

Cabin Safety Matters (Flight Ops)

Charlon BRINCAT

Charlon.Brincat@transport.gov.mt

The logo consists of the lowercase letters 'tm' in a white, sans-serif font, positioned on a black rectangular background. To the right of this black background is a solid orange rectangular area, which together form a larger graphic element.

tm

OAN 09/2020

Passenger Seating with 'Direct Access' to Emergency Exits Not Staffed by Cabin Crew Members

09/2020


Passenger Seating with 'Direct Access' to Emergency Exits Not Staffed by Cabin Crew Members

Issued on 14th September 2020 (3 months to become compliant). Deadline 14th December 2020.

The intent of the OAN is to provide a **VERBAL** briefing to passengers seated next to Emergency Exits with 'Direct Access' that are **NOT** staffed by Cabin Crew Members.

This OAN is applicable to all operations where cabin crew are required to conduct safety related duties as established in the type certificate of the aircraft.



OPERATIONS ADVISORY NOTICE (OAN)		 Transport Malta Civil Aviation Directorate Flight Operations Inspectorate Pantar Road, Lija, LJA2021 Malta
OAN Number: 09/2020	Issue Date: 14 th September 2020	
Subject: Passenger Seating with 'Direct Access' to Emergency Exits Not Staffed by Cabin Crew Members.		

1.0 Introduction

Following the outcome of various cabin inspections which were conducted throughout the year, TM-CAD is issuing this OAN to re-iterate the Authority's policy as applicable to aircraft type, concerning issues with regards to the occupancy of passenger seats with direct access to emergency exits where there is no cabin crew presence and the importance of carrying out a verbal pre-flight briefing for passengers seated adjacent to such exits.

2.0 General

This OAN is based on the Commission Regulation (EU) No 965/2012 and ICAO Doc 10088 – Manual on Information and Instructions for Passengers in Safety.

AMC1 CAT.OP.MPA.170, requires the operator to provide an additional briefing to passengers occupying seats with direct access to emergency exits not staffed by cabin crew members on the operation and use of such exits.

The acceptable means of compliance, AMC1 CAT.OP.MPA.165, requires that passenger seats (or seat rows) with direct access are occupied during taxi, take-off and landing, unless this would be impracticable due to a low number of passengers or might negatively impact the mass and balance limitations.

The operator shall follow and abide with the acceptable means of compliance developed by the Agency as stated in AMC2 CAT.OP.MPA.165 and must detail the suitability criteria or restriction for certain categories of passengers in their operation manuals.

Operators shall ensure that, prior to the commencement of taxi, cabin crew members shall carry out an additional verbal briefing for passengers occupying seats with direct access to emergency exits not staffed by cabin crew members.

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Passenger Seating with 'Direct Access' to Emergency Exits Not Staffed by Cabin Crew Members



The OAN has been issued following findings issued in 2019 & 2020 whereby the verbal safety briefing was being replaced by a briefing card or did not include instruction on how to operate the exit.

References used, Commission Regulation (EU) No 965/2012 and ICAO Doc 10086 - Manual on Information and Instructions for Passengers Safety.

Verbal Elements of the pre-flight briefing

- Cabin Crew Members shall verify that the passenger(s) is (are) able and willing to assist the crew in case of an emergency;
- Demonstrate the location and operation of the emergency exits;
- Comprehending the instructions for operating the exit;
- Following all the instructions given by a crew member including the signal or command to evacuate;
- Knowing when to open the exit;
- Check for hazards before opening the exit (i.e. fire, water, debris);
- Stowing (or otherwise disposing of) the exit hatch, if removable, so that it will not impede the use of the emergency exit.

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Passenger Seating with 'Direct Access' to Emergency Exits Not Staffed by Cabin Crew Members

Actions issued via Centrik to Operators (CMM)

Closed 7

Under Review 2

Open 8

Guidance for allowing virtual classroom instruction & distance learning

Virtual classroom instruction & distance learning

- CC Initial training course and examination (CC.TRA.220, Appendix 1 to Part-CC, AMC 1 Appendix 1 to Part-CC)
- Aircraft type specific training and operator conversion training (ORO.CC.125, AMC1 ORO.CC.125(c) and (d))
- Familiarisation (ORO.CC.135, AMC1 ORO.CC.135)
- Difference training (ORO.CC.130)
- Recurrent training (ORO.CC.140, AMC1 ORO.CC.140)
- Refresher training (ORO.CC.145, AMC1 ORO.CC.145, GM1 ORO.CC.145)
- Senior cabin crew member training (ORO.CC.200, AMC1 ORO.CC.200(c))
- Single cabin crew member training (ORO.CC.255)



Guidance for allowing virtual classroom instruction and distance learning

Guidelines in relation to the COVID-19 pandemic

Issue no.: 5 (first issue published)

Date: 18.08.2020

Virtual classroom instruction

- **Virtual Classroom** - A virtual environment, not physical, location where synchronous learning takes place.
- **Blended Training** - Includes different instructional methods and tools, different delivery methods, different scheduling (synchronous/asynchronous) or different levels of guidance. Blended training allows the integration of a range of learning opportunities.




