



# FOCA GM/INFO

Guidance Material / Information

## Annex II – ARO.GEN.330 – Changes @ Aircraft Operator

Scope	Air operators
Applies to	Aircraft operators which are <ul style="list-style-type: none"><li>- certified by FOCA (CAT operation) or</li><li>- having declared its operation in Switzerland (SPO/NCC) or</li><li>- operating an HB-registered aircraft according to Part NCO</li></ul>
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## 0 Scope & purpose of this GM/INFO

This GM/INFO focusses on any change of aircraft operators including changes to the management processes of air operator organisations. All technical changes in the field of airworthiness, maintenance programme, maintenance organisation etc. are not part of this GM/INFO and will be treated separately. For initial certification of AOC or declaration of NCC/SPO refer to separate GM/INFO as well.

This GM/INFO explains the procedure and the tools to be used for changes requiring approval and changes not requiring approval in cooperation with the FOCA.

It applies to aircraft operators operating according to part **CAT** (Commercial Air Transport operation), **NCC** (Non-Commercial operations with Complex motor-powered aircraft), **SPO** (Specialized Operation) and/or **NCO** (Non-Commercial air operations with Other than complex motor-powered aircraft) after the operator has been certified by FOCA or has declared its operation in Switzerland (NCC, SPO) or is operating according to part NCO with a HB registered aircraft.

Note: In this GM, FOCA stands for the two sections responsible for certification and oversight of aeroplane and helicopter operations, i.e. SBOC / SBHE.

## 1 Introduction

### 1.1 What is a change?

All modifications and amendments after initial certification of policies, processes, personnel or documentation as applicable by the type of operations shall in principle be considered as a change. The operator's change process shall ensure continued compliance.

### 1.2 Management of change

Management of change stands for the process to lead and control evaluation, assessment, planning, implementation, hand over to normal operations and life-cycle management (continued compliance by performance monitoring) of a planned change. A change shall be properly planned, organised, risk assessed, prepared, implemented and monitored for expected safety performance. For any change, the operator shall verify compliance before implementation.

### 1.3 Difference between approval / non-approval changes

EASA introduced this difference as a risk-based approach for compliance verification of changes. The highly safety-relevant processes must be checked for compliance by the authority before they will be implemented by the organisation, while that compliance verification of less safety-relevant processes may be conducted after the operator has implemented the change.

A compliance verification of a change may include

- an assessment of the changed process(es)/situation
- an assessment of the transition into operation phase (e.g. ensure safe operation during the implementation of a change)
- audits and/or inspections

The FOCA will approve a change, when all approval items are to be considered as demonstrated compliant and transition into operation is demonstrated as acceptably safe. The operator may start the implementation of the change only after the authority approved it.

Note: It is important to understand that FOCA will not approve any documentation or manuals. The approval testifies the compliance verification by FOCA and releases the process for use. The verification of compliance by FOCA includes the correct application of the required management processes to conduct changes.

## 2 Change process with FOCA (SBHE/SBOC)

### 2.1 Development

The FOCA Sections for oversight of aeroplane and helicopter operations (SBHE/SBOC) have planned a pronounced harmonisation of processes and working methods in the area of helicopter and aeroplane operations, i.e. to revise the whole change process and harmonize procedures and forms. The change-over to the new change process is imminent and will be introduced in close cooperation with the aircraft operators considering an adequate changeover period.

As a first step, a new Form for application for approval and/or notification of a change will be implemented. For Aeroplane operators, also the process for application of airworthiness approval has slightly changed.

### 2.2 Which changes do I have to process with FOCA?

The following list shows how different kind of operations basically have to deal with changes

Type of operation	Change process
CAT	Any change of a CAT operator has either to be approved by or to be notified to FOCA. A change process shall be established. At initial certification, the process how to conduct changes not requiring approval will be approved by FOCA. Any change to that process is also subject to prior approval.
SPO/NCC	Only changes requiring approval or authorisation must be processed with FOCA. Any other change is subject to the operator's own responsibility; there's no obligation to notify such changes to FOCA. However, FOCA will conduct regular audits and inspections in order to verify compliance.
NCO	For NCO operators, the same procedure applies as for SPO/NCC operators, i.e. only any change requiring approval shall be processed with FOCA (e.g. specific approvals). In addition, if an NCO operator operates with a Minimum Equipment List MEL, the MEL shall be notified to FOCA.

### 2.3 New Forms and its use

The following new forms is published and shall support the process for changes

#### **FOCA Form 330 - Changes @ Aircraft Operator**

The form

- will be called "Form 330" further in this document
- replaces and amends the previous Form 44.20
- shall be used to apply for operational approval/authorisation and to notify changes.
- shall be used by all kind of operators, i.e. aeroplane/helicopter operating under part CAT, NCC, SPO or NCO
- shall be used for application of airworthiness approvals for helicopters

Note: The form is numbered 330 based on EASA Authority Requirement ARO.GEN.330, which describes the handling of any changes. Also in the area of Aircrew and CAMO the authority requirements concerning changes are regulated in Art. 330.

Further, the following new form has been published (to be used for aeroplanes only)

#### **Part-SPA Airworthiness Application Aeroplane**

The form shall be used to apply for airworthiness approvals for aeroplanes. It replaces and amends the previous Form 44.20 in the field of airworthiness application aeroplanes. For further information contact your focal point of FOCA airworthiness section.

