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World Leaders in Aviation Safety

Lessons learned and missed opportunities from EMAR implementation programs

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SMARRT[®]
SAFETY TOOLS



Overview

Baines Simmons experience to date

Common implementation challenges

Strategic value and ‘selling points’

Missed opportunities

Some suggestions

Experience to date

What has been Baines Simmons' involvement with EMAR implementations?

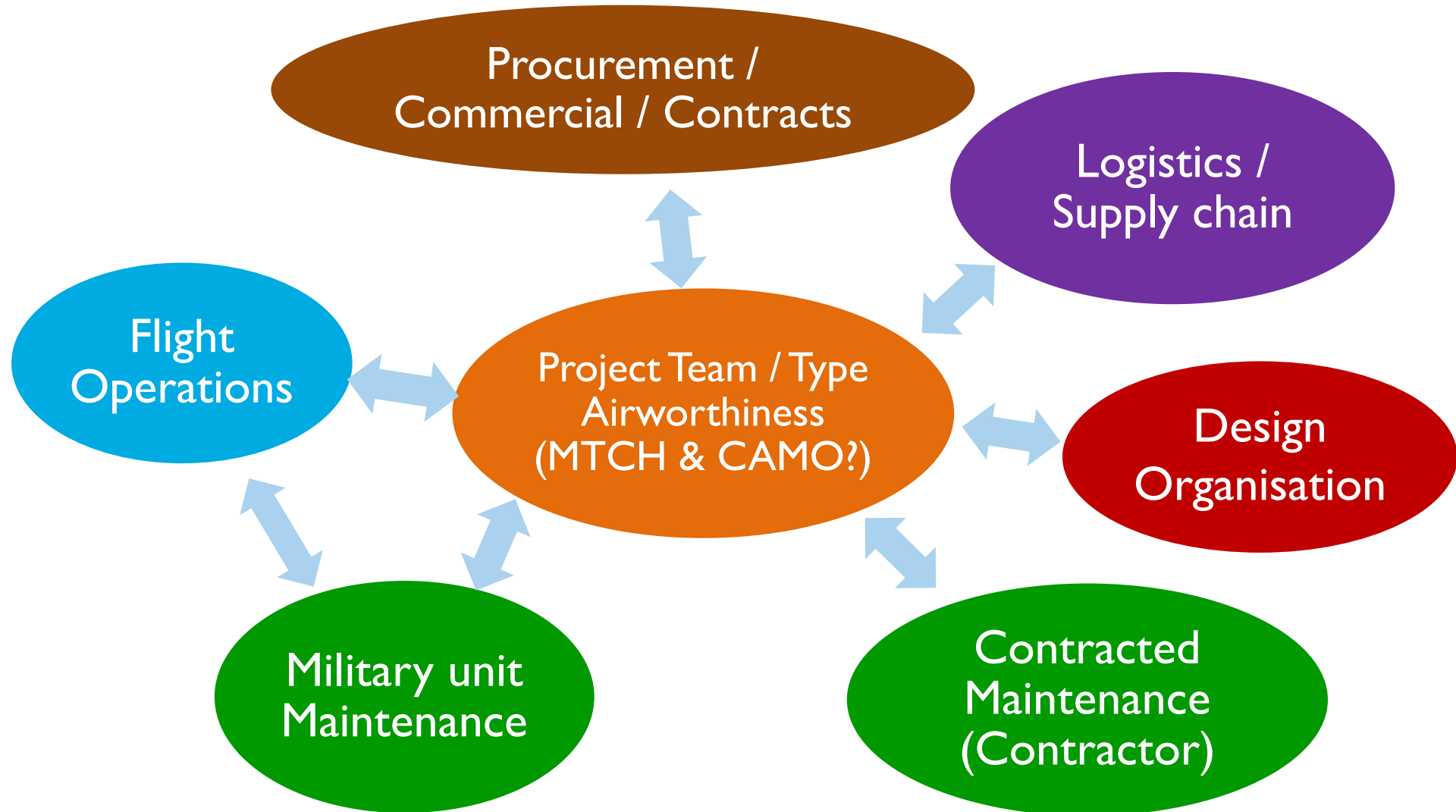
- EMAR Development support - advice, guidance, training - EDA
- Whole system set-up and implementation/Roll-out - Oman
- Regulatory system set-up and implementation Consultancy / Training – UK, Australia, Sweden and others
- MAA Outsourced oversight functions – UK, Oman
- Military unit / Commercial industry Gap Analysis / Implementation
- EMAR Training – Numerous customers EMAR 21, M, 145, 147, 66
- 'EASA' Rule implementation since 2003