OAN Number: 10/20

GUIDANCE FOR VIRTUAL CLASSROOM INSTRUCTION AND DISTANCE LEARNING

This OAN provides guidelines to operators for on-line learning to be used as part of blended training and which are meant to be included and published in their OM D.

The operator is required to:

- i. Perform a risk assessment; and
- ii. Management of Change.

OPERATIONS ADVISORY NOTICE (OAN)		 Transport Malta Civil Aviation Directorate Flight Operations Inspectorate Transport Malta Centre Triq Pantar Lija LJA 2021 Malta
OAN Number: 10/20	Issue Date: 28 September 2020	
Subject: GUIDANCE FOR VIRTUAL CLASSROOM INSTRUCTION AND DISTANCE LEARNING.		

1.0 INTRODUCTION

Following the successful use of virtual classroom training during the COVID 19 pandemic period, EASA has published [guidelines](#) which will continue to allow such training post pandemic period. Main excerpts are included in this OAN.

On-line teaching requires careful thinking about how students and teachers are equipped for the change and serious consideration about whether the teaching style is still effective when taken out from the classroom and transposed to or mixed with technological devices. Moreover, inequalities are exacerbated when it comes to access to technology and digital devices, as students may lack the connections and devices to learn remotely.

On-line learning makes extensive use of the concept of *connectivism* which is a learning theory that explains how Internet technologies have created new opportunities for people to learn and share information across the World Wide Web and among themselves. A good and thorough understanding of this theory will help course designers achieve effective learning in virtual classes as they would in a real class.

This OAN provides guidelines to operators for such training to be used as part of blended training and which are meant to be included and published in their OM D.

2.0 REQUIREMENTS FOR AOC HOLDERS WHO INTEND TO CHANGE TRAINING FORMAT FROM REAL CLASS TRAINING TO DISTANCE LEARNING OR VIRTUAL CLASSROOM INSTRUCTION.

When deciding to change distance learning, if applicable, or virtual classroom instruction, the operator needs to perform a risk assessment that, as a minimum, carefully evaluates whether:

1. Students and theoretical knowledge instructors will have access to appropriate equipment to support remote learning/instruction or the shift from face-to-face to virtual classroom training;
2. The teaching style remains effective in achieving the training objectives;
3. The remote environment can reach each training objective (not all will be achievable, such as those related to OSD in pilot training);
4. Time zone differences may impede the instructor and students to effectively conduct and attend such instruction. It may be useful to allow individual distance learning with feedback at a later stage.

Risk Assessment

Risk Assessment shall cover as a minimum the following elements;

- Appropriate IT equipment to support remote learning/instruction;
- Teaching style remains effective in achieving the training objectives;
- Remote environment can reach each training objective; and
- Consideration time zone differences.



Management of Change

- The shift from the face-to-face class to the virtual class shall be subject to a **management of change** as described in the operation manuals.
- An AOC holder outsourcing such training to third party providers shall include the verification of compliance by the third-party provider as part of the **compliance monitoring programme**.

The change from the physical tuition to a virtual one is a **major change**, requiring the prior approval of TM CAD.

OAN Number: 10/20

GUIDANCE FOR VIRTUAL CLASSROOM INSTRUCTION AND DISTANCE LEARNING

- TM CAD should have access to the virtual classrooms and sample the training.
- In the case of outsourcing, **training providers** shall provide TM CAD Flight Operations Inspectors with log in details in advance.

Article 71

Flexibility provisions

1. Member States may grant exemptions to any natural or legal person subject to this Regulation from the requirements applicable to that person pursuant to Chapter III, other than the essential requirements laid down in that Chapter, or to the delegated or implementing acts adopted on basis of that Chapter in the event of urgent unforeseeable circumstances affecting those persons or urgent operational needs of those persons, where all of the following conditions have been met:

- (a) it is not possible to adequately address those circumstances or needs in compliance with the applicable requirements;
- (b) safety, environmental protection and compliance with the applicable essential requirements are ensured, where necessary through the application of mitigation measures;

Article 71 – Flexibility Provisions

In such a case, the Member State concerned shall immediately notify the Commission, the Agency and the other Member States, through the repository established under Article 74, of the exemption granted, its duration, reason for granting it and, where applicable, the necessary mitigation measures applied.

