



# IS-BAO POLICY



## IS-BAO Policy 2010-06 - Revised

### Subject – IS-BAO Implementation Confirmation Letter

Effective: December 7, 2010

#### 1. Purpose

The purpose of this policy has been developed to assist operators who are developing their safety management system (SMS) and wish to demonstrate to civil aviation authorities that they meet the intent of para 3.3.2 of the Seventh Edition of ICAO Annex 6 Part II *Operation of Aircraft – International General Aviation – Aeroplanes*.

#### 2. Discussion

The Seventh Edition of Annex 6 Part II became applicable on November 18, 2010. That edition introduces a number of new requirements for the non-commercial operation of large or turbojet aeroplanes including:

- operations manual,
- operational control system,
- fatigue countermeasures program,
- Minimum Equipment List where an Master Minimum Equipment List has been established for the aircraft,
- aircraft maintenance program
- flight crew training program , and
- operator safety management system (SMS).

The SMS requirements are stated in para 3.3.2 as:

##### 3.3.2 Safety management system

3.3.2.1 An operator shall establish and maintain a safety management system that is appropriate to the size and complexity of the operation.

3.3.2.2 Recommendation. - *The safety management system should as minimum include:*

- a) *a process to identify actual and potential safety hazards and assess the associated risks;*
- b) *a process to develop and implement remedial action necessary to maintain an acceptable level of safety; and*
- c) *provision for continuous monitoring and regular assessment of the appropriateness and effectiveness of safety management activities.*

*Note. - Guidance on safety management systems is contained in the Safety Management Manual (SMM) (Doc 9859) and industry codes of practice.*

While many civil aviation authorities are expected to incorporate this requirement into their aviation regulations over the next few years, some have indicated that they will be applying the requirement in the near future. The Bermuda Department of Civil Aviation has issued a notice that they will be applying the requirement to visiting aircraft effective April 1, 2011. In a related notice they have specified a number of ways to meet the SMS requirement including a demonstration of intent. This is consistent with Chapter 10 of the ICAO *Safety Management Manual* which recognizes that it takes operators time to develop and implement an appropriate and effective SMS, and describes the following four phases to the implementation process.



# IS-BAO POLICY



- Phase 1 – Planning and SMS implementation,
- Phase II – Reactive safety management processes,
- Phase III – Proactive and predictive safety management processes, and
- Phase IV – Operational safety assurance.

Thorough discussions with the Bermuda Department of Civil Aviation it has been determined that the statement of intent was intended to allow for operators who are engaged in Phase I of the SMS implementation process to demonstrate that fact.

### 3. Policy:

Upon request to [administration@ibac.org](mailto:administration@ibac.org), IBAC will provide a letter to operators who have purchased the IS-BAO and have confirmed that they are engaged in implementation of the IS-BAO requirements, including the development of an SMS, confirming that they are engaged in the process of implementing the IS-BAO requirements and developing their SMS, and thereby, should be considered in Phase I of SMS implementation as described in section 10.3 of the *ICAO Safety Management Manual*. The letter will specify that the operator is to attach to the IBAC letter a declaration attesting that they are engaged in IS-BAO and SMS implementation including the target date for completion.

### 4. Additional Information

As of this date Bermuda is the only jurisdiction known to IBAC to be applying the provisions of Annex 6 Part II Section 3, and specifically requiring operators to demonstrate compliance with the SMS requirements. This policy, and the related information, will be updated from time to time as IBAC becomes aware of other States applying the requirements.

**Don Spruston**  
**Director General**