Common implementation challenges

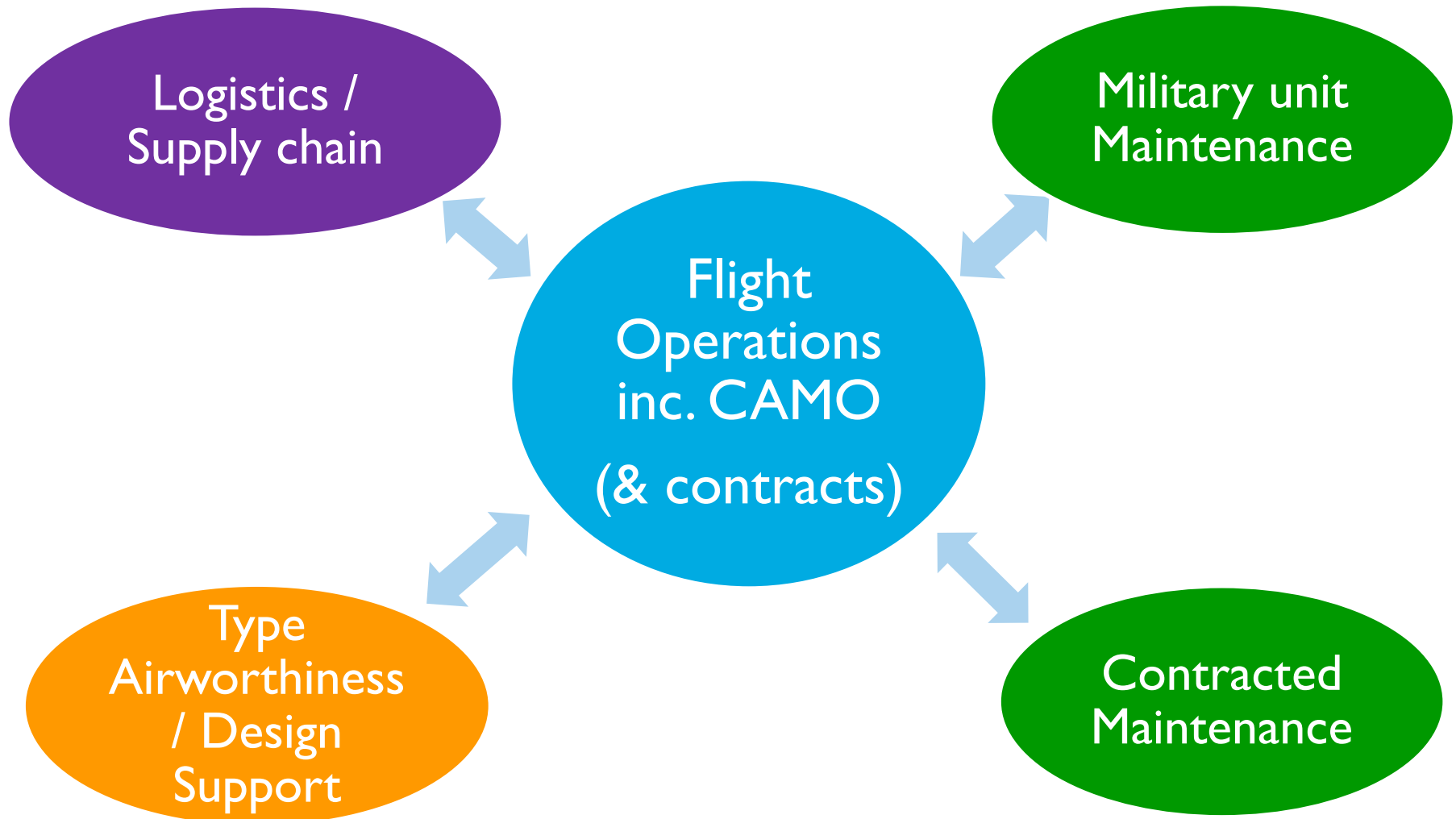
What typical challenges have been faced?

- Understanding and alignment with new philosophies – especially Approvals (vs. traditional authorisations etc), CAMO, Type Certificate Holder, Expositions/Handbooks, MAA Function
- Structure vs. Roles and Responsibilities – Trying to make the new requirements fit an existing structure – to minimise change
- Competence development – Training and sustained development is required throughout all airworthiness functions
- Adoption of revised Management, Assurance and Oversight philosophies
- Recognising the potential benefits in the new system – Strategic Leadership ‘pull and hunger’

Common Arrangements



An EMAR-based approach



The Ensuring / Assuring challenge

The EMARs are based on a Management System approach, implementing clear responsibilities and obligations

- Some nations have retained existing multi-level Assurance and Oversight structures
 - Duplication / Cost
 - Ownership of functions unclear
 - Assurance used in place of active management, in existing arrangements
 - Confidence in the system of Regulatory oversight / Internal Quality Assurance / Customer oversight?

Strategic Value Questions

What's in it for the Force, for future decades?

How will EMARs enhance our capability – our ability to fight?

How will EMARs support optimisation of our resources and funds?

How will this enhance aviation safety and allow us to focus on delivering the mission rather than worrying about safety?

How will this safeguard the reputation and perceived value to the government and the public?

What will be the Return on Investment?

How can our MAA support EMAR success?

How will the initiative support our industry partners?

Missed opportunities?

Industry questions

How can we get an EMAR approval – we want one, to compete, to tender?

How can we vary our Nation A approval to deliver work for Nation B?

Will it be easier to achieve EASA approval rather than apply for EMAR?