Flexibility Provision

Exemptions - Art. 71 of BR

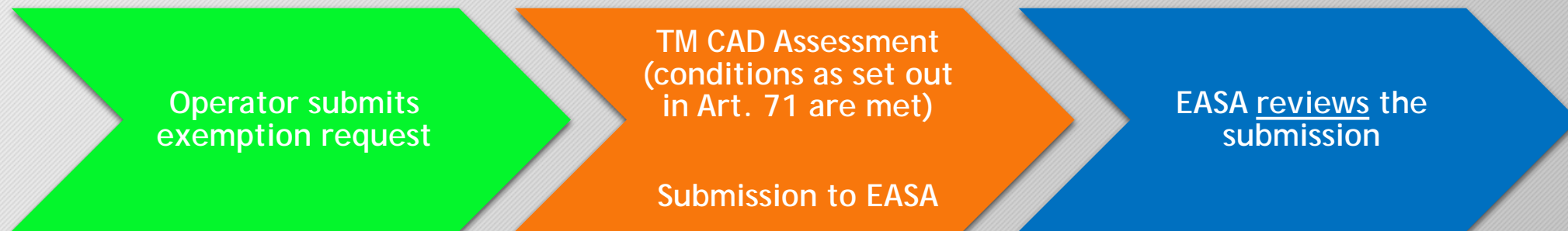
71(1)

Duration that does NOT exceed eight consecutive months.

71(2)

Exemption is granted for a duration that exceeds eight consecutive months or the same exemption has been granted repetitively and its total duration exceeds eight months.

Art. 71(1) - Process



Art 71(2) - Process

Operator submits exemption request

TM CAD Assessment
(conditions as set out in
Art. 71 are met)

Submission to EASA

EASA assesses the
submission confirming
conditions are met.

Issues a recommendation
to the Commission

Commission taking account
of the recommendation,
assess the conditions

TM CAD may revoke the
exemption subject to the
Commissions assessment

Flexibility Provision

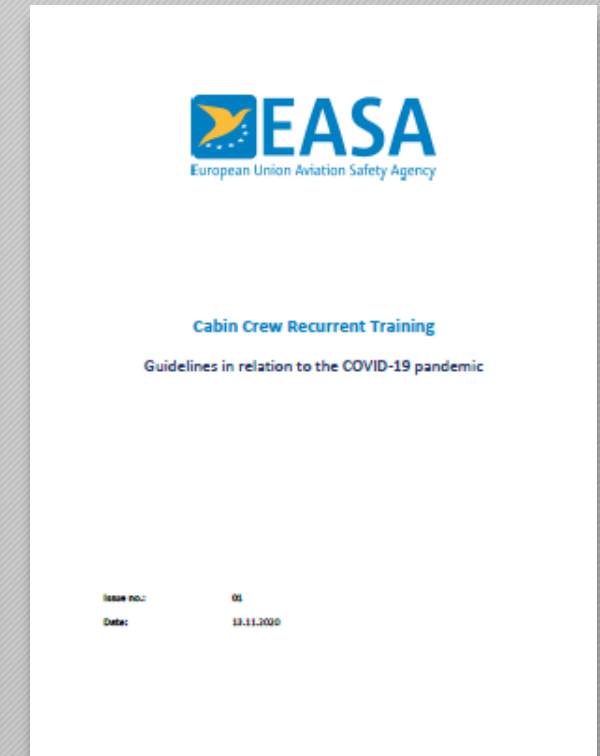
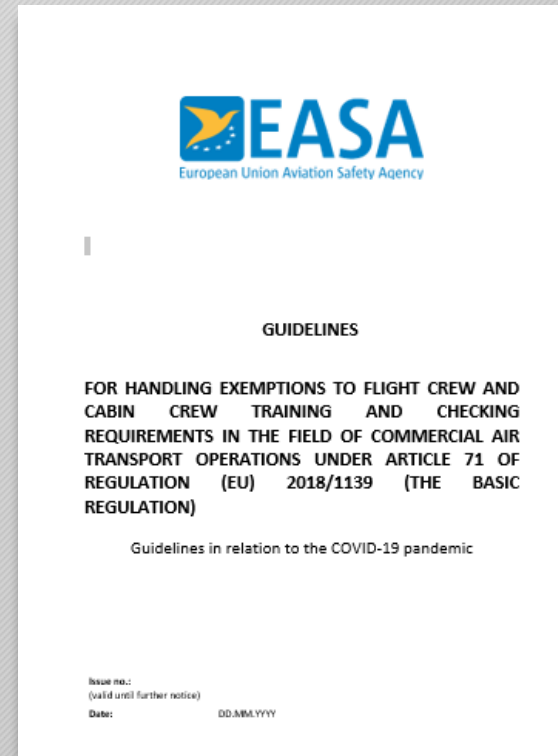
Understanding the difference between a 71(1) and 71(2) exemption is important for the operator in order to know the background work involved and the importance to submit the required documentation.

