b)(1)(ii)(B)	Recurrent training and checking RECURRENT TRAINING SYLLABUS	Recurrent checking - Operator proficiency checks (IFR)	Modif	3.965 (App.1, (b)(1)(iii))	N	ORO and OPS 3 similar except taht ORO, in the case of multi-engined helicopters, a simulated failure of one engine to be included in either the precision or non-precision approach to minima should be included in the OPS while OPS 3 indicates that this failure should be simulated on a precision approach

Appendix 2 - Comparison IR OPS and OPS3 - ORO 130306.xls

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
AMC1	ORO.FC.230 - (b)(1)(ii)(C)	Recurrent training and checking RECURRENT TRAINING SYLLABUS	Recurrent checking - Operator proficiency checks	NIL	3.965(b)(2) (last 2 sentences)	N	
AMC1	ORO.FC.230 - (b)(1)(iii)	Recurrent training and checking RECURRENT TRAINING SYLLABUS	Recurrent checking - Operator proficiency checks	NIL	3.965 (App.1, (b)(1)(ii))	N	
AMC1	ORO.FC.230 - (b)(1)(iv)	Recurrent training and checking RECURRENT TRAINING SYLLABUS	Recurrent checking - Operator proficiency checks	NIL	3.965(a)(4)(i)	N	<p>Consistency problem? AMC1 to ORO.FC.230 - (b)(1)(iv) : "Operator proficiency checks should be conducted by a type rating examiner (TRE) or a synthetic flight examiner (SFE), as applicable." (No CRE because this section is dedicated to helicopters</p> <p>In AMC1 to ORO.FC.230 - (d)(5)(i) "(d) Personnel providing training and checking (5) recurrent checking by the following personnel: (i) : operator proficiency check by a type rating examiner (TRE), class rating examiner (CRE)..." This text is applicable to helicopters and aeroplanes hence a reference to "class" of aircraft, which actually applies to aeroplanes only</p>
AMC1	ORO.FC.230 - (b)(2)		Recurrent checking - Emergency and safety equipment checks	NIL	3.965 (App.1, (b)(2))	N	
AMC1	ORO.FC.230 - (b)(3)(i)	Recurrent training and checking RECURRENT TRAINING SYLLABUS	Recurrent checking - Line checks	Modif	3.965 (App. 1 (b)(3)(i)) and 3.965 (AMC, 2.1 and 2.2)		<p>AMC1 to ORO.FC.230 - (b)(3)(i) (1st sentence) = 3.965 -App.1, (b)(3)(i) AMC1 to ORO.FC.230 - (b)(3)(i) (2d sentence) = 3.965 (AMC, 2.1) AMC1 to ORO.FC.230 - (b)(3)(i) (last sentence) = 3.965 (AMC, 2.2)</p> <p>Thus, ORO and OPS 3 are similar except that ORO indicates additionally (red font): "When weather conditions preclude a manual landing, an automatic landing is acceptable. The commander, or any pilot who may be required to relieve the commander, should also demonstrate his/her ability to 'manage' the operation and take appropriate command decisions."</p>

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AMC1	ORO.FC.230 - (b)(3)(ii)	Recurrent training and checking RECURRENT TRAINING SYLLABUS	Recurrent checking - Line checks	Modif	3.965 (App. 1 (b)(3)(ii))	N	New elements of ORO, not included in OPS 3 are the following (red font) : "The flight crew should be assessed on their CRM skills in accordance with a methodology described in the operations manual. The purpose of such assessment is to: (A) provide feedback to the crew collectively and individually and serve to identify retraining; and (B) be used to improve the CRM training system."
AMC1	ORO.FC.230 - (b)(3)(iii)	Recurrent training and checking RECURRENT TRAINING SYLLABUS	Recurrent checking - Line checks	New			"CRM assessment alone should not be used as a reason for a failure of the line check."
AMC1	ORO.FC.230 - (b)(3)(iv)	Recurrent training and checking RECURRENT TRAINING SYLLABUS	Recurrent checking - Line checks	NIL	3.965 (App. 1 (b)(3)(iii))	N	
AMC1	ORO.FC.230 - (b)(3)(v)	Recurrent training and checking RECURRENT TRAINING SYLLABUS	Recurrent checking - Line checks	Modif	3.965(a)(4)(ii) and 3.965-App.1 (b)(3)(v)	N	In ORO : "Line checks should be conducted by a commander nominated by the operator. The operator should inform the competent authority about the persons nominated" [in OPS 3 : persons should be "acceptable to the Authority"] Furthermore, the following requirement is new (?): "His/her CRM assessments should solely be based on observations made during the initial briefing, cabin briefing, flight crew compartment briefing and those phases where he/she occupies the observer's seat"
AMC1	ORO.FC.230 - (b)(3)(vi)	Recurrent training and checking RECURRENT TRAINING SYLLABUS	Recurrent checking - Line checks	New			Oro specifies : "Where a pilot is required to operate as pilot flying and pilot monitoring, he/she should be checked on one flight sector as pilot flying and on another flight sector as pilot monitoring. However, where the operator's procedures require integrated flight preparation, integrated cockpit initialisation and that each pilot performs both flying and monitoring duties on the same sector, then the line check may be performed on a single flight sector."
AMC1	ORO.FC.230 - (b)(4)	Recurrent training and checking RECURRENT TRAINING SYLLABUS	Recurrent checking - Line checks	NIL			Repeated from the rule

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AMC1	ORO.FC.230 - (b)(4)	Recurrent training and checking RECURRENT TRAINING SYLLABUS	Recurrent checking - Line checks	Modif	3.965 (App. 1 (b)(4))	N	<p>ORO indicates :</p> <p>"(5) In the case of single-pilot operations with helicopters, the recurrent checks referred to in (b)(1), (2) and (3) should be performed in the single-pilot role on a particular helicopter type in an environment representative of the operation."</p> <p>(b)(2) refers to "emergency and safety equipment check" and is not explicitly addressed in PS 3.</p>
AMC1	ORO.FC.230 - (c)	Recurrent training and checking RECURRENT TRAINING SYLLABUS	Flight crew incapacitation training, except single-pilot operations	Modif	3.1045 (App. 1)	N	<p>"(c) Flight crew incapacitation training, except single-pilot operations</p> <p>(1) Procedures should be established to train flight crew to recognise and handle flight crew incapacitation. This training should be conducted every year and can form part of other recurrent training. It should take the form of classroom instruction, discussion, audio-visual presentation or other similar means.</p> <p>(2) If an FSTD is available for the type of aircraft operated, practical training on flight crew incapacitation should be carried out at intervals not exceeding 3 years."</p> <p>Although flight crew incapacitation it is not directly mentioned in requirements of OPS 3, it is included in:</p> <ul style="list-style-type: none"> - OPS Manual A 4.4 - OPS manual A 8.3.14
AMC1	ORO.FC.230 - (d)(1) to (d)(3)	Recurrent training and checking RECURRENT TRAINING SYLLABUS	Personnel providing training and checking - ground and refresher training, flight training, emergency and safety equipment training	NIL	3.965(a)(3)(i) to (a)(3)(iii)	N	<p>Flight training may be provided by a class rating instructor also according to AMC1 to ORO.FC.230 - (d)(2)</p> <p>This AMC1 to ORO is common to aeroplanes and helicopters but is actually applicable to aeroplanes only. Hence ORO=OPS3</p>

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
AMC1	ORO.FC.230 - (d)(4)	Recurrent training and checking RECURRENT TRAINING SYLLABUS	Personnel providing training and checking - CRM	Modif	3.965(a)(3)(iv)	N	ORO much more detailed : "(d) Personnel providing training and checking Training and checking should be provided by the following personnel:... (4) CRM: (i) integration of CRM elements into all the phases of the recurrent training by all the personnel conducting recurrent training. The operator should ensure that all personnel conducting recurrent training are suitably qualified to integrate elements of CRM into this training; (ii) modular CRM training by at least one CRM trainer, who may be assisted by experts in order to address specific areas."
AMC1	ORO.FC.230 - (d)(5)	Recurrent training and checking RECURRENT TRAINING SYLLABUS	Personnel providing training and checking - recurrent checking by the following personnel	NIL	3.965(a)(4)(i) 3.965(a)(3)(iv)	N	ORO introduces the CRE (not included in OPS 3): "recurrent checking by the following personnel: (i) operator proficiency check by a type rating examiner (TRE), class rating examiner (CRE)..." Yet, this is not applicable to helicopters, hence ORO=OPS3
AMC1	ORO.FC.230 - (e)(1) and (e)(3)	Recurrent training and checking RECURRENT TRAINING SYLLABUS	Use of FSTD	NIL	3.965 - App. 1 (IEM, §1) and 3.965 - App. 1 (IEM, §4)	N	
AMC1	ORO.FC.230 - (e)(2)	Recurrent training and checking RECURRENT TRAINING SYLLABUS	Use of FSTD	NIL	3.965 (AMC, §1)	N	
GM1	ORO.FC.230 - (a)	Recurrent training and checking LINE CHECK AND PROFICIENCY TRAINING AND CHECKING		NIL	3.965 (IEM)	N	
GM1	ORO.FC.230 - (b) and (c)	Recurrent training and checking LINE CHECK AND PROFICIENCY TRAINING AND CHECKING		NIL	3.965 (AMC, 2.1) and 3.965 (AMC, 3)	N	
IR	ORO.FC.235	Pilot qualification to operate in either pilot's seat		NIL	3.968 (App. 1)	N	ORO.FC.235 (a) = 3.968, App. 1, 1st part of §(a) ORO.FC.235 (b) = 3.968, App. 1, ORO.FC.235 (c) = 3.968, App. 1, 2dpart of §(a) ORO.FC.235 (d) = 3.968, App. 1, §(b) ORO.FC.235 (e) = 3.968, App. 1, §(c) ORO.FC.235 (f) = 3.968, App. 1, §(d) ORO.FC.235 (g) = 3.968, App. 1, §(e)

Appendix 2 - Comparison IR OPS and OPS3 - ORO 130306.xls

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
AMC1	ORO.FC.235(d)	Pilot qualification to operate in either pilot's seat SINGLE-ENGINE HELICOPTERS – AUTOROTATIVE LANDING		NIL	3.968 (App.1, (b))	N	
GM1	ORO.FC.235(f);(g)	Pilot qualification to operate in either pilot's seat DIFFERENCES BETWEEN LEFT AND RIGHT-HAND SEATS		New			The differences between left- and right-hand seats may not be significant in cases where, for example, the autopilot is used.
IR	ORO.FC.240(a)	Operation on more than one type or variant		NIL	3.980(a)(2)	N	
IR	ORO.FC.240(a)(1), (2) and (3)	Operation on more than one type or variant		Modif	3.980 (App. 1, §1)	N	A minor difference exist between ORO and OPS 3 : ORO specifies that the procedures or operational restrictions for operation on more than one type or variant... shall cover all "applicable recent experience requirements for each type or variant" whereas OPS 3 mentions experience requirements that may be required by the Authority.
IR	ORO.FC.240(a)(1), (2) and (3)	Operation on more than one type or variant		Modif	3.980 (AMC, 2. d. ii)	N	ORO is more general as it provides : "The procedures or operational restrictions for operation on more than one type or variant... shall cover: (2) the minimum experience level on one type or variant before beginning training for and operation of another type or variant;" Whereas requirements in OPS 3 only concerns helicopters with MCTOM>5,7t or MOPSC > 19 ("a minimum of 3 months and 150 hours experience on the type or variant should be achieved before the flight crew member should commence the conversion course onto the new type or variant" This requirement is also in AMC1 to ORO.FC.240.(b)(iv)(B))
IR	ORO.FC.240(b)	Operation on more than one type or variant		NIL	3.981(a)(1)	N	

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
AMC1	ORO.FC.240 - (b)	Operation on more than one type or variant		Modif.	3.980 (AMC, §2)	N	<p>AMC1 to ORO.FC.240 - (b)(1)(i)=3.980 (AMC), 2.a AMC1 to ORO.FC.240 - (b)(1)(ii)=3.980 (AMC), 2.b</p> <p>AMC1 to ORO.FC.240 - (b)(1)(iii)=3.980 (AMC), 2.c - except that ORO allows potential credits related to training/checking/recent experience requirements as defined in the OSD</p> <p>AMC1 to ORO.FC.240 - (b)(1)(iv)=3.980 (AMC), 2.d - except that ORO allows potential credits in (b)(1)(iv)(A), (B) and (C), related to training/checking/recent experience requirements as defined in the OSD</p> <p>AMC1 to ORO.FC.240 - (b)(1)(v)=3.980 (AMC), 2.e - except that ORO allows potential credits related to training/checking/recent experience requirements as defined in the OSD</p> <p>AMC1 to ORO.FC.240 - (b)(1)(v)=3.980 (AMC), 2.f</p>
IR	ORO.FC.H.250(a)(1)	Commanders holding a CPL(H)		Modif	3.960(a)(2)(i)	N	<p>The text based on 3.960 has been in parts restructured and rephrased to improve clarity. Privileges of an ATPL are governed by Part-FCL; text not repeated here.</p> <p>OPS 3 implemented a possibility (in red font) that ORO does not include now :</p> <p>"when operating under IFR, he/she has a minimum of 700 hours total flight time on helicopters, including 300 hours as pilot-in-command [additional text in OPS 3: or as pilot-in-command under supervision of a commander proposed by the operator and approved by the Authority]"</p>
IR	ORO.FC.H.250(a)(2)	Commanders holding a CPL(H)		Modif	3.960(a)(2)(i)	N	<p>ORO and OPS 3 diverge. See red font for differences :</p> <p>"when operating under visual meteorological conditions (VMC) at night, he/she has:</p> <p>(i) a valid instrument rating (not addressed in OPS 3); or</p> <p>(ii) 300 hours of flight time on helicopters, including 100 hours [150h in OPS 3] as pilot-in-command [additional text in OPS 3: "or as pilot-in-command under supervision of a commander proposed by the operator and approved by the Authority] and 10 hours as pilot flying at night.</p>

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
		Minimum qualification requirement for commander ("related" requirements in ORO.FC.250)		Only in OPS 3 (not in JAR OPS 3)	3.960 (a)(iii) Minimum qualification requirement to upgrade to commander for CAT under VMC	N	OPS 3.960 Commandants de bord - Exigences minimales de qualification (a) Les exigences minimales de qualification pour un commandant de bord sont : (iii) lorsqu'il conduit des opérations de transport de passagers en conditions de vol à vue (VMC), un commandant de bord totalise 150 heures de vol sur hélicoptère comme commandant de bord ou commandant de bord sous supervision.
		Minimum qualification requirement for commander ("related" requirements in ORO.FC.250)		Only in OPS 3 (not in JAR OPS 3)	3.960 (b) and App. 1 to 3.960 Minimum qualification requirement to upgrade to commander on R22 and R44	N	(b) For given helicopters with specific characteristics, additional experience and training requirement is needed as defined in App. 1 to OPS 3.960 : App1 to 3.960 requires that to act as a commander of CAT flights operated with : - Robinson RH22, a pilot shall have 150 hours of flight time on RH22 as a pilot-in-command - Robinson RH22 and RH44, a pilot shall follow a safety training developed by Robinson and approved by the French civil Authority
		Line check ("related" requirements in ORO.FC.230)		Only in OPS 3 (not in JAR OPS 3)	3.965(c)(2)	N	OPS 3.965 (c)(2) gives a possibility to group helicopter types for the purpose of line checks (not implemented in either ORO.FC.230 (c) nor associated AMC). According to OPS 3, the flight crew member holding qualifications in more than one type of helicopter may complete the line check in only one of the relevant types held. The line check shall be conducted on the most significant type of helicopter (based on the following criteria : characteristics of engines, performances, complexity of the systems, MTOM, the complexity of the helicopter) ("Lorsqu'un pilote est qualifié sur plusieurs types d'hélicoptères, il peut ne subir qu'un contrôle en ligne pour les différents types d'hélicoptères qu'il utilise effectivement. Ce contrôle doit alors être effectué sur le type le plus significatif, celui-ci étant défini à l'aide des critères couramment pris en compte (notamment caractéristiques des moteurs, performances, complexité des systèmes, masse maximale au décollage, complexité de la mise en œuvre de la machine) sauf si le réseau exploité avec ce type n'est pas représentatif.")

NIL

No difference between IR OPS and French OPS 3

Difference (not major and more demanding) between IR OPS and French OPS 3.

It may result a modification ("Modif") of an existing requirment or a new requirement ("New"). Sometimes noted as "Not transposed" from OPS 3

Major difference between IR OPS and OPS 3 (more demanding).

It may result a modification ("Modif") of an existing requirment or a new requirement ("New"). Sometimes noted as "Not transposed" from OPS 3

Less demanding provision

It may result a modification ("Modif") of an existing requirment or a new requirement ("New"). Sometimes the alleviation result from a non transposition ("not transposed") of an OPS 3 requirement
It may also be noted "Allev."

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IR	CAT.GEN.100	Competent Authority		Modif	Civil Aviation Code (R. 133-5)		"The competent authority shall be the authority designated by the Member State in which the operator has its principal place of business."
IR	CAT.GEN.MPA.100	Crew Responsibilities		Modif	3.085(a), (b), (c)	B	To be noted : CAT.GEN.MPA.100(b)(2) + AMC1 to CAT.GEN.MPA.100(b) = 3.085(b)(2) CAT.GEN introduces new elements compared to OPS 3.085: - (b) (1) : "a crew member shall report to the commander any fault, failure, malfunction or defect which the crew member believes may affect the airworthiness or safe operation of the aircraft including emergency systems, if not already reported by another crew member;" - Introduction of flight time limitations : CAT.GEN.MPA.100(b)(4) and (b)(5(ii) require the crew member to comply with FTL and provide necessary data to each operator - In (c)(3), applicable medical requirements that need to be fulfilled
AMC1	CAT.GEN.MPA.100(b)	Crew Responsibilities		NIL	3.085(b)(2) (end of §)	B	
AMC1	CAT.GEN.MPA.100(c)(1)	Crew Responsibilities		Modif	3.085(d)	B	New requirement on blood alcohol level. "ALCOHOL CONSUMPTION. The operator should issue instructions concerning the consumption of alcohol by crew members. The instructions should be not less restrictive than the following: (b) the blood alcohol level should not exceed the lower of the national requirements or 0.2 per thousand at the start of a flight duty period;"
GM1	CAT.GEN.MPA.100(c)(2)	Crew Responsibilities		New			"ELAPSED TIME BEFORE RETURNING TO FLYING DUTY 24 hours is a suitable minimum length of time to allow after normal blood donation or normal recreational (sport) diving before returning to flying duties. This should be considered by operators when determining a reasonable time period for the guidance of crew members. PART-MED Information on the effects of medication, drugs, other treatments and alcohol can be found in Annex IV (Part-MED) to Regulation (EU) No 1178/2011."

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
IR	CAT.GEN.MPA.105(a) except (a)(13)	Responsibilities of the commander		Modif	3.085(e)	B	<p>CAT.GEN modifies two requirements :</p> <p>(a) The commander... shall:</p> <p>(1) be responsible for the safety of all crew members, passengers and cargo on board, as soon as the commander arrives on board the aircraft, until the commander leaves the aircraft at the end of the flight;</p> <p>In OPS 3.085(e)(1) limits the responsibility of the commander to the flight time period (rotors turning)</p> <p>Rules on the use of flight recorders amends requirements (set in 3.085(e)(9)) to align with ICAO Annex 6 (in red most important element):</p> <p>"The commander shall :</p> <p>(10) ensure that flight recorders:</p> <p>(i) are not disabled or switched off during flight; and</p> <p>(ii) in the event of an accident or an incident that is subject to mandatory reporting:</p> <p>(A) are not intentionally erased;</p> <p>(B) are deactivated immediately after the flight is completed; and</p> <p>(C) are reactivated only with the agreement of the investigating authority;"</p>
IR	CAT.GEN.MPA.105(a)(13)	Responsibilities of the commander		NIL	3.330(b)	D	
IR	CAT.GEN.MPA.105(b)	Responsibilities of the commander		NIL	3.085(f)	B	
IR	CAT.GEN.MPA.105(c)	Responsibilities of the commander		NIL	3.420(d)(1)(i) and end of (d)(1)	D	It is understood that report of air traffic incidents as referred to in OPS 3 included ACAS resolution advisory as specified in CAT.GEN.MPA.105(c)
IR	CAT.GEN.MPA.105(d)	Responsibilities of the commander		NIL	3.420(d)(3)	D	<p>Requirements of CAT.GEN and OPS 3 are identical except for the following :</p> <p>CAT.GEN and OPS 3 both require that, whenever a potential bird hazard is observed, the commander shall inform the air traffic service (ATS) unit.</p> <p>The only difference is that CAT.GEN indicates that this shall only be done when flight crew workload allows... This seems implicit : requirements of OPS 3 and CAT.GEN are hence considered similar.</p>
IR	CAT.GEN.MPA.110	Authority of the commander		NIL	3.090	B	

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
IR	CAT.GEN.MPA.115	Personnel or crew members other than cabin crew in the passenger compartment		New			"The operator shall ensure that personnel or crew members, other than operating cabin crew members, carrying out their duties in the passenger compartment of an aircraft: (a) are not confused by the passengers with operating cabin crew members; (b) do not occupy required cabin crew assigned stations; (c) do not impede operating cabin crew members in their duties." No cabin crew members yet in France
AMC1	CAT.GEN.MPA.115(a)	Personnel or crew members other than cabin crew in the passenger compartment		New			MEASURES TO PREVENT CONFUSION BY PASSENGERS If personnel or crew members other than operating cabin crew members carry out duties in a passenger compartment, the operator should ensure that they do not perform tasks or wear a uniform in such a way that might lead passengers to identify them as members of the operating cabin crew. No cabin crew members yet in France
IR	CAT.GEN.MPA.120	Common language		NIL	3.025(a)	B	
IR	CAT.GEN.MPA.130	Rotor engagement - helicopters		NIL	3.210(d)	D	
GM1	CAT.GEN.MPA.130	Rotor engagement - helicopters		New			This GM describes two situations where it is allowed to turn the rotor under power: "INTENT OF THE RULE (a) The following two situations where it is allowed to turn the rotor under power should be distinguished: (1) for the purpose of flight, this is described in the Implementing Rule; (2) for maintenance purposes. (b) Rotor engagement for the purpose of flight: the pilot should not leave the control when the rotors are turning... (c) Rotor engagement for the purpose of maintenance: the Implementing Rule, however, does not prevent ground runs being conducted by qualified personnel other than pilots for maintenance purposes. The following conditions should be applied: (1) the operator should ensure that the qualification of personnel, other than pilots, who are authorised to conduct maintenance runs is described in the appropriate manual; (2) ground runs should not include taxiing the helicopter; (3) there should be no passengers on board; and (4) maintenance runs should not include collective increase or autopilot engagement (due to the risk of ground resonance)."

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
IR	CAT.GEN.MPA.135	Admission to the flight crew compartment		NIL	3.100	B	
AMC1	CAT.GEN.MPA.135(a)(3)	Admission to the flight crew compartment		Allev.	3.005(f) (App.1 , (d)(1))		<p>In CAT.GEN :</p> <p>"Where an aircraft is used in a single-pilot operation under visual flight rules (VFR) by day but has more than one pilot station, the instructions of the operator may permit passengers to be carried in the unoccupied pilot seat(s), provided that the commander is satisfied that:</p> <p>(a) it will not cause distraction or interference...; and</p> <p>(b) the passenger occupying a pilot seat is familiar with the relevant restrictions and safety procedures."</p> <p>OPS 3 contains similar possibilities except that the scope of helicopters is not the same.</p> <p>In OPS 3 : MCTOM=<3175kg, MOPSC=<9 and day VFR with routes navigated over routes with reference to visual landmarks</p> <p>The alleviation scope is expanded in CAT.GEN as helicopters with MCTOM of over 3175kg or of MOPSC over 9 pax are eligible</p>
IR	CAT.GEN.MPA.140	Portable Electronic Devices		NIL	3.110	B	
AMC1	CAT.GEN.MPA.140	Portable Electronic Devices		New			<p>Restriction of use, test methods, ...</p> <p>Principle elements :</p> <p>> As the general principle all PEDs (including transmitting PEDs (T-PEDs)) are switched-off at the start of the flight</p> <p>> There are exceptions yet :</p> <ul style="list-style-type: none"> - Medical equipment necessary to support physiological functions - The use of PEDs, excluding T-PEDs, may be permitted during non-critical phases of flight, excluding taxiing.... <p>> The commander may for any reason and during any phase of flight require deactivation and stowage of PEDs.</p> <p>> Occurrences of suspected or confirmed interference that have potential safety implications should be reported to the competent authority.</p> <p>EFB (eletronic flight bag) (on-going NPA 2012-02):</p> <p>"(c) Restrictions on the use of PEDs in the flight compartment</p> <p>Due to the higher risk of interference and potential for distracting crew from their duties, PEDs should not be used in the flight compartment. However, the operator may allow the use of PEDs, e.g. to assist the flight crew in their duties, if procedures are in place to ensure the following:..."</p>

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
GM1	CAT.GEN.MPA.140	Portable Electronic Devices		New			Definition and categories of PEDs
GM2	CAT.GEN.MPA.140	Portable Electronic Devices		New			Information on fire caused by PED
IR	CAT.GEN.MPA.145	Information on emergency and survival equipment carried		NIL	3.055 (1st part)	B	
AMC1	CAT.GEN.MPA.145	Information on emergency and survival equipment carried		NIL	3.055 (2d part)	B	
IR	CAT.GEN.MPA.155	Carriage of weapons of war and munitions of war		Modif	3.065	B	In CAT.GEN : "(b)...the operator shall ensure that weapons of war and munitions of war are: (2) in the case of firearms, unloaded [unless before commencement of the flight, approval has been granted by all States concerned... Text in red included in OPS 3 only]" Alternatives to the rule in (b) 2. not transposed; this needs an Article 14 (Reg. (EC) No 216/2008) exemption.
GM1	CAT.GEN.MPA.155	Carriage of weapons of war and munitions of war		NIL	3.065 (IEM)		
IR	CAT.GEN.MPA.160 CAT.GEN.MPA.161	Carriage of sporting weapons and ammunition		Modif	3.070	B	In CAT.GEN : "(b)...the operator shall ensure that weapons of war and munitions of war are: (1) stowed in the aircraft in a place that is inaccessible to passengers during flight [unless the Authority has determined that compliance is impracticable and has accepted that other procedures might apply; Text in red included in OPS 3 only] Alternatives to the rule in (b) (1) also exists in CAT.GEN. Unlike in OPS 3 yet, such alleviations do not concern all helicopters but only those referred to in CAT.GEN.MPA.160(b) ("helicopters with a maximum certified take-off mass (MCTOM) of 3 175 kg or less operated by day and over routes navigated by reference to visual landmarks" Other exceptions would have now to be addressed through Article 14 (Reg. (EC) No 216/2008) exemption

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
GM1	CAT.GEN.MPA.160	Carriage of sporting weapons and ammunition		NIL	3.070(1) to (4)	B	
AMC1	CAT.GEN.MPA.161	Carriage of sporting weapons and ammunition / Alleviations		NIL	3.070(5)	B	
IR	CAT.GEN.MPA.165	Method of carriage of weapons		NIL	3.075	B	
IR	CAT.GEN.MPA.170	Alcohol and drugs		NIL	3.115	B	
IR	CAT.GEN.MPA.175	Endangering Safety		NIL	3.120	B	
IR	CAT.GEN.MPA.180(a)(1)	Documents, manuals and information to be carried		Modif	3.130(a)(3)	B	The aircraft flight manual or equivalent document shall be carried on each flight in both OPS 3 and CAT.GEN. Yet OPS 3 contains an alleviation (not included in CAT.GEN) : it allows not to carry the flight manual if the OPS manual contains the relevant information (if agreed by the Authority)
AMC1	CAT.GEN.MPA.180 General	Documents, manuals and information to be carried	General	NIL	3.135(b)	B	
GM1	CAT.GEN.MPA.180(a)(1)	Documents, manuals and information to be carried		New			Definition : "AIRCRAFT FLIGHT MANUAL OR EQUIVALENT DOCUMENT(S) 'Aircraft flight manual, or equivalent document(s)' means in the context of this rule the flight manual for the aircraft, or other documents containing information required for the operation of the aircraft within the terms of its certificate of airworthiness, unless these data are available in the parts of the operations manual carried on board."
IR	CAT.GEN.MPA.180(a)(2) to (a)(8)	Documents, manuals and information to be carried		Modif	3.125(a)	B	> "(4) the noise certificate, including an English translation, where one has been provided by the authority responsible for issuing the noise certificate;" Copy of the noise certificate is not sufficient An English version of the noise certificate is mandatory. In OPS 3.125 (a)(3), a copy was sufficient and no English translation was required > "(5) a certified true copy of the air operator certificate (AOC);" In OPS 3.125(a)(4), an original or copy was required > "(6) the operations specifications relevant to the aircraft type, issued with the AOC;" This requirement to carry on board OPS specs is new

