

Proposal number	Chapter number	Original text	Proposed text	Reason for change
1	AMC2 ARO.RAMP.100(c)	(a) entering ramp inspection reports into the centralised database within the timeframe defined in ARO.RAMP.145(a);	(a) entering ramp inspection reports into the centralised database WITHOUT DELAY BUT LATEST within the timeframe defined in ARO.RAMP.145(a).	The phrase "without delay" would be helpful to underline the necessity of a fast and effective data exchange
2	AMC2 ARO.RAMP.100(c)	missing	(p) Reporting to EASA, the Commission and the Member States, Contact with authorities and operators	For the tasks of the NC the following items are missing (in reference to the former App. 7):
3	AMC3 ARO.RAMP.100(c)	(b) By using the information sources and the information specified in AMC1 ARO.RAMP.100(b) and AMC1 ARO.RAMP.110, competent authorities should build a knowledge file on operators, in order to enable inspectors to verify the rectification of previously found non-compliance and to select the items to be inspected if the time available does not permit full inspection.	(b) By using the information sources and the information specified in AMC1 ARO.RAMP.100(b) and AMC1 ARO.RAMP.110, THE AGENCY should build a knowledge file on operators, in order to enable inspectors to verify the rectification of previously found non-compliance and to select the items to be inspected if the time available does not permit full inspection.	It is not the task of the national authorities to build up a knowledge file. In our opinion all data inserted into the SAFA Database are the basis for this file. So the NAA enters the data and the EASA is building up and managing the knowledge file
4	AMC4 ARO.RAMP.115(b)(2)	CHECKLIST ON-THE-JOB TRAINING OF INSPECTORS: A01 General condition <ul style="list-style-type: none"> • inappropriately pulled circuit breakers • reinforced flight crew compartment door, if required • crew baggage • flight crew seats • emergency exits (serviceability) • escape ropes (secured or not) 	CHECKLIST ON-THE-JOB TRAINING OF INSPECTORS: A01 General condition <ul style="list-style-type: none"> • inappropriately pulled circuit breakers • reinforced flight crew compartment door, if required • crew baggage • flight crew seats 	<ul style="list-style-type: none"> • emergency exits (serviceability) • escape ropes (secured or not) have to be moved to A02

5	AMC4 ARO.RAMP.115(b)(2)	A03 Equipment ACAS/TCAS II: <ul style="list-style-type: none"> • Presence • System test/passed 8.33 kHz: (if required) <ul style="list-style-type: none"> • Radio channel spacing RNAV: <ul style="list-style-type: none"> • Authorisation to perform operations in RNAV airspace. GPWS/TAWS: <ul style="list-style-type: none"> • presence • TAWS/SRPBZ for forward looking terrain avoidance function • System test (if possible) MNPS • Special authorisation 	A03 Equipment ACAS II/TCAS: <ul style="list-style-type: none"> • Presence • System test/passed 8.33 kHz: (if required) <ul style="list-style-type: none"> • Radio channel spacing RNAV: <ul style="list-style-type: none"> • Authorisation to perform operations in RNAV airspace. TAWS/E-GPWS: <ul style="list-style-type: none"> • presence • TAWS/SRPBZ for forward looking terrain avoidance function • Data Base of system (content and update) • System test (if possible) MNPS <ul style="list-style-type: none"> • Special authorisation Cockpit Voice Recorder <ul style="list-style-type: none"> • System test (if possible) RVSM: (if required) <ul style="list-style-type: none"> • Presence • Serviceability • Authorisation 	Some Typos, wrong format (e.g. MNPS in bold letter), some items missing
6	AMC4 ARO.RAMP.115(b)(2)	A06 Radio navigation / instrument charts <ul style="list-style-type: none"> • Presence of instrument approach charts (available/w within reach/ up-to-date) • Presence of en-route charts (available/w within reach/up-to-date) • Route covering 	A06 Radio navigation / instrument charts <ul style="list-style-type: none"> • Presence of instrument approach charts (available/w within reach/ up-to-date) • Presence of en-route charts (available/w within reach/up-to-date) • Route covering • FMS/GPS database validity 	wrong format, FMS/GPS missing (A03, but has influence on categorisation of A06)
7	AMC4 ARO.RAMP.115(b)(2)	A07 Minimum equipment list <ul style="list-style-type: none"> • Availability/w within reach • Up-to-date/less restrictive than MMEL • Does content reflect aircraft's equipment • Possible deferred defects/ accordance with instructions • Possible use of MMEL • Rukow odstawienie (check when possible) 	A07 Minimum <u>E</u> quipment <u>L</u> ist <ul style="list-style-type: none"> • Availability/w within reach • Up-to-date/less restrictive than MMEL • Does content reflect aircraft's equipment • Possible deferred defects/ accordance with instructions • Possible use of MMEL • Differences regarding the MEL philosophy and List of malfunctions which can be issued as separate manual / appendix or can be included in AFM - Rukow odstawienie (RLE) (check when possible) 	Different philosophy

8	AMC4 ARO.RAMP.115(b)(2)	A13 Flight preparation <ul style="list-style-type: none"> • Operational flight plan on board • Proper filling • Signed by pilot-in-command/commander (and where applicable, Dispatch) • Fuel calculation • Fuel monitoring/management • NOTAMs • Updated meteorological information • Letter Y in flight plan 	A13 Flight preparation <ul style="list-style-type: none"> • Operational flight plan on board • Proper filling • Signed by pilot-in-command/commander (and where applicable, Dispatch) • Fuel calculation • Fuel monitoring/management • NOTAMs • Updated meteorological information • ATC flight plan (presence and accuracy, designators in item 10) 	ATC designators are not only 8.33 KHz channel spacing (Y), mentioning of "Y" without mentioning the correct item can be misunderstood
9	AMC4 ARO.RAMP.115(b)(2)	A18 Oxygen equipment <ul style="list-style-type: none"> • On-board • Condition • Cylinder pressure (minimum acc. to operations manual) • Ask crew to perform the operational function check of combined oxygen and communication system • Follow practice of the flight crew Note: In the case where the inspection reveals that the smoke goggles are unserviceable this should be reported as a General Remark (Cat. G).	A18 Oxygen equipment <ul style="list-style-type: none"> • On-board (if required, depends from FL of intended flight) • Condition • Cylinder pressure (minimum acc. to operations manual) • Ask crew to perform the operational function check of combined oxygen and communication system • Follow practice of the flight crew • Eyes protecting equipment / smoke goggles (differences ICAO / EU) Note: In the case where the inspection reveals that the smoke goggles are unserviceable check the operator's national requirements (OM-A/B). Deviations from the operator's national standards should be reported as findings only if they have an impact on safety.	