This will help to understand the guidance material that has been issued by TM CAD and EASA.

Cabin Crew Recurrent Training Guidelines in relation to the COVID-19 pandemic

Guidelines - Cabin Crew Recurrent Training

- i. Guidelines for Handling Exemptions to Flight Crew and Cabin Crew training and checking requirements in the field of CAT under article 71 of The Basic Regulation.
- ii. Cabin Crew Recurrent Training - Guidelines in relation to the COVID-19 pandemic.




Guidelines - Cabin Crew Recurrent Training

- !! These guidelines are not intended to change the existing regulatory requirements.
- !! The current situation is to be considered as temporary and these guidelines as alternative training methods that are required for the duration of the pandemic.



OAN 02/20

1. Information regarding crew recurrent training, checking and recency during the SARS-CoV-2 outbreak.
2. Guidance on revised use of Flexibility Provisions post 30 November 2020.
3. Currently Draft will be issued once Guidelines are by EASA are issued.

OPERATIONS ADVISORY NOTICE (OAN)		 Transport Malta Civil Aviation Directorate Flight Operations Inspectorate Transport Malta Centre Triq Pantar Lija LJA 2021 Malta
OAN Number: 02/20 Rev 8	Issue Date: 18 November 2020	
Subject: Information regarding crew recurrent training, checking and recency during the SARS-CoV-2 outbreak		

Guidelines - Handling Exemptions to Cabin Crew training and checking requirements

1. Applicable crew training and checking requirements should be sought as far as possible even under the "new normal".
2. RNO is not as fast as initially expected.
3. For these cases, the potential continued use of the flexibility provisions of the BR, also beyond the initial 8-month duration, needs to be considered.
4. The requirements from which exemptions may be considered for Cabin Crew is ORO.CC.140 (AMC1 ORO.CC.140).

Operators having the possibility to conduct the training shall continue to do so.



GUIDELINES

FOR HANDLING EXEMPTIONS TO FLIGHT CREW AND CABIN CREW TRAINING AND CHECKING REQUIREMENTS IN THE FIELD OF COMMERCIAL AIR TRANSPORT OPERATIONS UNDER ARTICLE 71 OF REGULATION (EU) 2018/1139 (THE BASIC REGULATION)

Guidelines in relation to the COVID-19 pandemic

Issue no.:
(valid until further notice)

Date: DD.MM.YYYY

Cabin Crew Recurrent Training Guidelines in relation to the COVID-19 pandemic

1. CC Recurrent Training guidelines primarily focus on theoretical training and their alternative training methods.

2. Further exemption above 8 months for **theoretical training will NOT be supported.**
 - i. Training elements which are conducted as theoretical instruction or as touch-drills, can be performed with the use of alternative training methods.



Cabin Crew Recurrent Training

Guidelines in relation to the COVID-19 pandemic

Issue no.: 01
Date: 19.11.2020

Cabin Crew Recurrent Training

Guidelines in relation to the COVID-19 pandemic

- Training elements which are conducted as practical instruction with individual operation or practice and **cannot be performed with the use of alternative methods** as noted in the table that is provided in the guidelines can be considered in the context of flexibility provisions.
- Consideration should be given to conduct of practical training elements on a **case-by-case basis**.
- If the training cannot be performed, the training element shall still be included in the theoretical training as a refresher of knowledge by instructor and cabin crew member discussions, videos, CBT or any other means.

Cabin Crew Recurrent Training Guidelines in relation to the COVID-19 pandemic

- All changes to the training programmes shall be approved by TM CAD before the beginning of the training.
- All training shall be documented and hold evidence that every cabin crew member has completed each stage of training and checking.