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GM1	GM1.CAT.GEN.MPA.180(a)(5)	Documents, manuals and information to be carried	Air operator certificate	New			"THE AIR OPERATOR CERTIFICATE Certified true copies may be provided: (a) directly by the competent authority; or (b) by persons holding privileges for certification of official documents in accordance with applicable Member State's legislation, e.g., public notaries, authorised officials in public services."
IR	CAT.GEN.MPA.180(a)(9)	Documents, manuals and information to be carried	Journey log	NIL	3.1055(a) and (b)	D	'Other documentation' was amended to 'or equivalent' in CAT.GEN.MPA.180(a)(9) and expanded in GM1 CAT.GEN.MPA.180(a)(9)
GM1	CAT.GEN.MPA.180(a)(9)	Documents, manuals and information to be carried	Journey log	NIL	3.1055(b) (IEM)		the term "Equivalent " is explained
IR	CAT.GEN.MPA.180(a)(10) to (a)(23)	Documents, manuals and information to be carried		Modif	3.135	B	CAT.GEN.MPA.180(a)(10)=OPS 3.135(a)(2) CAT.GEN.MPA.180(a)(11)=OPS 3.135(a)(3) CAT.GEN.MPA.180(a)(12)=OPS 3.135(a)(9) CAT.GEN.MPA.180(a)(13) is not addressed in OPS 3.135 : "procedures and visual signals information for use by intercepting and intercepted aircraft;" Yet it is mentioned in the OPS manual content (app. 1 to 3.1045, §A.12 concerning rules of the Air) CAT.GEN.MPA.180(a)(14)=OPS 3.050 CAT.GEN.MPA.180(a)(15)=OPS 3.130(a)(1) CAT.GEN.MPA.180(a)(16) is new (MEL) CAT.GEN.MPA.180(a)(17)=OPS 3.135(a)(4) CAT.GEN.MPA.180(a)(18)=OPS 3.135(a)(5) CAT.GEN.MPA.180(a)(19)=OPS 3.135(a)(8) and (a)(10) CAT.GEN.MPA.180(a)(20)=OPS 3.135(a)(6) CAT.GEN.MPA.180(a)(21)=OPS 3.135(a)(1) CAT.GEN.MPA.180(a)(22)=OPS 3.135(a)(7) and (a)(8) (note : the requirement to carry notification of special categories of passenger (SCPs) on board is the same. Yet, definition of SCP in CAT.GEN has been expanded compared to OPS 3) CAT.GEN.MPA.180(a)(23)=OPS 3.135(a)(10)

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
AMC1	CAT.GEN.MPA.180(a)(13)	Documents, manuals and information to be carried		New			"PROCEDURES AND VISUAL SIGNALS FOR USE BY INTERCEPTING AND INTERCEPTED AIRCRAFT The procedures and the visual signals for use by intercepting and intercepted aircraft should reflect those contained in the International Civil Aviation Organisation (ICAO) Annex 2. This may be part of the operations manual."
GM1	CAT.GEN.MPA.180(a)(14)			New			"SEARCH AND RESCUE INFORMATION This information is usually found in the State's aeronautical information publication."
GM1	CAT.GEN.MPA.180(a)(23)	Documents, manuals and information to be carried		Modif			"DOCUMENTS THAT MAY BE PERTINENT TO THE FLIGHT Any other documents that may be pertinent to the flight or required by the States concerned with the flight may include, for example, forms to comply with reporting requirements. STATES CONCERNED WITH THE FLIGHT The States concerned are those of origin, transit, overflight and destination of the flight." (States concerned with the flight is defined in the context of the transport of dangerous goods only in IEM to OPS 3.1165(b)(1))
IR	CAT.GEN.MPA.180(b)	Documents, manuals and information to be carried		Allev.	3.055(f) App. 1, (d)(2))	B	As far as the possibility to retain documentation on the ground is concerned : - the scope of alleviations in 3.005 (f) and CAT.GEN.MPA.180(b) is very similar (MCTOM > 3 175 kg or less; MOPSC =< 9, VFR by day, local area...) except for the fact that OPS 3.005 (f), unlike CAT.GEN.MPA.180 (b), may also concern multi-pilot operations (theoretically). Besides, in OPS 3.005 (f), all alleviations but the carriage of the operational flight plan concern A to A flights (carriage of the flight plan is not necessary even for local A to B flights) - Alleviations in CAT.GEN.MPA.180 (b) are expanded compared to OPS 3; the list of documents that can be retained on ground additionally contains: >noise certificate >aircraft radio license >journey log, or equivalent >aircraft technical log >mass and balance documentation

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IR	CAT.GEN.MPA.180(b)	Documents, manuals and information to be carried		New	3.055(g) (App. 1, (c)(1))	B	As far as the possibility to retain documentation on the ground is concerned, alleviations for aircraft complying with the conditions of 3.005 (g) (MCTOM > 3 175 kg or less; MOPSC =< 9, VFR by day, local area...) have not been transposed : indeed CAT.GE.A.180(b), which contains similar alleviations, only addresses non complex aircraft.
IR	CAT.GEN.MPA.180(c)	Documents, manuals and information to be carried		NIL	3.125 (ACJ)	B	
IR	CAT.GEN.MPA.185	Information to be retained on ground		Modif	3.140	B	Some alleviations exist for aircraft concerned by OPS 3.005 (f) and (g) : "Information need not be retained on the ground when other methods of recording are employed."
IR	CAT.GEN.MPA.190	Provision of documentation and records		NIL	3.150(b)	B	
IR	CAT.GEN.MPA.195	Preservation, production and use of flight recorder recordings		Modif	3.160	B	Rule updated with recent ICAO amendments. The following requirement is new : "(b) The operator shall conduct operational checks and evaluations of flight data recorder (FDR) recordings, cockpit voice recorder (CVR) recordings and data link recordings to ensure the continued serviceability of the recorders." The following requirement, included in OPS 3.160(a)(3), has not been transposed : "(3) Additionally, when the Authority so directs, the operator of a helicopter on which a flight recorder is carried shall preserve the original recorded data for a period of 60 days unless otherwise directed by the investigating authority." Furthermore CAT.GEN.MPA.195 (f) specifies that "CVR recordings shall only be used for purposes other than for the investigation of an accident or an incident subject to mandatory reporting, if all crew members and maintenance personnel concerned consent." There was no reference to maintenance personnel in OPS 3.160 (c)

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GM1	CAT.GEN.MPA.195(a)	Preservation, production and use of flight recorder recordings		New			Added to clarify that the need to remove recorders is determined by the investigating authority: "REMOVAL OF RECORDERS AFTER A REPORTABLE OCCURRENCE The need for removal of the recorders from the aircraft is determined by the investigating authority with due regard to the seriousness of an occurrence and the circumstances, including the impact on the operation."
AMC1	CAT.GEN.MPA.195(b)	Preservation, production and use of flight recorder recordings		New			Added to clarify when operational checks are needed.
GM1	CAT.GEN.MPA.195(b)	Preservation, production and use of flight recorder recordings		New			Description of how the inspection of flight recorders should be conducted
IR	CAT.GEN.MPA.200(a)	Transport of dangerous goods		Modif	3.1160	R	Requirements in CAT.GEN address the circumstances under which dangerous goods might be carried without holding an approval in accordance with SPA.DG. "(a) Unless otherwise permitted by this Annex, the transport of dangerous goods by air shall be conducted in accordance with Annex 18 to the Chicago Convention as last amended and amplified by the 'Technical instructions for the safe transport of dangerous goods by air' (ICAO Doc 9284-AN/905), including its supplements and any other addenda or corrigenda." This requirement encompasses more or less previous OPS 3.1160
IR	CAT.GEN.MPA.200(b)	Transport of dangerous goods		New			"(b) Dangerous goods shall only be transported by an operator approved in accordance with Annex V (Part-SPA), Subpart G, except when: (1) they are not subject to the technical instructions in accordance with Part 1 of those instructions; or (2) they are carried by passengers or crew members, or are in baggage, in accordance with Part 8 of the technical instructions."
IR	CAT.GEN.MPA.200(c)	Transport of dangerous goods		NIL	3.1165(a)	R	
IR	CAT.GEN.MPA.200(d)	Transport of dangerous goods		NIL	3.1215(c)	R	

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
IR	CAT.GEN.MPA.200(e)	Transport of dangerous goods		Modif	3.1225(a) 3.1225(b)	R	In CAT.GEN.MPA.200(e)(3), the requirement to report to the competent authority the finding of dangerous goods carried not in accordance with Part 8 of the technical instructions concerns passengers, as in OPS 3 but, unlike OPS 3 which does not address it, crew members also.
IR	CAT.GEN.MPA.200(f)	Transport of dangerous goods		NIL	3.1215(b)(1)	R	
IR	CAT.GEN.MPA.200(g)	Transport of dangerous goods		NIL	3.1215(b)(2)	R	
AMC1	CAT.GEN.MPA.200(e) - (a)	Transport of dangerous goods		Modif	3.1225 (AMC, §1)	R	CAT.GEN and OPS 3 similar except that CAT.GEN specifies that : "For the purposes of the reporting of undeclared and misdeclared dangerous goods found in cargo, the Technical Instructions considers this to include items of operators' stores that are classified as dangerous goods."
AMC1	CAT.GEN.MPA.200(e) - (b)	Transport of dangerous goods		Modif	3.1225 (a) and (b) 3.1225 (AMC, §2)	R	CAT.GEN and OPS 3 similar except that CAT.GEN explicitly specifies the following : "If necessary, a subsequent report should be made as soon as possible giving all the details that were not known at the time the first report was sent. If a report has been made verbally, written confirmation should be sent as soon as possible"
AMC1	CAT.GEN.MPA.200(e) - (c) and (d)	Transport of dangerous goods		NIL	3.1225 (AMC, §3 and 4)	R	
AMC1	CAT.GEN.MPA.200(e) - (e)	Transport of dangerous goods		NIL	3.1150(a)(3) and (a)(4)	R	
AMC1	CAT.GEN.MPA.200(e) - (f)	Transport of dangerous goods		New	3.1225		Dangerous occurrence report from is provided in this paragraph
GM1	CAT.GEN.MPA.200 - (a)	Transport of dangerous goods		Modif			"a) The requirement to transport dangerous goods by air in accordance with the Technical Instructions is irrespective of whether: (1) the flight is wholly or partly within or wholly outside the territory of a state; or (2) an approval to carry dangerous goods in accordance with Annex V (Part SPA), Subpart G is held."

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GM1	CAT.GEN.MPA.200 - (b)	Transport of dangerous goods		Modif	3.1165(b)(1) (IEM, §1)	R	The beginning of (b) and the paragraph 1 of IEM to OPS 3.1165(b)(1) are identical. End of §(b) of CAT.GEN is new : "Although exemptions are most likely to be granted for the carriage of dangerous goods that are not permitted in normal circumstances, they may also be granted in other circumstances, such as when the packaging to be used is not provided for by the appropriate packing method or the quantity in the packaging is greater than that permitted. The Technical Instructions also make provision for some dangerous goods to be carried when an approval has been granted only by the State of Origin and the State of the Operator."
GM1	CAT.GEN.MPA.200 - (c)	Transport of dangerous goods		New			"When an exemption is required, the States concerned are those of origin, transit, overflight and destination of the consignment and that of the operator. For the State of overflight, if none of the criteria for granting an exemption are relevant, an exemption may be granted based solely on whether it is believed that an equivalent level of safety in air transport has been achieved."
GM1	CAT.GEN.MPA.200 - (d)	Transport of dangerous goods		New			"The Technical Instructions provide that exemptions and approvals are granted by the 'appropriate national authority', which is intended to be the authority responsible for the particular aspect against which the exemption or approval is being sought. The Instructions do not specify who should seek exemptions and, depending on the legislation of the particular State, this may mean the operator, the shipper or an agent. If an exemption or approval has been granted to other than the operator, the operator should ensure a copy has been obtained before the relevant flight. The operator should ensure all relevant conditions on an exemption or approval are met."
GM1	CAT.GEN.MPA.200 - (e)	Transport of dangerous goods		NIL	3.1155 (IEM, §3)	R	

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
IR	CAT.OP.MPA 100 (a)(1)	Use of air traffic services		NIL	3.215	D	
IR	CAT.OP.MPA 100 (a)(2)	Use of air traffic services		New			"in-flight operational instructions involving a change to the ATS flight plan, when practicable, are coordinated with the appropriate ATS unit before transmission to an aircraft."
GM1	CAT.OP.MPA 100 (a)(2)	Use of air traffic services		New			Harmonised with rules applicable to aeroplanes : "IN-FLIGHT OPERATIONAL INSTRUCTIONS When coordination with an appropriate air traffic service (ATS) unit has not been possible, in-flight operational instructions do not relieve a commander of responsibility for obtaining an appropriate clearance from an ATS unit, if applicable, before making a change in flight plan."
IR	CAT.OP.MPA.100(b)(2)	Use of air traffic services	Use of ATS for small helicopters operations	NIL	3.005(f) (App. 1 - (d)(5))	B	Same scope in CAT.OP as in OPS 3 (no use of "other than complex" criterion : multipilots are also concerned by the alleviation allowing the possibility not to use ATS unless mandated by airspace requirements)
IR	CAT.OP.MPA.100(b)(3)	Use of air traffic services	Use of ATS for local area operations	NIL	3.005(g) (App. 1 - (c)(4))	B	Same scope in CAT.OP as in OPS 3 (local operations as defined in IR OPS may include A to B operations. In OPS3, local area operations shall be A to A operations performed on the same day)
IR	CAT.OP.MPA.105	Use of aerodromes and operating sites	adequacy of aerodromes and operating sites	Modif	3.220	D	The rule also addresses operating sites, not only aerodromes. Operating sites are usable for all helicopters.
AMC1	CAT.OP.MPA.105 - (a), (b) and (c)	Use of aerodromes and operating sites		New			Text newly included in AMC1 to CAT.OP.MPA.105 : "(a) An adequate site is a site that the operator considers to be satisfactory, taking account of the applicable performance requirements and site characteristics (guidance on standards and criteria are contained in ICAO Annex 14 Volume 2 and in the ICAO Heliport Manual (Doc 9261-AN/903)). (b) The operator should have in place a procedure for the survey of sites by a competent person. Such a procedure should take account for possible changes to the site characteristics which may have taken place since last surveyed. (c) Sites that are pre-surveyed should be specifically specified in the operations manual. The operations manual should contain diagrams or/and ground and aerial photographs, and depiction (pictorial) and description of: (1) the overall dimensions of the site;..."

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AMC1	CAT.OP.MPA.105 - (d)	Use of aerodromes and operating sites		Modif	3.005(f) (App. 1, (d)(6)) and 3.005(g) (App. 1, (c)(5))	B	The content of the EASA OPS rule : "For sites that are not pre-surveyed, the operator should have in place a procedure that enables the pilot to make, from the air, a judgment on the suitability of a site. (c)(1) to (c)(6) should be considered." is applicable to all helicopter operations for sites that are not pre-surveyed, which is understood to be the intent of this rule, not only for small helicopters (3.005 (f)) or local area operations (3.005 (g))
AMC1	CAT.OP.MPA.105 - (e)	Use of aerodromes and operating sites		New			"Operations to non-pre-surveyed sites by night (except in accordance with SPA.HEMS.125 (b)(4)) should not be permitted."
AMC2	CAT.OP.MPA.105	Use of aerodromes and operating sites		NIL	3.220 (AMC)	D	
IR	CAT.OP.MPA.107	Adequate Aerodromes		New			Definition of an 'Adequate aerodrome': general information on adequate aerodrome is provided : "The operator shall consider an aerodrome as adequate if, at the expected time of use, the aerodrome is available and equipped with necessary ancillary services such as air traffic services (ATS), sufficient lighting, communications, weather reporting, navigation aids and emergency services."
IR	CAT.OP.MPA.110(a)	Aerodrome operating minima		NIL	3.225(a) and (b) 3.430(a)	D E	In OPS3, the calculation method shall be acceptable to the Authority in OPS 3.430(a). This requirement has not been included in CAT.OP; yet, inclusion of this method in the OPS manual is required as per CAT.OP.MPA.110(d)
IR	CAT.OP.MPA.110(b)	Aerodrome operating minima	Head up display	New			Head-up display : Scope of the implementing rule extended to helicopter operations.
IR	CAT.OP.MPA.110(c)(1) to (c)(8)	Aerodrome operating minima		NIL	3.430(b)(1) to (b)(8)	E	The scope of (9) flight technique extended to helicopter operations.
IR	CAT.OP.MPA.110(c)(9)	Aerodrome operating minima		New		E	The scope of (9) flight technique extended to helicopter operations : "(c) When establishing aerodrome operating minima, the operator shall take the following into account : ... (9) the flight technique to be used during the final approach."
IR	CAT.OP.MPA.110(d)	Aerodrome operating minima		NIL	3.430(a) and 3.1045 (App.1, A 8.1.3)	E	
IR	CAT.OP.MPA.110(e)	Aerodrome operating minima		NIL	3.225(c)	D	

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
AMC2	CAT.OP.MPA.110	Aerodrome operating minima	Take off RVR minima depending on aerodromes installations	NIL	3.430 (App. 1, (a)(1) to (a)(3))	E	<p>AMC2 to CAT.OP.MPA.110 - (a) = App. 1 to OPS 3.430(a)(1) AMC2 to CAT.OP.MPA.110 - (b) = App. 1 to OPS 3.430(a)(2) AMC2 to CAT.OP.MPA.110 - (c) = App. 1 to OPS 3.430(a)(3)</p> <p>To be noted : Table 1.H associated to AMC2 to CAT.OP.MPA.110 - (c) seems different from table 1 in App. 1 to OPS 3.430(a)(3) : no value of table 1.H appears to be below 400m whereas some contained in table 1 of OPS 3 go down to 150m. Yet this difference is normal : below 400m, the operation is now subject to specific approval (Part SPA.LVTO). In this case another table applies : table 1.H of AMC2 to SPA.LVO.100: all values of this table are the same as those in table 1 in App. 1 to OPS 3.430(a)(3)</p>
AMC3	CAT.OP.MPA.110 - (a)	Aerodrome operating minima	Decision heights for NPA, APV and CAT I operations	Modif	3.430 (App. 1, (c)(2)) and operational directive of 16th of March , 2012	E	<p>CAT I+APV+NPA operated with CFDA are now grouped together in (a). No real difficulty :</p> <p>"(a) The DH to be used for a NPA approach flown with the continuous descent final approach technique, approach procedure with vertical guidance (APV) or CAT I operation should not be lower than the highest of:</p> <ol style="list-style-type: none"> (1) the minimum height to which the approach aid can be used without the required visual reference; (2) the (OCH for the category of aircraft; (3) the published approach procedure DH where applicable; (4) the system minimum specified in Table 3; or (5) the minimum DH specified in the aircraft flight manual (AFM) or equivalent document, if stated." <p>Those elements are contained in :</p> <ul style="list-style-type: none"> - for ILS/MLS/PAR operations, in appendix 1 to OPS 3.430 (c)(2) (no difference) - for PBN operations (LNAV, LNAV/VNAV and SBAS) in operational directive of 16th of March, 2012. See http://www.developpement-durable.gouv.fr/IMG/pdf/Consigne_operationnelle_F-2012-02_du_16_mars_2012.pdf and associated http://www.developpement-durable.gouv.fr/IMG/pdf/ST-GuideO1-_PBN-RNAV_GNSS__ENGV3.pdf

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
AMC3	CAT.OP.MPA.110 - (b)	Aerodrome operating minima	Decision heights for NPA, APV and CAT I operations	Modif	3.430 (App. 1, (b)(1), (b)(2), (c)(2)(iv)) and operational directive of 16th of March , 2012	E	To be noted : Table 3 (System minima) of §(b) of AMC 3 to CAT.OP.MPA.110 = Table 2 of appendix 1 to OPS 3.430 (§(b)(1)) + (c)(2)(iv) of appendix 1 to OPS 3.430 (ILS/MLS) + operational directive of 16th of March , 2012 for GNSS operations To be noted also (no consequence): - system minima for GNSS/SBAS are 200ft (not implemented yet) - system minima for NDB/DME are introduced (350ft whereas system minima currently defined only concern NDB (350ft))
AMC6	CAT.OP.MPA.110	Aerodrome operating minima	DETERMINATION OF RVR/CMV/VIS MINIMA FOR NPA, CAT I — HELICOPTERS	NIL	3.430 (App. 1, (b)(4) and (c) 4)	E	AMC6 CAT.OP.MPA.110 (a)(1)=App.1 to OPS 3.430 - (b)(4)(i) AMC6 CAT.OP.MPA.110 (a)(1)(i)=App.1 to OPS 3.430 - (b)(4)(ii) AMC6 CAT.OP.MPA.110 (a)(1)(ii)=App.1 to OPS 3.430 - (b)(4)(iii) AMC6 CAT.OP.MPA.110 (a)(1)(iii)=App.1 to OPS 3.430 - (b)(4)(iv) AMC6 CAT.OP.MPA.110 (a)(2)=App.1 to OPS 3.430 - (c)(4) AMC6 CAT.OP.MPA.110 (a)(2)(i)=App.1 to OPS 3.430 - (c)(4)(i) AMC6 CAT.OP.MPA.110 (a)(1)(ii)=App.1 to OPS 3.430 - (c)(4)(ii) Table 6.1.H (Onshore NPA minima) = table 3 in App.1 to OPS 3.430 - (b)(4)(i) Table 6.2.H (Onshore CAT I minima) = table 4 in App.1 to OPS 3.430 - (c)(4)
AMC8	CAT.OP.MPA.110	Aerodrome operating minima	ONSHORE CIRCLING OPERATIONS - HELICOPTERS	NIL	3.430 (App. 1, (f)(2))	E	
AMC9	CAT.OP.MPA.110	Aerodrome operating minima	VISUAL APPROACH OPERATIONS	NIL	3.430 (App. 1, (g))	E	
AMC10	CAT.OP.MPA.110	Aerodrome operating minima	CONVERSION OF REPORTED METEOROLOGICAL VISIBILITY TO RVR	Modif	3.430 (App.1 , (h))	E	A new elements has been introduced (no real consequence) : "(b) If the RVR is reported as being above the maximum value assessed by the aerodrome operator, e.g. 'RVR more than 1 500 m', it should not be considered as a reported value for (a)(1)."

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
AMC11	CAT.OP.MPA.110	Aerodrome operating minima	EFFECT ON LANDING MINIMA OF TEMPORARILY FAILED OR DOWNGRADED GROUND EQUIPMENT	Modif	3. 430(b)(4) (AMC)	E	<p>AMC11 CAT.OP.MPA.110 - (a) = AMC to OPS 3.430(b)(4) - §2 except that the reference to the "outer marker" in OPS 3 is replaced by a reference to "1000ft" in IR OPS : "...It is however not expected that the commander would consult such instructions after passing 1 000 ft above the aerodrome..."</p> <p>AMC11 CAT.OP.MPA.110 - (b) = AMC to OPS 3.430(b)(4) - §4i, §4ii, §4iv (§4iii deals with CATII and CATII : such provisions are addressed in part SPA.LVO; no operations concerned in France) In IR OPS, a reference to MLS is added in (b)(3) (no impact)</p> <p>for comparison of table see below</p>
				Modif			<p>Table 1A/1B of OPS 3 and table 9 of IR OPS are identical except for : and in table 9</p> <ul style="list-style-type: none"> - Failure of outer marker for CAT I operations : OPS 3 indicates there is no effect on landing minima if equivalent position is provided. IR OPS indicates there is no effect if a height check at 1000ft is performed (equivalent to OPS3) - Failure of outer marker for APV/NPA : no effect in OPS 3 whereas IR OPS indicates the approach may not be allowed if the outer marker is used as a FAF. - Failure of approach lights except the last 210m: OPS3 -> NALS minimum, IR-OPS -> BALS minimum - Failure of centerline lights : no effect on minima in OPS3. In IR OPS : no effect on minima if a HUD, F/D or autopilot is used otherwise, RVR=750m <p>Anemometer, tellometer and standby power of FATO(1) lights failures have no impact on landing minima in OPS 3 table. No mention of such failures in IR OPS table (for standby power FATO lights yet, RVR >=800m if FATO is the destination; FATO shall not be selected as an alternate)</p>
GM1	CAT.OP.MPA.110	Aerodrome operating minima	ONSHORE AERODROME DEPARTURE PROCEDURES – HELICOPTERS	NIL	3.430(a)(3)(i) (App.1 - IEM)	E	
GM2	CAT.OP.MPA.110	Aerodrome operating minima	APPROACH LIGHTING SYSTEMS – ICAO, FAA	New			Table providing a comparison between ICAO and FAA approach lighting system specifications
GM3	CAT.OP.MPA.110	Aerodrome operating minima	SBAS OPERATIONS	New			Information on SBAS operations
GM	CAT.OP.MPA.110(a)	Aerodrome operating minima	INCREMENTS SPECIFIED BY THE COMPETENT AUTHORITY	New			Further explains which increments could be specified by the competent authority.

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
IR	CAT.OP.MPA.120	Airborne radar approaches (ARAs) for overwater operations - helicopters		Modif	3.430 (App.1, (i))	E	<p>CAT.OP.MPA.120 (a)(1) = App. 1 to 3.430, (i) - §(1)(iii) CAT.OP.MPA.120 (a)(2) = App. 1 to 3.430, (i) - §(2) and (3) CAT.OP.MPA.120 (b) = App. 1 to 3.430, (i) - §(1)(ii) CAT.OP.MPA.120 (c) = Provision is not explicit un current OPS 3; yet it does not really bring a new requirement : "The decision range shall provide adequate obstacle clearance in the missed approach from any destination for which an ARA is planned." CAT.OP.MPA.120 (d) = App. 1 to 3.430, (i) - §(5) CAT.OP.MPA.120 (e) = App. 1 to 3.430, (i) - §(6) (see AMC1 also)</p> <p>Provision contained in App. 1 to 3.430, (i) - §(1)(i) requiring an authorization from the authority to perform airborne radar approaches is not included in CAT.OP.MPA.120, yet present in GM 3 ORO.GEN.130 (j)(1). Is it normal?</p>
AMC1	CAT.OP.MPA.120	Airborne radar approaches (ARAs) for overwater operations - helicopters		Modif	3.430 (App.1, (i))	E	<p>AMC1 CAT.OP.MPA.120 (a) = App. 1 to 3.430, (i) - §(1)(iv) AMC1 CAT.OP.MPA.120 (b) = App. 1 to 3.430, (i) - §(1)(v) AMC1 CAT.OP.MPA.120 (c) = App. 1 to 3.430, (i) - §(2) AMC1 CAT.OP.MPA.120 (d) = App. 1 to 3.430, (i) - §(3) AMC1 CAT.OP.MPA.120 (e) = App. 1 to 3.430, (i) - §(4) except for difference in red font : "The decision range should not be less than ¾ NM unless the operator has demonstrated that a lesser decision range can be used at an acceptable level of safety [in red : included in OPS3 only, not in AMC1 CAT.OP.MPA.120]"</p> <p>AMC1 CAT.OP.MPA.120 (f)+CAT.OP.MPA.120 (e) = App. 1 to 3.430, (i) - §(63)</p>

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
				Not transposed	3.430 (App.1, (j))	E	<p>This paragraph specifies conditions to be met for IFR Procedures without ATS.</p> <p>One element to be noted is that in (2) Arrival : The instrument approach procedures are permitted only if there is a station providing QNH or an automatic system to transmit required parameters...</p> <p>"(1) Au décollage : Lorsqu'il n'existe pas d'héliport de décollage accessible et qu'une procédure peut être effectuée sur l'héliport de départ, les paramètres météorologiques au moment du décollage doivent être supérieurs aux minimums opérationnels d'atterrissage requis. De nuit, le décollage n'est autorisé que si le balisage réglementaire existe et fonctionne. Les décollages par faible visibilité ne sont pas autorisés.</p> <p>(2) A l'arrivée : Les procédures d'approche aux instruments ne sont autorisées que s'il existe une station désignée pour fournir le QNH ou un système de transmission automatique de paramètres (STAP) et si l'héliport est ouvert à de telles opérations. Elles sont obligatoirement suivies d'une manœuvre à vue.</p> <p>(3) L'héliport de décollage, choisi par le commandant de bord, est pourvu d'un organisme de la circulation aérienne dans les plages horaires d'utilisation prévues.</p> <p>(4) Pour les opérations de transport régulier, un représentant de l'exploitant devra être présent sur l'héliport et devra disposer des consignes approuvées lui permettant de déclencher le plan de secours</p>
GM1	CAT.OP.MPA.120	Airborne radar approaches (ARAs) for overwater operations - helicopters		NIL	3.430 (App.1, (i) - IEM)	E	
IR	CAT.OP.MPA.125	Instrument departure and approach procedures		Modif	3.230	D	<p>French regulation specifies : "(d) At an aerodrome where instrument approach procedures exist, if no specific approach procedures were designed for helicopters, the operator shall use the procedures defined for category A aeroplanes"</p>
IR	CAT.OP.MPA.131(a)	Noise abatement procedures - helicopters		NIL	3.235	D	

Appendix 3 - Comparison IR OPS and OPS3 - CAT and SPA 130306.xls

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
IR	CAT.OP.MPA.131(b)	Noise abatement procedures - helicopters		New			Introduction of b) in CAT.OP.MPA.131 : "The procedures shall: (1) ensure that safety has priority over noise abatement; and (2) be simple and safe to operate with no significant increase in crew workload during critical phases of flight."
IR	CAT.OP.MPA.135(a)(1) to (a)(4) and (b)	Routes and areas of operations - general		NIL	3.240(a)(1) to (a)(4) and (b)	D	
IR	CAT.OP.MPA.135(c)	Routes and areas of operations - general		New			Alleviation for VFR by day operations (CAT A to A) introduced
IR	CAT.OP.MPA.137	Routes and areas of operations - helicopters		NIL	3.240(a)(5) and (a)(6)	D	
GM1	CAT.OP.MPA.137 (b)	Routes and areas of operations - helicopters	Coastal transit	New			GM existing in JAR OPS 3 but not in French OPS 3. GM contains : (a) General (b) Establishing the width of the coastal corridor (c) Provision for safe flying (d) Provision for a safe forced landing and evacuation (e) Provisions for survival
IR	CAT.OP.MPA.145	Establishment of minimum flight altitudes		NIL	3.250(a) to (c)	D	
AMC1	CAT.OP.MPA.145 (a)	Establishment of minimum flight altitudes		NIL	3.250(d) and (e)	D	Now in AMC but used to be in OPS 3.250
AMC1.1	CAT.OP.MPA.145(a)	Establishment of minimum flight altitudes		New			The AMC is also applicable to operations with helicopters: "CONSIDERATIONS FOR ESTABLISHING MINIMUM FLIGHT ALTITUDES This AMC provides another means of complying with the rule for VFR operations of other-than-complex motor-powered aircraft by day, compared to that presented in AMC1 CAT.OP.MPA.145(a). The safety objective should be satisfied if the operator ensures that operations are only conducted along such routes or within such areas for which a safe terrain clearance can be maintained and take account of such factors as temperature, terrain and unfavourable meteorological conditions."
GM	CAT.OP.MPA.145(a) - (a) to (d)	Establishment of minimum flight altitudes		NIL	3.250 (IEM)	D	Integration of a new formula : Lido's formula
GM	CAT.OP.MPA.145(a) - (e)	Establishment of minimum flight altitudes		New			Integration of a new formula to establish minimum flight altitudes : Lido's formula
IR	CAT.OP.MPA.150	Fuel Policy		Modif	3.255	D	According to CAT.OP.MPA.150(a), the fuel policy and any change to it require a prior approval by the competent authority.