10	AMC4 ARO.RAMP.115(b)(2)	<p>A20 Flight crew licence/composition</p> <ul style="list-style-type: none"> • On-board • Form/content/English translation when needed • Validity • Ratings (appropriate type) (pilot-in-command (PIC)/ATPL) • Pilots' age • Possible difference with ICAO Annex 1 (concerning the age of pilots) • In case of validation (all documents needed) • Medical assessment/ check interval • Spare eye glasses if applicable 	<p>A20 Flight crew licence/composition</p> <ul style="list-style-type: none"> • On-board • Form/content/English translation when needed • Validity • Ratings (appropriate type) (pilot-in-command (PIC)/ATPL) • Pilots' age • Possible difference with ICAO Annex 1 (concerning the age of pilots) • In case of validation (all documents needed) • Medical assessment/ check interval • Spare eye glasses if applicable • Crew composition / minimum number of crew members (available in the AFM/ AOM/ OM-A/B) 	see Pol
11	AMC1 ARO.RAMP.120(a)	(c) The competent authority should issue the approval for an unlimited duration.		A limitation for e.g. 2 or 3 years would be more practicable in order to audit the TO and renew the evaluation
12	AMC4 ARO.RAMP.120(a)(1)	has established procedures, including a quality system ensuring adequate control of the training development, preparation, delivery process and records keeping;	has established procedures, ensuring adequate control of the training development, preparation, delivery process and records keeping;	A quality system is a big burden for smaller training organisations. As the need for a quality system is not mentioned in ARO.RAMP.120, such a system should not be stipulated only in the AMC. E.g. in Part M the system is required on legislative level (MA 712)
13	AMC5 ARO.RAMP.120(a)(c)(2)	attend a recurrent training workshop at least once every 3 years or at request of the Agency to update their knowledge of the EU Ramp Inspection Programme and to promote standardisation.	attend or familiarize with the content of a recurrent training workshop at least once every 3 years or at request of the Agency to update their knowledge of the EU Ramp Inspection Programme and to promote standardisation.	As the recurrent training workshop is held only on one or two specific dates, an attendance may not be possible for each instructor
14	AMC7 ARO.RAMP.120(a)	<i>When the competent authority verifies continuous compliance of a training organisation, it should, apply the relevant provisions of ARO.GEN.115, ARO.GEN.300, ARO.GEN.305, ARO.GEN.330 and ARO.GEN.350.</i>	<i>When the competent authority verifies continuous compliance of a training organisation, it should, apply the relevant provisions of ARO.GEN.115, ARO.GEN.300, ARO.GEN.305, ARO.GEN.330 and ARO.GEN.350 ON AN ANNUAL BASIS.</i>	Without a time limitation of the evaluation (AMC1 ARO.RAMP.120(a)) an oversight interval should be recommended (e.g. at least bi-annually)
15	AMC1 ARO.RAMP.120(c)	(e) When the results of the Agency's report indicate that the training organisation meets the applicable requirements, the competent authority should approve that organisation.		Why do not the EASA itself approve the TO?

16	GM1 ARO.RAMP.125(b)	<p>UNREASONABLE DELAY</p> <p>...</p> <p>(b) In order to minimise hindrance to flight and cabin crew , the inspector should:</p> <p>(1) try to be as precise and complete as possible when asking for aircraft documents from flight crew . This should result in a minimum of discussion time, thus allow ing the flight crew to deal w ith their primary task of flight preparation;</p>	<p>UNREASONABLE DELAY</p> <p>...</p> <p>(b) In order to minimise hindrance to flight and cabin crew , the inspector should:</p> <p>(1) try to be as precise and complete as possible when asking for aircraft documents from flight crew . The inspector should be prepared and able to explain the document's content. This should result in a minimum of discussion time, thus allow ing the flight crew to deal w ith their primary task of flight preparation;</p>	Some operators / flight crew members are not properly familiarised or have different name or abbreviation of the document
17	AMC1 ARO.RAMP.125(c)	<p>(a)</p> <p>(1) Only the remarks mentioned in the POI should be reported as findings in the final ramp inspection report. Any other relevant information which was not included in the POI should only be reported in the final report as a general remark or in the additional information box.</p>	<p>(a)</p> <p>(1) Only the remarks mentioned in the POI should be reported as findings in the final ramp inspection report. Any other relevant information which was not included in the POI should only be reported in the final report as a general remark "G" or in the additional information box. Nevertheless follow -up corrective actions could be initiated and marks in the POI in accordance w ith ARO.RAMP.135 (e.g. communication to the operator / responsible CAA, flight operational restrictions etc).</p>	The finding categorisation and follow ing corrective actions are not always corresponding to the finding categories, i.a.w . ARO.RAMP.135, e.g. a missing entry permission (national requirement) is only a general remark, but the permission has to be show n before departure.
18	GM1 ARO.RAMP.130	<p>(a)</p> <p>(b)</p> <p>(c)</p> <p>(d)</p>	<p>(a)</p> <p>(b)</p> <p>(c)</p> <p>(d)</p> <p>(e) In addition also the operator's standards / requirements available in the OM-A/B on board may be checked (e.g. requirements regarding the survival equipment on board, such as smoke goggles for third country operators).</p> <p>(f) Whenever EU standards are low er than ICAO standards, then the EU standards should be applied to all EU and non-EU operators (e.g. the BR and it's IR are requiring the presence of a copy of the AOC to be on board of an aircraft, while the ICAO standards require the presence of a certified true copy of the AOC. Absence of certified true copy should not constitute a finding (provided a non-certified copy is available on board).</p>	

19	GM2 ARO.RAMP.130(b)	Notified differences may, however, be taken into account in the follow up process of the ramp inspection report (as detailed in the follow up procedures).	To prevent repetitive findings on similar items, non-compliances that have been notified and have no direct impact on safety should be reported as category G (General Remark). In addition, notified differences may be taken into account in the follow up process of the ramp inspection report (as detailed in the follow up procedures).	self-explanatory
20	GM5 ARO.RAMP.130(a)	as described in GM9 ARO.RAMP.130.	as described in GM8 ARO.RAMP.130.	There is no GM9 ARO.RAMP.130 available
21	Appendix to GM8 ARO.RAMP.130	Old flow chart	New flow chart	The Appendix shows the older flow chart from Guidance Material 2.0 and should be changed through the newer flow chart published by the SAEA Training Bulletin 2012
22	GM8 ARO.RAMP.130	(a)	(a) (b) The follow-up corrective actions could be initiated and marks in the POI in accordance with ARO.RAMP.135 (e.g. communication to the operator / responsible CAA, flight operational restrictions etc). E.g.: Smoke goggles at the work station in the cockpit u/s (broken). No ICAO reference, but the operator's regulation published in the OM requires to have the smoke goggles as a survival equipment.	The inspection team should be authorised to carry out the preventive actions to comply with the national of operator regulations, if they have an influence on safety of intended flight and / or to avoid such problem in the future.
23	GM8 ARO.RAMP.130(a)(1)	an electrical torch missing or unserviceable during a flight conducted entirely in daylight;	delete	It is a bad example, as this is only applicable for third country operators and not for EU-carriers. The example should be deleted or changed by another one
24	AMC1 ARO.RAMP.135(a)(b)(5)	Only send a communication to the operator, if the operator's response has not satisfied the inspecting authority, based on the information contained in the POI	delete	The sentence is unclear and in contradiction to ARO.RAMP.135(a)(1), that states that the operator has to be informed after the inspection. It should be further explained or deleted
25	AMC1 ARO.RAMP.135(a)(c)	... e.g. when the medical certificate does not indicate the medical class.	... e.g. when the medical certificate does not indicate the medical class or type / instrument rating validation / expiration date is not mentioned etc.	ICAO A1-5.1.1.2 IX) Certification concerning validity and authorization for holder to exercise privileges appropriate to licence;

