

# NOTICE OF PROPOSED AMENDMENTS (NPA)



**NPA 2024-6**

**Additional Flight Operations amendments 2024**

## Notice of Proposed Amendment - NPA 2024-6

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### 1. Introduction

This Notice of Proposed Amendment proposes several amendments to the Flight Operations GARs stemming from a review by the ODCA and 2-REG of Parts 121, 125 and 135.

### 2. Consultation Categories

This Notice of Proposed Amendment is offered to interested parties for both information and public consultation. The proposals in this NPA fall into three categories, as follows:

Category 1: Information only. This applies to those proposals that would have no material impact on interested parties, or codify policies and practices that are already in use, or are adaptations to external developments that cannot be influenced by Guernsey.

Category 2: Comments invited on proposed implementation period only. This applies to proposals that ensure compliance of GARs with amendments of ICAO Annexes or other mandatory external standards, or from audits. Interested parties may comment on the proposed publication period but not on the substance of the change. Any comment for extending the implementation period should be substantiated with the reason and supported with evidence. It should be borne in mind that whilst the proposed implementation period starts on the publication date of the GAR revision, interested parties can start preparing for implementation from the moment that this NPA is published. The effective implementation period for interested parties is therefore longer.

Category 3: Comments invited on both the proposed implementation period and the substance of the change. This applies to those changes that may have a material effect on interested parties. Comments that propose changes to the substance of the proposal should state the reason and preferably contain an alternative text proposal, and be supported with evidence. Any comment for extending the implementation period should be substantiated with the reason and supported with evidence.

### 3. Method of Consultation

Interested parties should use the commenting form as published on [www.2-reg/consultations](http://www.2-reg/consultations) for submitting their comments.

### 4. Timelines

The commenting period for this NPA is four weeks. All comments received by 16 December 2024 will be processed by the Guernsey Office of the Director of Civil Aviation (ODCA).

It is expected that this process will take 1 month and result in publication of the revised GARs on 15 January 2025. The changes that would materially affect interested parties would then become effective 3 months after that, i.e. 15 April 2025. Changes that have no effect or would be a relaxation will become effective on the publication date.

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### 5. List of Proposals

Proposal no.	Title of proposal	Consultation category	Interested parties*	Proposed effectivity date
1	GAR 125.910: editorial correction	1	POC holders	15 Jan. 2025
2	GAR 121/135.1135: addition of validity for alternate seat qualifications	3	AOC holders	15 April 2025
3	GAR 121/135.1120 and .1145: transfer of requirements for line checker from flight examiner requirements (.1145) to operator line check requirements (.1120)	2	AOC holders	15 April 2025
4	GAR 125 Appendix B: new sample of POC Operations Specification	1	POC holders	15 Jan. 2025

\*CAMO/TC: Technical Coordinator/AMO/Operator/Owner

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### 6. The proposals

#### 6.1 Proposal 1 – GAR 125.910: editorial correction

<b>Reason:</b>	A consequential change of proposal 40 of NPA 2022-5, which was adopted in revision 10 of GAR 91/125, was an editorial change to the introductory paragraph of 125.910. This was however omitted at the time. This is now corrected. Proposal 40 made training for ACAS applicable to all operations involving ACAS equipped aircraft, not only commercial air transport operations.
<b>Justification:</b>	Editorial correction only
<b>Safety impact:</b>	Neutral
<b>Regulatory verification:</b>	Not applicable

Current GAR 125.910 text	Proposed GAR 125.910 text
The operator shall ensure, by use of appropriate procedures, that the requirements of 91.910 (a) to (d) are met and, in addition, 125.910(e).	The operator shall ensure, by use of appropriate procedures, that the requirements of 91.910 (a) to (e) are met.

#### 6.2 Proposal 2 – GAR 121/135.1135: addition of validity for alternate seat qualifications

<b>Reason:</b>	Currently, no validity is stipulated for alternate seat qualifications.
<b>Justification:</b>	Although ICAO does not require such a validity to be set, it is good practice to do so. A 12 month validity is proposed, which is the same as that set by EASA.
<b>Safety impact:</b>	Positive.
<b>Regulatory verification:</b>	ICAO: none Guernsey ANL: none

Current GAR 121/135.1135(a) text	Proposed GAR 121/135.1135(a) text
The competency assessment programme shall specify those pilots that may be required to operate in an alternate pilot seating position and will require left hand/right hand seat competency checks.	The competency assessment programme shall specify those pilots that may be required to operate in an alternate pilot seating position and shall require left hand/right hand seat competency checks with a validity of 12 months plus the remainder of that twelfth month.

#### 6.3 Proposal 3 – GAR 121/135.1120 and .1145: transfer of requirements for line checker from flight examiner requirements (.1145) to operator line check requirements (.1120)

<b>Reason:</b>	Currently, a person conducting an operator line check (OLC), called herein line checker, must meet the flight examiner requirements as codified in 121/135.1145. This includes the requirement that the line checker must be
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	qualified on the aircraft type on which the OLC is performed. This is not required by ICAO and considered too onerous. EASA does neither require this. It is therefore proposed to transfer the line checker requirements from .1145 to the section which prescribes the OLC (.1120). The requirement that the line checker is acceptable to the Director is replaced by a requirement that the line checker is notified to the Director.
<b>Justification:</b>	Whilst these changes constitute an alleviation, they are considered justified as they still well exceed ICAO standards and now align with EASA standards, which are generally considered as amongst the world's most stringent.
<b>Safety impact:</b>	See justification.
<b>Regulatory verification:</b>	ICAO: none Guernsey ANL: none

Current GAR text	Proposed GAR text
<b>121/135.1145(c)</b>	<b>91/135/121.700c2</b>
Flight examiners conducting operator line checks (OLC) shall be: (1) nominated by the operator in accordance with the approved competency assessment programme; and (2) provided with suitable training, as specified within the approved training programme; and (3) acceptable to the Director.	[Deleted and made reserved to save existing subparagraph numbering]
<b>121/135.1120(d)</b>	<b>121/135.1120(d)</b>
void	The OLC shall be conducted by a suitably qualified commander nominated by the operator and notified to the Director, trained in CRM concepts and the assessment of CRM skills.

### 6.4 Proposal 4 - GAR 125 Appendix B: new sample of POC Operations Specification

<b>Reason:</b>	Update of POC Operations Specification format
<b>Justification:</b>	To include latest revision of POC Operations Specification format
<b>Safety impact:</b>	Neutral
<b>Regulatory verification:</b>	ICAO: none Guernsey ANL: none

Current GAR 125 text	Proposed GAR 125 text
[sample of POC Operations Specification rev. 5]	[sample of POC Operations Specification rev. 9]