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
AMC3	CAT.OP.MPA.150(b)	Fuel Policy		Modif	3.255 (AMC)	D	AMC to CAT.OP and OPS 3 are identical except for the text in red (in §(a)(4) of AMC3 to CAT.OP and §1.4 of AMC to OPS 3.255) : (4) alternate fuel, which should be: (i) fuel for a missed approach from the applicable MDA/DH at the destination aerodrome to missed approach altitude... (ii) fuel for a climb from missed approach altitude to cruising level/altitude; (iii) fuel for the cruise from top of climb to top of descent; (iv) fuel for descent from top of descent to the point where the approach is initiated...; (v) fuel for executing an approach and landing at the destination alternate...; and (vi) or for helicopters operating to or from helidecks located in a hostile environment, 10 % of (a)(4)(i) to (v);
GM1	CAT.OP.MPA.150(c)(3)(ii)	Fuel Policy		New			"DESTINATION ALTERNATE AERODROME The departure aerodrome may be selected as the destination alternate aerodrome." This possibility is implicit in OPS 3
IR	CAT.OP.MPA.151(b)	Fuel Policy - alleviations		Allev.	3.005(f) (App.1, (d)(7)) 3.005(g) (App.1, (c)(6))	B	Alleviations for helicopters with an MCTOM of 3 175 kg or less, by day and over routes navigated by reference to visual landmarks or local helicopter operations. Yet alleviations in CAT.OP rule encompass more cases as they also concern : - helicopters with a MOPSC >9 (may be theoretical as MCTOM =<3175kg) - helicopters performing A to B local operations. In OPS3, local area operations shall be A to A operations performed on the same day
IR	CAT.OP.MPA.155	Carriage of special categories of passengers (SCPs)		Modif	3.260 3.261 3.262 3.265 and 3.260 (IEM, §(1))	D	All requirements concerning persons with reduced mobility in OPS 3 are, under CAT.OP, applicable to infants, unaccompanied children, deportees, inadmissible passengers and prisoners in custody : seat allocation, establishment of procedures for SCPs
				Not transposed	3.005(f) (App. 1, (c)(2)) 3.005(g) (App. 1, (b)(2))	B	Prohibition to transport deportees inadmissible passengers or persons in custody persons with a non-complex helicopter or during local helicopter operation not transposed because not considered to be relevant (unlikely)

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
AMC1	CAT.OP.MPA.155(b)	Carriage of special categories of passengers (SCPs)		Modif	3.260 (IEM, partially)	D	Items to be considered : AMC1 to CAT.OP.MPA.155(b) Carriage of special categories of passengers (SCPs) PROCEDURES When establishing the procedures for the carriage of special categories of passengers, the operator should take into account the following factors: (a) the aircraft type and cabin configuration; [New] (b) the total number of passengers carried on board; [New] (c) the number and categories of SCPs, which should not exceed the number of passengers capable of assisting them in case of an emergency evacuation; [=IEM to 3.260, §3.a] and (d) any other factor(s) or circumstances possibly impacting on the application of emergency procedures by the operating crew members.[New]"
IR	CAT.OP.MPA.160	Stowage of baggage and cargo		NIL	3.270	D	
AMC1	CAT.OP.MPA.160	Stowage of baggage and cargo		NIL	3.270 (App. 1)	D	
AMC2	CAT.OP.MPA.160 - (b)	Stowage of baggage and cargo		NIL	3.270 (AMC)	D	
IR	CAT.OP.MPA.165	Passenger seating		NIL	3.280	D	
				Not transposed	3.005(f) (App. 1, (d) (8))	B	Alleviation authorising not to establish procedures for passenger seating allocation has not been transposed : for operations with non-complex helicopter, such procedures, although adapted to the scope of operations, shall be established
AMC1	CAT.OP.MPA.165	Passenger seating		NIL	3.280 (ACJ 1, §1)	D	
				Not transposed	3.280 (ACJ 1, §2)	D	Seat allocation requirements associated to emergency exits may not apply according to OPS 3 ACJ : "2. The text above [requirement on seat allocation with access to emergency exits] does not apply to helicopters which normal exit door also serves as emergency exit. However, in such circumstances, the allocation of seats close to normal exits is left with the operator's discretion that has to make sure that the evacuation will not be hampered in case of emergency. "

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
AMC2	CAT.OP.MPA.165	Passenger seating		NIL	3.280 (ACJ 2)	D	
GM1	CAT.OP.MPA.165	Passenger seating		NIL	3.280 (ACJ 2, Note)	D	
IR	CAT.OP.MPA.170	Passenger briefing		NIL	3.285(a)	D	
				Not transposed	3.005(f) (App. 1, (d)(9))	B	Deletion of : "unless to do so would be unsafe, passengers are verbally briefed of safety matters, parts or all of which may be given by an audiovisual presentation. Prior approval must be given for the use of portable electronic devices" The intent of this alleviation is obscure. CAT.GEN.MPA.140 already implies that the use of a PED needs permission by the operator. all other requirements are not really different, hence deletion of such provision in CAT.OP
AMC1	CAT.OP.MPA.170	Passenger briefing		NIL	3. 285(b) to (f)	D	The only new element in CAT.OP compared to OPS 3 is in red font : "Passenger briefings should contain the following: (b) After take-off (1) (ii) use of safety belts or restraint systems including the safety benefits of having safety belts fastened when seated irrespective of seat belt sign illumination. "
AMC1.1	CAT.OP.MPA.170	Passenger briefing		New			Based on stakeholder input, this AMC provides another means to comply with the safety objective by providing a training programme: "(a) The operator may replace the briefing/demonstration as set out in AMC1 CAT.OP.MPA.170 with a passenger training programme covering all safety and emergency procedures for a given type of aircraft. (b) Only passengers who have been trained according to this programme and have flown on the aircraft type within the last 90 days may be carried on board without receiving a briefing/demonstration."

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
IR	CAT.OP.MPA.175(a) and (b)	Flight preparation		NIL	3.290(a) and (b)	D	CAT.OP introduces some modifications as indicated below : - in (a) : "an operational flight plan shall be completed for each intended flight based on considerations of aircraft performance, other operating limitations and relevant expected conditions on the route to be followed and at the aerodromes/ operating sites concerned." This is a minor change - Elements contained in OPS 3.290(b)(1), (3), (4), (10) and (11) are covered by CAT.OP.MPA.175 (b) : "(1) all items stipulated in 2.a.3 of Annex IV to Regulation (EC) No 216/2008 concerning the airworthiness and registration of the aircraft, instrument and equipment, mass and centre of gravity (CG) location, baggage and cargo and aircraft operating limitations can be complied with;"
IR	CAT.OP.MPA.175(c)(2)	Flight preparation		Modif	3.005(f) (App. 1, (d)(10)(i) and App. 1, (d)(21))	B	Yet alleviations in CAT.OP rule encompass more cases as they also concern helicopters with a MOPSC >9 (may be theoretical as MCTOM =<3175kg)
AMC1	CAT.OP.MPA.175(a)	Flight preparation		NIL	3.1060	P	
AMC1	CAT.OP.MPA.175(a) (end of paragraph)	Flight preparation	OPERATIONAL FLIGHT PLAN - OTHER-THAN-COMPLEX MOTOR-POWERED AIRCRAFT OPERATIONS AND LOCAL OPERATIONS	Not transposed	3.005(f) (App. 1, (d)(10)(ii) and 3.005(g) (App. 1, (c)(7) and (c)(14))	B	Non complex helicopters operations according to BR 216/2008 also encompass IFR or VFR by night but compared to the scope of 3.005 (f), exclude operations with helicopters certified for multi pilot operations (are there?) Local helicopter operations according to Reg 965/2012 encompass more operations than those described in 3.005 (g) as R 965/2012 does not require operations to start and end at the same location on the same day As a consequence, alleviations provided by CAT.OP for operational flight plan go further than those in OPS 3
GM1	CAT.OP.MPA.175 (b)(5)	Flight preparation		NIL	3.1045 (App. 1, B.0)	P	This reference to conversion tables ("The documentation should include any conversion tables necessary to support operations where metric heights, altitudes and flight levels are used") appears in the content of the OPS manual

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
IR	CAT.OP.MPA.181	Selection of aerodromes and operating sites - helicopters		Modif.	3.295	D	<p>CAT.OP.MPA.181(a) = 3.295(b) CAT.OP.MPA.181(b)(3) = 3.295(c)(3) CAT.OP.MPA.181(c) = 3.295(d) CAT.OP.MPA.181(d) = 3.295(e) CAT.OP.MPA.181(e) = 3.295(f)</p> <p>CAT.OP.MPA.181(b)(1) and (2) differ from 3.295(c)(1) and (2) (JAR OPS 3 is similar to CAT.OP)</p> <p>(b) For IFR flights or when flying under VFR and navigating by means other than by reference to visual landmarks, the commander shall specify at least one destination alternate aerodrome in the operational flight plan unless: (1) the destination is a coastal aerodrome and the helicopter is routing from offshore [text in blue not included in OPS 3]; (2) for a flight to any other land destination, the duration of the flight and the meteorological conditions prevailing are such that, at [in OPS3, instead of "at" : "for the period from 1 hour before until 1 hour after"] the estimated time of arrival at the site of intended landing : - in CAT. OP : "an approach and landing is possible under visual meteorological conditions (VMC); or..." - in OPS 3 : "visibility is above 5km and ceiling above : (i) in IFR, max [2000 ft; circling MDH+500ft] (ii) in VFR, 2000 ft ; or..."</p>
AMC1	CAT.OP.MPA.181(b)(1)	Selection of aerodromes and operating sites - helicopters		NIL	3.295(c)(1) (AMC)	D	
GM1	CAT.OP.MPA.181	Selection of aerodromes and operating sites - helicopters		NIL	OPS 3.295(d) (IEM) OPS 3.295(e)(4) (IEM)	D	
AMC1	CAT.OP.MPA.181(d)	Selection of aerodromes and operating sites - helicopters		NIL	OPS 3.295(e) (AMC)	D	
IR	CAT.OP.MPA.186	Planning minima for IFR flights - helicopters		NIL	3.297	D	

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
GM1	CAT.OP.MPA.186	Planning minima for IFR flights - helicopters		New			"PLANNING MINIMA FOR ALTERNATE AERODROMES Non-precision minima (NPA) in Table 1 of CAT.OP.MPA.186 mean the next highest minima that apply in the prevailing wind and serviceability conditions. Localiser only approaches, if published, are considered to be non-precision in this context. It is recommended that operators wishing to publish tables of planning minima choose values that are likely to be appropriate on the majority of occasions (e.g. regardless of wind direction). Unserviceabilities should, however, be fully taken into account. As Table 1 does not include planning minima requirements for APV, LTS CAT I and OTS CAT II operations, the operator may use the following minima: (a) for APV operations – NPA or CAT I minima, depending on the DH/MDH; (b) for LTS CAT I operations – CAT I minima; and (c) for OTS CAT II operations – CAT II minima."
IR	CAT.OP.MPA.190	Submission of the ATS flight plan		NIL	3.300	D	
AMC1	CAT.OP.MPA.190	Submission of the ATS flight plan		NIL	3.300 (AMC)	D	
IR	CAT.OP.MPA.195	Refuelling/defuelling with passengers embarking, on board or disembarking		NIL	3.305	D	
AMC1	CAT.OP.MPA.195 - (a)	Refuelling/defuelling with passengers embarking, on board or disembarking		NIL	3.305 (IEM)	D	
AMC1	CAT.OP.MPA.195 - (d)	Refuelling/defuelling with passengers embarking, on board or disembarking	OPERATIONAL PROCEDURES - HELICOPTERS	Modif	3.305 (App. 1)	D	OPS 3 contains more details and requirements : - procedures shall address the cases of rotors stopped and rotors turning - The "fasten seat belt" sign shall be switched off.

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
IR	CAT.OP.MPA.200	Refuelling/defuelling with wide-cut fuel		Modif	3.307	D	IN CAT.OP : "Refuelling/defuelling with wide-cut fuel shall only be conducted if the operator has established appropriate procedures taking into account the high risk of using wide-cut fuel types" In OPS 3 : "an operator shall establish procedures for refuelling/defuelling with wide-cut fuel (e.g. Jet B or equivalent) if this is required"
GM1	CAT.OP.MPA.200	Refuelling/defuelling with wide-cut fuel		NIL	3.307 (IEM)	D	
IR	CAT.OP.MPA.210	Crew members at station		Modif	3.310	D	CAT.OP.MPA.210(a)(3) introduces the concept of controlled rest for crew members in case of lack of alertness as is the case already for aeroplanes
AMC1	CAT.OP.MPA.210(b)	Crew members at station		NIL	3.310(b) (IEM)	D	
GM1	CAT.OP.MPA.210	Crew members at station		New			Applicability of the GM, which concerns controlled rest, has been extended to helicopter operations. I
IR	CAT.OP.MPA.216	Use of headset - helicopters		New			"Each flight crew member required to be on duty in the flight crew compartment shall wear a headset with boom microphone, or equivalent, and use it as the primary device to communicate with ATS"
IR	CAT.OP.MPA.220	Assisting means for emergency evacuation		New			"The operator shall establish procedures to ensure that before taxiing, take-off and landing and when safe and practicable to do so, all means of assistance for emergency evacuation that deploy automatically are armed."
IR	CAT.OP.MPA.225	Seats, safety belts and restraint systems		NIL	3.320	D	
IR	CAT.OP.MPA.230	Securing of passenger compartment and galley(s)		NIL	3.325	D	
IR	CAT.OP.MPA.235	Life-jackets - helicopters		NIL	3.330 a)	D	
IR	CAT.OP.MPA.240	Smoking on board		NIL	3.335 3.305 (App. 1)	D	All requirements of CAT.OP were covered in OPS 3.335 except CAT.OP.MPA.240 (b) = App. 1 to 3.305 - (a)(4) (smoking not allowed during refuelling or defuelling of the aircraft)
				Modif	3.005 (f) (App. 1, (c)(4)) and 3.005(g) (App. 1, (b)(4))	D	In OPS 3.005 (f) and (g), smoking prohibition is permanent. This prohibition has not been transposed as the rule provides sufficient protection.
IR	CAT.OP.MPA.245	Meteorological conditions - all aircraft		NIL	3.340(a) to (c)	D	

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
IR	CAT.OP.MPA.247(a)	Meteorological conditions - helicopters		New			New rules concerning VFR flights overwater out of sight of land (a) "On VFR flights overwater out of sight of land with helicopters, the commander shall only commence take-off when the appropriate weather reports and/or forecasts indicate that the cloud ceiling will be above 600 ft by day or 1 200 ft by night."
IR	CAT.OP.MPA.247(b)	Meteorological conditions - helicopters		New			(b) Notwithstanding (a), when flying between helidecks located in class G airspace where the overwater sector is less than 10 NM, VFR flights may be conducted when the limits are at, or better than, the following: Table 1... Minima for flying between helidecks located in class G airspace Values depending upon Day/Night single/multi pilot.
IR	CAT.OP.MPA.247(c)	Meteorological conditions - helicopters		NIL	3.340(d)	D	
IR	CAT.OP.MPA.250	Ice and other contaminants - ground procedures		NIL	3.345	D	
GM1	CAT.OP.MPA.250	Ice and other contaminants - ground procedures		New			The applicability of this GM has been extended to helicopter operations. It contains definitions
GM2	CAT.OP.MPA.250	Ice and other contaminants - ground procedures		New			The applicability of this GM has been extended to helicopter operations. It contains DE-ICING/ANTI-ICING - PROCEDURES
GM3	CAT.OP.MPA.250	Ice and other contaminants - ground procedures		New			The applicability of this GM has been extended to helicopter operations. It contains background information
IR	CAT.OP.MPA.255 (a) and (b)	Ice and other contaminants - flight procedures		NIL	3.346	D	
IR	CAT.OP.MPA.255 (c)	Ice and other contaminants - flight procedures		New		D	"(c) If icing exceeds the intensity of icing for which the aircraft is certified or if an aircraft not certified for flight in known icing conditions encounters icing, the commander shall exit the icing conditions without delay, by a change of level and/or route, if necessary by declaring an emergency to ATC."
AMC1	CAT.OP.MPA.255	Ice and other contaminants - flight procedures		NIL	3.346 (ACJ)	D	
IR	CAT.OP.MPA.260	Fuel and oil supply		NIL	3.350	D	
IR	CAT.OP.MPA.265	Take-off conditions		NIL	3.355 3.360	D	
IR	CAT.OP.MPA.270	Minimum flight altitudes		NIL	3.365	D	

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
IR	CAT.OP.MPA.275	Simulated abnormal situations in flight		NIL	3.370	D	
IR	CAT.OP.MPA.281	In-flight fuel management - helicopters		NIL	3.375	D	
AMC1	CAT.OP.MPA.281	In-flight fuel management - helicopters		NIL	3.375 (App. 1)	D	In AMC1 to CAT.OP, (b)(1) (ii) mentions: "replan the flight in accordance with CAT.OP.MPA.181 (d)(1)..". (d)(1) does not seem to be the right reference. Rather (c)(1) Besides, appendix 1 to 3.375 does not apply to helicopters for which alleviations exist as per appendixes 1 to 3.005 (f) (small helicopters under VFR by day) and 3.005 (g) (local area operations) AMC1 does not apply to non complex helicopters, neither to local area operations. (see details below)
AMC1	CAT.OP.MPA.281	In-flight fuel management - helicopters		Allev.	3.005 (f) (App. 1, (d)(14) and 3.005 (g) (App. 1, (c)(12)	D	Appendix 1 to 3.375 does not apply to helicopters for which alleviations exist as per appendixes 1 to 3.005 (f) (small helicopters under VFR by day) and 3.005 (g) (local area operations) AMC1 does not apply to non complex helicopters, neither to local area operations. (3.005 (f) : (1) MCTOM =< 3 175 kg ; (2) MOPSC =< 9 (3) VFR by day; routes navigated by reference to visual landmarks shall be conducted in accordance with appendix 1 to 3.005 (f) Non complex helicopters operations according to BR 216/2008 also encompass IFR or VFR by night and exclude helicopters certified for multi pilot operations (are there?) 3.005 (g): (1) MCTOM > 3 175 kg ; (2) MOPSC =< 9 (3) VFR by day; routes navigated by reference to visual landmarks (4)Local area (5) A to A (except provided otherwise by the Authority) on the same day Local helicopter operations according to Reg 965/2012 encompass more operations than those described in 3.005 (g) as R 965/2012 does not require operations to start and end at the same location on the same day
IR	CAT.OP.MPA.285	Use of supplemental oxygen		NIL	3.385	D	

Appendix 3 - Comparison IR OPS and OPS3 - CAT and SPA 130306.xls

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
IR	CAT.OP.MPA285	Use of supplemental oxygen		Not transposed	3.005(f) (App. 1, (d)(12) and 3.005(g) (App. 1, (c)(9))	D	For small helicopter operations (VFR day only), the following alleviation contained in OPS 3.005 (f) (Appendix 1) is not transposed : "Non pressurised helicopters. With prior approval of the Authority, excursions of a short duration between 10000ft and 16000ft may be undertaken without supplemental oxygen), in accordance with procedures contained in the OPS manual" This deletion is consistent with ICAO Annex 6. An exemption is given under strict conditions and with prior approval of the competent authority for Part-SPO only
IR	CAT.OP.MPA.290	Ground proximity detection		NIL	3.395	D	"When undue proximity to the ground is detected by a flight crew member or by a ground proximity warning system, the pilot flying shall take corrective action immediately to establish safe flight conditions [OPS 3 adds "in accordance with established procedures"] This is not mentioned in this paragraph. Yet such procedures are required in the OPS manual (A.8.3.5)
GM1	CAT.OP.MPA.290	Ground proximity detection		New			Transposes TGL 27, with minor amendments.
IR	CAT.OP.MPA.295	Use of ACAS		NIL	3.398	D	CAT.OP and OPS 3 are basically identical except for the fact that CAT.OP refers to new regulations (AUR.ACAS, Commission Regulation (EU) No 1332/2011)
GM1	CAT.OP.MPA.295	Use of ACAS		Modif	3.398 (IEM, partially)		GM 1 Transposes TGL 11 §(a) of GM1 to CAT.OP.MPA.295) = IEM to 3.398 §(b) to (j) are new
IR	CAT.OP.MPA.300	Approach and landing conditions		NIL	3.400	D	
AMC1	CAT.OP.MPA.300	Approach and landing conditions		NIL	IEM OPS 3.400	D	

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
IR	CAT.OP.MPA.305	Commencement and continuation of approach		Modif	3.405	D	The reference to the outer marker is replaced by 1 000 ft or the final approach segment where the DH/MDH is more 1 000 ft above the aerodrome height. Hence, 1000 ft (or flight into the final approach segment) is the height below which the pilot shall discontinue the approach if the reported RVR/visibility is less than the applicable minimum Besides, a new paragraph is included in CAT.OP (f) "The touchdown zone RVR shall always be controlling. If reported and relevant, the midpoint and stopend RVR shall also be controlling. The minimum RVR value for the midpoint shall be 125 m or the RVR required for the touchdown zone if less, and 75 m for the stopend. For aircraft equipped with a rollout guidance or control system, the minimum RVR value for the midpoint shall be 75 m."
AMC1	CAT.OP.MPA.305(e) - (a)	Commencement and continuation of approach	VISUAL REFERENCES FOR INSTRUMENT APPROACH OPERATIONS (a) NPA, APV and CAT I	NIL	3.430 (App. 1, (b)(3),(c)(3))	E	
AMC1	CAT.OP.MPA.305(e) - (b) to (f)	Commencement and continuation of approach	VISUAL REFERENCES FOR INSTRUMENT APPROACH OPERATIONS (b) Lower than standard category I (LTS CAT I) operations (c) CAT II or OTS CAT II operations (d) CAT III operations (e) Approach operations utilising EVS – CAT I operations (f) Approach operations utilising EVS – APV and NPA operations flown with the CDEA technique	New			No such IFR operations by helicopters conducted in France
GM	GM1 CAT.OP.MPA.305(f)	Commencement and continuation of approach		New			Definition of "relevant" : "Relevant' in this context means that part of the runway used during the high-speed phase of the landing down to a speed of approximately 60 kt." Aeroplane oriented
IR	CAT.OP.MPA.315	Flight hours reporting - helicopters		NIL	3.426	D	
GM1	CAT.OP.MPA.315	Flight hours reporting - helicopters		NIL	3.426 (ACJ)	D	To be published

Appendix 3 - Comparison IR OPS and OPS3 - CAT and SPA 130306.xls

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
IR	CAT.OP.MPA.320	Aircraft categories		NIL			The applicability of this implementing rule has been extended to helicopter operations. Yet French regulation specifies : "(d) At an aerodrome where instrument approach procedures exist, if no specific approach procedures were designed for helicopters, the operator shall use the procedures defined for category A aeroplanes"

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
				Allev.	3.003 Definition (14)		(14) Public interest site (PIS) : site used for operations in the public interest Public interest operations are the following: (i) HEMS operations, (ii) Operations to/from PIS located in a State that applies similar regulatory provisions..." The use of PIS has been included in CAT.POL.H (not in part SPA) the use of PIS is not limited to HEMS operations in the European context, as it was according to OPS 3
IR	CAT.POL.H.100 (a)	Applicability	Requirements for PC1, PC2 and PC3	New	NIL		Helicopters shall be operated in accordance with the applicable performance class requirements.
IR	CAT.POL.H.100 (b)	Applicability	PC1	NIL	3.470 (a)	F	(b)(2) in CAT.POL... refers to the possibility to operate PC2 with MOPSC > 19 if performed in accordance with CAT.POL.H.305. The same possibility exists in OPS 3.470 : PC2 with MOPSC > 19 shall be performed in accordance with OPS 3.517(a). Yet, there are some differences between CAT.POL.H.305 and OPS 3.517(a) (See below)
IR	CAT.POL.H.100 (c)	Applicability	PC2 or PC1	NIL	3.470 (b)	F	
IR	CAT.POL.H.100 (d)	Applicability	PC3, PC2 or PC1	NIL	3.470 (c)	F	
IR	CAT.POL.H.105 (a)	General	Mass	NIL	3.475 (a)	F	
IR	CAT.POL.H.105 (b)	General	Performance and AFM	Modif.	3.475 (b)	F	In CAT.POL...(b) : The approved performance data contained in the AFM shall be used to determine compliance with the requirements of this Section, supplemented as necessary with other data as prescribed in the relevant requirement. In OPS 3.470 (b), "other data" shall be acceptable to the Authority
IR	CAT.POL.H.105 (c)(1) to (c)(3)(ii)(B)	General	Performance	NIL	3.475(c)(1) to (c)(3)(ii)(B)	F	
GM1	CAT.POL.H.105 (c)(3)(ii)(A)	General	Performance-Wind	New			GM1 provides : "The reported headwind component should be interpreted as being that reported at the time of flight planning and may be used, provided there is no significant change of unfactored wind prior to take-off"

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
IR	CAT.POL.H.105 (c)(3)(ii)(C)	General	Performance-Wind components	Modif.	3.475(c)(3)(ii)(C) and 3.475(c)(3)(ii) (ACJ)	F	<p>In CAT.POL... :</p> <p>"where precise wind measuring equipment enables accurate measurement of wind velocity over the point of take-off and landing, wind components in excess of 50 % may be established by the operator, provided that the operator demonstrates to the competent authority that the proximity to the FATO and accuracy enhancements of the wind measuring equipment provide an equivalent level of safety"</p> <p>In OPS (see also ACJ below) :</p> <p>"Where precise wind measuring equipment enables accurate measurement of wind velocity over the point of take-off and landing, alternate wind components specific to a site may be approved by the Authority."</p> <p>ACJ :</p> <p>"When considering approving the use of reported wind components in excess of 50% for take-off and the take-off flight path the following should be considered:</p> <p>1 The proximity to the FATO, and accuracy enhancements, of the wind measuring equipment ; and</p> <p>2 The existence of appropriate procedures in a supplement to the Flight Manual ; and</p> <p>3 The establishment of a safety case</p> <p>Differences :</p> <p>- Wind components in excess of 50% for landing is addressed in CAT.POL.H and is not in OPS 3 (ACJ).</p> <p>- Demonstration to the authority as per CAT.POL.H is similar to the risk assessment and existence of procedures required in OPS 3. Yet, in CAT.POL.H, no specific approval is required</p>
IR	CAT.POL.H.105 (c)(4) and (c)(5)	General	Performance	NIL	3.475(c)(4) and (c)(5)	F	
IR	CAT.POL.H.110 (a)(1), (a)(2)(i) and (a)(2)(ii)	Obstacle accountability	Obstacle accountability	NIL	3.477(a)(1), (a)(2)(i) and (a)(2)(ii)	F	
GM1	CAT.POL.H.110 (a)(2)(i)	Obstacle accountability	Course guidance	NIL	3.477(a)(2)(iii)	F	
IR	CAT.POL.H.110 (a)(3), (B) and (c)	Obstacle accountability	Obstacle accountability	NIL	3.477(a)(3), (b) and (c)	F	
IR	CAT.POL.H.200	General	PC1-General	Modif.	3.485	G	<p>In CAT.POL..., new element (red font) :</p> <p>"Helicopters operated in performance class 1 shall be certified in Category A or equivalent as determined by the Agency"</p>