26	AMC1 ARO.RAMP.135(a)(g)	Findings should remain 'open' as long as no satisfactory response of the operator and/or the State(s) of oversight was received. However, findings could be closed if an additional inspection confirms that appropriate corrective action was taken. When there is no satisfactory response, a comment should be added in the Centralised Database to each open finding showing no response has been received despite several reminders (possibly including date and means). Evidence of communications sent could be	Findings should remain 'open' as long as no satisfactory response of the operator and/or the State(s) of oversight was received.	An open finding is an open finding. It directly implies that there has been no or no satisfactory response. Further entries to the Centralised Database are not necessary and significantly increase the workload for states with a high number of inspections
27	AMC1 ARO.RAMP.135(b)(d)	provided that the inspecting authority has set forth provisions in its national regulation covering this case	provided that the inspecting authority is allowed to enter the aircraft in accordance with ORO.GEN.140 or has set forth provisions in its national regulation covering this case	At least for European operators, such a provision should not be necessary in accordance with ORO.GEN.140.
28	GM1 ARO.RAMP. 135(b)	... this has to be communicated immediately to the State responsible for overseeing the airworthiness of the aircraft.	... this has to be communicated immediately to the State responsible for overseeing the airworthiness of the aircraft and (if different / applicable) to the state responsible for overseeing the operator	SAFA Ramp Inspections Guidance material Version 2.0, 6.2.2 Class 3 actions, Class 3c
29	GM1 ARO.RAMP.145(b)(a)	'Standard report'	'Standard report'	Typo
30	C. DRAFT DECISION on instructions on the categorisation of findings for SAFA	— Convention on International Civil Aviation (ICAO) (also known as Chicago Convention), 9th Edition, 2006. ICAO Annex 1 (11th Edition, July 2011, Amendment 170)"	— Convention on International Civil Aviation (ICAO) (also known as Chicago Convention), 9th Edition, 2006. — ICAO Annex 1 (11th Edition, July 2011, Amendment 170)	On page 31 a line break should be inserted between Chicago Convention and Annex 1 (first line). Not all Annexes are up to the latest revision (Editions as well as Amendments) and should be revised or amendments/ revision status should be deleted
31	Page 31		Table of content	In dependence on the former Guidance material an index of contents for the list of PDFs would be appreciated, otherwise the tables are much too confusing
32	General			Generally it should be considered whether it would be better to combine the SACA/SAFA-PDF-List with inserting only an additional column for the different standards(EU/TCO). The current draft is inefficient for the inspectors on the airfield and in a printed booklet version too bulky and impractical. Additionally the results of the Trainings Bulletin 2012 should be inserted in the PDF as notes
33	General			The abbreviations E I M N O used in the column "Std." should be officially described somewhere.

34	A01 SAFA Instructions	Check if the crew composition meets the minimum crew requirements (available in the AFM) When circumstances dictate (e.g. aircraft undergoes significant delay), check whether the crew members are in compliance with the flight and duty time rules contained within the <u>Operations Manual</u> .	Move to A20	Belong to the Item A20 Flight Crew Licence / Composition - Ref.: Com Reg (CR) 965/2012 App III, Pol –Page 39
35	A01 SAFA Instructions	When circumstances dictate (e.g. aircraft undergoes significant delay), check whether the crew members are in compliance with the flight and duty time rules contained within the <u>Operations Manual</u> .	Move to A20	Belong to the Item A20 Flight Crew Licence / Composition - Ref.: Com Reg (CR) 965/2012 App III, Pol –Page 39
36	A01 SAFA	Insufficient number of flight crew members	Move to A20	Belong to the Item A20 Flight Crew Licence / Composition - Ref.: Com Reg (CR) 965/2012 App III, Pol –Page 39
37	A01 SAFA	Flight Crew member not in compliance with the flight and duty time rules	Move to A20	Belong to the Item A20 Flight Crew Licence / Composition - Ref.: Com Reg (CR) 965/2012 App III, Pol –Page 39
38	A03 SAFA		New PDF: GPWS with forward looking terrain avoidance function installed but the terrain database is expired (within MEL limits) Additional Reference: A6-I-7.4.2	To follow the philosophy of A06 Radio Navigation Charts / Nav DB and to be more precise in case of CAT 2 Finding
39	A03 SAFA	GPWS with forward looking terrain avoidance function not installed or unserviceable (outside MEL limits)	Additional Reference: A6-I-7.4.2	
40	A04 SAFA	No or incomplete parts of the Operations Manual pertaining to flight operations on board	Additional Reference: A6-I-4.3.3.2	
41	A07 SAFA	Check if the MEL is fully customised. For example, the MEL should not contain a reference to regulatory material (“ATA 23 Communication systems – Any in excess of those required by 14 CFR may be inoperative provided it is not powered by Stand by Bus and is not required for emergency procedures.”) but should mention the actual required number.	Check if the MEL is fully customised. For example, the MEL should not contain a reference to regulatory material (“ATA 23 ...”) or if equipment should become unserviceable the actions to maintain an acceptable level of safety.	ICAO A6-I-"ATTACHMENT F. MINIMUM EQUIPMENT LIST (MEL) (4), Supplementary to Chapter 6, 6.1.3
42	A08 SAFA Instructions	GM8 ARO.RAMP.130 Assessment of findings on certificates and licenses prior to categorisation	GM7 ARO.RAMP.130 Assessment of findings on certificates and licenses prior to categorisation	wrong reference number

43	A10 SAFA Instructions	Note: EU-OPS is less restrictive than ICAO on the carriage of a copy of the AOC on board: where ICAO requires a certified true copy, EU-OPS requires in OPS 1.125 that "the original or copy" is carried during each flight.	must be deleted	Wrong reference: The new OPS regulation does not say "the original or the copy" but requires: CAT.GEN.MPA.180 Documents, manuals and information to be carried (a) The following documents, manuals and information shall be carried on each flight, as originals or copies unless otherwise specified: (5) a certified true copy of the air operator certificate (AOC);
44	A10 SAFA Instructions	GM8 ARO.RAMP.130 Assessment of findings on certificates and licenses prior to categorisation	GM7 ARO.RAMP.130 Assessment of findings on certificates and licenses prior to categorisation	Wrong reference number; the same wrong reference is used throughout the document (e.g. A12, ...) <u>it should be revised everywhere</u>
45	A10 SAFA	BR 216/2008, Art. 9(2)		For the TCO-Findings in A10 the PDF-Code is missing. As additional reference the Part TCO should be used. As it is a Cat. 3 finding, clear advice for possible corrective action should be given in the Inspecting Instructions. However, it should be discussed to wait with the editing of the PDF concerning TCO until TCO-requirements are in force.
46	A12 SAFA	No English translation	No English translation of Certificate of Airworthiness	Although A12 implies that the CofA is meant, the old PDF can be difficult to understand for <u>operators having little experience with SAFA</u>
47	A13 SAFA	Note: Alternate airports do not always need to be mentioned on the ATC flight plan, e.g. flight allowed without an alternate or in the case of repetitive flight plans (RPL). In the latter case, a contact should be mentioned on the flight plan where ATC can obtain information with regard to the selected alternates for the concerned flight (see Doc 4444, Chapter 16.4.2.2)	Alternate airports do not always need to be mentioned on the ATC flight plan, e.g. flight allowed without an alternate.	The note at page 60, A13 should be shortened as agreed on ESSG#18 in Madrid
48	A13 SAFA	Alternate airport(s) (or indication of operators' contacts in case of RPL) considered in OFP but not specified in the ATS flight plan	Alternate airport(s) considered in OFP but not specified in the ATS flight plan	Correction made in the past already
49	A13 SAFA		Operational flight plan not signed by the PIC	PDF missing, signature is important to prove that the Flight Crew accepted the flight planning and fuel calculation
50	A13 SAFA	Content and use of the Operational Flight plan not in accordance with the operations manual	Additional Reference: A6-I-4.3.3.2	