Military statements

We don't apply EMARs at our military units

If we issue Part 66 licenses then people will leave once they are qualified

We don't adopt EMARs, but our system is based on them, or is equivalent

We won't be able to restructure, so we will have to make the EMARs fit.

Missed opportunities / Suggestions

The EMARs reflect civil regulatory best-practice – a tried and tested international model.

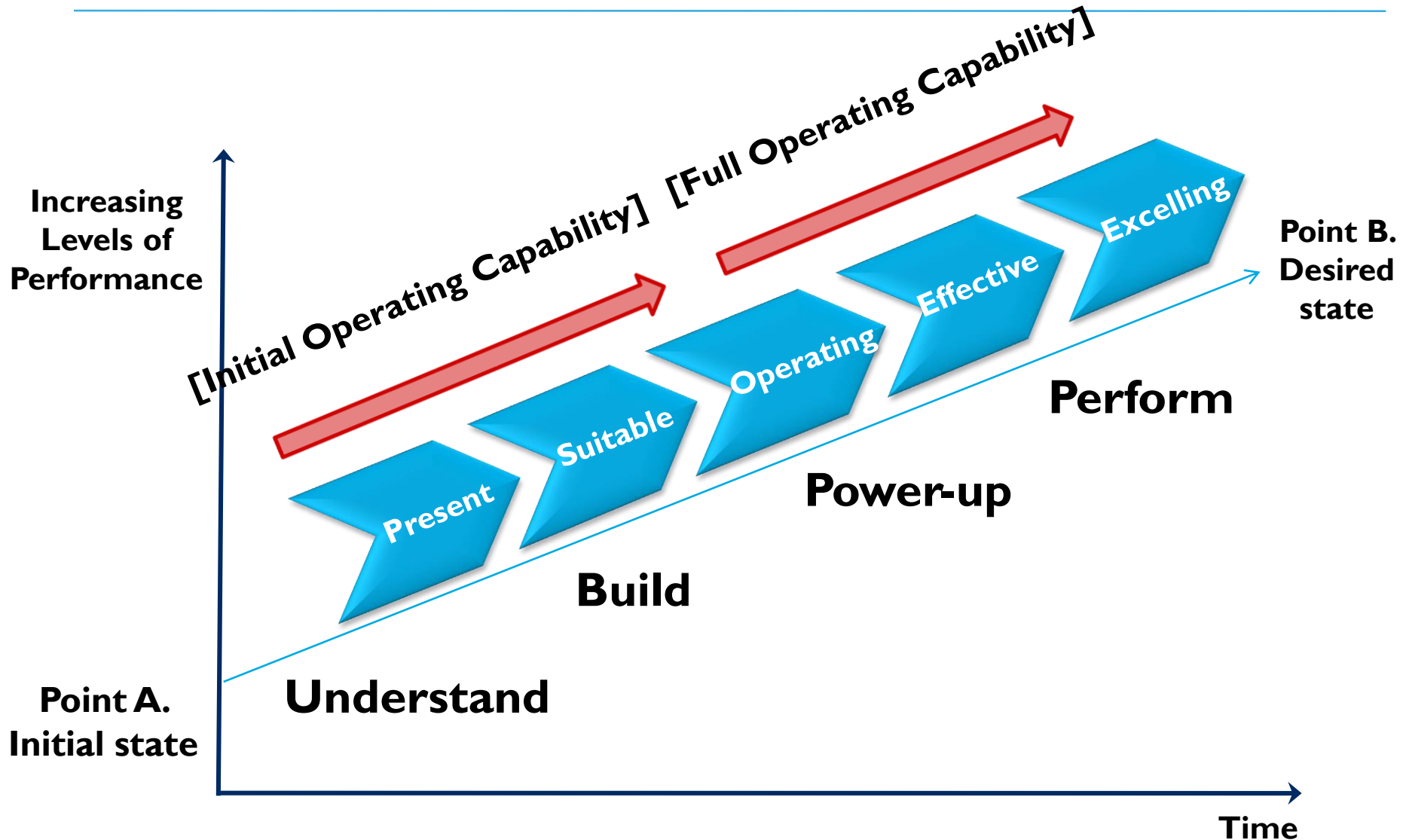
- ▶ There is no need to adapt or further develop the EMARs for local reasons – National variations make things difficult (Handbook / Exposition procedures could be used more)
- ▶ Aircraft Type and/or Customer / Operating organisation specific requirements could be addressed by contract;
 - Organisation competence and authorisation systems should be used to address customer / aircraft differences
 - Handbook / Exposition / Procedural development and NMAA approval and oversight – Customer monitoring
- ▶ Mutual recognition of EMAR approvals, by default.

Suggestions

Allow organisations to apply for an EMAR approval;

- Accept EMAR approvals as the baseline for acceptance
- Standardise pMS NMAAs
- Create or engage a central ‘organisation certification authority’
- Allow applicants to pay a fee for the approval
- Resource and support EDA to continuously review and periodically update the EMARs based on EASA Rule changes and pMS feedback.

Maturity Development



Conclusion

The full benefits of the EMARs are within reach and grasping them is not as difficult as it may seem.

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