Appendix 3 - Comparison IR OPS and OPS3 - CAT and SPA 130306.xls

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
GM1	CAT.POL.H.200, 300&400	General	Categories A and B	NIL	3.480 (a)(1)&(a)(2) (ACJ)	F	JAR references updated to CS references in new GM1 GM1... §(a)=ACJ... §1. GM1... §(b)=ACJ... §2. GM1... §(c) and (d)=ACJ... §3. GM1... §(e)=ACJ... §4.
IR	CAT.POL.H.205 (a) and (b)	Take off	Mass	NIL	3.490 (a)(1) and (a)(2)	G	CAT.POL.. (a)=OPS 3.490 (a)(1) CAT.POL.. (b)=OPS 3.490 (a)(2)
AMC1	CAT.POL.H.205 (b)(4)	Take off	The application of TODRH	NIL	3.480 (a) (31) (ACJ, §2)	F	AMC1-CAT.POL.H.205 (b)(4)= second half of §2 of ACJ OPS 3.480 (a) (31)
IR	CAT.POL.H.205 (c) to (e)	Take off		NIL	3.490 (b) to (d)	G	CAT.POL.. (c)=OPS 3.490 (b) CAT.POL.. (d)=OPS 3.490 (c) CAT.POL.. (e)=OPS 3.490 (d)
GM1	CAT.POL.H.205(b)(4) - §(a) to §(d)	Take off	The application of TODRH	Modif.	3.480 (a) (31) (ACJ, §1 to §4 except en of §2)	F	GM1...§(a)= ACJ...§1 GM1...§(b)= ACJ...§2 except that 2d half of §2 constitutes the new AMC 1-CAT.POL.H.205 (b)(4) GM1...§(c)= ACJ...§3 GM1...§(d)= ACJ...§4 except that : - title (d)(1) of GM is : "Limited area, restricted area and helipad procedures (other than elevated)" instead of "Procédures ponctuelles (sauf procédures en terrasse)" - "helipad" and "FATO" used in GM. "Helipad" in JAR OPS 3 ACJ and "hélistation" in French OPS 3 This GM is associated to Performance Class 1 (PC1) helicopters only whereas in OPS 3, the ACJ is in subpart F "Performance General" which is applicable to PC1, 2 and 3 helicopters
AMC1	CAT.POL.H.205 (e)	Take off	Obstacle clearance in the back-up area	NIL	3.490 (d) (ACJ)	G	

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
AMC1	CAT.POL.H.205&220	Take off and landing	application for alternative take-off and landing procedures	Modif.	3.490&510 (ACJ § <u>Méthods of Application</u>)	G	<p>AMC :</p> <p>"(a) A reduction in the size of the take-off surface may be applied when the operator has demonstrated to the competent authority that compliance with the requirements of CAT.POL.H.205, 210 and 220 can be assured with:</p> <p>...(2) a take-off or landing mass not exceeding the mass scheduled in the AFM for a hover out of ground effect one- engine-inoperative (HOGE OEI) [OPS 3 included the following additional element in §2 of Methods of Application of ACJ : "in compliance with HEC class D performance requirements"] ensuring that :</p> <p>(i) following an engine failure at..."</p> <p>References to HEC class D as included in OPS 3 have not been transposed in CAT.POLH, as this is covered by Part-SPA, subpart HHO.</p>
AMC1	CAT.POL.H.205&220	Take off and landing	application for alternative take-off and landing procedures	Modif.	3.490&510 (ACJ § <u>Méthode d'application</u>)	G	<p>AMC :</p> <p>"(b) An upwards shift of the TDP and LDP may be applied when the operator has demonstrated to the competent authority that compliance with the requirements of CAT.POL.H.205, 210 and 220 can be assured with:</p> <p>(1) a procedure based upon an appropriate Category A take-off and landing profile scheduled in the AFM;</p> <p>(2) a take-off or landing mass not exceeding the mass scheduled in the AFM for a HOGE OEI [OPS 3 included the following additional element in §4 of Methods of Application of ACJ : "in compliance with HEC class D performance requirements"] ensuring that:</p> <p>(i) following an engine failure at..."</p> <p>References to HEC class D as included in OPS 3 have not been transposed in CAT.POLH, as this is covered by Part-SPA, subpart HHO.</p>

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
GM1	CAT.POL.H.205&220	Take off and landing	application for alternative take-off and landing procedures	Modif.	3.490&510 (ACJ § <u>Discussion</u>)	G	At the end of the GM : "Such assertions are concerned only with the vertical or the back-up procedures and can be regarded as achievable under the following circumstances: (a) when the procedure is flown, it is based upon a profile contained in the AFM - with the exception of the necessity to perform a rejected take-off; (b) the TDP, if shifted upwards (or upwards and backward in the backup procedure) will be the height at which the HOGE OEI performance is established; and (c) if obstacles are permitted in the backup area they should continue to be permitted with a revised TDP. In ACJ, one more condition : "2 The HOGE OEI performance is specified as in AC 29-2C, MG 12 for the Human External Cargo (HEC) Class D requirements."
IR	CAT.POL.H.210 (a) and (b)	Take-off flight path	Obstacle clearance	NIL	3.495 (a) and (b)	G	
IR	CAT.POL.H.215 (a) to (c)	En-route — critical engine inoperative	En-route — critical engine inoperative	NIL	3.500 (a) to (c)	G	
GM1	CAT.POL.H.215 (b)(3)	En-route — critical engine inoperative	En-route — critical engine inoperative	NIL	3.500 (a)(5) (IEM)	G	IEM OPS 3.500 (a)(5) is a wrong reference as (a)(5) does not exist. Otherwise, content of IEM and GM is the same
IR	CAT.POL.H.220 (a) to (e)	Landing		NIL	3.510 (a) to (c)	G	CAT.POL...(a)=OPS 3.510 (a)(1) CAT.POL...(b)=OPS 3.510 (a)(2) CAT.POL...(c)=OPS 3.510 (a)(3) and (a)(4) CAT.POL...(d)=OPS 3.510 (b) CAT.POL...(e)=OPS 3.510 (c)
IR	CAT.POL.H.225 (a)	Helicopter operations to/from a public interest site	PC2 possible on PIS	NIL	3.005 (i) (App. 1 - § (d)(2) to (d)(2)(ii))	B	
IR	CAT.POL.H.225 (a)(1)	Helicopter operations to/from a PIS	Date since when PIS is in use	Modif.	3.005 (i) (App. 1 - § (c)(iii))	B	In CAT.. : (a)(1) the PIS was in use before 1 July 2002; In App 1 to OPS... : in use before 1st January 2004 in JAR OPS 3, date was also 1st July 2002
IR	CAT.POL.H.225 (a)(2)	Helicopter operations to/from a PIS	Size of the PIS (PC1 not possible)	NIL	3.005 (i) (App. 1 - § (c)(ii))	B	
IR	CAT.POL.H.225 (a)(3)	Helicopter operations to/from a PIS	MOPSC	NIL	3.005 (i) (App. 1 - § (c))	B	See below

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
	NIL			Not transposed	3.005 (i) (App. 1 - § (c))	B	<p>In OPS3, introduction of (c) indicates not only MOPSC =6 or less but also :</p> <ol style="list-style-type: none"> 1. multi-turbine helicopters 2. PIS is in a hostile environment (see (c)(i)) <p>- About point 1 : PIS operations are PC 2 operations, hence multi engine.</p> <p>The use of public interest sites is theoretically not limited to turbine engines in IR OPS. Yet, the usage monitoring system (UMS) requirements as per CAT.POL.H.305 (b)(3) and AMC1 to CAT.POL.H.305(b)-§(c) does not seem compatible with piston engines. To be confirmed. anyway, in France PIS are used by multi-turbine helicopters only (in the framework of HEMS operations).</p> <p>- About point 2 : as per §3.470, PIS makes sense only in a congested hostile environment : in other environments, PIS does not bring any new alleviation compared to standard requirements of IR OPS.</p>
IR	CAT.POLH.225 (a)(4) and (a)(5)	Helicopter operations to/from a public interest site	<p>Compliance with CAT.POLH.305 (b)(2) and (b)(3)</p> <p>Mass limitation (8% climb gradient with OEI)</p>	Modif.	3.005 (i) (App. 1 - § (d)(2))	B	<p>In OPS 3 :</p> <p>"(d) (1) Réserve (2) ...provided that the operator complies with (a) (2) (i) and (ii) of appendix 1 to paragraph OPS 3.517 (a) [=CAT...(a)(4)] and that : .. (ii) and, for operations in congested hostile environment, the helicopter mass does not exceed the maximum mass specified in the AFM for a climb gradient of 8 % in still air at the appropriate take-off safety speed (V TOSS) with the critical engine inoperative and the remaining engines operating at an appropriate power rating;..." [=CAT...(a)(5) except for the text in red, not included in CAT.POL.H]"</p> <p>The reference to "congested hostile environment" above, included in OPS 3, is not in CAT.POL.H.</p> <p>PIS makes sense only in a congested hostile environment : in other environments, PIS does not bring any new alleviation compared to standard requirements of IR OPS. In that perspective, referring to it or not has no impact.</p>

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
AMC1	CAT.POLH.225 (a)(5)	Helicopter operations to/from a public interest site	Mass limitation (8% climb gradient with OEI)	NIL	3.005 (i) (App. 1 (ACJ))	B	In AMC1 to CAT.POL.H226(a)(5) - §(d)(3) : "Rate of climb in the first segment configuration This chart can be entered with a rate of climb equal to the climb speed (VTOSS) value in knots (converted to true airspeed) multiplied by 8.1, resulting in a mass value for every pressure-altitude/temperature combination considered." In ACJ to OPS : same provisions (except for the factor: 8.07 instead of 8.1)
IR	CAT.POLH.225 (a)(6)	Helicopter operations to/from a public interest site	Authority approval	Modif.	3.005 (i) and 3.005 (i) (App. 1 - §(a))	B	In appendix 1 ... (a) : "An operator .. must have the prior approval of the Authority issuing the AOC and the Authority of the State in which it is intended to conduct such operations" In CAT.. (a)(6): the operator has obtained prior approval for the operation from the competent authority. Before such operations take place in another Member State, the operator shall obtain an endorsement from the competent authority of that State
GM1	CAT.POLH.225 (a)(6)	Helicopter operations to/from a public interest site	ENDORSEMENT FROM ANOTHER STATE	New			"(a) Application to another State To obtain an endorsement from another State the operator should submit to that State: (1) the reasons that preclude compliance with the requirements for operations in performance class 1; (2) the site-specific procedures to minimise the period during which there would be danger to helicopter occupants and person on the surface in the event of an engine failure during take-off and landing; and (3) the extract from the operations manual to comply with CAT.POL.H.225 (c). (b) Endorsement from another State Upon receiving the endorsement from another State the operator should submit it together with the site specific procedures and the reasons and justification that preclude the use of performance class 1 criteria, to the competent authority issuing the AOC to obtain the approval or extend the approval to a new public interest site.

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
IR	CAT.POL.H.225 (b) and (c)	Helicopter operations to/from a public interest site	AFM	Modif.	3.005 (i) (App. 1 - §(e))	B	OPS 3 included text (in red font) not transposed in In CAT.POL.H.225 (c) : "The operations manual shall contain for each PIS: a diagram or annotated photograph, showing the main aspects, the dimensions, [in OPS 3 : "preferential axes for landing and take-off] the non-conformance with the requirements performance class 1, the main hazards and the contingency plan should an incident occur"
IR	ARO.OPS.220			Modif.	3.005 (i) (App. 1 - §(a))	B	In ARO... : The approval referred to in CAT.POL.H.225 shall include a list of the public interest site(s) specified by the operator to which the approval applies. In OPS : "An operator wishing to conduct operations in accordance with this Appendix .. must have the prior approval of the Authority issuing the AOC. Such an approval shall specify: (1) The public interest site(s) (2) The type(s) of helicopter; and (3) The type of operation In red font : these information are not mentioned in IR OPS. Yet, implicitly, these information should be given when the operator applies for the approval (e.g. the type of helicopter is necessary in IR OPS, even if not mentioned, so as to justify that the MOPSC is less than 6...)
				Not transposed	3.005 (i) (App. 1 - § (c)(iv))	B	In appendix 1 to OPS... : "(c) This Appendix shall only be applicable to/from a PIS.. (iv) ... located in a congested hostile environment, when a program aiming at improving the characteristics of the PIS has been implemented so as to allow operation in accordance with requirements of subpart G (performance class 1)." Text in red is in : - appendix 1 to 3.005(i) - (c)(iv) in French OPS 3 - ACJ to appendix 1 to 3.005(i) (a)(1) in JAR OPS 3 It has not been transposed in CAT.POL as justified by the Agency: "These sites fall outside the scope of the Agency remit..."
GM1	CAT.POL.H.225	Helicopter operations to/from a public interest site		New			ACJ to appendix 1 to OPS 3.005(i) was not transposed from JAR OPS 3 to French OPS 3

Appendix 3 - Comparison IR OPS and OPS3 - CAT and SPA 130306.xls

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
IR	CAT.POL.H.300	General	PC2-General	Modif.	3.515	H	In CAT.POL..., new element (red font) : "Helicopters operated in performance class 2 shall be certified in Category A or equivalent as determined by the Agency"
GM1	CAT.POL.H.200, 300&400	General	Categories A and B	NIL	3.480 (a)(1)&(a)(2) (ACJ)	G	JAR references updated to CS references in new GM1 GM1... §(a)=ACJ... §1. GM1... §(b)=ACJ... §2. GM1... §(c) and (d)=ACJ... §3. GM1... §(e)=ACJ... §4.
IR	CAT.POL.H.305 (a)	Operations without an assured safe forced landing capability	Approval required	NIL	3.517 (a)	H	OPS3 title is different : "Operation with exposure time". Equivalent.
IR	CAT.POL.H.305 (b)(1)	Operations without an assured safe forced landing capability	Risk assessment	NIL	3.517 (a) (App. 1 - (a)(1))	H	
IR	CAT.POL.H.305 (b)(2)	Operations without an assured safe forced landing capability	Set of conditions required	Modif.	3.517 (a) (App. 1 - (a)(2)(i))	H	Appendix 1 to 3.517(a) - §(a)(2)(i) is general : it states that approval for operations without an assured safe forced landing capability during the take-off and landing is based on compliance with a set of requirements. ACJ2 lists these requirements. Hence what was in ACJ is at the IR level <u>now</u> . In summary : CAT.POL.H305 (b) + associated AMC2 = OPS 3.517 (a) + appendix 1 to OPS 3.517(a)+ACJ2 to appendix 1 to OPS 3.517 (A)
IR	CAT.POL.H.305 (b)(2)(i)	Operations without an assured safe forced landing capability	Helicopter/engine modification	NIL	3.517 (a) (ACJ2 to Appendix 1- §1)	H	CAT.POL.H.305 (b)(2)(i) = appendix 1 to 3.517(a)(2)(i) +ACJ2 to appendix 1 to 3.517 (a) - §1
IR	CAT.POL.H.305 (b)(2)(ii)	Operations without an assured safe forced landing capability	Helicopter/engine maintenance	NIL	3.517 (a) (ACJ2 to Appendix 1- §2)	H	CAT.POL.H.305 (b)(2)(ii) = appendix 1 to 3.517(a)(2)(i) +ACJ2 to appendix 1 to 3.517 (a) - §2

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
IR	CAT.POL.H.305 (b)(2)(iii)	Operations without an assured safe forced landing capability	Take off and landing procedures	Modif.	3.517 (a) (ACJ2 to Appendix 1-§4)	H	<p>CAT.POL.H.305 (b)(2)(iii) = appendix 1 to 3.517(a)(2)(i) +ACJ2 to appendix 1 to 3.517 (a) - §4</p> <p>Yet §4 of ACJ2 is more complete : text in red is included in this §4 indeed and has not been transposed in CAT.POLH.305</p> <p>"4. include take-off and landing procedures in the operations manual, consistent with exposure times, where they do not already exist in the Helicopter Flight Manual. These procedures should be based on procedures recommended by the manufacturer when they exist. For helicopter types for which the manufacturer does not provide them, specific take-off and landing procedures may be established by the operator. Those procedures should be acceptable to the authority"</p> <p>* text in red was not in JAR OPS 3, only in French OPS 3</p>
IR	CAT.POL.H.305 (b)(2)(iv)	Operations without an assured safe forced landing capability	Training	NIL	3.517 (a) (ACJ2 to Appendix 1-§5)	H	CAT.POL.H.305 (b)(2)(iv) = appendix 1 to 3.517(a)(2)(i) +ACJ2 to appendix 1 to 3.517 (a) - §5
IR	CAT.POL.H.305 (b)(2)(v)	Operations without an assured safe forced landing capability	Engine failure/events reporting	NIL	3.517 (a) (ACJ2 to Appendix 1-§6)	H	CAT.POL.H.305 (b)(2)(v) = appendix 1 to 3.517(a)(2)(i) +ACJ2 to appendix 1 to 3.517 (a) - §6
IR	CAT.POL.H.305 (b)(3)	Operations without an assured safe forced landing capability	Usage monitoring system	NIL	3.517 (a) (App. 1 - (a)(2)(ii))	H	
AMC1	CAT.POL.H.305 (b)	Operations without an assured safe forced landing capability	Engine reliability statistics	NIL	3.517 (a) (ACJ1 to Appendix 1)	H	<p>AMC1..§(a)=ACJ1 to appendix 1 to §3.517(a)-§1</p> <p>AMC1..§(b)=ACJ1...§2</p> <p>AMC1..§(c)=ACJ1...§3</p> <p>AMC1..§(d)=ACJ1...§4</p> <p>AMC1..§(e)=ACJ1...§5</p>

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
AMC2	CAT.POL.H.305 (b)	Operations without an assured safe forced landing capability	Implementation of the set of conditions	Modif.	3.517 (a) (ACJ2 to Appendix 1)	H	<p>AMC2... §(a)= ACJ2 to appendix 1 to 3.517(a) - §1 AMC2... §(b)= ACJ2... §2 AMC2... §(c)= ACJ2... §3 except that AMC introduces an element that was not included in ACJ2 to appendix 1 to 3.517(a) - §3.5 (new text in red font) :</p> <p>(c) The usage monitoring system should fulfil at least the following:...</p> <p>(5) The analysis of parameters gathered by the usage monitoring system, the frequency of such analysis ..."</p> <p>AMC2... §(d)= ACJ2... §5 AMC2... §(e)= ACJ2... §6</p>
GM1	CAT.POL.H.305 (b)	Operations without an assured safe forced landing capability	Use of Full Authority Digital Engine Control (FADEC) Recording requirements	New	NIL		"...Where a FADEC is capable of recording some of the parameters required by (c)(1) of AMC2 CAT.POL.H.305(b) it is not intended that the recording of the parameters is to be duplicated...."
IR	CAT.POL.H.310	Take-off	Performance	Modif.	3.520	H	<p>CAT.POL.H.310 (a)= 3.520 (a)(1) CAT.POL.H.310 (b)= 3.520 (a)(2) CAT.POL.H.310 (c)= 3.520 (a)(3) except that : - CAT.POL.H.310 (c)(2)(ii) does not transpose text in red font which was indeed included in 3.520(a)(3)(ii)(B).See below CAT.POL.H.310 :</p> <p>"(c) For operations in accordance with CAT.POL.H.310, in addition to the requirements of (a):...</p> <p>(2) for operations from a helideck:...</p> <p>(i) with a helicopter that has an MOPSC of more than 19; or (ii) ["After 1st January 2015" in OPS 3] any helicopter operated from a helideck located in a ["non congested" in OPS 3] hostile environment, the take-off mass shall take into account: the procedure; deck-edge miss and drop down appropriate to the height of the helideck with the critical engine(s) inoperative and the remaining engines operating at an appropriate power rating..."</p> <p><u>Currently, this requirement is not implemented</u></p> <p>CAT.POL.H.310 (d)= 3.520 (b) CAT.POL.H.310 (e)= 3.520 (c)</p>

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
GM1	CAT.POL.H.310(c)& 325(c)	Take-off and landing	Procedure for continued operations to helidecks	Modif.	3.520(a)(3) & 3.535(a)(3) (ACJ)	H	<p>GM1... §(a)=ACJ...§1 GM1... §(b)=ACJ...§3 except that GM1 differs from ACJ [see additional/different provision in OPS in red font] :</p> <p>In GM1 : "Performance : To perform the following take-off and landing profiles, adequate all engines operating (AEO) hover performance at the helideck is required. In order to provide a minimum level of performance, data (derived from the AFM AEO out of ground effect (OGE), [ACJ adds: "taking due account of the wind"]) should be used to provide the maximum take-off or landing mass..."</p> <p>GM1... §(c)=ACJ...§4 except that GM1 differs from ACJ [see additional provision in OPS in red font] :</p> <p>In GM1: "(c) Take-off profile (3) It has been found that the climb to RP is best made between 110 % [100% in ACJ instead of 110%-Transposition problem between JAR OPS3 and French OPS 3 : JAR OPS 3 also indicates 110%] and 120 % of the power required in the hover...3</p> <p>GM1... §(d)=ACJ...§5 ... GM1... §(l)=ACJ...§13</p>
GM1	CAT.POL.H.310& 325	Take-off and landing	Take-off and landing techniques	NIL	3.520 & 3.535 (IEM)	H	<p>GM1... §(a)=IEM...§1 GM1... §(b)=IEM...§2 GM1... §(c)=IEM...§3 GM1... §(d)=IEM...§4 GM1... §(e)=IEM...§5 except that GM1 differs a little bit from IEM (see indications in red font): "This GM [in OPS 3 : "IEM"] describes three types of operation to/from helidecks and elevated FATOs by helicopters operating in performance class 2.... (e) Take-off - non-congested hostile environment (with exposure time) ... (2) If an engine failure occurs after the exposure time the helicopter is capable of a safe forced landing or [text in red font nor included in IEM] safe continuation of the flight. ... GM1... §(g)=IEM...§7 GM1... §(h)=IEM...§8</p>
IR	CAT.POL.H.315	Take-off flight path		NIL	3.525	H	

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
IR	CAT.POL.H.320	En-route — critical engine inoperative		NIL	3.530	H	
IR	CAT.POL.H.325	Landing		Modif.	3.535	H	<p>CAT.POL.H.325 §(a)=3.535 (a)(1) CAT.POL.H.325 §(b)=3.535 (a)(2) CAT.POL.H.325 §(c)=3.535 (a)(3) except that CAT.POL.H.325 (c)(2)(ii) does not transpose text in red font which was indeed included in 3.535(a)(3)(ii)(B). See below CAT.POL.H.325 : "(c) For operations in accordance with CAT.POL.H.305, in addition to the requirements of (a):... (2) for operations from a helideck:...</p> <p>(i) with a helicopter that has an MOPSC of more than 19; or (ii) ["After 1st January 2015" in OPS 3] any helicopter operated to a helideck located in a ["non congested" in OPS 3] hostile environment, the landing mass shall take into account the procedure and drop down appropriate to the height of the helideck with the critical engine inoperative and the remaining engine(s) operating at an appropriate power rating. <u>Currently, this requirement is not implemented</u></p> <p>CAT.POL.H.325 §(d)=3.535 (b) CAT.POL.H.325 §(e)=3.535 (c)</p>
GM	GM to Section 2, Chapter 3 performance class 2 ,	OPERATIONS IN PERFORMANCE CLASS 2		NIL	ACJ Sous Partie H – Exploitation en Classe de Performances 2	H	<p>GM..(a)=ACJ...§1 GM..(b)=ACJ...§2 GM..(c)=ACJ...§3 GM..(d)=ACJ...§4 GM..(e)=ACJ...§5 GM..(f)(1)=ACJ...§6.1 GM..(f)(3)=end of ACJ...§6.2 (take-off mass for PC2) GM..(f)(4)=end of ACJ...§6.3 / (f)(5)=§6.4 / (f)(6)=§6.54 / (f)(7)=§6.6 / (f)(8)=§6.7 / (f)(9)=§6.8 GM...(g)=ACJ...§7 except that GM...(g)(2) quotes and refers to ICAO Annex 6 part II 6th edition when ACJ refers to the 5th edition.</p>
IR	CAT.POL.H.400	General	PC3-General	NIL	3.540	I	<p>CAT.. (a)=3.540(a)(1) CAT.. (b)=3.540(a)(2) CAT.. (c)=3.540(b) CAT.. (d)=3.540(c)</p>

Appendix 3 - Comparison IR OPS and OPS3 - CAT and SPA 130306.xls

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
GM1	CAT.POL.H.200, 300&400	General	Categories A and B	NIL	3.480 (a)(1)&(a)(2) (ACJ)	G	JAR references updated to CS references in new GM1 GM1... §(a)=ACJ... §1. GM1... §(b)=ACJ... §2. GM1... §(c) and (d)=ACJ... §3. GM1... §(e)=ACJ... §4.
GM1	CAT.POL.H.400 (c)	General	The take-off and landing phases	Modif.	3.540 (b) (ACJ)		the following paragraph was not included in OPS 3 : "(f) Specifically, the use of this exception to the requirement for a safe forced landing (during take-off or landing) does not permit semi-continuous operations over a hostile environment such as a forest or hostile sea area." Indeed those excursions are allowed in a hostile environment outside a congested area under French OPS 3 (see appendix 1 to 3.005(e) - §(d))
IR	CAT.POL.H.405	Take-off		Modif.	3.545	I	CAT.POL.H.405(a)=3.540(a) except that CAT differs from OPS [requirement in red font not included in OPS] : "(a) The take-off mass shall be the lower of: (1) the MCTOM; or (2) the maximum take-off mass specified for a hover in ground effect with all engines operating at take-off power, or..." CAT.POL.H.405(b)=3.540(b)
IR	CAT.POL.H.410	En-route		NIL	3.550	I	
IR	CAT.POL.H.415	Landing		Modif.	3.555	I	CAT.. (a)=3.540(a) except that CAT differs from OPS [requirement in red font not included in OPS] : "(a) The landing mass of the helicopter at the estimated time of landing shall be the lower of: (1) the MCTOM; or (2) the maximum landing mass specified for a hover in ground effect with all engines operating at take-off power, or..." CAT.. (b)=3.540(b)

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
IR	CAT.POL.H.420 (a)	Helicopter operations over a hostile environment located outside a congested area	Eligibility criteria and basic requirements	Modif.	3.005 (e) (App. 1 - § (a), intro of (b) and intro of (d))	B	<p>CAT.POL.H.420 :</p> <p>"(a) Operations over a non-congested hostile environment without a safe forced landing capability with turbine-powered helicopters with an MOPSC of six or less shall only be conducted if the operator has been granted an approval by the competent authority, following a safety risk assessment performed by the operator. Before such operations take place in another Member State, the operator shall obtain an endorsement from the competent authority of that State."</p> <p>- Requirement for turbine-powered helicopters = intro of (b) of Appendix 1 to 3.005 (e)</p> <p>- Requirement for approval in CAT.POL.H.420(a) = (a) of Appendix 1 to 3.005 (e)</p> <p><u>Requirement for endorsement by the third State in CAT.POL.H.420(a) replaces "approval" of OPS 3</u></p> <p>- Requirement MOPSC=6 or less : intro of (d) of Appendix 1 to 3.005 (e)</p> <p>Requirement for safety risk assessment is new (also addressed through CAT.POL.H.420(b)(4) where compliance with CAT.POL.H.305 (b) is required; CAT.POL.H.305 (b)(1) requires the risk assessment)</p>
IR	CAT.POL.H.420 (b)(1)	Helicopter operations over a hostile environment located outside a congested area	Conditions for approval	Modif.	3.005 (e) (App. 1 - §(b)(2))	B	<p>In CAT :</p> <p>"(b) To obtain and maintain such approval the operator shall: (1) only conduct these operations in the areas and under the conditions specified in the approval;</p> <p>In OPS 3 :</p> <p>"(b) This Appendix shall only be applicable to ... area where : ... (2) the flight over hostile environment outside congested area is limited in time as specified in ... (d) of appendix 1 to 3.005(e)"</p> <p>Under OPS 3, flights in accordance with appendix 1 to 3.005 (e) - §(d)(2) are allowed, which means with exposure time, independently from "helicopter limitations, or other justifiable considerations, preclude the use of the appropriate performance criteria". See AMC1 to CAT.POL.H.420 (b)</p>

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
IR	CAT.POL.H.420(b)(2)	Helicopter operations over a hostile environment located outside a congested area	Conditions for approval	Modif.	3.005 (e) (App. 1 - §(b)(2))	B	<p>In CAT : "(b) To obtain and maintain such approval the operator shall: ... (2) not conduct these operations under a HEMS approval; "</p> <p>In OPS 3, HEMS operations carried out in PC3 are allowed over a hostile environment outside a congested (see also below "HEMS operations in hostile environment outside congested area")</p> <p>3.005 (e) specifies : "Helicopter operations over a hostile environment located outside a congested area shall be conducted in accordance with ...Appendix 1 to OPS 3.005(e)... This Appendix does not apply to special HEMS operations conducted in accordance with Appendix 1 to OPS 3.005(d)."</p> <p>Hence, in France, Appendix 1 to OPS 3.005(e) is applicable to basic HEMS operations (basic HEMS operations being those for which "normal" CAT minima are applied. See part SPA)</p>
IR	CAT.POL.H.420 (b)(3)	Helicopter operations over a hostile environment located outside a congested area	Conditions for approval	NIL	3.005 (e) (App. 1 - §(b)(1))	B	<p>This paragraph addresses the case of helicopter limitations, or other justifiable considerations, precluding the use of the appropriate performance criteria</p>