51	A13 SAFA		<p>PDF Cat 2: Destination alternate fuel less than minimum ICAO requirements, but overall fuel on board more than required</p> <p>4.3.6.3 The pre-flight calculation of usable fuel required shall include:</p> <p>d) destination alternate fuel, which shall be:</p> <p>1) where a destination alternate aerodrome is required, the amount of fuel required to enable the aeroplane to:</p> <p>i) perform a missed approach at the destination aerodrome;</p> <p>ii) climb to the expected cruising altitude;</p> <p>iii) fly the expected routing;</p> <p>iv) descend to the point where the expected approach is initiated; and</p> <p>v) conduct the approach and landing at the</p>	New PDF, as presented by ESSG
52	A14 SAFA	Weight and Balance sheet	Mass and Balance Calculation	Ref.: Com Reg (CR) 965/2012 App III, Pol –Page 39; should be amended all through the document (SAFA and SACA)
53	A14 SAFA	Incorrect mass and/or balance calculations, within a/c limits, and having no effect on the performance calculations.	Mass and/or balance calculations incorrect but the performance calculations are within a/c limits. Additional Reference: A6-I-4.3.1(f)	Incorrect mass and/or balance calculations are always affecting on the performance calculations.
54	A14 SAFA	Incorrect mass and/or balance calculations, within a/c limits, but affecting the performance calculations.	Mass and/or balance calculations incorrect but the performance calculations are outside a/c limits. Additional Reference: A6-I-4.3.1(f)	
55	A15 SAFA Instructions	Note: Often HFEs in excess of those required (by MEL provisions) may be U/S, however in such a case, check against the MEL to verify compliance with the applicable (M) and/or (O) provisions. If the latter MEL actions have not been applied, a finding should be raised using the "detection/reporting/assessment of significant technical defect" procedure (see chapter 4.2 of the ramp inspection procedure).	Note: Often HFEs in excess of those required (by MEL provisions) may be U/S, however in such a case, check against the MEL to verify compliance with the applicable (M) and/or (O) provisions. If the latter MEL actions have not been applied, a finding should be raised using the "detection/reporting/assessment of significant technical defect" procedure (see GM5 APO-RAMP120).	New reference

56	A18 SAFA Instructions	Note: In the case where the inspection reveals that the smoke goggles are unserviceable this should be reported as a General Remark (Cat. G).	Note: In the case where the inspection reveals that the smoke goggles are unserviceable this should be reported as a General Remark (Cat. G). However, check the operation manual / list of survival equipment and if such equipment has to be available and serviceable, appropriate follow up measures have to be applied.	The smoke goggles are safety relevant emergency equipment
57	A20 SAFA Instructions	(last note) 28 EU Member States	Croatia new Member
58	A20 SAFA Instructions	Information about the countries which have filed a corrective action plan with ICAO, as requested by the Resolution A36-11, can be found on the ICAO FSIX web-page: http://www.icao.int/fsix/lp.cfm	Information about the countries which have filed a corrective action plan with ICAO, as requested by the Resolution A37-10, can be found on the ICAO FSIX web-page: http://www.icao.int/fsix/lp.cfm	Resolution A36-11 was already superseded by resolution A37-10 in 2011
59	A20 SAFA	A valid and appropriate Flight crew licence was issued but not carried on board at the time of the inspection	A valid and appropriate Flight crew licence or Medical certificate was issued but not carried on board at the time of the inspection	The same concept should be used both for the licence and for the medical
60	A20 SAFA	Flight Crew Licence	Flight Crew Licence / Composition	Com Reg (CR) 965/2012 App III, Pol –Page 39, should be changed all through the document
61	B04 SAFA Instructions	If the latter MEL actions have not been applied, a finding should be raised using the "detection / reporting / assessment of significant technical defect" procedure (see Chapter 4.2 above).	If the latter MEL actions have not been applied, a finding should be raised using the "detection / reporting / assessment of significant technical defect" procedure (see GM6 ARO RAMP 130).	Wrong reference
62	B09 SAFA Instructions	Note: inspectors should take into account that EU OPS 1.770 b.2(v) requires for aircraft not certified to operate above 25.000 ft. to carry sufficient oxygen supply for 10% of the passengers, whereas ICAO requires this for all passengers.	Note: inspectors should take into account that CAT.IDE.A.235(e) requires for aircraft not certified to operate above 25.000 ft. to carry sufficient oxygen supply for 10% of the passengers, whereas ICAO requires this for all passengers.	wrong reference
63	C08 SAFA			PDF codes C08-02 and C08-03 missing
64	C10C09 SAFA			The obvious repairs (C10) should be renamed as C09 (former propeller item).
65	C11C10 SAFA			Wrong inspection items (C11C10, C12C11 etc) and misleading PDF-Codes.
66	Page 173		Regulation (EC) 748/2012	Reference is mentioned in several PDFs but not mentioned as legal basis
67	Page 173		Certification specifications (CS 25 and CS 23)	Reference is mentioned in several PDFs but not mentioned as legal basis
68	Page 173		In cases where no reference in European regulations exist ICAO references stay applicable	Should be added as in several cases ICAO references are used

69	Page 173		Table of content	In dependance on the former Guidance material an index of contents for the list of PDFs would be appreciated otherwise the tables are much too confusing
70	SACA general			The columns "Std. ref." and "Standard's Text" should be formatted more accurately
71	SACA general			AMC and GM should not be referenced in the standard's column, because they are NOT standards, but only AMC/GM. Or, if necessary and requested by majority (discussed during ESSG), AMC/GM should be printed in cursive letters
72	A01 SACA Insp. Instructions A04 SACA Insp. Instructions A07 SACA Insp. Instructions ...	The presence in the cockpit of an additional crew member during all phases of the flight is considered to fully meet ICAO requirements. [...] Check that no equipment is installed such that it obviously does not meet the systems design features and emergency landing provisions in Annex 8 Part IIIA/B, Chapter 4	The presence in the cockpit of an additional crew member during all phases of the flight is considered to fully meet the requirements. [...] Check that no equipment is installed such that it obviously does not meet the systems design features and emergency landing provisions	ICAO is not the correct regulation for SACA. Also in several other Insp. Instructions, there are references to ICAO, that should be changes to the applicable EU regulations
73	A01 SACA Instructions	The presence in the cockpit of an additional crew member during all phases of the flight is considered to fully meet ICAO requirements.	The presence in the cockpit of an additional crew member during all phases of the flight is considered to fully meet EU - OPS requirements.	New reference
74	A01 SACA	Interior equipment and/or other object(s) not correctly secured or stowed	Interior equipment, baggage, cargo and/or other object(s) not correctly secured or stowed	The old PDF is misunderstood very often, as baggage is no interior equipment
75	A01 SACA	(a) in the case of aeroplanes with an MOPSC of more than 19, a door between the passenger compartment and the flight crew compartment, with a placard indicating 'crew only' and a locking means to prevent passengers from opening it without the permission of a member of the flight crew.		The standard is referenced for the PDF 'Placard "Crew only" not applied or not readable' and 'Operational flight deck markings and/or placards missing or incorrect', it should be deleted for the latter PDF
76	A01 SACA	Check if the crew composition meets the minimum crew requirements (available in the AFM). When circumstances dictate (e.g. aircraft undergoes significant delay), check whether the crew members are in compliance with the flight and duty time rules contained within the Operations Manual.	Move to A20	Belong to the Item A20 Flight Crew Licence / Crew Composition - Ref.: Com Reg (CR) 965/2012 App III, Pol –Page 39
77	A01 SACA	Insufficient number of flight crew members ORO.FC.100	Move to A20	Belong to the Item A20 Flight Crew Licence / Crew Composition - Ref.: Com Reg (CR) 965/2012 App III, Pol –Page 39