Cabin Crew Recurrent Training Exemptions

- Practical items of the annual and triennial recurrent training programmes (e.g. when actual use of fire fighting, donning of PBE etc.), can be extended provided that operators' risk assessment defines mitigation measures, including additional training.
- This additional training may include:
 - theoretical training items related to the postponed practical training;
 - touch drills in the aircraft;
 - demonstrations;
 - Videos
- If the crewmember has completed a recurrent triennial training, the validity of this training may be extended up to 12 months. In other cases, a shorter period could be an acceptable mitigating action.

Reasons for granting Article 71(2) - Urgent unforeseeable circumstances

Demonstrate and provide evidence that consideration of the following has been made and included in the SRA:

1. Proof that the service provider is **not available** to provide the required training;
2. Proof that **alternative service providers** have been contacted and are also not available;
3. Planning of the exempted training has been executed **well in advance** of the end of the validity of training, and **unexpected change in health measures** imposed the **inability to comply**.

Reasons for granting Article 71(2) - Urgent unforeseeable circumstances

4. The operator shall ensure that **due diligence** in preventing the need for an exemption has been executed.
5. A **reduction in capacity** at training facilities as result of health measures to comply with that could have not been foreseen when planning training activities.

*Exemptions request should be processed only after the operator has completed his due diligence in implementing such processes and has justified the urgency, linked with the impossibility to normally comply with the rules

Action by Operators

Operators applying for flexibility provisions shall contact the principal inspector at the earliest.

The application shall be made through Form 385 and submitted through Centrik.

The operator shall provide the following documentation in order to satisfy the criteria of the exemption.

- Form 385

- Risk Assessment/s

- Temporary OM revisions

- Justification

Cabin Crew Recurrent Training Exemptions - Quarantine

1. The quarantine itself should not be considered as a sufficient reason to grant an exemption.
2. However, if the Operator could demonstrate:
 - i. To have made the plan for training and checking events well in advance;
 - ii. To have evaluated the possibility to make the COVID test in advance and in accordance with the health measures imposed by local authorities;
 - iii. That an unexpected change in the health measures imposed and procedures to comply with, happened without allowing any solution;

Cabin Crew Recurrent Training Exemptions

- The use of actual tools (aircraft/real classroom/mock-up/simulator/equipment) should always be the first option for the conduct of cabin crew recurrent training;
- Digital tools preferably should not be used as the sole means when a higher-level desired tool (e.g. aircraft, mock-up/simulator, classroom, etc.) is available and can be used; and
- A reasonable balance between the different training methods has to be maintained.

Cabin Crew Recurrent Training Exemptions

Remember

Operators having the possibility to conduct the training shall continue to do so.

7. Table 1 – Cabin Crew Recurrent Training

Ref		Text	Training and checking methods – mitigation measures
ORO.CC.140			
(a)		Each cabin crew member shall complete annually recurrent training and checking.	x
(b)		Recurrent training shall cover the actions assigned to each member of the cabin crew in normal and emergency procedures and drills relevant to each aircraft type and/or variant to be operated.	x
(c)		Aircraft type specific training elements:	x
	(1)	Recurrent training shall include annually touch-drills by each cabin crew member for simulating the operation of each type or variant of normal and emergency doors and exits for passenger evacuation.	Actual aircraft; Mock-up/Simulator; Real classroom with representative images of exits; Computer Based Training (CBT); Web Based Training; Virtual Reality Training.
	(2)	Recurrent training shall also include at intervals not exceeding three years:	x
	(i)	operation and actual opening by each cabin crew member, in a representative training device or in the actual aircraft, of each type or variant of normal and emergency exits in the normal and emergency modes;	Actual aircraft or representative training device. Note: AMC1 ORO.CC.140 (b)(1) should be followed. Mitigating actions when exempted under Regulation (EU) 2018/1139 Article 71: Real classroom with representative images of exits; Virtual classroom; video; CBT; Web Based Training; Virtual Reality Training.

Cabin Crew Recurrent Training Exemptions

- The operating and actual opening exits in the normal and emergency modes;
- Operation of the flight crew compartment security door;
- Flight deck seat and restraint system;
- Handling of all safety and emergency equipment installed or carried on board;
- Annual donning of life-jackets, portable oxygen and PBE;
- Triennial extinguishing a fire characteristic of an aircraft interior fire;
- Triennial donning and use of PBE in an enclosed simulated smoke-filled environment;

Conclusion

- These guidelines constitute a base for the MS, air operators and EASA as an alternative and solution to address the training and compliance needs **during the pandemic period**.
- Essential components of these guidelines include pragmatism, common sense, creativity, risk-based situation management and the good will of working together towards achieving the best possible safety outcomes while ensuring that deviations from the accustomed norms result in the same standards of crew training.