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
IR	CAT.POL.H.420 (b)(4)	Helicopter operations over a hostile environment located outside a congested area	Conditions for approval	Modif.	3.005 (e) (App. 1 - § (d)(1))	B	<p>In CAT, the following change has been implemented: "(b) To obtain and maintain such approval the operator shall: ... (4) be approved in accordance with CAT.POL.H.305 (b) [in appendix 1 to OPS 3.005 (e), §(d)(1), we had instead : "comply with Appendix 1 to OPS 3.517(a), §(a)(2)(i) & (ii)]. (The approval concerns the capability to operate without an assured safe forced landing)</p> <p>Difference between CAT.POL.H.305 (b) and Appendix 1 to OPS 3.517(a), §(a)(2)(i) & (ii) is the following (in red): CAT.POL.H.305 (b): "(b) To obtain and maintain such approval the operator shall: (1) conduct a risk assessment, specifying: (i) the type of helicopter; and (ii) the type of operations; (2) implement the following set of conditions... (3) implement a usage monitoring system (UMS)."</p> <p>Appendix 1 to OPS 3.517(a), §(a)(2)(i) & (ii): "(2) Such an approval will be subject to the following conditions: (i) A set of conditions [same as for CAT]...; (ii) Implementation of a Usage Monitoring System (UMS)"</p> <p><u>In conclusion, the difference lies in the conduct of the risk assessment required by CAT.POL.H</u></p>
AMC1	CAT.POL.H.420 - (a)	Helicopter operations over a hostile environment located outside a congested area		NIL	3.005 (e) (ACJ to App. 1 - §1.1 and 1.2)	B	<p>Two cases that are deemed to be acceptable for the alleviation under the conditions of CAT.POL.H.420 : flights over mountainous areas and remote areas. Same statement in ACJ to App.1 to 3.005 (e).</p> <p>- AMC1 to CAT.POL.H.420 - (a)(1)=ACJ to App.1 1 to 3.005 (e) - §1.2 (approximately)</p> <p>- AMC1 to CAT.POL.H.420 - (a)(2) deals with Mountainous areas : "Current generation twin-engined helicopters may not be able to meet the performance class 1 or 2 requirements at the operational altitude; consequently, the outcome of an engine failure is the same as a single-engined helicopter. In this case, the operator should justify the use of exposure in the en-route phase" ACJ to App.1 1 to 3.005 (e) - §1.1 is comparable, although providing determined figures : "1.1. Operation in mountainous area - operation comprising a take-off from/landing to a FATO above 1500m AMSL."</p>

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
AMC1	CAT.POL.H.420 - (b)	Helicopter operations over a hostile environment located outside a congested area		Modif.	3.005 (e) (App. 1 - §(d)(2)) 3.005 (e) (App. 1 - §(b)(2)) and 3.005 (e) (ACJ to App. 1 - §1.3)	B	AMC1 to CAT.POL.H.420 - (b) deals with "Other areas of operation" (meaning other than mountainous or remote areas) : "For other areas of operations to be considered for the operational approval, a risk assessment should be conducted by the operator that should, at least, consider the following factors:" In appendix 1 to 3.005 (e) - §(d)(2): "Helicopters operated in PC 3 over a hostile environment outside a congested area are exempted from complying with OPS 3.240 (a) (5) [\Leftrightarrow CAT.OP.MPA.137 requiring, for PC3 operations, surfaces that permit a safe forced landing to be executed...]: ... (2) when the cumulative flight time over hostile environments outside congested areas is less than half the total flight time and with no portion of flight exceeding 5 consecutive minutes over such areas. For these operations, the operator shall comply with (a)(1) and (a)(2) of appendix 1 to OPS 3.517 (a) [meaning a risk assessment, implementation of a set of conditions and of a UMS]" The framework of such operations is given in GM1 to CAT.POL.H.420
GM1	CAT.POL.H.420	Helicopter operations over a hostile environment located outside a congested area	EXAMPLE OF A SAFETY RISK ASSESSMENT	New			(a) Introduction (b) The elements of the risk assessment.. The approval to operate with this high risk of endangering the helicopter occupants should therefore only be granted against a comparative risk assessment (i.e. compared to other means of transport the risk is demonstrated to be lower), or where there is no economic justification to replace single-engined helicopters by multi-engined helicopters.
GM2	CAT.POL.H.420(a)	Helicopter operations over a hostile environment located outside a congested area	ENDORSEMENT FROM ANOTHER STATE	New			(a) Application to another State To obtain an endorsement from another State the operator should submit to that State the safety risk assessment and the reasons and justification that preclude the use of appropriate performance criteria, over those hostile areas outside a congested area over which the operator is planning to conduct operations. (b) Endorsement from another State Upon receiving the endorsement from another State the operator should submit it together with the safety risk assessment and the reasons and justification that preclude the use of appropriate performance criteria, to the competent authority issuing the AOC to obtain the approval or extend the existing approval to a new area.

Appendix 3 - Comparison IR OPS and OPS3 - CAT and SPA 130306.xls

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
	NIL			Modif.	3.005 (e) (appendix 1 §(c))		Updated because JAA had not done so following NPA OPS 38. The alleviation concerning operations over a hostile environment located outside a congested area now only applies to PC3. No similar requirement/possibility in CAT

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
IR	CAT.POL.MAB.100 (a)	Mass and balance, loading		NIL	3.605 (a)	J	
IR	CAT.POL.MAB.100 (b)	Mass and balance, loading		Modif	3.605 (b)	J	CAT...100 (b) contains text in red font not included in 3.605 (b) : (b) The operator shall establish the mass and the CG of any aircraft by actual weighing prior to initial entry into service and thereafter at intervals of 4 years if individual aircraft masses are used, or 9 years if fleet masses are used
IR	CAT.POL.MAB.100 (c)	Mass and balance, loading		NIL	3.605 (Appendix 1 - (a) (2) (ii))	J	
IR	CAT.POL.MAB.100 (d)	Mass and balance, loading		NIL	3.605 (c)	J	
IR	CAT.POL.MAB.100 (e)	Mass and balance, loading		NIL	3.605 (d)	J	
IR	CAT.POL.MAB.100 (f)	Mass and balance, loading		Modif	3.605 (Appendix 1 - (b))	J	In part CAT : "In addition to standard masses for passengers and checked baggage, the operator can use standard masses for other load items, if it demonstrates to the competent authority that these items have the same mass or that their masses are within specified tolerances " in OPS 3 : (b) ...In addition to standard masses for passengers and checked baggage, an operator can submit for approval to the Authority standard
IR	CAT.POL.MAB.100 (g)	Mass and balance, loading		NIL	3.605 (e)	J	
IR	CAT.POL.MAB.100 (h)	Mass and balance, loading		NIL	3.605 (Appendix 1 - (c) (1) & (c) (2))	J	
IR	CAT.POL.MAB.100 (i)	Mass and balance, loading		NIL	3.605 (Appendix 1 - (c) (3) & (c) (4))	J	
IR	CAT.POL.MAB.100 (j)	Mass and balance, loading		NIL	3.610	J	
AMC1	CAT.POL.MAB.100 (b) - §(a)	Mass and balance, loading	Weighing of an aircraft	NIL	3.605 (Appendix 1 - (a) (1) (i))	J	
AMC1	CAT.POL.MAB.100 (b) - §(b)	Mass and balance, loading	Weighing of an aircraft	NIL	3.605 (Appendix 1 - (a) (1) (ii))	J	
AMC1	CAT.POL.MAB.100 (b) - §(c)	Mass and balance, loading	Weighing of an aircraft	NIL	3.605 (Appendix 1 - (a) (2) (iii))	J	

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
AMC1	CAT.POL.MAB.100 (b) - §(d)	Mass and balance, loading	Weighing of an aircraft	NIL	3.605 (Appendix 1 - (a) (2) (iii)) and associated IEM for table in the end of §(d) of AMC1)	J	
AMC3	CAT.POL.MAB.100 (b) - §(a)(1) to (a)(7)	Mass and balance, loading	CG limits - operational CG envelope and in-flight CG	Modif	3.605 (IEM to Appendix 1 - §(d))	J	In part CAT : "In the Certificate Limitations section of the AFM, forward and aft CG limits are specified. These limits ensure that the certification stability and control criteria are met" In OPS 3, additional text in red font : "In the Certificate Limitations section of the Helicopter Flight Manual, forward and aft centre of gravity (CG) as lateral left and right limits are specified"
AMC3	CAT.POL.MAB.100 (b) - §(b)(1)	Mass and balance, loading	CG limits - operational CG envelope and in-flight CG	New	NIL	J	In part CAT : "(b) Defining and applying operational procedures in order to: (1) ensure an even distribution of passengers in the cabin;" Nothing in OPS 3
AMC3	CAT.POL.MAB.100 (b) - §(b)(2)&(b)(3)	Mass and balance, loading	CG limits - operational CG envelope and in-flight CG	NIL	3.605 (Appendix 1 - (d) (2))	J	
AMC1	CAT.POL.MAB.100 (d)	Mass and balance, loading	Dy operating mass	NIL	3.607 (a)	J	
AMC2	CAT.POL.MAB.100 (d)	Mass and balance, loading	Mass values for crew members	Modif	3.615	J	In EU OPS, additional text in red compared to part CAT : "(a) The operator should use the following mass values for crew to determine the dry operating mass: (1) actual masses including any crew baggage; or (2) standard masses, including hand baggage, of 85 kg for flight crew/technical crew members and 75 kg for cabin crew members. 3. other standard masses acceptable to the Authority."
AMC1	CAT.POL.MAB.100 (e) - §(a)	Mass and balance, loading	Mass values for passengers and baggage	NIL	3.620 (a) (et AMC au 3.620 (a))		
AMC1	CAT.POL.MAB.100 (e) - §(b)	Mass and balance, loading	Mass values for passengers and baggage	NIL	3.620 (b)		

Appendix 3 - Comparison IR OPS and OPS3 - CAT and SPA 130306.xls

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
AMC1	CAT.POL.MAB.100 (e) - §(c)	Mass and balance, loading	Mass values for passengers and baggage	NIL	3.620 (c), (d), (e) & (f)		Mass values for adult (male and female) passengers shall be increased : +6kg for male/female/adult masses in part CAT compared to OPS 3. Yet, AMC1...MAB.100 (e) - §(c)(1) indicates : "On aeroplane flights with 19 passenger seats or less and all helicopter flights where no hand baggage is carried in the cabin or where hand baggage is accounted for separately, 6 kg may be deducted from male and female masses in Table 2" : equivalent to OPS 3 provisions
AMC1	CAT.POL.MAB.100 (e) - §(d)(1) à (d)(4)	Mass and balance, loading	Mass values for passengers and baggage	NIL	3.620 (g)	J	AMC1...MAB.100 (e) - §(d)(2) + (d)(3) =3.620 (g)
AMC1	CAT.POL.MAB.100 (e) - §(d)(5)	Mass and balance, loading	Mass values for passengers and baggage	New			Definition of the "European region"
AMC1	CAT.POL.MAB.100 (e) - §(f) to (g) (should be (e) to (f))	Mass and balance, loading	Mass values for passengers and baggage	NIL	3.620 (h) to (j)	J	
AMC2	CAT.POL.MAB.100 (e) - (a) to (c)(6)	Mass and balance, loading	Procedure for establishing revised standard mass values for passengers and baggage	NIL	3.620 (h) (Appendix 1)	J	
AMC2	CAT.POL.MAB.100 (e) - (c)(7)	Mass and balance, loading	Procedure for establishing revised standard mass values for passengers and baggage	NIL	3.620 (h) (AMC to Appendix 1, (c)(4))	J	
GM1	CAT.POL.MAB.100 (e)	Mass and balance, loading	Adjustment of standard masses	NIL	3.620 (i)&(j) (IEM)	J	
GM2	CAT.POL.MAB.100 (e)	Mass and balance, loading	Adjustment of standard masses	NIL	3.620 (h) (IEM)	J	
GM3	CAT.POL.MAB.100 (e)	Mass and balance, loading	Guidance on passengers weighing surveys	NIL	3.620 (h) (IEM to appendix 1)	J	
GM1	CAT.POL.MAB.100 (g)	Mass and balance, loading	Fuel density	NIL	3.605 (e) (IEM)	J	
GM1	CAT.POL.MAB.100 (i)	Mass and balance, loading	In-flight changes in loading - helicopters	New	NIL		IN-FLIGHT CHANGES IN LOADING - HELICOPTERS In-flight changes in loading may occur in hoist operations
IR	CAT.POL.MAB.105 (a) except (a)(5) and last 2 sentences of (a)	Mass and balance data and documentation		NIL	3.625 (a) (and associated Appendix 1 - (a)(1)(i))	J	

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
IR	CAT.POL.MAB.105 - last 2 sentences of (a)	Mass and balance data and documentation		Modif	3.625 (Appendix 1 - (a)(1)(ii))	J	<p>In part CAT : "The information above [mass and balance documentation] shall be available in flight planning documents or mass and balance systems. Some of this information may be contained in other documents readily available for use."</p> <p>In OPS 3: 3.625 (a) : An operator shall establish mass and balance documentation prior to each flight specifying the load and its distribution 3.625 (b) : Subject to the approval of the Authority, an operator may use an alternative to the procedures required by paragraphs (a) and (b) above</p> <p>In appendix : "Subject to the approval of the Authority, an operator may omit some of this Data from the mass and balance documentation."</p>
Ir	CAT.POL.MAB.105 - (a)(5)(i)	Mass and balance data and documentation		NIL	3.625 (IEM to Appendix 1 to 3.625)	J	
AMC1	CAT.POL.MAB.105 (a)	Mass and balance data and documentation	Contents	NIL	3.620 (k)	J	
IR	CAT.POL.MAB.105 (b)	Mass and balance data and documentation		NIL	3.625 (Appendix 1 - 1st sentence of (b))	J	CAT...(b)+AMC1= (b) of appendix 1 to 3.625
AMC1	CAT.POL.MAB.105 (b)	Mass and balance data and documentation	Integrity	NIL	3.625 (Appendix 1 - 2d sentence of (b))	J	
IR	CAT.POL.MAB.105 (c)	Mass and balance data and documentation		NIL	3.625 end of (a)	J	

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
AMC1	CAT.POL.MAB.105(c)	Mass and balance data and documentation	Signature or equivalent	New			"Where a signature by hand is impracticable or it is desirable to arrange the equivalent verification by electronic means, the following conditions should be applied in order to make an electronic signature the equivalent of a conventional hand-written signature: (a) electronic 'signing' by entering a PIN code with appropriate security etc.; (b) entering the PIN code generates a print-out of the individual's name and professional capacity on the relevant document(s) in such a way that it is evident, to anyone having a need for that information, who has signed the document; (c) the computer system logs information to indicate when and where each PIN code has been entered; (d) the use of the PIN code is, from a legal and responsibility point of view, considered to be fully equivalent to signature by hand; (e) the requirements for record keeping remain unchanged; and. (f) all personnel concerned are made aware of the conditions associated with electronic signature and this is documented."
AMC2	CAT.POL.MAB.105(c)	Mass and balance data and documentation	Mass and balance data and documentation sent via data link	NIL	3.625 (Appendix 1 - (d))	J	
IR	CAT.POL.MAB.105 (d)	Mass and balance data and documentation		NIL	3.625 (b)	J	intro of CAT.POL.MAB.105 (d) = 3.625 (b)
IR	CAT.POL.MAB.105 (d)(1) to (d)(3)	Mass and balance data and documentation		Modif	3.625 (Appendix 1 - (a)(2))	J	In part CAT : "(d) The operator shall specify procedures for last minute changes to the load to ensure that: (2) the maximum last minute change allowed in passenger numbers or hold load is specified; and..." In OPS 3 : "The maximum allowed change in the number of passengers or hold load acceptable as a last minute change must be specified in the Operations Manual" =Clarification only

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
IR	CAT.POL.MAB.105 (e)	Mass and balance data and documentation		Modif	3.625 (Appendix 1 - (c))	J	Last sentence of (e) of part CAT (red font) not included in OPS 3 : " The operator shall obtain approval by the competent authority if he/she wishes to use an onboard integrated mass and balance computer system or a stand-alone computerised mass and balance system as a primary source for dispatch. The operator shall demonstrate the accuracy and reliability of that system. "
GM1	CAT.POL.MAB.105 (e)	Mass and balance data and documentation	Onboard integrated mass and balance computer system	New	NIL		An onboard integrated mass and balance computer system may be an aircraft installed system capable of receiving input data either from other aircraft systems or from a mass and balance system on ground, in order to generate mass and balance data as an output.
GM2	CAT.POL.MAB.105 (e)	Mass and balance data and documentation	Stand alone computerised mass and balance system	New	NIL		A stand-alone computerised mass and balance system may be a computer, either as a part of an electronic flight bag (EFB) system or solely dedicated to mass and balance purposes, requiring input from the user, in order to generate mass and balance data as an output

Appendix 3 - Comparison IR OPS and OPS3 - CAT and SPA 130306.xls

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
IR	CAT.IDE.H.100(a)	Instruments and equipment – general		NIL	3.630(a)(1) and 3.845(a)(1)	K L	
IR	CAT.IDE.H.100(a)(1) - (9)	Instruments and equipment – general		Modif.	3.630(c)		In CAT.IDE.H, fuses and child restraint devices have been added to the equipment not needing to be approved. Not included in OPS 3
IR	CAT.IDE.H.100, (b)	Instruments and equipment – general		New			Paragraph added to ensure that compliance with the essential requirements (Annex IV of Reg. (EC) No 216/2008) does not rely on non-approved equipment : Instruments and equipment not required by Subpart CAT.IDE that do not need to be approved...shall : - not be used for communication or navigation purposes as required by CAT.IDE.H.330, CAT.IDE.H.335, CAT.IDE.H.340 and CAT.IDE.H.345 - not affect the airworthiness of the helicopter, even in the case of failures or malfunction.
GM1	CAT.IDE.H.100(b)	Instruments and equipment – general INSTRUMENTS AND EQUIPMENT THAT DO NOT NEED TO BE APPROVED IN ACCORDANCE WITH REGULATION (EC) NO 1702/2003, BUT ARE CARRIED ON A FLIGHT		New			Clarifications and guidance have been added on equipment that do not need to be approved in GM1 : - (a) The provision of this paragraph does not exempt the item of equipment from complying with Regulation (EC) No 748/2012 if the instrument or equipment is installed in the helicopter... - (b) The functionality of non-installed instruments and equipment required by this Subpart that do not need an equipment approval should be checked against recognised industry standards... - (c) The failure of additional non-installed instruments or equipment not required by this Part or the airworthiness codes...should not adversely affect the airworthiness and/or the safe operation of the aircraft
IR	CAT.IDE.H.100(c)	Instruments and equipment – general		NIL	3.630(d) and 3.845(a)(4)	K L	
IR	CAT.IDE.H.100(d)	Instruments and equipment – general		NIL	3.630(e)	K	CAT.IDE.H.100(d) + GM1 to CAT.IDE.H.100(d) = 3.630(e)
GM1	CAT.IDE.H.100(d)	Instruments and equipment - general POSITIONING OF INSTRUMENTS		NIL	3.630(e)	K	GM1 to CAT.IDE.H.100(d) = last sentence of 3.630(e)
IR	CAT.IDE.H.100(e)	Instruments and equipment – general		NIL	3.330(b)	D	
IR	CAT.IDE.H.105(a)	Minimum equipment for flight		NIL	3.630(a)(2) and 3.845(a)(3)	K L	
IR	CAT.IDE.H.105(b)	Minimum equipment for flight		NIL	3.030(b)	B	
IR	CAT.IDE.H.115	Operating lights		NIL	3.640	K	

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Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
IR	CAT.IDE.H.125&CAT.IDE.H.130	Operations under VFR by day & Operations under IFR or at night – flight and navigational instruments and associated equipment INTEGRATED INSTRUMENTS			See below		General
AMC1	CAT.IDE.H.125&CAT.IDE.H.130	Operations under VFR by day & Operations under IFR or at night – flight and navigational instruments and associated equipment INTEGRATED INSTRUMENTS		NIL	3.650/3.652 (AMC)	K	
IR	CAT.IDE.H.125, (a)(1)(i)	Operations under VFR by day – flight and navigational instruments and associated equipment		NIL	3.650(a)	K	CAT.IDE.H.125(a)(1)(i) + AMC1 to CAT.IDE.H.125(a)(1)(i)&CAT.IDE.H.130(a)(1) = 3.650(a)
AMC1	CAT.IDE.H.125(a)(1)(i)&CAT.IDE.H.130(a)(1)	Operations under VFR by day & Operations under IFR or at night – flight and navigational instruments and associated equipment MEANS OF MEASURING AND DISPLAYING MAGNETIC HEADING		NIL	3.650(a)	K	CAT.IDE.H.125(a)(1)(i) + AMC1 to CAT.IDE.H.125(a)(1)(i)&CAT.IDE.H.130(a)(1) = 3.650(a)
IR	CAT.IDE.H.125(a)(1)(ii)	Operations under VFR by day – flight and navigational instruments and associated equipment		NIL	3.650(b)	K	CAT.IDE.H.125(a)(1)(ii) + AMC1 to CAT.IDE.H.125(a)(1)(ii)&CAT.IDE.H.130(a)(2) = 3.650(b) except that AMC1 is a little bit more detailed see AMC1 below)
AMC1	CAT.IDE.H.125(a)(1)(ii)&CAT.IDE.H.130(a)(2)	Operations under VFR by day & Operations under IFR or at night – flight and navigational instruments and associated equipment MEANS OF MEASURING AND DISPLAYING THE TIME		Modif.	3.650(b)	K	In AMC1 to CAT.IDE : "An acceptable means of compliance is a clock displaying hours, minutes and seconds, with a sweep-second pointer or digital presentation" whereas in OPS 3, what is required is : "a clock displaying hours, minutes and seconds"
IR	CAT.IDE.H.125(a)(1)(iii)	Operations under VFR by day – flight and navigational instruments and associated equipment		NIL	3.650(c)	K	CAT.IDE.H.125(a)(1)(iii) + AMC1 to CAT.IDE.H.125(a)(1)(iii)&CAT.IDE.H.130(b) = 3.650(c)
AMC1	CAT.IDE.H.125(a)(1)(iii)&CAT.IDE.H.130(b)	Operations under VFR by day & Operations under IFR or at night – flight and navigational instruments and associated equipment CALIBRATION OF THE MEANS OF MEASURING AND DISPLAYING PRESSURE ALTITUDE		NIL	3.650(c)	K	CAT.IDE.H.125(a)(1)(iii) + AMC1 to CAT.IDE.H.125(a)(1)(iii)&CAT.IDE.H.130(b) = 3.650(c)

Appendix 3 - Comparison IR OPS and OPS3 - CAT and SPA 130306.xls

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
IR	CAT.IDE.H.125(a)(1)(iv)	Operations under VFR by day – flight and navigational instruments and associated equipment		NIL	3.650(d)	K	CAT.IDE.H.125(a)(1)(iv) + AMC1 to CAT.IDE.H.125(a)(1)(iv)&CAT.IDE.H.130(a)(3) = 3.650(d)
AMC1	CAT.IDE.H.125(a)(1)(iv)&CAT.IDE.H.130(a)(3)	Operations under VFR by day – flight and navigational instruments and associated equipment & operations under IFR or at night – flight and navigational instruments and associated equipment CALIBRATION OF THE INSTRUMENT INDICATING AIRSPEED		NIL	3.650(d)	K	CAT.IDE.H.125(a)(1)(iv) + AMC1 to CAT.IDE.H.125(a)(1)(iv)&CAT.IDE.H.130(a)(3) = 3.650(d)
IR	CAT.IDE.H.125(a)(1)(v), (vi)	Operations under VFR by day – flight and navigational instruments and associated equipment		NIL	3.650(e), (f)	K	
IR	CAT.IDE.H.125(a)(1)(vii)	Operations under VFR by day – flight and navigational instruments and associated equipment		NIL	3.650(g)	K	CAT.IDE.H.125(a)(1)(vii) + AMC1 to CAT.IDE.H.125(a)(1)(vii)&CAT.IDE.H.130(a)(8) = 3.650(g) + 3.650&3.652(k) (AMC)
AMC1	CAT.IDE.H.125(a)(1)(vii)&CAT.IDE.H.130(a)(8)	Operations under VFR by day & Operations under IFR or at night – flight and navigational instruments and associated equipment OUTSIDE AIR TEMPERATURE		NIL	3.650(g) and 3.650(g) & 3.652(k) (AMC)	K	CAT.IDE.H.125(a)(1)(vii) + AMC1 to CAT.IDE.H.125(a)(1)(vii)&CAT.IDE.H.130(a)(8) = 3.650(g) + 3.650&3.652(k) (AMC)
IR	CAT.IDE.H.125(a)(2)	Operations under VFR by day – flight and navigational instruments and associated equipment		NIL	3.650(k)	K	
IR	CAT.IDE.H.125(b)	Operations under VFR by day – flight and navigational instruments and associated equipment		NIL	3.650(h)	K	
AMC1	CAT.IDE.H.125(b)&CAT.IDE.H.130(h)	Operations under VFR by day & Operations under IFR or at night – flight and navigational instruments and associated equipment MULTI-PILOT OPERATIONS - DUPLICATE INSTRUMENTS		NIL	3.650(j)	K	
IR	CAT.IDE.H.125(c)	Operations under VFR by day – flight and navigational instruments and associated equipment		NIL	3.650(i)	K	CAT.IDE.H.125(c)(2) + AMC1 to CAT.IDE.H.125(c)(2)&CAT.IDE.H.130(a)(7) = 3.650(i)(2)

Appendix 3 - Comparison IR OPS and OPS3 - CAT and SPA 130306.xls

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
AMC1	CAT.IDE.H.125(c)(2)&CAT.IDE.H.130(a)(7)	Operations under VFR by day & Operations under IFR or at night – flight and navigational instruments and associated equipment STABILISED HEADING		NIL	3.650(i)(2)		CAT.IDE.H.125(c)(2) + AMC1 to CAT.IDE.H.125(c)(2)&CAT.IDE.H.130(a)(7) = 3.650(i)(2) AMC1 should also be an AMC to CAT.IDE.H.130(h)(6)
IR	CAT.IDE.H.125(d)	Operations under VFR by day – flight and navigational instruments and associated equipment		NIL	3.650(l)	K	CAT.IDE.H.125(d) + AMC1 to CAT.IDE.H.125(d)&CAT.IDE.H.130(d) = 3.650(l)
AMC1	CAT.IDE.H.125(d)&CAT.IDE.H.130(d)	Operations under VFR by day & Operations under IFR or at night – flight and navigational instruments and associated equipment MEANS OF PREVENTING MALFUNCTION DUE TO CONDENSATION OR ICING		NIL	3.650(l)	K	CAT.IDE.H.125(d) + AMC1 to CAT.IDE.H.125(d)&CAT.IDE.H.130(d) = 3.650(l)
GM1	CAT.IDE.H.125&CAT.IDE.H.130	Operations under VFR by day & Operations under IFR or at night – flight and navigational instruments and associated equipment SUMMARY TABLE		NIL	3.650/3.652 (IEM)		
IR	CAT.IDE.H.130(a)(1)	Operations under IFR or at night – flight and navigational instruments and associated equipment		NIL	3.652(a)		CAT.IDE.H.130(a)(1) + AMC1 to CAT.IDE.H.125(a)(1)(i)&CAT.IDE.H.130(a)(1) = 3.652(a)
AMC1	CAT.IDE.H.125(a)(1)(i)&CAT.IDE.H.130(a)(1)	Operations under VFR by day & Operations under IFR or at night – flight and navigational instruments and associated equipment MEANS OF MEASURING AND DISPLAYING MAGNETIC HEADING		NIL	3.652(a)		CAT.IDE.H.130(a)(1) + AMC1 to CAT.IDE.H.125(a)(1)(i)&CAT.IDE.H.130(a)(1) = 3.652(a)
IR	CAT.IDE.H.130(a)(2)	Operations under IFR or at night – flight and navigational instruments and associated equipment		NIL	3.652(b)	K	CAT.IDE.H.130(a)(2) + AMC1 to CAT.IDE.H.125(a)(1)(ii)&CAT.IDE.H.130(a)(2) = 3.652(b) except that AMC1 is a little bit more detailed (see AMC1 below)
AMC1	CAT.IDE.H.125(a)(1)(ii)&CAT.IDE.H.130(a)(2)	Operations under VFR by day & Operations under IFR or at night – flight and navigational instruments and associated equipment MEANS OF MEASURING AND DISPLAYING THE TIME		Modif.	3.652(b)	K	In AMC1 to CAT.IDE : "An acceptable means of compliance is a clock displaying hours, minutes and seconds, with a sweep-second pointer or digital presentation" whereas in OPS 3, what is required is : "a clock displaying hours, minutes and seconds"