78	A01 SACA	When circumstances dictate (e.g. aircraft undergoes significant delay), check whether the crew members are in compliance with the flight and duty time rules contained within the Operations Manual	Move to A20	Belong to the Item A20 Flight Crew Licence / Crew Composition - Ref.: Com Reg (CR) 965/2012 App III, Pol –Page 39
79	A01 SACA	Flight Crew member not in compliance with the flight and duty time rules	Move to A20	Belong to the Item A20 Flight Crew Licence / Crew Composition - Ref.: Com Reg (CR) 965/2012 App III, Pol –Page 39
80	A02 SACA	CAT.OP.MPA. 165 Passenger seating	delete	The reference CAT.OP.MPA.165 (pax seating) is not necessary for the A02-item (emergency exit in the cockpit)
81	A03 SACA Instructions	some CIS-built aircraft are equipped with GPWS systems like the SSOS or SPPZ (SPBZ) that do not fulfil the ICAO requirements regarding the E-GPWS. Only the 7-channel (SRPBZ) with forward looking terrain avoidance function meets the ICAO requirement	some CIS-built aircraft are equipped with GPWS systems like the SSOS or SPPZ (SPBZ) that do not fulfil the EU requirements regarding the E-GPWS. Only the 7-channel (SRPBZ) with forward looking terrain avoidance function meets the EU requirements.	As these are the SACA PDFs the EU requirements should be relevant not the ICAO ones
82	A03 SACA Instructions	For aircraft with their first CoA issued on or after 1 March 2012, check if ACAS II, software version 7.1 is installed. This can be done by performing a test of aural warnings; version 7.1 will have the extra resolution advisory “Level off, level off” (this requirement is only applicable in the territory of the EU Member States, Iceland, Norway and Switzerland)	delete	ACAS II is applicable for SACA, hence the note is not necessary here
83	A03 SACA	ACAS II N/A or U/S (outside MEL limits) Unless otherwise provided for by Regulation (EU) No [...] /2011, turbine-powered aeroplanes with a maximum MCTOM of more than 5 700 kg or an MOPSC of more than 19 shall be equipped with ACAS II	ACAS II N/A or U/S (outside MEL limits) Unless otherwise provided for by Regulation (EU) No 1332/2011, turbine-powered aeroplanes with a maximum MCTOM of more than 5 700 kg or an MOPSC of more than 19 shall be equipped with ACAS II	Number of regulation is missing
84	A03 SACA	2.3.1 Responsibility of pilot-in-command The pilot-in-command of an aircraft shall, whether manipulating the controls or not, be responsible for the operation of the aircraft in accordance with the rules of the air, except that the pilot-in-command may depart from these rules in circumstances that render such departure absolutely necessary in the interests of safety		The standard does not really reflect the PDF and should be amended

85	A03 SACA		New PDF: GPWS with forward looking terrain avoidance function installed but the terrain database is expired (within MEL limits) Additional Reference: CAT.IDE.A.355(d) A6-I-7.4.2	To follow the philosophy of A06 Radio Navigation Charts / Nav DB and to be more precise in case of CAT 2 Finding
86	A03 SACA	GPWS with forward looking terrain avoidance function not installed or unserviceable (outside MEL limits)	Additional Reference: CAT.IDE.A.355(d) A6-I-7.4.2	
87	A04 SACA Instructions	Note: ICAO standards do not require the manuals to be written in English language. Such a case does not constitute a finding unless it is obvious that the pilot(s) do not understand the language in which the manuals are written	Note: EU regulations do not require the manuals to be written in English language. Such a case does not constitute a finding unless it is obvious that the pilot(s) do not understand the language in which the manuals are written	New reference
88	A04 SACA Instructions	Note: Annex 6 does require that specific parts of the Operations Manual be approved by the National Authority. However, the Annex does not require that proof of such approval be contained in the manual itself. It is up to each and every Contracting State to determine how they approve a manual and whether evidence of such approval is required in the manual. The absence of a specific approval does not constitute a finding		New EU reference needed
89	A04 SACA	Note: ICAO standards do not require the manuals to be written in English language. Such a case does not constitute a finding unless it is obvious that the pilot(s) do not understand the language in which the manuals are written		The notes should be given in OPS-standards instead of ICAO
90	A07 SACA Instructions	Note: Annex 6 does require that the MEL is approved by the State of Operator.	Note: ORO.MLR.105 (b) does require that the MEL is approved by the State of Operator.	ICAO requirement irrelevant for SACA PDFs; European standard is applicable
91	A08 SACA Instructions	Note: Although ICAO does not specifically allow to carry other than the original of the document, it is considered acceptable if a copy certified by the issuing authority is carried on board	Note: Although EU does not specifically allow to carry other than the original of the document, it is considered acceptable if a copy certified by the issuing authority is carried on board	Replace by European requirements
92	A08 SACA Instructions	GM8 ARO.RAMP.130 Assessment of findings on certificates and licenses prior to categorisation	GM7 ARO.RAMP.130 Assessment of findings on certificates and licenses prior to categorisation	

93	A08 SACA Instructions	E	I	The Column "Std." says "E", while the Column "Std. ref." says "AX-X", For SACA inspections, these standards should be changed to EU ones; this is a general problem for several other SACA PDFs
94	A09 SACA Instructions	Note: Certain States (e.g. United States, China) incorporate the noise certification data in the Aircraft Flight Manual and/or the Certificate of Airworthiness. Such cases are in compliance with the ICAO requirements and do not constitute a finding.	can be deleted	European rules have to be applied
95	A09 SACA Instructions	Note: Although ICAO does not specifically allow carrying other than the original of the document, it is considered acceptable if a copy certified by the issuing authority is carried on board.	Note: Although EU does not specifically allow carrying other than the original of the document, it is considered acceptable if a copy certified by the issuing authority is carried on board.	European rules have to be applied
96	A10 SACA Instructions	Check if format (layout and content) of AOC and OPS Specs is in compliance with Annex 6	Check if format (layout and content) of AOC and OPS Specs is in compliance with Appendix I to part ARO	European rules have to be applied
97	A10 SACA Instructions	GM8 ARO.RAMP.130 Assessment of findings on certificates and licenses prior to categorisation	GM7 ARO.RAMP.130 Assessment of findings on certificates and licenses prior to categorisation	Wrong reference number
98	A10 SACA Instructions	Note 1: although ICAO requires a specific layout, no finding but a Category G remark should be raised if the content is in compliance with the ICAO requirements, but the layout is different. Note 2: ICAO Annex 6 requires that the operations specifications specifically mention whether the operator is entitled to transport dangerous goods or not.	can be deleted	Requirements regarding AOC- and Ops specs layout and format are explicitly laid down in Appendices I and II of part ARO
99	A10 SACA Instructions	Check if the aircraft operation (inbound and outbound) is in compliance with the Operations Specifications (limitations, special authorisations: Low Visibility Operations (LVO) (B/P) RNAV	Check if the aircraft operation (inbound and outbound) is in compliance with the Operations Specifications (limitations, special authorisations: Low Visibility Operations (LVO) RNAV	Acc. SPA.PBN.100 B-RNAV is no longer subject to a specific approval
100	A10 SACA Instructions	Check for the TCO authorisation (presence and validity)		An European operator does not have a TCO authorisation
101	A10 SACA	Commercial Air Transport operations not in accordance with the operations specifications ARO.GEN.310 (b)	Commercial Air Transport operations not in accordance with the operations specifications ORO.GEN.125	Would be a more suitable reference
102	A11 SACA Instructions	Although ICAO does not specifically allow to carry other than the original of the document, it is considered acceptable if a copy certified by the issuing authority is carried on board.	delete	Irrelevant note as this is regularised in part CAT (CAT.GEN.MPA.180)
103	A11 SACA Instructions	GM8 ARO.RAMP.130 Assessment of findings on certificates and licenses prior to categorisation	GM7 ARO.RAMP.130 Assessment of findings on certificates and licenses prior to categorisation	Wrong reference number

104	A12 SACA Instructions	Although ICAO does not specifically allow to carry other than the original of the document, it is considered acceptable if a copy certified by the issuing authority is carried on board	should be deleted	Irrelevant note as this is explicitly regularised in part CAT (CAT.GEN.MPA.180)
105	A12 SACA Instructions	GM8 ARO.RAMP.130 Assessment of findings on certificates and licenses prior to categorisation	GM7 ARO.RAMP.130 Assessment of findings on certificates and licenses prior to categorisation	Wrong reference number
106	A12 SACA	Regulation (EU) no 478/2012, Subpart H, 21.B.325	Regulation (EU) no 748/2012, Subpart H, 21.B.325	Regulation number wrong
107	A12 SACA	Regulation (EU) no 478/2012, Annex I, Appendices	Regulation (EU) no 748/2012, Annex I, Appendices	Regulation number wrong
108	A12 SACA	CofA not issued nor rendered valid by the State of registry CAT.GEN.MPA.180(a)	CofA not issued nor rendered valid by the State of registry Regulation (EU) no 748/2012, Subpart H, 21.B.325	Subpart H is the better reference for this PDF as CAT.GEN.MPA.180(a) says nothing about the issuance of the CofA
109	A13 SACA Instructions	Note: in line with the previous note, A6-I-4.3.5.2 only requires that the IFR flight "(...) shall not be commenced unless information is available which indicates that (...)"; there is no requirement that the information needs to be on board	should be deleted	in CAT.GEN.MPA.180(a) it is clearly said that the respective documents have to be on board
110	A13 SACA Instructions	Note: From the standard A6-I-4.1.1 it results that the operator/flight crew has to be aware of the availability (usually held in Notams) of ground and/or water facilities. As long as the flight crew is aware of it, there is no requirement to carry on board the Notams and no finding should be raised	should be deleted	CAT.GEN.MPA.180(a) clearly says that NOTAMs have to be on board
111	A13 SACA	No copy of the operational flight plan retained on the ground ORO.MLR.115(b)	No copy of the operational flight plan retained on the ground A6-I-4.3.3.1	in the named references there is no requirement that a copy of the OFP has to be retained on the ground. ICAO reference is much more precise
112	A13 SACA	No weather forecast available indicating that the destination or destination alternate aerodrome conditions are at or above minima	CAT.GEN.MPA.180(a) The following documents, manuals and information shall be carried on each flight, as originals or copies unless otherwise specified: (18) appropriate meteorological information	Should be added as additional reference
113	A13 SACA	Actual weather and weather forecast not checked before departure	CAT.OP.MPA.150	Reference should be deleted as there is no relevant information regarding the respective PDF
114	A13 SACA		PDF Cat 2: Destination alternate fuel less than minimum ICAO requirements, but overall fuel on board more than required CAT.OP.MPA.150(b) and AMC3 CAT.OP.MPA.150(b)	New PDF, as presented during ESSG

115	A14 SACA	Insufficient data to enable the crew to check the Mass & balance calculations E I	Insufficient data to enable the crew to check the Mass & balance calculations E	Wrong Std.
116	A14 SACA	Insufficient data to enable the crew to check the Mass & balance calculations CAT.POL.MAB.105	Insufficient data to enable the crew to check the Mass & balance calculations CAT.POL.MAB.105 (a)	Consistent numbering
117	A14 SACA	No mass and balance calculations performed Cat.POL.MAB.100	No mass and balance calculations performed CAT.OP.MPA.175 (b)(1)	Reference might be more appropriate
118	A15 SACA instructions	see chapter 4.2 of the ramp inspection procedure	see GM 6.ARO.RAMP.130	Old reference
119	A15 SACA	HFE not marked with the appropriate operating instructions CAT.IDE.A.100 (e), CS 25.1411,...	HFE not marked with the appropriate operating instructions A8-III A-8.3	both references should be deleted as there is no relevant information regarding the respective PDF, as they say nothing about operating instructions. A8-III A-8.3 is a more appropriate reference
120	A16 SACA Instructions	ICAO does not require, ICAO requires	EU-OPS does not require, EU-OPS requires	For the SACA GM, EU requirements should be relevant, not the ICAO ones
121	A17 SACA Instructions	A seat belt only does not meet the ICAO requirements for a safety harness	A seat belt only does not meet the EU requirements for a safety harness	For the SACA GM, EU requirements should be relevant, not the ICAO ones
122	A18 SACA Instructions	ICAO does not require...	EU-OPS does not require...	For the SACA GM, EU requirements should be relevant, not the ICAO ones
123	A18 SACA Instructions	Note: In the case where the inspection reveals that the smoke goggles are unserviceable this should be reported as a General Remark (Cat. G).	Note: In the case where the inspection reveals that the smoke goggles are unserviceable this should be reported as a General Remark (Cat. G). However, check the operation manual / list of survival equipment and if such equipment has to be available and serviceable, appropriate follow up measures have to be applied.	The smoke goggles are safety relevant emergency equipment. Especially, when smoke goggles are part of the PBE (no full face, but mask with goggles), i.e. w. CAT.IDE.A.245 a Cat. 3 should be applied.
124	A20 SACA Instructions	GM8 ARO.RAMP.130 Assessment of findings on certificates and licenses prior to categorisation	GM7 ARO.RAMP.130 Assessment of findings on certificates and licenses prior to categorisation	Wrong reference number
125	A20 SACA Instructions	Information about the countries which have filed a corrective action plan with ICAO, as requested by the Resolution A36-11, can be found on the ICAO FSIX web-page: http://www.icao.int/fsix/lp.cfm	Information about the countries which have filed a corrective action plan with ICAO, as requested by the Resolution A37-10, can be found on the ICAO FSIX web-page: http://www.icao.int/fsix/lp.cfm	Resolution A36-11 was already superseded by resolution A37-10 in 2011
126	A20 SACA Instructions	ICAO urges Contracting States to take a flexible approach towards States which made progress with regard to their implementation plans for language proficiency. Therefore, for those States no cat. 3 findings should be raised		Note should be deleted as there is a concrete requirement in part-FCL (FCL.055) which should overrule ICAO requirements
127	A20 SACA	No crew member holds a valid R/T licence/rating FCL.740(a)		Reference should be deleted as there is no relevant information regarding the respective PDF