Appendix 3 - Comparison IR OPS and OPS3 - CAT and SPA 130306.xls

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
IR	CAT.IDE.H.130(a)(3), (d), (e)	Operations under IFR or at night – flight and navigational instruments and associated equipment		NIL	3.652(d)	K	CAT.IDE.H.130(a)(3), (d), (e) + AMC1 to CAT.IDE.H.125(a)(1)(iv)&CAT.IDE.H.130(a)(3) + AMC1 to CAT.IDE.H.125(d)&CAT.IDE.H.130(d) = 3.652(d)
AMC1	CAT.IDE.H.125(a)(1)(iv)&CAT.IDE.H.130(a)(3)	Operations under VFR by day – flight and navigational instruments and associated equipment CALIBRATION OF THE INSTRUMENT INDICATING AIRSPEED		NIL	3.652(d)	K	CAT.IDE.H.130(a)(3), (d), (e) + AMC1 to CAT.IDE.H.125(a)(1)(iv)&CAT.IDE.H.130(a)(3) + AMC1 to CAT.IDE.H.125(d)&CAT.IDE.H.130(d) = 3.652(d)
AMC1	CAT.IDE.H.125(d)&CAT.IDE.H.130(d)	Operations under VFR by day & Operations under IFR or at night – flight and navigational instruments and associated equipment MEANS OF PREVENTING MALFUNCTION DUE TO CONDENSATION OR ICING		NIL	3.652(d)	K	CAT.IDE.H.130(a)(3), (d), (e) + AMC1 to CAT.IDE.H.125(a)(1)(iv)&CAT.IDE.H.130(a)(3) + AMC1 to CAT.IDE.H.125(d)&CAT.IDE.H.130(d) = 3.652(d)
IR	CAT.IDE.H.130, (a)(4)	Operations under IFR or at night – flight and navigational instruments and associated equipment		NIL	3.652(e)	K	
IR	CAT.IDE.H.130, (a)(5), (a)(6)	Operations under IFR or at night – flight and navigational instruments and associated equipment		NIL	3.652(f), (g)	K	
IR	CAT.IDE.H.130(a)(7)	Operations under IFR or at night – flight and navigational instruments and associated equipment		NIL	3.652(j)	K	CAT.IDE.H.130(a)(7) + AMC1 to CAT.IDE.H.125(c)(2)&CAT.IDE.H.130(a)(7) = 3.652(j)
AMC1	CAT.IDE.H.125(c)(2)&CAT.IDE.H.130(a)(7)	Operations under VFR by day & Operations under IFR or at night – flight and navigational instruments and associated equipment STABILISED HEADING		NIL	3.652(j)	K	CAT.IDE.H.130(a)(7) + AMC1 to CAT.IDE.H.125(c)(2)&CAT.IDE.H.130(a)(7) = 3.652(j) AMC1 should also be an AMC to CAT.IDE.H.130(h)(6)
IR	CAT.IDE.H.130(a)(8)	Operations under IFR or at night – flight and navigational instruments and associated equipment		NIL	3.652(k)	K	CAT.IDE.H.130(a)(8) + AMC1 to CAT.IDE.H.125(a)(1)(vii)&CAT.IDE.H.130(a)(8) = 3.652(k) + 3.650&3.652(k) (AMC)
AMC1	CAT.IDE.H.125(a)(1)(vii)&CAT.IDE.H.130(a)(8), (a)	Operations under VFR by day & Operations under IFR or at night – flight and navigational instruments and associated equipment OUTSIDE AIR TEMPERATURE		NIL	3.652(k) and 3.650(g) & 3.652(k) (AMC)	K	CAT.IDE.H.130(a)(8) + AMC1 to CAT.IDE.H.125(a)(1)(vii)&CAT.IDE.H.130(a)(8) = 3.652(k) + 3.650&3.652(k) (AMC)

Appendix 3 - Comparison IR OPS and OPS3 - CAT and SPA 130306.xls

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
IR	CAT.IDE.H.130(b)	Operations under IFR or at night – flight and navigational instruments and associated equipment		NIL	3.652(c)	K	CAT.IDE.H.130(b) + AMC1 to CAT.IDE.H.125(a)(1)(iii)&CAT.IDE.H.130(b) = 3.652(c)
AMC1	CAT.IDE.H.125(a)(1)(iii)&CAT.IDE.H.130(b)	Operations under VFR by day & Operations under IFR or at night – flight and navigational instruments and associated equipment CALIBRATION OF THE MEANS OF MEASURING AND DISPLAYING PRESSURE ALTITUDE		NIL	3.652(c)	K	CAT.IDE.H.130(b) + AMC1 to CAT.IDE.H.125(a)(1)(iii)&CAT.IDE.H.130(b) = 3.652(c)
IR	CAT.IDE.H.130(c)	Operations under IFR or at night – flight and navigational instruments and associated equipment		NIL	3.652(p)	K	
IR	CAT.IDE.H.130(d)	Operations under IFR or at night – flight and navigational instruments and associated equipment		NIL	3.652(d)	K	See above CAT.IDE.H.130(a)(3), (d), (e)
AMC1	CAT.IDE.H.125(d)&CAT.IDE.H.130(d)	Operations under VFR by day & Operations under IFR or at night – flight and navigational instruments and associated equipment MEANS OF PREVENTING MALFUNCTION DUE TO CONDENSATION OR ICING		NIL	3.652(d)	K	See above CAT.IDE.H.130(a)(3), (d), (e)
IR	CAT.IDE.H.130(e)	Operations under IFR or at night – flight and navigational instruments and associated equipment		NIL	3.652(d)	K	See above CAT.IDE.H.130(a)(3), (d), (e)
AMC1	CAT.IDE.H.130(e)	Operations under IFR or at night – flight and navigational instruments and associated equipment MEANS OF INDICATING FAILURE OF THE MEANS OF PREVENTING MALFUNCTION DUE TO EITHER CONDENSATION OR ICING OF THE AIRSPEED INDICATING SYSTEM		NIL	3.652(d) & (m)(2) (AMC)	K	
IR	CAT.IDE.H.130(f)	Operations under IFR or at night – flight and navigational instruments and associated equipment		NIL	3.652(h), (i)	K	CAT.IDE.H.130(f)(1) = 3.652(h) (implicit) CAT.IDE.H.130(f)(2) = 3.652(h)(2) CAT.IDE.H.130(f)(3) = 3.652(h) (intro) CAT.IDE.H.130(f)(4) = 3.652(h)(3) CAT.IDE.H.130(f)(5) = 3.652(h)(1) CAT.IDE.H.130(f)(6) = 3.652(h)(4) CAT.IDE.H.130(f)(7) = 3.652(i)

Appendix 3 - Comparison IR OPS and OPS3 - CAT and SPA 130306.xls

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
AMC1	CAT.IDE.H.130(f)(6)	Operations under IFR or at night – flight and navigational instruments and associated equipment ILLUMINATION OF STANDBY MEANS OF MEASURING AND DISPLAYING ATTITUDE		New			AMC1 has been added for clarity : "ILLUMINATION OF STANDBY MEANS OF MEASURING AND DISPLAYING ATTITUDE The standby means of measuring and displaying attitude should be illuminated so as to be clearly visible under all conditions of daylight and artificial lighting."
IR	CAT.IDE.H.130(g)	Operations under IFR or at night – flight and navigational instruments and associated equipment		NIL	3.652(l)	K	
IR	CAT.IDE.H.130(h)	Operations under IFR or at night – flight and navigational instruments and associated equipment		NIL	3.652(m)	K	
AMC1	CAT.IDE.H.125(b)&CAT.IDE.H.130(h)	Operations under VFR by day & Operations under IFR or at night – flight and navigational instruments and associated equipment MULTI-PILOT OPERATIONS - DUPLICATE INSTRUMENTS		NIL	3.652(o)	K	
IR	CAT.IDE.H.130(i)	Operations under IFR or at night – flight and navigational instruments and associated equipment		NIL	3.652(n)	K	
AMC1	CAT.IDE.H.130(i)	Operations under IFR or at night – flight and navigational instruments and associated equipment CHART HOLDER		New			AMC1 has been added to take into account charts shown on electronic flight bags : "CHART HOLDER An acceptable means of compliance with the chart holder requirement is to display a pre-composed chart on an electronic flight bag (EFB)."
IR	CAT.IDE.H.135	Additional equipment for single pilot operation under IFR		NIL	3.655	K	
				Not transposed	3.655 (AMC)	K	AMC to 3.655 allowing IFR operations with a single pilot without an autopilot was included in OPS 3 and has not been transposed in CAT.IDE.H.135.
IR	CAT.IDE.H.145	Radio altimeters		NIL	3.660	K	
AMC1	CAT.IDE.H.145	Radio altimeters AUDIO WARNING DEVICE		Modif.	3.660(a) (end of §)	K	In CAT.IDE : "The audio warning required in CAT.IDE.H.145 should be a voice warning." Whereas in OPS 3 : "voice warning or any other equivalent means acceptable to the Authority "
IR	CAT.IDE.H.160	Airborne weather detecting equipment		NIL	3.670	K	CAT.IDE.H.160+ AMC1 to CAT.IDE.H.160 = 3.670

Appendix 3 - Comparison IR OPS and OPS3 - CAT and SPA 130306.xls

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
AMC1	CAT.IDE.H.160	Airborne weather detecting equipment GENERAL		NIL	3.670	K	CAT.IDE.H.160+ AMC1 to CAT.IDE.H.160 = 3.670
IR	CAT.IDE.H.165	Additional equipment for operations in icing conditions at night		NIL	3.675(b)	K	
IR	CAT.IDE.H.170	Flight crew interphone system		NIL	3.685	K	CAT.IDE.H.170+ AMC1 to CAT.IDE.H.170 = 3.685
AMC1	CAT.IDE.H.170	Flight crew interphone system TYPE OF FLIGHT CREW INTERPHONE		NIL	3.685	K	CAT.IDE.H.170+ AMC1 to CAT.IDE.H.170 = 3.685
IR	CAT.IDE.H.175	Crew member interphone system		NIL	3.690(a)	K	
AMC1	CAT.IDE.H.175	Crew member interphone system SPECIFICATIONS		Modif.	3.690(b)	K	AMC1 to CAT.IDE.H.175 - §(a) = 3.690(b)(1) AMC1 to CAT.IDE.H.175 - §(b) = 3.690(b)(4) AMC1 to CAT.IDE.H.175 - §(c) = 3.690(b)(5) AMC1 to CAT.IDE.H.175 - §(d) = 3.690(b)(6)+AMC to 3.690(b)(6) AMC1 to CAT.IDE.H.175 - §(e) = 3.690(b)(2) AMC1 to CAT.IDE.H.175 - §(f) = 3.690(b)(3) Yet, OPS 3 requirement differs in that the system shall be operable in less than 10 seconds. This is not mentioned in CAT.IDE
IR	CAT.IDE.H.180(a)	Public address system		NIL	3.695(a)	K	CAT.IDE.H.180(a) allows alleviation (see CAT.IDE.H.180(b))
IR	CAT.IDE.H.180(b)	Public address system		New			helicopters with an MOPSC of more than nine and less than 20 are exempted from having a public address system, if: (1) the helicopter is designed without a bulkhead between pilot and passengers; and (2) the operator is able to demonstrate that when in flight, the pilot's voice is audible and intelligible at all passengers' seats.
AMC1	CAT.IDE.H.180	Public address system SPECIFICATIONS		NIL	3.695(b)	K	
IR	CAT.IDE.H.185(a)	Cockpit voice recorder		NIL	3.700(a) (intro) and 3.705(a) (intro)	K	
IR	CAT.IDE.H.185(b)(1)	Cockpit voice recorder	Recording duration for helicopters with CofA >1/01/2016	New			(b) The CVR shall be capable of retaining the data recorded during at least: (1) the preceding two hours for helicopters referred to in (a)(1) and (a)(2), when first issued with an individual CofA on or after 1 January 2016;

Appendix 3 - Comparison IR OPS and OPS3 - CAT and SPA 130306.xls

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
AMC1	CAT.IDE.H.185	Cockpit voice recorder OPERATIONAL PERFORMANCE REQUIREMENTS		Modif.	3.700 (IEM) and 3.705 (IEM)		References documents for operational performance requirements updated (ED56 in IEM to 3.700 and ED56/ED56A in IEM to 3.705 changed to ED112) : "For helicopters first issued with an individual CofA on or after 01 January 2016 the operational performance requirements for cockpit voice recorders (CVRs) should be those laid down in EUROCAE Document ED-112...dated March 2003, including amendments n°1 and n°2..."
IR	CAT.IDE.H.185(b)(2) to (b)(4)	Cockpit voice recorder	Recording duration for helicopters with CofA <1/01/2016	NIL	3.700(b) 3.705(b)	K	
IR	CAT.IDE.H.185(c)	Cockpit voice recorder		NIL	3.700(a)(1) to (a)(5) 3.705(a)(1) to (a)(5)	K	CAT.IDE.H.185(c)(1) = 3.700(a)(1) and 3.705(a)(1) CAT.IDE.H.185(c)(2) = 3.700(a)(3)+(5) and 3.705(a)(3)+(5) CAT.IDE.H.185(c)(3)(i) = 3.700(a)(2) CAT.IDE.H.185(c)(3)(ii) = 3.705(a)(2) CAT.IDE.H.185(c)(4) = 3.700(a)(4) and 3.705(a)(4)
IR	CAT.IDE.H.185(d), (e)(1)	Cockpit voice recorder		NIL	3.700(c) (1st sentence) 3.705(c)	K	CAT.IDE.H.185(d)=3.700(c) (first sentence) CAT.IDE.H.185(d)=3.705(c) CAT.IDE.H.185(e)(1) repeats CAT.IDE.H.185(d) for helicopters with a MCTOM>3175kg and CofA>1/08/99
IR	CAT.IDE.H.185(e)(2)	Cockpit voice recorder		NIL	3.700(c) (last sentence)	K	CAT.IDE.H.185(e)(2) = 3.700(d) last sentence
IR	CAT.IDE.H.185(f)	Cockpit voice recorder		NIL	3.700(d) 3.705(d)	K	
IR	CAT.IDE.H.190(a)	Flight data recorder		NIL	3.715(a) 3.720(a)	K	
IR	CAT.IDE.H.190(b)(1)	Flight data recorder	Recording duration for helicopters with CofA >1/01/2016	New			ICAO Annex 6, D-NPA-OPS 67 and EUROCAE amendments taken into account (b) The FDR shall record the parameters required to determine accurately the: (1) flight path, speed, attitude, engine power, operation and configuration and be capable of retaining the data recorded during at least the preceding 10 hours, for helicopters referred to in (a)(1) and first issued with an individual CofA on or after 1 January 2016;

Appendix 3 - Comparison IR OPS and OPS3 - CAT and SPA 130306.xls

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
AMC1	CAT.IDE.H.190	Flight data recorder OPERATIONAL PERFORMANCE REQUIREMENTS FOR HELICOPTERS HAVING AN MCTOM OF MORE THAN 3 175 KG AND FIRST ISSUED WITH AN INDIVIDUAL C OF A ON OR AFTER 1 JANUARY 2016, AND PERFORMANCE SPECIFICATIONS FOR THESE PARAMETERS		Modif.	3.715/3.720 (ACJ)		ICAO Annex 6, D-NPA-OPS 67 and EUROCAE amendments taken into account References documents for operational performance requirements updated (ED55 in ACJ to 3.715/3.720 changed to ED112). For helicopters first issued with an individual CofA on or after 01 January 2016 "operational performance requirements for flight data recorders (FDRs) should be those laid down in EUROCAE Document ED-112...dated March 2003, including amendments n°1 and n°2..." Besides, AMC1 to CAT.IDE.H.190 gives tables of parameters to be recorded
IR	CAT.IDE.H.190(b)(2)	Flight data recorder	Recording duration for helicopters with CofA <1/01/2016	NIL	3.715(b)	K	
IR	CAT.IDE.H.190(b)(3)	Flight data recorder	Recording duration for helicopters with CofA <1/01/2016	NIL	3.720(b)	K	
IR	CAT.IDE.H.190(c)	Flight data recorder		NIL	3.715(d) 3.720(e)	K	
IR	CAT.IDE.H.190(d)	Flight data recorder		NIL	3.715(e) 3.720(f)	K	
IR	CAT.IDE.H.190(e)	Flight data recorder		NIL	3.715(f) 3.720(g)	K	
AMC2	CAT.IDE.H.190 - (a)(1), (a)(2) and (b)	Flight data recorder LIST OF PARAMETERS TO BE RECORDED FOR HELICOPTERS HAVING AN MCTOM OF MORE THAN 3 175 KG AND FIRST ISSUED WITH AN INDIVIDUAL C OF A ON OR AFTER 1 AUGUST 1999 AND BEFORE 1 JANUARY 2016 AND HELICOPTERS HAVING AN MCTOM OF MORE THAN 7 000 KG OR AN MPSC OF MORE THAN NINE AND FIRST ISSUED WITH AN INDIVIDUAL C OF A ON OR AFTER 1 JANUARY 1989 AND BEFORE 1 AUGUST 1999		NIL	3.715(c)(1) and (c)(2) 3.720(c)(1) and (c)(2)	K	Paragraphs (a)(1) and (a)(2) are ambiguous : there is no reference to applicable table (1 or 2) for helicopters with a CofA issued after 1/01/1989 and before 1/08/1999

Appendix 3 - Comparison IR OPS and OPS3 - CAT and SPA 130306.xls

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
AMC2	CAT.IDE.H.190 - (a)(3)	Flight data recorder LIST OF PARAMETERS TO BE RECORDED FOR HELICOPTERS HAVING AN MCTOM OF MORE THAN 3 175 KG AND FIRST ISSUED WITH AN INDIVIDUAL C OF A ON OR AFTER 1 AUGUST 1999 AND BEFORE 1 JANUARY 2016 AND HELICOPTERS ...		NIL	3.715(c)(4) 3.720(c)(4)	K	
AMC2	CAT.IDE.H.190 - (a)(4)	Flight data recorder LIST OF PARAMETERS TO BE RECORDED FOR HELICOPTERS HAVING AN MCTOM OF MORE THAN 3 175 KG AND FIRST ISSUED WITH AN INDIVIDUAL C OF A ON OR AFTER 1 AUGUST 1999 AND BEFORE 1 JANUARY 2016 AND HELICOPTERS ...		NIL	3.715(c)(3) 3.720(c)(3)	K	
AMC2	CAT.IDE.H.190 - (c)	Flight data recorder LIST OF PARAMETERS TO BE RECORDED FOR HELICOPTERS HAVING AN MCTOM OF MORE THAN 3 175 KG AND FIRST ISSUED WITH AN INDIVIDUAL C OF A ON OR AFTER 1 AUGUST 1999 AND BEFORE 1 JANUARY 2016 AND HELICOPTERS ...		Modif.	3.720(d)	K	Provision : "Individual parameters that can be derived by calculation from the other recorded parameters need not to be recorded, if agreed by the competent authority." is included in CAT.IDE but was not in OPS 3.715 (helicopters with a MCTOM of more than 3175kg and first issued with a CofA after 1 August 1999).
AMC2	CAT.IDE.H.190 - (d)	Flight data recorder LIST OF PARAMETERS TO BE RECORDED FOR HELICOPTERS HAVING AN MCTOM OF MORE THAN 3 175 KG AND FIRST ISSUED WITH AN INDIVIDUAL C OF A ON OR AFTER 1 AUGUST 1999 AND BEFORE 1 JANUARY 2016 AND HELICOPTERS ...		Modif.	3.715/3.720 (ACJ, §2)	K	ICAO Annex 6, D-NPA-OPS 67 and EUROCAE amendments taken into account. Modification is in red : "The parameters should meet, as far as practicable, the performance specifications (range, sampling intervals, accuracy limits and resolution in read-out) defined in AMC3 CAT.IDE.H.190. [text in red not included in ACJ to OPS 3. In OPS 3 reference to an outdated version of ED document]" AMC3 to CAT.IDE.H.190 specifies parameters taken from an updated version of ED documentation. See AMC3 to CAT.IDE.H.190 for details about parameters to be recorded
AMC2	CAT.IDE.H.190 - (e)	Flight data recorder LIST OF PARAMETERS TO BE RECORDED FOR HELICOPTERS HAVING AN MCTOM OF MORE THAN 3 175 KG AND FIRST ISSUED WITH AN INDIVIDUAL C OF A ON OR AFTER 1 AUGUST 1999 AND BEFORE 1 JANUARY 2016 AND HELICOPTERS ...		NIL	3.715/3.720 (ACJ, §4)	K	

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Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
AMC2	CAT.IDE.H.190 - (f)	Flight data recorder LIST OF PARAMETERS TO BE RECORDED FOR HELICOPTERS HAVING AN MCTOM OF MORE THAN 3 175 KG AND FIRST ISSUED WITH AN INDIVIDUAL C OF A ON OR AFTER 1 AUGUST 1999 AND BEFORE 1 JANUARY 2016 AND HELICOPTERS ...		NIL	3.715/3.720 (ACJ, §5)	K	
AMC2	CAT.IDE.H.190 - Table 1	Flight data recorder LIST OF PARAMETERS TO BE RECORDED FOR HELICOPTERS HAVING AN MCTOM OF MORE THAN 3 175 KG AND FIRST ISSUED WITH AN INDIVIDUAL C OF A ON OR AFTER 1 AUGUST 1999 AND BEFORE 1 JANUARY 2016 AND HELICOPTERS ...		NIL	3.715/3.720 (App.1, Table A)	K	CAT.IDE introduces the following element (in red), not included in OPS 3 : Parameter 3 : "Indicated airspeed or calibrated airspeed "
AMC2	CAT.IDE.H.190 - Table 2	Flight data recorder LIST OF PARAMETERS TO BE RECORDED FOR HELICOPTERS HAVING AN MCTOM OF MORE THAN 3 175 KG AND FIRST ISSUED WITH AN INDIVIDUAL C OF A ON OR AFTER 1 AUGUST 1999 AND BEFORE 1 JANUARY 2016 AND HELICOPTERS ...		NIL	3.715/3.720 (App.1, Table B)	K	CAT.IDE introduces the following element (in red), not included in OPS 3 : Parameter 3 : "Indicated airspeed or calibrated airspeed "
AMC2	CAT.IDE.H.190 - Table 3	Flight data recorder LIST OF PARAMETERS TO BE RECORDED FOR HELICOPTERS HAVING AN MCTOM OF MORE THAN 3 175 KG AND FIRST ISSUED WITH AN INDIVIDUAL C OF A ON OR AFTER 1 AUGUST 1999 AND BEFORE 1 JANUARY 2016 AND HELICOPTERS ...		NIL	3.715/3.720 (App.1, Table C)	K	
AMC3	CAT.IDE.H.190	Flight data recorder PERFORMANCE SPECIFICATIONS FOR THE PARAMETERS TO BE RECORDED FOR HELICOPTERS HAVING AN MCTOM OF MORE THAN 3 175 KG AND FIRST ISSUED WITH AN INDIVIDUAL C OF A ON OR AFTER 1 AUGUST 1999 AND BEFORE 1 JANUARY 2016 AND HELICOPTERS ...		Modif.	3.715(c)(3) 3.720(c)(3)	K	ICAO Annex 6, D-NPA-OPS 67 and EUROCAE amendments taken into account AMC 3 to CAT.IDE.H.190 gives details in tables 1 and 2 about parameters to be recorded whereas OPS 3 "only" quotes an outdated version of ED documentation where details about parameters may be found. Hence no detailed table in OPS 3
GM1	CAT.IDE.H.190	Flight data recorder GENERAL		NIL	3.715/3.720 (ACJ, 5)	K	

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Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
IR	CAT.IDE.H.195	Data link recording		New		K	Takes into account NPA-OPS 48A and alignment with ICAO "Helicopters first issued with an individual CofA on or after 8 April 2014 that have the capability to operate data link communications and are required to be equipped with a CVR, shall record data link communication..."
AMC1	CAT.IDE.H.195	Data link recording GENERAL		New		K	Takes into account NPA-OPS 48A and alignment with ICAO
GM1	CAT.IDE.H.195	Data link recording DEFINITION AND ACRONYMS		New		K	Takes into account NPA-OPS 48A and alignment with ICAO
IR	CAT.IDE.H.200	Combination recorder		NIL	3.700(e) 3.705(e) 3.715(g) 3.720(h)	K	
AMC1	CAT.IDE.H.200	Flight data and cockpit voice combination recorder GENERAL		Modif.	3.700(e) (ACJ)	K	AMC1 to CAT.IDE... gives the following possibility : "(b) In addition a flight data and cockpit voice combination recorder may record data link communication messages and related information required by CAT.IDE.H.195."
IR	CAT.IDE.H.205(a)(1)	Seats, seat safety belts, restraint systems child restraint devices		NIL	3.730(a)(1)	K	
IR	CAT.IDE.H.205(a)(2)	Seats, seat safety belts, restraint systems child restraint devices		Modif.	3.730(a)(2), (3)	K	CAT.IDE.H.250(a)(2) is equivalent to common requirements laid down in OPS 3.730(a)(2) and (a)(3) except for the fact that CAT.IDE makes it clear that restraining belts are also needed for each berth
IR	CAT.IDE.H.205(a)(3)	Seats, seat safety belts, restraint systems child restraint devices		NIL	3.730(a)(3)	K	
O	CAT.IDE.H.205(a)(4)	Seats, seat safety belts, restraint systems child restraint devices		NIL	3.730(a)(4)	K	
IR	CAT.IDE.H.205(a)(5)	Seats, seat safety belts, restraint systems child restraint devices		NIL	3.730(a)(5)	K	New upper torso restraint system definition is taken into account in place of the previous 'shoulder harness' terminology. Minor change
IR	CAT.IDE.H.205(a)(6)	Seats, seat safety belts, restraint systems child restraint devices		NIL	3.730(a)(6)	K	New upper torso restraint system definition is taken into account in place of the previous 'shoulder harness' terminology. Minor change
IR	CAT.IDE.H.205(b)(1)	Seats, seat safety belts, restraint systems child restraint devices		Modif.	3.730(b)	K	Alleviation for diagonal shoulder straps is not transposed in CAT.IDE.

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Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
IR	CAT.IDE.H.205(b)(2)	Seats, seat safety belts, restraint systems child restraint devices		New			New upper torso restraint system definition is introduced to allow the necessary flexibility for existing design solutions compliant with current certification standards
AMC1	CAT.IDE.H.205	Seats, seat safety belts, restraint systems and child restraint devices CHILD RESTRAINT DEVICES (CRDS)		New			This AMC deals with CRD : - in (a), what is an acceptable CRD - in (b) possible standards meeting the objectives of a CRD - in (c), (d) and (e), location, installation and operation of CRDs
AMC2	CAT.IDE.H.205	Seats, seat safety belts, restraint systems and child restraint devices UPPER TORSO RESTRAINT SYSTEM & SAFETY BELTS		New			UPPER TORSO RESTRAINT SYSTEM An upper torso restraint system having three straps is deemed to be compliant with the requirement for restraint systems with two shoulder straps. SAFETY BELT A safety belt with diagonal should strap (three anchorage points) is deemed to be compliant with safety belts (two anchorage points).
AMC3	CAT.IDE.H.205	Seats, seat safety belts, restraint systems and child restraint devices SEATS FOR MINIMUM REQUIRED CABIN CREW SEATS		Modif.	3.730(a)(7)	K	CAT.IDE and OPS 3 are very similar except for the fact that in CAT.IDE : "Seats for the minimum required cabin crew members may be located elsewhere than near required floor level emergency exits, provided that the emergency evacuation of passengers would be enhanced. (whatever the number of exits and cabin crew members)" In OPS 3, this possibility is only left if there are more cabin crew members than exits
IR	CAT.IDE.H.210	Fasten seat belt and no-smoking signs		NIL	3.731	K	
IR	CAT.IDE.H.220(a), (b)(1)	First-aid kits		NIL	3.745(a)	K	
IR	CAT.IDE.H.220(b)(2)	First-aid kits		NIL	3.745(b)(1)	K	
AMC1	CAT.IDE.H.220 - (a)	First-aid kits CONTENT OF FIRST-AID KITS		New			CONTENT OF FIRST-AID KITS (a) First-aid kits should be equipped with appropriate and sufficient medications and instrumentation. However, these kits should be complemented by the operator according to the characteristics of the operation (scope of operation, flight duration, number and demographics of passengers etc.).