128	A20 SACA	No declaration of licence differences compared to ICAO standards		PDF should be deleted completely. Licences of EU carriers shall be compliant with EU requirements, which per se should not deviate from ICAO standards. Therefore PDF no.1 of A20 (Form and/or content not in compliance with Appendices I and VI to ANNEX VI PART-ARA) should be sufficient
129	A20 SACA	No endorsement of the required English language proficiency and/ or level lower than Level 4		For European operators it is completely irrelevant whether they filed a difference from ICAO requirements. They have to comply with part-FCL requirements. Therefore, all ICAO references should be deleted and all reference in the PDFs regarding corrective actions filed to ICAO as well. Anyway, all those findings constitute a deviation which are incorporated by finding no. 1 (Form and/or content not in compliance with Appendices I and VI to ANNEX VI PART-ARA)
130	A20 SACA	No English translation of ICAO required items of the licence	No English translation of EU required items of the licence	For the SACA GM, EU requirements should be relevant, not the ICAO ones
131	A20 SACA	No mention of ICAO medical class	No mention of medical class	For the SACA GM, EU requirements should be relevant, not the ICAO ones
132	A20 SACA	Flight crew member without appropriate licence	A1-1.2.1	Reference missing, Typo, however it should be changed through the applicable EU one
133	A20 SACA	No appropriate type rating on flight crew member's licence; CC-32a, CC-40		References can be deleted. For the SACA GM, the European references should be sufficient
134	A23 SACA	Deferred defect closed after the deadline	Deferred defect closed after the deadline AND AIRCRAFT IN OPERATION DURING THAT PERIOD.	Occasionally misunderstood or misinterpreted by inspectors
135	A23 SACA	Rectification interval set in the ATLB exceeding the rectification interval prescribed by the MEL (but still within the MEL rectification interval)	INCORRECT MEL ITEM INTERVAL APPLIED, BUT ACTUALLY CORRECT MEL INTERVAL STILL IN LIMITS	Original text is hard to understand
136	A23 SACA	Maintenance personnel working on the aircraft without using appropriate tooling and/or technical data Annex I to Regulation (EC) No 216/2008, 3.a.1 BR 216/2008 Annex IV Art. 6 a (iv) & 8 a		Error in formatting, BR 216/2008 Annex IV Art. 6.a (iv) to be deleted

137	B01 SACA	6.a. The aircraft must not be operated unless: (i) the aircraft is in an airworthy condition; (ii) the operational and emergency equipment necessary for the intended flight is serviceable; (iii) the airworthiness document of the aircraft is valid; and (iv) the maintenance of the aircraft is performed in accordance with its maintenance programme. 6.d. The aircraft must not be operated unless it is released to service by qualified persons or organisations, after maintenance. The signed release to service must contain in particular, the basic details of the		NO RELATION TO PDF: Cabin equipment not properly secured; referenced legislation doesn't mention that equipment has to be secured Mismatch between Std. Ref. and Std. text
138	B01 SACA	Lavatory inoperative (not placarded as such and not confirmed with MEL restrictions if any) 2.a.3. The pilot in command must be satisfied that: (iii) instruments and equipment as specified in point 5		Wrong reference. The intent of point 5 probably does not include lavatories ("An aircraft must be equipped with all navigation, communication and other equipment necessary for the intended flight, taking account of air traffic regulations and rules of the air applicable during any phase of the flight.")
139	B01 SACA	Galley/lavatory waste receptacle access door cover inoperative (outside MEL limits)	Annex IV to Regulation 216/2012 8.a.3	Reference completely missing
140	B02 SACA	The following aeroplanes shall be equipped with a life-jacket for each person on board or equivalent flotation device for each person on board younger than 24 months, stowed in a position that is readily accessible from the seat or berth of the person for whose use it is provided: (1)....landplanes operated over water at a distance of more than 50 NM from the shore or taking off or landing at an aerodrome where the take-off or approach path is so disposed over water that there would be a likelihood of a ditching; and (2)....seaplanes operated over water. (b)....Each life-jacket or equivalent individual flotation device shall be equipped with a means of electric illumination for the purpose of facilitating the location of persons	The following aeroplanes shall be equipped with a life-jacket for each person on board or equivalent flotation device for each person on board younger than 24 months, stowed in a position that is readily accessible from the seat or berth of the person for whose use it is provided: (1)....landplanes operated over water at a distance of more than 50 NM from the shore or taking off or landing at an aerodrome where the take-off or approach path is so disposed over water that there would be a likelihood of a ditching; and (2)....seaplanes operated over water. (b)....Each life-jacket or equivalent individual flotation device shall be equipped with a means of electric illumination for the purpose of	THE FULL LEGISLATION TEXT BLURRES THE DETAILS, PLEASE HIGHLIGHT THE REAL FACTUAL WORDS, INSTEAD; THIS NOTE APPLIES TO THE FULL FINDING DOCUMENT AND IS AS A GENERAL CRITIQUE APPLICABLE
141	B02 SACA	Cabin Crew seat(s) obviously not installed correctly (more than 15 degrees from the longitudinal axis)		LEGISLATION REFERENCED DOES NOT STIPULATE REQ FOR 15 DEG ETC.; THEREFORE SEEN AS INAPPROPRIATE REFERENCE