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Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
AMC1	CAT.IDE.H.220	First-aid kits CONTENT OF FIRST-AID KITS		Modif.	3.745	K	Content of first-aid kits revised to take into account NPA-OPS 51 CAT.IDE contains new items : (b)(1)(xiii) thermometers (non mercury), (b)(2)(vi) antihistamine. One element is deleted compared to OPS 3 : ground/air visual signal code for use by survivors
AMC2	CAT.IDE.H.220 - (a)	First-aid kits MAINTENANCE OF FIRST-AID KITS		NIL	3.745(b)(1)	K	
AMC2	CAT.IDE.H.220 - (b)	First-aid kits MAINTENANCE OF FIRST-AID KITS		NIL	3.745(b)(2)	K	
AMC2	CAT.IDE.H.220 - (c)	First-aid kits MAINTENANCE OF FIRST-AID KITS		New			To be kept up to date first-aid kits should be: ... (c) replenished after use-in-flight at the first opportunity where replacement items are available.
IR	CAT.IDE.H.240(intro)	Supplemental oxygen — non-pressurised helicopters		NIL	3.775(a)(1) and 3.775(a)(3)	K	
AMC1	CAT.IDE.H.240	Supplemental oxygen - non-pressurised helicopters DETERMINATION OF OXYGEN		NIL	3.775(a)(2)	K	
IR	CAT.IDE.H.240 Table 1	Supplemental oxygen — non-pressurised helicopters		NIL	3.775 - Appendix 1	K	
IR	CAT.IDE.H.240 Table 2	Supplemental oxygen — non-pressurised helicopters		Modif.	3.005(f) - Appendix 1, (d)(16) and (d)(17)		For small helicopter operations (VFR day only), the following alleviation contained in OPS 3.005 (f) (Appendix 1) is not transposed : "Non pressurised helicopters. With prior approval of the Authority, excursions of a short duration between 10000ft and 16000ft may be undertaken without supplemental oxygen), in accordance with procedures contained in the OPS manual" CAT.IDE contains a different alleviation for non complex helicopters : - For any period exceeding 30 minutes between 10 000ft and 13 000ft : oxygen supply for all occupants of flight crew compartment seats on duty, crew members assisting flight crew in their duties, required cabin crew members and 10% of passengers - Above 13 000ft, oxygen supply for all occupants of the helicopter (FC, CC and TC members and 100% of passengers)

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Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
IR	CAT.IDE.H.240	Supplemental oxygen — non-pressurised helicopters		Not transposed	3.005(g) - Appendix 1, (c)(12) and (c)(13)		For local area helicopter operations (VFR day only), the following alleviation contained in OPS 3.005 (f) (Appendix 1) is not transposed : "Non pressurised helicopters. With prior approval of the Authority, excursions of a short duration between 10000ft and 16000ft may be undertaken without supplemental oxygen), in accordance with procedures contained in the OPS manual"
IR	CAT.IDE.H.250(a)	Hand fire extinguishers		Modif.	3.790(b)	K	Reference to Halon extinguisher that was in OPS 3 is not included in CAT.IDE (Halon to be forbidden by Regulation (EC) No 1005/2009)
IR	CAT.IDE.H.250(b), (c), (d) and (e)	Hand fire extinguishers		NIL	3.790(d), (d), (a) and (e) (respectively)	K	
AMC1	CAT.IDE.H.250	Hand fire extinguishers NUMBER, LOCATION AND TYPE		NIL	3.790 (AMC)	K	
IR	CAT.IDE.H.260	Marking of break-in points		NIL	3.800	K	
AMC1	CAT.IDE.H.260	Marking of break-in points MARKINGS -COLOUR AND CORNERS		NIL	3.800	K	
IR	CAT.IDE.H.270	Megaphones		NIL	3.810	K	
AMC1	CAT.IDE.H.270	Megaphones LOCATION OF MEGAPHONES		Modif.	3.810 (AMC)	K	OPS 3 reference to more than 2 megaphones deleted in CAT.IDE Minor change
IR	CAT.IDE.H.275(a)	Emergency lighting and marking		NIL	3.815	K	
IR	CAT.IDE.H.275(b)	Emergency lighting and marking		New	3.830(a)(4)		Exit markings are referred to in OPS 3 also. Yet, CAT.IDE requires that these markings be "visible in daylight or in the dark when operated" (not included in OPS 3)
IR	CAT.IDE.H.280(a)	Emergency locator transmitter (ELT)		NIL	3.820(a)	K	
IR	CAT.IDE.H.280(b)	Emergency locator transmitter (ELT)		Modif.	3.820(b)	K	Deployable ELT are required based on the same criteria in CAT.IDE and OPS 3 except for an additional condition only found in OPS 3 : flights for which ELT (AD) is required are those in support of or in connection with offshore exploitation of mineral resources. OPS 3 introduced a possible "equivalent" equipment to ELT(AD)
IR	CAT.IDE.H.280(c)	Emergency locator transmitter (ELT)		NIL	3.820(c)	K	Only the specific requirement on ELT frequencies is set at implementing rule level. Compliance with ICAO Annex 10 is set at AMC level. CAT.IDE.H.280(c) +AMC2 to CAT.IDE.H.280(c) - (c)=3.820(c)

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Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
AMC1	CAT.IDE.H.280	Emergency locator transmitter (ELT) ELT BATTERIES		NIL	3.830(a)(2) (AMC, §3)	K	
AMC2	CAT.IDE.H.280 - (a)(1) to (a)(3)	Emergency locator transmitter (ELT) TYPES OF ELT AND GENERAL TECHNICAL SPECIFICATIONS		NIL	3.820 (IEM, §1a. to 1c)	K	In (a)(3), AMC2 mentions the fact that ELT (AD) may be activated by an impact (as in OPS 3), and also, in some cases, also by hydrostatic sensors (not include in OPS 3)
AMC2	CAT.IDE.H.280 - (a)(4)	Emergency locator transmitter (ELT) TYPES OF ELT AND GENERAL TECHNICAL SPECIFICATIONS		NIL	3.830(a)(3) (AMC)	K	
AMC2	CAT.IDE.H.280(b)	Emergency locator transmitter (ELT) TYPES OF ELT AND GENERAL TECHNICAL SPECIFICATIONS		NIL	3.820 (IEM, §2)	K	
AMC2	CAT.IDE.H.280(c)	Emergency locator transmitter (ELT) TYPES OF ELT AND GENERAL TECHNICAL SPECIFICATIONS		NIL	3.820(c) and 3.830 (App. 1)	K	CAT.IDE.H.280(c) +AMC2 to CAT.IDE.H.280(c) - (c)=3.820(c)
IR	CAT.IDE.H.290	Life-jackets		NIL	3.825	K	
AMC1	CAT.IDE.H.290(a)	Life-jackets ACCESSIBILITY		NIL	3.825 (after (a)(3))	K	
AMC2	CAT.IDE.H.290(c)	Life-jackets ELECTRIC ILLUMINATION		NIL	3.825 (after (a)(3))	K	
GM1	CAT.IDE.H.290	Life-jackets SEAT CUSHIONS		NIL	3.825 (IEM)	K	
IR	CAT.IDE.H.295	Crew survival suits		Modif.	3.827	K	Crew survival suits are required based on the same criteria in CAT.IDE and OPS 3 except for an additional condition only found in OPS 3 : flights for which survival suits are required are those in support of or in connection with offshore exploitation of mineral resources.
GM1	CAT.IDE.H.295	Crew survival suits ESTIMATING SURVIVAL TIME		NIL	3.827 5 (IEM)	K	GM1 to CAT.IDE.H.295 - (a) = IEM to 3.827 - §1 GM1 to CAT.IDE.H.295 - (b)(1) to (b)(5) = IEM to 3.827 - §3.1 to 3.5
IR	CAT.IDE.H.300	Life-rafts, survival ELTs and survival equipment on extended overwater flights		Modif.	3.830	K	there are some differences between CAT.IDE and OPS 3 (text in red) : - life-rafts are , stowed so as to facilitate their ready use in an emergency [not included in OPS 3] - at least one survival ELT (ELT(S)) for each required life-raft [OPS 3 specifies there may not be more than 2]
AMC1	CAT.IDE.H.300	Life-rafts, survival ELTs and survival equipment on extended overwater flights LIFE-RAFTS AND EQUIPMENT FOR MAKING DISTRESS SIGNALS - HELICOPTERS		NIL	3.830(a)(2) (AMC, §1 and 2)	K	

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Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
AMC1	CAT.IDE.H.300(b)(3)&CAT.IDE.H.305(b)	Flight over water & Survival equipment SURVIVAL ELT		New			SURVIVAL ELT An ELT(AP) may be used to replace one required ELT(S) provided that it meets the ELT(S) requirements. A water-activated ELT(S) is not an ELT(AP).
IR	CAT.IDE.H.305	Survival equipment		NIL	3.835	K	CAT.IDE.H.305+GM1 to CAT.IDE.H.305 = 3.835(a)
GM1	CAT.IDE.H.305	Survival equipment SIGNALLING EQUIPMENT		NIL	3.835(a) (end of (a))	K	
AMC1	CAT.IDE.H.300(b)(3)&CAT.IDE.H.305(b)	Flight over water & Survival equipment SURVIVAL ELT		New			SURVIVAL ELT An ELT(AP) may be used to replace one required ELT(S) provided that it meets the ELT(S) requirements. A water-activated ELT(S) is not an ELT(AP).
AMC1	CAT.IDE.H.305	Survival equipment ADDITIONAL SURVIVAL EQUIPMENT		NIL	3.835(c) (AMC)	K	
GM2	CAT.IDE.H.305	Survival equipment AREAS IN WHICH SEARCH AND RESCUE WOULD BE ESPECIALLY DIFFICULT'		NIL	3.835 (IEM)	K	
IR	CAT.IDE.H.310	Additional requirements for helicopters conducting offshore operations in a hostile sea area		Modif.	3.837	K	Additional requirements for helicopters conducting offshore operations in a hostile sea area are based on the same criteria in CAT.IDE and OPS 3 except for an additional condition only found in OPS 3 : flights for which requirements are set are those in support of or in connection with offshore exploitation of mineral resources. CAT.IDE.H.310 (g) provides that life-jackets shall be worn at all times, unless the passenger or crew member is wearing an integrated survival suit. The same provision exists in OPS 3 except that this survival suit shall be acceptable to the Authority
AMC1	CAT.IDE.H.310	Additional requirements for helicopters operating to or from helidecks located in a hostile sea area INSTALLATION OF THE LIFE RAFT		NIL	3.837(a)(2) (IEM)	K	
IR	CAT.IDE.H.315	Helicopters certified for operating on water - miscellaneous equipment		NIL	3.840	K	
GM1	CAT.IDE.H.315	Helicopters certificated for operating on water - Miscellaneous equipment INTERNATIONAL REGULATIONS FOR PREVENTING COLLISIONS AT SEA		NIL	3.840(b)	K	

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Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
IR	CAT.IDE.H.320	All helicopters on flights over water - ditching		Modif.	3.843	K	CAT.IDE deleted a text that was included in OPS 3 (text in red font): "(b) Helicopters shall be designed for landing on water or certified for ditching in accordance the relevant airworthiness code or fitted with emergency flotation equipment when operated in: (2) performance class 2, when taking off or landing over water, except in the case of helicopter emergency medical services (HEMS) operations, where for the purpose of minimising exposure, the landing or take-off at a HEMS operating site located in a congested environment is conducted over water [in OPS 3: "unless otherwise provided by the Authority" which means the Authority could require e.g. flotation device even for such HEMS flights] ;
AMC1	CAT.IDE.H.320(b)	All helicopters on flight over water - ditching GENERAL		New	3.843(c)(IEM)	K	AMC1 to CAT.IDE.H.320(b) = AMC1 to CAT.IDE.H.310 (much more complete than corresponding 3.843(c) (IEM))
IR	CAT.IDE.H.325	Headset		NIL	3.647	K	
AMC1	CAT.IDE.H.325	Headset GENERAL		NIL	3.647 (IEM)	K	
GM1	CAT.IDE.H.325	Headset GENERAL		New			GENERAL The term 'headset' includes any aviation helmet incorporating headphones and microphone worn by a flight crew member
IR	CAT.IDE.H.330	Radio communication equipment		NIL	3.850(a) and (c)	L	
IR	CAT.IDE.H.335	Audio selector panel		NIL	3.855	L	
IR	CAT.IDE.H.340	Radio equipment for operations under VFR over routes navigated by reference to visual landmarks		NIL	3.860(a) to (c)	L	
IR	CAT.IDE.H.345(a)	Communication and navigation equipment for operations under IFR or under VFR over routes not navigated by reference to visual landmarks		NIL	3.865(a)	L	
IR	CAT.IDE.H.345(b)	Communication and navigation equipment for operations under IFR or under VFR over routes not navigated by reference to visual landmarks		NIL	3.865(b)(1)	L	

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
IR	CAT.IDE.H.345(c) and (d)	Communication and navigation equipment for operations under IFR or under VFR over routes not navigated by reference to visual landmarks		New			(c) Helicopters shall have sufficient navigation equipment to ensure that, in the event of the failure of one item of equipment at any stage of the flight, the remaining equipment shall allow safe navigation in accordance with the flight plan. (d) Helicopters operated on flights in which it is intended to land in IMC shall be equipped with suitable equipment capable of providing guidance to a point from which a visual landing can be performed for each aerodrome at which it is intended to land in IMC and for any designated alternate aerodromes.
AMC1	CAT.IDE.H.345	Communication and navigation equipment for operations under IFR or under VFR over routes not navigated by reference to visual landmarks TWO INDEPENDENT MEANS OF COMMUNICATION		NIL	3.850(b)	L	
AMC2	CAT.IDE.H.345 - (a)(1) and (a)(2)	Communication and navigation equipment for operations under IFR or under VFR over routes not navigated by reference to visual landmarks ACCEPTABLE NUMBER AND TYPE OF COMMUNICATION AND NAVIGATION EQUIPMENT		Modif.	3.865(c) (except (c)(1)(iii))	L	In CAT.IDE : "(a) An acceptable number and type of communication and navigation equipment is: (1) two VHF omnidirectional radio range (VOR) receiving systems on any route, or part thereof, where navigation is based only on VOR signals; (2) two automatic direction finder (ADF) systems on any route, or part thereof, where navigation is based only on non-directional beacon (NDB) signals; ..." Whereas in OPS 3, instead of (a)(1) and (a)(2) : "Navigation equipment : (1) Comprises not less than (i) 2 independant Nav aids appropriate to the route/area to be flown (ii) An approach aid suitable for the destination and alternate aerodrome (iii) an RNAV system where RNAV is required for the route/area to be flown (iv) an additional VOR for any route or part thereof where navigation is based only on VOR signals (v) an additional ADF for any route or part thereof where navigation is based only on NDB signals" (2) Complies with RNP Type for operation in the airspace concerned

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Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
AMC2	CAT.IDE.H.345 - (a)(3)	Communication and navigation equipment for operations under IFR or under VFR over routes not navigated by reference to visual landmarks ACCEPTABLE NUMBER AND TYPE OF COMMUNICATION AND NAVIGATION EQUIPMENT		NIL	3.865(c)(1)(iii)	L	
AMC2	CAT.IDE.H.345 - (b)	Communication and navigation equipment for operations under IFR or under VFR over routes not navigated by reference to visual landmarks ACCEPTABLE NUMBER AND TYPE OF COMMUNICATION AND NAVIGATION EQUIPMENT		NIL	3.865(d)	L	
AMC2	CAT.IDE.H.345 - (c)	Communication and navigation equipment for operations under IFR or under VFR over routes not navigated by reference to visual landmarks ACCEPTABLE NUMBER AND TYPE OF COMMUNICATION AND NAVIGATION EQUIPMENT		Modif.	3.865(e)	L	VHF communication equipment, instrument landing system (ILS) localiser and VOR receivers installed on helicopters to be operated under IFR should comply with the following FM immunity performance standards: (1) ICAO Annex 10, Volume I - Radio Navigation Aids, and Volume III, Part II - Voice Communications Systems; and (2) acceptable equipment standards contained in EUROCAE Minimum Operational Performance Specifications, documents ED-22B for VOR receivers, ED-23B for VHF communication receivers and ED-46B for LOC receivers and the corresponding Radio Technical Commission for Aeronautics (RTCA) documents DO-186,
AMC3	CAT.IDE.H.345	Communication and navigation equipment for operations under IFR or under VFR over routes not navigated by reference to visual landmarks FAILURE OF A SINGLE UNIT		NIL	3.845(a)(2)	L	
GM1	CAT.IDE.H.345	Communication and navigation equipment for operations under IFR or under VFR over routes not navigated by reference to visual landmarks APPLICABLE AIRSPACE REQUIREMENTS		New			APPLICABLE AIRSPACE REQUIREMENTS For helicopters being operated under European air traffic control, the applicable airspace requirements include the Single European Sky legislation.
IR	CAT.IDE.H.350	Transponder		NIL	3.860(d) 3.865(a) 3.865(b)(2)	L	Compliance with volume IV of ICAO Annex 10 is replaced by the content of AMC1 to CAT.IDE.H.350

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
AMC1	CAT.IDE.H.350	Transponder SSR TRANSPONDER		New			<p>SSR TRANSPONDER</p> <p>(a) The secondary surveillance radar (SSR) transponders of aircraft being operated under European air traffic control should comply with any applicable Single European Sky legislation.</p> <p>(b) If the Single European Sky legislation is not applicable, the SSR transponders should operate in accordance with the relevant provisions of Volume IV of ICAO Annex 10.</p> <p>In OPS 3, ICAO compliance is required for all concerned aircraft (be the operator EU or not) (see 3.860(d) and 3.865(b)(2))</p>
				Not transposed	3.865 (f)	L	<p>In OPS 3 :</p> <p>"Where no more than one item of equipment specified in (a) (corresponding to CAT.IDE.H.345(a)), is unserviceable when the helicopter is about to begin the flight, the helicopter may take off if :</p> <p>(1) It is not reasonably practical to repair that item before the commencement of the flight</p> <p>(2) the helicopter has not made more than one flight since the item was found to be unserviceable</p> <p>(3) The commander has satisfied...that the flight can be made safely..."</p> <p>In CAT.IDE, operations with inoperative equipment are dealt with at MEL level.</p>

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Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
IR	SPA.GEN.100	Competent authority		New			
IR	SPA.GEN.105	Application for a specific approval		New			
AMC1	SPA.GEN.105(a)	Application for a specific approval DOCUMENTATION		New			
IR	SPA.GEN.110	Privileges of an operator holding a specific approval		New			
IR	SPA.GEN.115	Changes to a specific approval		New			
IR	SPA.GEN.120	Continued validity of a specific approval		New			
IR	SPA.DG.100	Transport of dangerous goods		NIL	3.1155 (a)	R	
IR	SPA.DG.105 (intro)	Approval to transport dangerous goods		NIL	3.1160 (a)	R	
IR	SPA.DG.105 (a)	Approval to transport dangerous goods		NIL	3.1220 §(a) and 3.1155 §2, 1st sentence (IEM)	R	
AMC1	SPA.DG.105(a) - (a)	Approval to transport dangerous goods TRAINING PROGRAMME		NIL	3.1220 (AMC - §1, 1st and last sentences)	R	
AMC1	SPA.DG.105(a) - (b)	Approval to transport dangerous goods TRAINING PROGRAMME		NIL	3.1220 (AMC - §2)	R	
AMC1	SPA.DG.105(a) - (c)	Approval to transport dangerous goods TRAINING PROGRAMME		NIL	3.1220 (d) (for test) 3.1220 (AMC - §1, 2d sentence - 4.1.b - §7)	R	
AMC1	SPA.DG.105(a) - (d)	Approval to transport dangerous goods TRAINING PROGRAMME		NIL	3.1220 (AMC - §1, 3d sentence - 4.1.a - §7)	R	
AMC1	SPA.DG.105(a) - (e)	Approval to transport dangerous goods TRAINING PROGRAMME		NIL	3.1220 (AMC - §5)	R	
AMC1	SPA.DG.105(a) - (f)	Approval to transport dangerous goods TRAINING PROGRAMME		NIL	3.1220 (e)	R	
IR	SPA.DG.105	Approval to transport dangerous goods		NIL	3.080		See below for precise requirements of SPA.DG.105

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Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
IR	SPA.DG.105 b) 1)	Approval to transport dangerous goods		NIL	3.1045 (App 1 §A 9.1 (a))	R	
IR	SPA.DG.105 b) 2)	Approval to transport dangerous goods		NIL	3.1045 (App 1 §A 9.1 (b)) and 3.1195, 3.1210 (a)	R	
IR	SPA.DG.105 b) 3)	Approval to transport dangerous goods		Modif	3.1215 (a)(1)	R	In IR OPS : "...the operator shall... : (b) establish operating procedures to ensure the safe handling of dangerous goods at all stages of air transport, containing information and instructions on: ... (3) actions to take in the event of an aircraft accident or incident when dangerous goods are being carried;.." In OPS : "(a) Information to Ground Staff. An operator shall ensure that: (1) Information is provided to enable ground staff to carry out their duties with regard to the transport of dangerous goods, including the actions to be taken in the event of incidents and accidents involving dangerous goods; and" No such requirement exist in OPS 3 for flight crew. To be included in the procedures (operations manual)
IR	SPA.DG.105 b) 4)	Approval to transport dangerous goods		NIL	3.1045 (App 1 §A 9.1 (c)) and 3.1215 (c)	R	
AMC1	SPA.DG.105(b)	Approval to transport dangerous goods PROVISION OF INFORMATION IN THE EVENT OF AN IN-FLIGHT EMERGENCY		NIL	3.420 (d)(4)	D	
IR	SPA.DG.105 b) 5)	Approval to transport dangerous goods		Modif	3.1205 (a)(1)	R	Requirement for removal of possible contamination also exists in OPS. Still, it has to be included in the procedures (not explicitly the case today)
IR	SPA.DG.105 b) 6)	Approval to transport dangerous goods		NIL	3.1045 (App 1 §A 9.1 (d)) and 3.1155 (IEM - §2)	R	
GM1	SPA.DG.105(b)(6)	Approval to transport dangerous goods PERSONNEL		New	-	R	Description of the term 'personnel'.

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Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
IR	SPA.DG.105 b) 7)	Approval to transport dangerous goods		Modif	3.1200 (a) (1) to (a) (4)	R	Requirement for inspection for damage, leakage, contamination also exists in OPS. Still, it has to be included in the procedures (not explicitly the case today)
IR	SPA.DG.105 b) 8)	Approval to transport dangerous goods		Modif	3.1225	R	Requirement for reporting also exists in OPS. Still, it has to be included in the procedures (not explicitly the case today)
IR	SPA.DG.110 (a)	Dangerous goods information and documentation		Modif	3.1215 (d)	R	IR OPS "The operator shall, in accordance with the technical instructions: (a) provide written information to the pilot-in-command/commander: (1) about dangerous goods to be carried on the aircraft; (2) for use in responding to in-flight emergencies;" OPS is less detailed : "An operator shall ensure that the commander is provided with written information, as specified in the Technical Instructions"
AMC1	SPA.DG.110(a)	Dangerous goods information and documentation INFORMATION TO THE PILOT-IN-COMMAND/COMMANDER		New		R	Information to be provided in case of an in-flight emergency to be summarised if impracticable
IR	SPA.DG.110 (b)	Dangerous goods information and documentation		NIL	3.1195 (b)	R	
IR	SPA.DG.110 (c)	Dangerous goods information and documentation		Allev.	3.1185	R	Required dangerous goods document possibly provided in electronic form
IR	SPA.DG.110 (d)	Dangerous goods information and documentation		NIL	3.140 (a) and (b)(5)		
IR	SPA.DG.110 (e)	Dangerous goods information and documentation		New			In IR OPS, requirement copy of the information to the pilot-in-command/commander is retained on the ground and that this copy, or the information contained in it, is readily accessible to the aerodromes of last departure and next scheduled arrival, until after the flight to which the information refers; Not in OPS 3?
IR	SPA.DG.110 (f)	Dangerous goods information and documentation		NIL	3.1195 (b) and 3.1065 (App 1 Tab 2)	R	

Appendix 3 - Comparison IR OPS and OPS3 - CAT and SPA 130306.xls

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
IR	SPA.DG.110 (g)	Dangerous goods information and documentation		NIL	3.1065 (App 1 - Tab 3)	R	
AMC1	SPA.DG.110(b) - (a)(1)	Dangerous goods information and documentation ACCEPTANCE OF DANGEROUS GOODS		NIL	3.1195 (a)		
AMC1	SPA.DG.110(b) - (a)(2)	Dangerous goods information and documentation ACCEPTANCE OF DANGEROUS GOODS		New			Dangerous goods acceptance on the condition that it is accompanied by 2 copies of DG transport document (or doc in electronic form)
AMC1	SPA.DG.110(b) - (a)(3)	Dangerous goods information and documentation ACCEPTANCE OF DANGEROUS GOODS		NIL	3.1180 (c) and 1185 (b)		
AMC1	SPA.DG.110(b) - (b)	Dangerous goods information and documentation ACCEPTANCE OF DANGEROUS GOODS		NIL	3.1195 (b)		

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
IR	SPA.HEMS.100	Helicopter emergency medical service (HEMS) operations		Modif	3.005(d)	B	<p>Specificity of 3.005 (d) in OPS 3 is that refers to two different appendixes. The operator has to comply with either Appendix 1 or Appendix 2 (operator's choice).</p> <p><u>In appendix 1</u>, crewing requirements are based on either one single pilot (no HEMS crew member) or two pilots - If OPS are conducted under VFR and the minima applied are the same as those for CAT operations, one pilot (no HEMS crew member) is required. Such operations are called "basic HEMS" (see def. 3.003 (a)(9)) - For OPS needing lower minima, two pilots are required ; requirements for such operations differ from the ones set for "basic HEMS"; in particular, applicable minima can be found in 3.005 (d) - appendix 1, §(c)(4)(ii)(B) and are the same as those included in SPA.HEMS.120, Table 1. Such operations are called "special HEMS" (see def. 3.003 (a)(10))</p> <p><u>In appendix 2</u>, crewing requirements are the same as those contained in JAR OPS3 (one pilot + one additional crew member, either a HEMS crew member or another pilot)</p> <p>All french operators comply with appendix 1 and perform "basic HEMS"</p>

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
GM1	SPA.HEMS.100(a)	Helicopter emergency medical service (HEMS) operations THE HEMS PHILOSOPHY		Modif	3.005(d) (Appendix - ACJ)	B	<p>In GM, paragraphs related to search and rescue have been deleted compared to ACJ to appendix 1 to 3.005 (d) :</p> <ul style="list-style-type: none"> - part of §1 of ACJ (=a) of GM) deleted - all §5 of ACJ deleted - part of §6 of ACJ (=e) of GM) deleted - part of §9 of ACJ (=h) of GM) deleted <p>In §8, a program designed for improving hospitals sites when needed is mentioned. Not included in GM of part SPA...</p> <p>The other elements introduced in GM, not present in ACJ, have been included in §(g). They concern hospital sites and are the following :</p> <p>"These sites are generally found in a congested hostile environment: (1) in the grounds of hospitals; or (2) on hospital buildings."</p> <p>"Even though the rule for the use of such sites in hospital grounds for HEMS operations attracts alleviation, it is only partial and will still impact upon present operations."</p>
IR	SPA.HEMS.110	Equipment requirements for HEMS operations	Equipment requirements for HEMS operations	Modif	3.005(d) (appendix 1, (d)(1)(i))	B	Reference to approval according to regulation 1702/2003 for those equipment that are installed
IR	SPA.HEMS.115	Communication		NIL	3.005(d) (appendix 1, (d)(2)(ii))	B	<p>In OPS3, communication equipment require approval : "un tel équipement additionnel doit être agréé par les services de certification."</p> <p>This approval is not mentioned in SPA.HEMS. Though, it will be maintained in French regulation through aircraft radio equipment license (LSA)</p>

Appendix 3 - Comparison IR OPS and OPS3 - CAT and SPA 130306.xls

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
IR	SPA.HEMS.120 (a)	HEMS operating minima		Modif	3.005(d) (appendix 1, (c)(4)(ii)(B))	B	<p>SPA.HEMS.120 (a) and 3.005 (d) - appendix 1, (c)(4)(ii)(B) are exactly the same but the scope differs : In France these minima are only applicable to VFR operations performed under "special HEMS". "Special HEMS" and those minima are not used in fact.</p> <p>Operations are actually conducted under "basic HEMS" (only one pilot), which means :</p> <ul style="list-style-type: none"> - Applicable minima are not lower than those applicable during CAT operations [see 3.005(d) - appendix 1, (c)(4)(ii)(A)] - Specific conditions are introduced to mitigate the single pilot crewing (see note 1 below) <p><i>Note 1 : 3.005 (d) - appendix 1, §(d)(2)(i) specifies that helicopters used in HEMS are equipped with :</i></p> <ul style="list-style-type: none"> - a radio-altimeter (aural and visual alerts), - a navigation system supplying immediate position by direct reading - for night operations, a system augmenting stability on three axes or an autopilot <p><i>Note 2 : 3.005 (d) - appendix 1, (c)(4)(i) specifies conditions for HEMS IFR operations (same conditions as for CAT OPS)</i></p>
IR	SPA.HEMS.120 (b)	HEMS operating minima		NIL	3.005(d) (appendix 1, (c)(4)(ii)(C))	B	
GM1	SPA.HEMS.120 (a)	HEMS operating minima REDUCED VISIBILITY		New			"In the rule the ability to reduce the visibility for short periods has been included. This will allow the commander to assess the risk of flying temporarily into reduced visibility against the need to provide emergency medical service, taking into account the advisory speeds included in Table 1...."
GM1	SPA.HEMS.120 (b)	HEMS operating minima REDUCED VISIBILITY		NIL	3.465 (ACJ) (and similar to 3.005(d) - appendix 1, (c)(4)(ii)(B) an (C)		

Appendix 3 - Comparison IR OPS and OPS3 - CAT and SPA 130306.xls

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
IR	SPA.HEMS.125 (a)	Performance requirements for HEMS operations		Modif	3.005(d) (appendix 1, §(c)(1))	B	<p>No PC3 operation is allowed under HEMS over a hostile environment in SPA.HEMS.</p> <p>This differs from OPS3 which specifies that PC3 "basic HEMS" operations may be conducted over a hostile environment outside congested areas (in compliance with 3.005 (e) - appendix 1; 3.005 (e) - appendix 1 §(d)(1) "equivalent to" CAT.POL.H420 with a major difference as CAT.POL.H.420 excludes HEMS OPS over a hostile environment outside congested areas)</p> <p><i>Note : PC3 HEMS is possible under 3.005 (e) - appendix 1 §(d)(1), if operators comply with (a)(2)(i) and (ii) of App. 1 to 3.517 (a) and associated ACJ (CAT.POL.H420 required compliance with CAT.POL.H.305 (b))</i></p>
IR	SPA.HEMS.125 (b)	Performance requirements for HEMS operations		NIL	3.005(d) (appendix 1, §(c)(2)(i))	B	<p>SPA.HEMS.125 (b) concerns helicopters with a MCTOM < or > 5,7t.</p> <p>3.005 (d) appendix 1 §(c)(2)(i) concerns helicopters with a MCTOM < 5,7t.</p> <p>3.005 (d) appendix 1 §(c)(2)(ii) concerns helicopters with a MCTOM > 5,7t. Yet no helicopter falling under this § in France.</p>
IR	SPA.HEMS.125 (b) (1) and (2)	Performance requirements for HEMS operations		Modif	3.005(d) (appendix 1, §(c)(2)(i)(A))	B	<p>In SPA.HEMS and OPS3, PC1 is required for OPS to/from FATO in congested hostile environment except if FATO is a public interest site, PIS (in compliance with CAT.POLH.225).</p> <p>SPA.HEMS differs from OPS3 :</p> <ul style="list-style-type: none"> - under SPA.HEMS, in a congested hostile environment, PC1 is required at the operating base (even if it is classified as a PIS) - in a hostile environment outside a congested area, PC3 is possible under OPS3 (PC2 only in IR OPS according to CAT.POL.H.100 + SPA.HEMS.125 (a)) <p><i>Note : for comprehensive analysis, see comparison for PIS use between OPS3 and CAT. In particular, SIP may only be used under HEMS approval according to OPS3.</i></p>

Appendix 3 - Comparison IR OPS and OPS3 - CAT and SPA 130306.xls

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
IR	SPA.HEMS.125 (b) (3)	Performance requirements for HEMS operations	Performance requirements for HEMS operations	Modif	3.005(d) (appendix 1, §(c)(2)(i)(B))	B	In SPA : "Helicopters conducting operations to/from a HEMS operating site located in a hostile environment shall be operated in accordance with performance class 2 and be exempt from the approval required by CAT.POL.H.305(a), provided compliance is shown with CAT.POL.H.305(b)(2) and (b)(3)." In OPS 3 : instead of the text in red font, OPS3 specifies that OPS should be conducted under PC1 as far as possible and that he should minimise exposure time. This may mean CP2 or CP3
GM1	SPA.HEMS.125(b)(3)	Performance requirements for HEMS operations PERFORMANCE CLASS 2 OPERATIONS AT A HEMS OPERATING SITE		New	-	B	"As the risk profile at a HEMS operating site is already well known, operations without an assured safe forced landing capability do not need a separate approval and the requirements does not call for the additional risk assessment that is specified in CAT.POL.H.305 (b)(1)."
IR	SPA.HEMS.125 (b) (4)	Performance requirements for HEMS operations		NIL	3.005(d) (appendix 1, §(c)(2)(i)(C))	B	SPA.HEMS.125 (b) (4) + AMC1 SPA.HEMS.125 (b) (4) - §(b) = 3.005(d) - appendix 1, §(c)(2)(i)(C))
AMC1	SPA.HEMS.125 (b) (4) - §(a)	Performance requirements for HEMS operations HEMS OPERATING SITE DIMENSIONS		NIL	3.005(d) (appendix 1, §(c)(2)(i)(C)) (IEM)	B	
AMC1	SPA.HEMS.125 (b) (4) - §(b)	Performance requirements for HEMS operations HEMS OPERATING SITE DIMENSIONS		NIL	3.005(d) (appendix 1, §(c)(2)(i)(C))	B	SPA.HEMS.125 (b) (4) + AMC1 SPA.HEMS.125 (b) (4) - §(b) = 3.005(d) - appendix 1, §(c)(2)(i)(C))
IR	SPA.HEMS.130 (a) et (b)	Crew requirements Crew requirements for HEMS operations	Selection and experience	NIL	3.005(d) - Appendix 1, (c)(3)(i) and (c)(3)(ii)(A) to (C)	B	
AMC1	SPA.HEMS.130(b)(2)	Crew requirements Experience	Experience	NIL	3.005(d) - Appendix 1, (c)(3)(ii)(B) (ACJ)	B	
IR	SPA.HEMS.130 (c)	Crew requirements Crew requirements for HEMS operations	Operational training	Modif	3.005(d) - Appendix 1, (c)(3)(ii)(D)	B	SPA and OPS identical except for text in red font only included in SPA: "(c) Operational training. Successful completion of operational training in accordance with the HEMS procedures contained in the operations manual." OPS only refers instead to training and control contained in 3.005 (d) - appendix 1, §(e)

Appendix 3 - Comparison IR OPS and OPS3 - CAT and SPA 130306.xls

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
IR	SPA.HEMS.130 (d)	Crew requirements Crew requirements for HEMS operations	Recency	Modif	3.005(d) - Appendix 1, (c)(3)(iii)	B	SPA and OPS identical except for text in red : (d) Recency. All pilots conducting HEMS operations shall have completed a minimum of 30 minutes' flight by sole reference to instruments in a helicopter or in an FSTD [STD in OPS3] within the last six [seven in OPS3] months
AMC1	SPA.HEMS.130(d)	Crew requirements Crew requirements for HEMS operations	Recency	Modif	3.005(d) - Appendix 1, (c)(3)(iii) (ACJ)	B	STD mentioned in ACJ (OPS3) instead of FSTD in SPA
IR	SPA.HEMS.130 (e)	Crew requirements for HEMS operations	Crew composition	New	3.005(d) - Appendix 1, (c)(3)(iv) and (v)	B	As stated before, there two kinds of operations : "basic HEMS" (3.005(d) - Appendix 1, (c)(3)(iv)) and "special HEMS" (3.005(d) - Appendix 1, (c)(3)(v)) For basic HEMS, there is no additional crew member (same rules as for CAT operations) For special HEMS (which is not currently used) : - two pilots for night operations - Two pilots for day operations except for specific circumstances as described in associated AMC (similar to those described in SPA.HEMS.130 (e)(1)(i))
AMC1	SPA.HEMS.130(e)	Crew requirements for HEMS operations HEMS TECHNICAL CREW MEMBER		New			
GM1	SPA.HEMS.130(e)(2)(ii)	Crew requirements Crew requirements for HEMS operations	SPECIFIC GEOGRAPHICAL AREAS	New			"SPECIFIC GEOGRAPHICAL AREAS In defining those specific geographical areas, the operator should take account of the cultural lighting and topography. In those areas where the cultural lighting an topography make it unlikely that the visual cues would degrade sufficiently to make flying of the aircraft problematical, the HEMS technical crew member is assumed to be able to sufficiently assist the pilot, since under such circumstances instrument and control monitoring would not be required. In those cases where instrument and control monitoring would be required the operations should be conducted with two pilots."
GM1	SPA.HEMS.130(e)(2)(ii)(B)	Crew requirements Crew requirements for HEMS operations	Flight folowing system	New			FLIGHT FOLLOWING SYSTEM A flight following system is a system providing contact with the helicopter throughout its operational area.
IR	SPA.HEMS.130(f)(1)	Crew requirements Crew requirements for HEMS operations	Crew training and checking	Modif	3.005(d) - Appendix 1, (e)(1) and (e)(2)	B	In SPA, requirement is refined : (f) Crew training and checking (1) Training and checking shall be conducted in accordance with a detailed syllabus approved by the competent authority and included in the operations manual
AMC1	SPA.HEMS.130(f)(1)-§(a) and (b)	Crew requirements Crew requirements for HEMS operations		NIL	3.005(d) - Appendix 1, (e)(1)	B	

Appendix 3 - Comparison IR OPS and OPS3 - CAT and SPA 130306.xls

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
AMC1	SPA.HEMS.130(f)(1)-§(c)	Crew requirements Crew requirements for HEMS operations		NIL	3.005(d) - Appendix 2, (e)(2)	B	For operations conducted with HEMS technical crew member, same requirements as those included in this AMC For others (no HEMS technical crew member), paragraph is not relevant
IR	SPA.HEMS.130(f)(2)(i)	Crew requirements Crew requirements for HEMS operations	Crew training and checking	NIL	3.005(d) - Appendix 1, (e)(1)(i)	B	General objectives concerning training programmes were not included in OPS3, yet developed in 3.005(d) - Appendix 1, (e)(1)(i) (which is equivalent to AMC1 to SPA.HEMS.130 (f)(1))
IR	SPA.HEMS.130(f)(2)(ii)	Crew requirements Crew requirements for HEMS operations	Crew training and checking Line checks	NIL	3.005(d) - Appendix 1, (e)(1)(ii)	B	
AMC1	SPA.HEMS.130(f)(2)(ii)(B)	Crew requirements for HEMS operations LINE CHECKS	Crew requirements for HEMS operations LINE CHECKS	NIL	3.005(d) - Appendix 1, (e)(1)(ii)(B) (ACJ)	B	-
IR	SPA.HEMS.135 (a)	HEMS medical passenger and other personnel briefing	HEMS medical passenger and other personnel briefing Medical passenger	NIL	3.005(d) - Appendix 1, (e)(2)	B	General objectives concerning medical passenger briefing were not included in OPS3, yet developed in 3.005(d) - Appendix 1, (e)(2) (which is equivalent to AMC1 to SPA.HEMS.135 (a))
AMC1	SPA.HEMS.135(a)	HEMS medical passenger and other personnel briefing HEMS MEDICAL PASSENGER BRIEFING	HEMS medical passenger and other personnel briefing HEMS MEDICAL PASSENGER BRIEFING	NIL	3.005(d) - Appendix 1, (e)(2)	B	-
AMC1.1	SPA.HEMS.135(a)	HEMS medical passenger and other personnel briefing HEMS MEDICAL PASSENGER BRIEFING	HEMS medical passenger and other personnel briefing HEMS MEDICAL PASSENGER BRIEFING	Allev.	-		Not included in OPS 3 : "HEMS MEDICAL PASSENGER BRIEFING Another means of complying with the rule as compared to that contained in AMC1-SPA.HEMS.135(a) is to make use of a training programme as mentioned in AMC1.1 CAT.OP.MPA.170."
IR	SPA.HEMS.135 (b)	HEMS medical passenger and other personnel briefing	HEMS medical passenger and other personnel briefing Ground emergency service personnel	NIL	3.005(d) - Appendix 1, (e)(3)	B	General objectives concerning ground emergency service personnel briefing were not included in OPS3, yet developed in 3.005(d) - Appendix 1, (e)(3) (which is equivalent to AMC1 to SPA.HEMS.135 (b))
AMC1	SPA.HEMS.135 (b)-§(a)	HEMS medical passenger and other personnel briefing	HEMS medical passenger and other personnel briefing Ground emergency service personnel	NIL	3.005(d) - Appendix 1, (e)(3) (IEM)	B	SPA and OPS identical except for text in red font only included in SPA: "(a) The task of training large numbers of emergency service personnel is formidable. Wherever possible, helicopter operators should afford every assistance to those persons responsible for training emergency service personnel in HEMS support. This can be achieved by various means, such as, but not limited to, the production of flyers, publication of relevant information on the operator's web site and provision of extracts from the operations manual. "

Appendix 3 - Comparison IR OPS and OPS3 - CAT and SPA 130306.xls

Type de texte	Paragraphe	Titre	Résumé	Différence	§ OPS3 équivalent	Sub part	Commentaires & synthèse du changement par rapport à l'OPS 3
AMC1	SPA.HEMS.135 (b)-§(b)	HEMS medical passenger and other personnel briefing	HEMS medical passenger and other personnel briefing Ground emergency service personnel	NIL	3.005(d) - Appendix 1, (e)(3)	B	
IR	SPA.HEMS.135 (c)	HEMS medical passenger and other personnel briefing	HEMS medical passenger and other personnel briefing Medical patient	Allev.	3.005(d) - Appendix 1, (e)(3), (e)(4)		Briefing as per CAT.OP.MPA.170 may be omitted
IR	SPA.HEMS.140 (a)	Information and documentation		Modif	3.005(d) - Appendix 1, (b)	B	SPA a little more detailed than OPS3 (text in red) : (a) The operator shall ensure that, as part of its risk analysis and management process, risks associated with the HEMS environment are minimised by specifying in the operations manual: selection, composition and training of crews; levels of equipment and dispatch criteria; and operating procedures and minima, such that normal and likely abnormal operations are described and adequately mitigated.
IR	SPA.HEMS.140 (b)	Information and documentation		NIL	3.005(d) - Appendix 1, (b)	B	
AMC1	SPA.HEMS.140	Information and documentation OPERATIONS MANUAL		Modif	3.005(d) - Appendix 1, (b) and (d)(1)(i)	B	Content of OPS manual seem quite the same as for SPA except that SPA includes : "(b) guidance on take-off and landing procedures at previously unsurveyed HEMS operating sites; (c) the final reserve fuel, in accordance with SPA.HEMS.150;" Training programmes also to be included although not mentioned in AMC1 to SPA.HEMS.140 (see SPA.HEMS.130 (c) an (f)(1)
IR	SPA.HEMS.145	HEMS operating base facilities		NIL	3.005(d) - Appendix 1, (d)(3)	B	
IR	SPA.HEMS.150	Fuel supply		Allev.			For VFR local and defined geographical area operations, final reserve is at least : (1) 30 minutes of flying time at normal cruising conditions; or (2) when operating within an area providing continuous and suitable precautionary landing sites, 20 minutes of flying time at normal cruising speed.
IR	SPA.HEMS.155	Refuelling with passengers embarking, on board or disembarking		NIL	3.005(d) - Appendix 1, (d)(4)	B	

NIL

No difference between IR OPS and French OPS 3

Difference (not major and more demanding) between IR OPS and French OPS 3.

It may result a modification ("Modif") of an existing requirment or a new requirement ("New"). Sometimes noted as "Not transposed" from OPS 3

Major difference between IR OPS and OPS 3 (more demanding).

It may result a modification ("Modif") of an existing requirment or a new requirement ("New"). Sometimes noted as "Not transposed" from OPS 3

Less demanding provision

It may result a modification ("Modif") of an existing requirment or a new requirement ("New"). Sometimes the alleviation result from a non transposition ("not transposed") of an OPS 3 requirement
It may also be noted "Allev."

APPENDIX 4

Courtesy translation of Order of February, 20th, 2013, as regards to the application of regulation (UE) n° 965/2012

(the original « Arrêté du 20 février 2013 relatif à l'application du règlement (UE) n° 965/2012 de la Commission du 5 octobre 2012 déterminant les exigences techniques et les procédures administratives applicables aux opérations aériennes conformément au règlement (CE) n° 216/2008 du Parlement européen et du Conseil » is attached to appendix 4)

The Minister for Ecology, Sustainable Development and Energy,

Having regard to COUNCIL REGULATION (EEC) n°3922/91 of 16 December 1991 on the harmonization of technical requirements and administrative procedures in the field of civil aviation;

Having regard to REGULATION (EC) n° 216/2008 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 20 February 2008 on common rules in the field of civil aviation and establishing a European Aviation Safety Agency, and repealing Council Directive 91/670/EEC, Regulation (EC) n° 1592/2002 and Directive 2004/36/EC;

Having regard to COMMISSION REGULATION (EU) n° 965/2012 of 5 October 2012 laying down technical requirements and administrative procedures related to air operations pursuant to Regulation (EC) n°216/2008 of the European Parliament and of the Council;

Having regard to the Order of 21st March 2011 as modified by the Order of 10th August 2011, as regards to technical conditions for operations of helicopter by public transport companies (OPS 3);

Having regard to DECISION N° 2012/018/DIRECTORATE R of the Executive Director of the Agency of 24th October 2012 on AMC and GM to COMMISSION REGULATION (EU) n° 965/2012,

Has adopted this regulation

Art. 1

The present Order is applicable to all operators to which an air operator certificate (AOC) has been issued whenever they:

- a. operate aeroplanes or helicopters to which regulation (CE) n°216/2008 applies and
- b. perform operations other than those referred to in derogations pursuant to article 6, paragraph 1, of regulation (UE) n°965/2012 aforementioned.

It is also applicable to applicants for an AOC who envisage performing operations complying with conditions a) and b) above.

Art. 2

The present Order sets out the dates for implementing the provisions of Annexes I to V of regulation (EU) n° 965/2012 for operators and applicants referred to in article 1.

Pursuant to paragraph 2 of article 10 of regulation (EU) n° 965/2012, Annexes I to V of said regulation shall apply from October 28th, 2014, subject to the other dates set out in the following Articles 3 to 7.

Art. 3. – Initial application for an AOC after the July 1st, 2013.

Applicants for an initial issue of an AOC who apply after July 1st, 2013, may comply with :

- either provisions of Annex III of regulation (CE) n° 3922/91 for aeroplanes operations or provisions of aforementioned Order of 21st March 2011 for helicopter operations, whichever is applicable ;
- or provisions of Annexes III and IV of regulation (EU) n° 965/2012, in which case they shall also comply with Annex V of regulation (EU) n° 965/2012 if they intend to perform one of the operations referred to in article 5, paragraphs 2. a to 2. f of said regulation.

As from October 28th, 2013, any application for an initial issue of an AOC based on the regulation in force at the date of the present Order shall be accompanied with a schedule concerning the adaptation of the management system, training programs, procedures and manuals with a view to complying at the latest on October 28th, 2014, to annexes III, IV and V, as applicable, of regulation (UE) n° 965/2012.

Art. 4. – Provisions concerning operators with an AOC

AOC not issued in compliance with regulation (UE) n° 965/2012 shall not be considered valid after October 28th, 2014.

As from July 1st, 2013, the minister in charge of civil aviation may, at the request of an operator and provided said operator complies with Annexes III, IV and V, as applicable, of regulation (EU) n° 965/2012, replace, for an aeroplane operator, or convert, for a helicopter operator, his AOC on the basis of the regulation (EU) n° 965/2012 and Annexes I to V.

As from October 28th, 2013, any AOC re-issued based on the regulation in force at the date of the present Order shall be accompanied with a schedule concerning the adaptation of the management system, training programs, procedures and manuals with a view to complying at the latest on October 28th, 2014, to annexes III, IV and V, as applicable, of regulation (UE) n° 965/2012.

Art. 5. – Transitional provisions

Until October 28th, 2014, any provision implemented by an operator to ensure anticipated compliance with a requirement of regulation (EU) n° 965/2012 is deemed to be compliant with the equivalent requirement included in:

- for aeroplanes, Annex III of regulation (CEE) n°3922/91;
- for helicopters, Order of aforementioned 21st March 2011 (OPS 3).

Training programs due to be approved by the minister in charge of civil aviation after October 28th, 2013, shall comply with the requirements of Annexes III, IV and V of regulation (UE) n° 965/2012 and shall be accompanied with an implementing schedule.

Art. 6. – Oversight

As from July 1st, 2013, oversight acts performed by the minister in charge of civil aviation concerning the management system, training programs, procedures and manuals shall investigate the compliance with the applicable requirements of Annexes III, IV and V of regulation (UE) n° 965/2012.

In case non compliances are identified, the operator shall submit an action plan aiming at establishing conformity to Annexes III, IV and V of regulation (UE) n° 965/2012 at the latest on October, 28th, 2014,

Art. 7. – Ramp inspections

Ramp inspections of aircraft belonging to operators for which safety oversight is ensured by another State shall be performed in compliance with paragraphs ARO.RAMP.005 to ARO.RAMP.160 of Annex II to regulation (UE) n° 965/2012 as from October 28th, 2014.

Art. 8. – Specific provisions applicable to helicopter operators

The minister in charge of civil aviation may grant, at the request of helicopter operators and within the limits of articles 14.4 to 14.7 of regulation (CE) n° 216/2008, a derogation to paragraph SPA.HEMS.130 «Crew requirements » of Annex V of regulation (UE) n° 965/2012 with a view to issuing an AOC complying with said regulation, in which case the following conditions shall be met: for a transitory period, provisions concerning crew requirements of helicopter emergency medical service operations as set out in paragraph OPS 3.005 (d) and associated appendixes 1 and 2 may be maintained instead of SPA.HEMS.130 provided that:

- operations are already being conducted at the date the AOC is converted,
- the operators can demonstrate that compliance with regulation (UE) n° 965/2012 would involve undue and disproportionate effort.

Appendix 1 to paragraph OPS 3.005 (e) of aforementioned Order of 21st March 2011 shall be accepted as an alternative means to comply with the risk assessment referred to in paragraph AMC1 CAT.POL.H.420 (b) of aforementioned decision n° 2012/018/R, for demonstrating compliance to paragraph CAT.POL.H.420 « Helicopter operations over a hostile environment located outside a congested area » of Annex IV of regulation (UE) n° 965/2012.

Art. 9 The Director of Civil Aviation Safety is responsible for the implementation of this Order, to be published in the Official Journal of the French Republic.

Dated February 20th, 2013.

The Minister for Ecology, Sustainable Development and Energy

Décrets, arrêtés, circulaires

TEXTES GÉNÉRAUX

MINISTÈRE DE L'ÉCOLOGIE, DU DÉVELOPPEMENT DURABLE ET DE L'ÉNERGIE

Arrêté du 20 février 2013 relatif à l'application du règlement (UE) n° 965/2012 de la Commission du 5 octobre 2012 déterminant les exigences techniques et les procédures administratives applicables aux opérations aériennes conformément au règlement (CE) n° 216/2008 du Parlement européen et du Conseil

NOR : DEVA1304971A

La ministre de l'écologie, du développement durable et de l'énergie,

Vu le règlement (CE) n° 3922/91 modifié du Conseil en ce qui concerne les règles techniques et procédures administratives communes applicables au transport commercial par avion ;

Vu le règlement (CE) n° 216/2008 modifié du Parlement européen et du Conseil du 20 février 2008 concernant des règles communes dans le domaine de l'aviation civile et instituant une Agence européenne de la sécurité aérienne, et abrogeant la directive 91/670/CEE du Conseil, le règlement (CE) n° 1592/2002 et la directive 2004/36/CE ;

Vu le règlement (UE) n° 965/2012 de la Commission du 5 octobre 2012 déterminant les exigences techniques et les procédures administratives applicables aux opérations aériennes conformément au règlement (CE) n° 216/2008 du Parlement européen et du Conseil ;

Vu le code des transports ;

Vu le code de l'aviation civile ;

Vu l'arrêté du 25 février 1985 modifié relatif aux conditions d'utilisation des hélicoptères exploités par une entreprise de transport aérien ;

Vu l'arrêté du 21 mars 2011, modifié par l'arrêté du 10 août 2011, relatif aux conditions techniques d'exploitation d'hélicoptères par une entreprise de transport aérien public (OPS 3) ;

Vu la décision n° 2012/018/R du 24 octobre 2012 du directeur exécutif de l'Agence européenne de sécurité aérienne relative aux moyens de conformité et guide pris en application du règlement (UE) n° 965/2012 susvisé,

Arrête :

Art. 1^{er}. – Le présent arrêté est applicable à tout exploitant détenteur d'un certificat de transporteur aérien qui :

a) Réalise des opérations au moyen d'avions ou d'hélicoptères relevant du règlement (CE) n° 216/2008 modifié susvisé ; et

b) Réalise des opérations autres que celles relevant des dérogations décrites à l'article 6, paragraphe 1, alinéa 1, du règlement (UE) n° 965/2012 susvisé.

Il est également applicable à tout postulant à la délivrance d'un certificat de transporteur aérien qui envisage de réaliser des opérations répondant aux conditions énoncées aux points a et b ci-dessus.

Art. 2. – Le présent arrêté fixe les dates d'application des dispositions des annexes I à V du règlement (UE) n° 965/2012 susvisé pour les exploitants et postulants mentionnés à l'article 1^{er}.

En application du paragraphe 2 de l'article 10 du règlement (UE) n° 965/2012 susvisé, les annexes I à V dudit règlement sont applicables à compter du 28 octobre 2014, sous réserve des dispositions des articles 3 à 7 ci-après.

Art. 3. – Demande initiale de certificat de transporteur aérien après le 1^{er} juillet 2013.

Tout postulant à la délivrance initiale d'un certificat de transporteur aérien qui en fait la demande après le 1^{er} juillet 2013 peut choisir de se conformer :

– Soit aux dispositions de l'annexe III du règlement (CE) n° 3922/91 susvisé pour l'exploitation d'avions et de l'arrêté du 21 mars 2011 modifié susvisé pour l'exploitation d'hélicoptères, selon le cas ;

- Soit aux dispositions des annexes III et IV du règlement (UE) n° 965/2012 susvisé. Dans ce dernier cas, il se conforme en outre à l'annexe V du règlement (UE) n° 965/2012 susvisé dès lors que, parmi les opérations qu'il envisage de réaliser, figure l'une de celles décrites à l'article 5, paragraphes 2 *a* à 2 *f*, dudit règlement.

A compter du 28 octobre 2013, toute demande initiale de certificat de transporteur aérien effectuée sur la base de la réglementation en vigueur à la date du présent arrêté est accompagnée d'un échéancier portant sur l'adaptation du système de gestion, des programmes de formation, des procédures et des manuels afin de se conformer au plus tard le 28 octobre 2014 aux annexes III, IV et V, selon le cas, du règlement (UE) n° 965/2012 susvisé.

Art. 4. – Mesures concernant les exploitants disposant de certificat de transporteur aérien.

Les certificats de transporteur aérien qui n'ont pas été délivrés conformément au règlement (UE) n° 965/2012 susvisé ne sont plus valides à compter du 28 octobre 2014.

Le ministre chargé de l'aviation civile peut, sur demande de l'exploitant, à compter du 1^{er} juillet 2013 et sous réserve qu'il soit en conformité avec les annexes III, IV et V si nécessaire du règlement (UE) n° 965/2012 remplacer, pour un exploitant d'avions, ou convertir, pour un exploitant d'hélicoptères, son certificat de transporteur aérien sur la base du règlement (UE) n° 965/2012 susvisé et de ses annexes I à V.

A compter du 28 octobre 2013, tout renouvellement de certificat de transporteur aérien effectué sur la base de la réglementation en vigueur à la date du présent arrêté est accompagné d'un échéancier fourni par l'exploitant et portant sur l'adaptation du système de gestion, des programmes de formation, des procédures et des manuels afin de se conformer au plus tard le 28 octobre 2014 aux annexes III, IV et V, selon le cas, du règlement (UE) n° 965/2012 susvisé.

Art. 5. – Dispositions transitoires.

Jusqu'au 28 octobre 2014, toute disposition mise en œuvre par anticipation pour assurer la conformité à une exigence du règlement (UE) n° 965/2012 susvisé est réputée conforme à l'exigence réglementaire équivalente de l'annexe III du règlement (CEE) n° 3922/91 du Conseil relatif à l'harmonisation de règles techniques et de procédures administratives dans le domaine de l'aviation civile pour les avions et de l'arrêté du 21 mars 2011 (OPS 3) modifié relatif aux conditions techniques d'exploitation d'hélicoptères par une entreprise de transport aérien public.

Les programmes de formation proposés à l'approbation de la DGAC après le 28 octobre 2013 sont conformes aux dispositions des annexes III, IV et V du règlement (UE) n° 965/2012 susvisé et sont accompagnés d'un échéancier de mise en œuvre desdites formations.

Art. 6. – Surveillance.

A compter du 1^{er} juillet 2013, les actes de surveillance de la DGAC dans les domaines des systèmes de gestion, des programmes de formation, des procédures et des manuels examinent la conformité aux dispositions pertinentes des annexes III, IV et V du règlement (UE) n° 965/2012 susvisé. Dans les cas où des non-conformités à ces dispositions sont identifiées, l'exploitant propose un échéancier permettant d'établir, au 28 octobre 2014 au plus tard, la conformité du domaine inspecté aux dispositions pertinentes des annexes III, IV et V du règlement (UE) n° 965/2012 susvisé.

Art. 7. – Inspections au sol.

Les inspections au sol des aéronefs appartenant à des exploitants soumis à la surveillance réglementaire d'un autre Etat sont effectuées conformément aux paragraphes ARO.RAMP.005 à ARO.RAMP.160 de l'annexe II au règlement (UE) n° 965/2012 susvisé à compter du 28 octobre 2014.

Art. 8. – Dispositions spécifiques aux exploitants d'hélicoptères.

Le ministre chargé de l'aviation civile peut accorder à un exploitant d'hélicoptères, à sa demande et dans les limites permises par les articles 14.4 à 14.7 du règlement (CE) n° 216/2008 susvisé, une dérogation au paragraphe SPA.HEMS.130 « Exigences en matière d'équipage » de l'annexe V au règlement (UE) n° 965/2012 susvisé en vue de l'obtention d'un certificat de transport aérien conforme audit règlement, selon les modalités suivantes : à titre transitoire, les dispositions relatives à la composition des équipages effectuant des opérations de service médical d'urgence par hélicoptère contenues dans le paragraphe OPS 3.005 *d* et ses appendices 1 et 2 peuvent être conservées en lieu et place du paragraphe SPA.HEMS.130 dès lors que ces opérations sont engagées à la date de conversion du certificat de transporteur aérien et que l'exploitant est en mesure de montrer que la mise en conformité avec les exigences du règlement (UE) n° 965/2012 susvisé demanderait un effort indu et disproportionné.

L'appendice 1 au paragraphe OPS 3.005 *e* de l'arrêté du 21 mars 2011 susvisé est accepté comme moyen de conformité alternatif à l'étude de risque, à laquelle il est référé au paragraphe AMC1 CAT.POL.H.420 (*b*) de la décision n° 2012/018/R susvisée, pour la démonstration de conformité au paragraphe CAT.POL.H.420 « Exploitation d'hélicoptères au-dessus d'un environnement hostile se trouvant en dehors d'une zone habitée » de l'annexe IV au règlement (UE) n° 965/2012 susvisé.

Art. 9. – La directrice de la sécurité de l'aviation civile est chargée de l'exécution du présent arrêté, qui sera publié au *Journal officiel* de la République française.

Fait le 20 février 2013.

Pour la ministre et par délégation :
*La directrice de la sécurité
de l'aviation civile,*
F. ROUSSE