142	B03 SACA Instructions	Note: A First-Aid kit or a Medical kit or a universal precaution kit is only an ICAO recommendation.	to be deleted	Requirement might only be an ICAO recommendation but is a EU regulation requirement. For the SACA GM, EU requirements should be relevant, not the ICAO ones
143	B03 SACA Instructions	ICAO does not require	EU or EU-OPS or reg (EU) 965/2012 do not require	For the SACA GM, EU requirements should be relevant, not the ICAO ones
144	B03 SACA	Medical supplies not at the indicated location CAT.OP.MPA.170	Medical supplies not at the indicated location CS 25.1411 (b)(1)	Should CS material be regarded as valid reference, CS 25.1411 would be a more suitable reference
145	B03 SACA	Contents of the first aid kit past expiration date	(b) First-aid kits shall be: (1) readily accessible for use; and (2) kept up to date.	Point (b) should be added as a reference as here is the explicit reference to the specific finding
146	B04 SACA Instructions	(see Chapter 4.2 above).	(see GM 6 ARO.RAMP.130 above).	Out-dated reference
147	B04 SACA	HFE not marked with the appropriate operating instructions		LEGISLATION REFERENCED DOES NOT STIPULATE REQM FOR OPERATING INSTRUCTION.; THEREFORE SEEN AS INAPPROPRIATE REFERENCE
148	B04 SACA	HFE not at indicated location	CAT.GEN.MPA.105	reference should be added additionally for a consistent numbering with respect to exactly the same finding for FAKs
149	B04 SACA	HFE not marked with the appropriate operating instructions CS 25.1411	HFE not marked with the appropriate operating instructions CAT.GEN.MPA 105	Would be a more appropriate reference as the PDF does not deal with accessibility
150	B04 SACA	HFE not correctly secured CS 25.561(a)	HFE not correctly secured CS 25.561(c)	Dealing with equipment CS 25.561(c) would be more appropriate as a reference
151	B05 SACA Instructions	... ICAO / see Annex 6 references below)		ICAO must be changed into EU / EU-OPS or reg (EU)965/2012, respectively. Reference to Annex 6 must be deleted as there are no such references
152	B05 SACA	Life-jackets / equivalent flotation not easily accessible and required for the type of flight	Life-jackets / equivalent flotation DEVICE not easily accessible and required for the type of flight	TYPO: MISSING WORD: DEVICE
153	B07 SACA	PDF text is missing	Insufficient number of independent portable lights for each crew member	
154	B08 SACA	No equipment for making the pyrotechnical distress signals when required for operated over areas in which search and rescue would be especially difficult		WORDS MISSING OR MIXED UP
155	B08 SACA	Portable ELT not at indicated location		AMBIGIOUS WORD: NOT AVAILABLE AT ALL OR NOT AT INDICATED LOCATION, BUT IN ANOTHER PLACE? PLS CLARIFY
156	B09 SACA	Oxygen equipment not readily accessible and required for the type of flight CAT.OP.MPA.285	Oxygen equipment not readily accessible and required for the type of flight CS 25.1411 (b)(1)	Should CS material be regarded as valid reference, CS 25.1411 would be a more suitable reference, as this is a cabin item not a flight deck item

157	B09 SACA	Oxygen equipment not adequately marked with its operating instructions		LEGISLATION REFERENCED DOES NOT STIPULATE REQM FOR OPERATING INSTRUCTION.; THEREFORE SEEN AS INAPPROPRIATE REFERENCE
158	B09 SACA	Oxygen bottles not correctly secured CS 25.561, CS 25.562 (a), (b)	Oxygen bottles not correctly secured CS 25.561, CS 23.561 (a), (c)	Wrong reference; plus point c is much more relevant than point b
159	B10 SACA Instructions	ABC = Aircraft Briefing Card	should be deleted	They are called safety briefing cards in regulation (EU) 965/2012
160	B12 SACA	Access to emergency exits impeded by baggage or cargo CS 25.803 / CS 25 813	Access to emergency exits impeded by baggage or cargo CAT.OP.MPA.160	A CS cannot be used as a basic reference for exits being impeded by baggage or cargo. During certification there will probably be no baggage in the way. Therefore an OPS reference is more appropriate
161	B14 SACA	Seat(s)/baby berth(s) not certified to be installed on board of aircraft CAT.IDE.A.205	Seat(s)/baby berth(s) not certified to be installed on board of aircraft CS 25.785	CAT.IDE.A.205 does not say anything about certification. Therefore, in this case a CS reference would be more suitable
162	C01 SACA Instructions	ICAO	EU	For the SACA GM, EU requirements should be relevant, not the ICAO ones
163	C01 SACA	Paint damage with exposed composite		NORMALLY OVERDONE FINDING IN CAT 2; HEAVILY MISUSED IN SAFA (NOT HELPING ITS CREDIBILITY), VERY LIMITED EFFECT ON SAFETY - RATHER MINOR FINDING
164	C01 SACA	Pressure port(s) damaged or contaminated	Pressure port(s) damaged or contaminated OUTSIDE AMM LIMITS	CAT 3 OUTSIDE LIMITS OR CAT 2
165	C01 SACA	Poor condition of de-icing system	CS 25.929 could be added as a more precise reference	Should CS material be regarded as valid reference, CS 25.929 could also be added as a more precise reference to this PDF
166	C03 SAFA	Flight controls unserviceable I	Flight controls unserviceable E	European reference given, but "I" in column "Std."
167	C08 SAFA	Propeller de-icing system unserviceable (outside MEL/AMM limits)	CS 25.929 could be added as reference	Should CS material be regarded as valid reference, CS 25.929 could also be added as a reference to this PDF
168	C09 SAFA ff.	C10C09 C11C10 C12C11		All inspection item numbers wrong
169	D01 SACA	Cargo bay smoke detection test fail or outside MEL limits	CS 25.858	Should CS material be regarded as valid reference, CS 25.858 could also be added as a reference to this PDF
170	D01 SACA	Unserviceable fire extinguishing system and the affected cargo compartment is used	CS 25.858	Should CS material be regarded as valid reference, CS 25.858 could also be added as a reference to this PDF
171	D02 SACA	Incorrect or incomplete information in NOTOC, not concerning CAO packages SPA.DG.105	Incorrect or incomplete information in NOTOC, not concerning CAO packages SPA.DG.110	No. of reference is wrong, but standard's text is right

172	D02 SACA	Incorrect or incomplete information in NOTOC concerning CAO packages SPA.DG.105	Incorrect or incomplete information in NOTOC concerning CAO packages SPA.DG.110	No. of reference is wrong, but standard's text is right
173	D02 SACA	Required identification tag not properly filled in or partly invisible (no CAO packages inside)	DOC 9284 (part 7)	An additional reference to DOC 9284 as in SAFA GM would make the PDF easier to understand
174	D02 SACA	Required identification tag missing (CAO packages inside)	DOC 9284 (part 7)	An additional reference to DOC 9284 as in SAFA GM would make the PDF easier to understand
175	D02 SACA	Dangerous goods carried as limited quantities or excepted quantities but limits exceeded	DOC 9284 (part 3)	An additional reference to DOC 9284 as in SAFA GM would make the PDF easier to understand
176	D02 SACA	Hazardous and/or radioactive contamination not removed	A18 - 8.6	An additional reference to Annex 18 as in SAFA GM would make the PDF easier to understand
177	D02 SACA	Required NOTOC missing SPA.DG.105	Required NOTOC missing SPA.DG.110	No. of reference is wrong, but standard's text is right
178	D02 SACA	DG carried in the cabin or on the flight deck not permitted by the provisions of the technical instructions	A18 - 8.5	An additional reference to Annex 18 as in SAFA GM would make the PDF easier to understand
179	D02 SACA	No access to DG packages labelled "Cargo aircraft only" where required	A18 - 8.9	An additional reference to Annex 18 as in SAFA GM would make the PDF easier to understand

Additional comments	

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As there are now two different guidance materials for SAFA and SACA inspections it should be considered if the EU-OPS requirements are still applicable to foreign aircraft	
In our opinion the usage of certification specifications as legal basis for ramp inspections is not legitimate. As the name already says it is a basis for certification not for continuing oversight	

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