## 2.4 Forms to be used for changes

Although the Form 44.20 is replaced and amended by the new "Form 330", the main procedure for manual revision and the use of previous forms will presently remain as before.

Therefore, the "Form 330" shall be used in the following cases,

- as an application of **any new approval** (including all approvals according to "Form 330")
- for **changes to granted approvals** (approved processes)
- as an application of **SPO** high risk authorisation **HRA**
- for **changes of management personnel**

while existing forms and documents shall be used as follows

- **PRA/NMR** -> as in the past
- **Compliance list** -> as in the past

Note: If a manual revision contains changes of approved processes, a "form 330" is required.

## 2.5 Scope of an approval

Most approval points are based on a process. In this case, changes to the process description and other aids to conduct that process are to be considered as prior approval.

The FOCA (SBHE/SBOC) intends to develop checklists for all approvals which summarise all the requirements which are to be seen within the scope of the approval. Any policy, procedure, documentation or tool used to meet any of the requirements shall be subject to be part of the respective approval.

## 2.6 Application for Approval / Notification of change

All applications for approval including any change to existing approvals in regard to flight operation and the organisation's management system shall be submitted with the "Form 330". The form is designed to be used by all categories of operators, i.e. aeroplane/helicopter operating under part CAT, NCC, SPO or NCO.

The form essentially serves as an "order" to initiate the FOCA process for changes. To enable FOCA to take that "order", further details shall be specified in the form as far as possible and necessary.

For each selected aircraft category and operations, the form shows the applicable and available approvals and required specifications. Non-approval changes are usually submitted as a manual/document revision together with the relevant documents. However, for certain non-approval changes, the FOCA requires further details which have to be specified in the form too (e.g. management personnel).

## 2.7 Changes affecting the airworthiness of an aircraft

Aeroplane operators shall apply for airworthiness approval by providing the Form Part-SPA Airworthiness Application Aeroplane to the respective section for airworthiness of FOCA. Only when the technical approval has been granted or its granting is anticipated, the "Form 330" and the required documents for the operational change should be submitted.

Helicopter operators shall provide FOCA with the application for operational approval including the required technical information and specifications, using "Form 330" (same process as with old Form 44.20).

## 2.8 Changes affecting more than one aircraft

If the application is related to one or several aircraft, the specifications incorporated shall be applicable to all listed aircraft. If different specifications are to apply to different aircraft, a separate form shall be submitted for each different specification. However, if these specifications are part of one change, this should be mentioned in the general description.

## 2.9 Compliance verification

The FOCA compliance verification process remains the same as before. However, please be aware, that in future the compliance verification of approval and non-approval items will be separated further, i.e. non-approval items will only be notified and, if necessary, reviewed by the FOCA after the change has been implemented already.

*Hint: It is the responsibility of the operator to ensure continued compliance.*

## 2.10 Granting of approval

The process to grant an approval remains until the new change process will be implemented. Therefore, FOCA will still provide the compliance list as evidence of granting an approval; including any EASA Forms 138, 139, 140 and/or 151 as applicable.

## 2.11 Digital signature by FOCA

SBOC/SBHE will issue all official EASA Forms with digital signature, if not otherwise requested. The authenticity of such a signature can be easily determined [online](#) at any time. For this purpose, the original signed document must be available.

## 2.12 Completion of manual revisions

The process to complete a manual revision is still done by PRA/NMR and compliance list.

# 3 Handling of FOCA Form 330 - Changes @ Aircraft Operator

## 3.1 System requirements

The Form is running on Windows and Mac Adobe Acrobat Reader (freeware).

## 3.2 Structure and reset functions

The Form consists of 5 different layers, which will be explained below (layer 1 to layer 5)

Further, the form resets or keeps inputs as follows:

- Inputs on layer 1 are independent of any other selection or inputs and will remain, there is no reset function on that layer
- When layer 2 will be changed from Aeroplanes to Helicopter or vice versa, all entries made in layer 3 to 5 will be reset.
- When a layer 3 item will be selected or deselected, inputs in layer 4 and 5 will be reset.
- When layer 5 inputs are done and the corresponding approval on layer 4 will be deselected, the inputs will remain. To display the Layer 5 again, just select the corresponding approval again.

*Hint: Some dropdown elements contain "none" as an option. This is due to the fact, that inadvertent inputs may not be deleted.*

### 3.3 Layer 1 – Administrative entries

Layer 1 is mainly self-explaining (administrative entries, e.g. organisation information, description of the change and any contact details).

Organisation Information	
Name of the Organisation:	<input type="text"/>
<b>Contact Person</b>	
Name:	<input type="text"/>
First name:	<input type="text"/>
Function:	<input type="text"/>
Email:	<input type="text"/>
Phone No:	<input type="text"/>
Description of the Change	
Briefly specify the change (e.g. OM-B REV; Import aircraft; Request SPA etc.)	
<input type="text"/>	

*Hint: The contact person airworthiness is only to be filled in by helicopter operators if the change affects airworthiness of aircraft.*

### 3.4 Layer 2 – Aircraft Category

Layer 2 is used to select which approvals are to be displayed and to which FOCA section the Form is to be addressed.

Aircraft Category	
Select <b>one</b> aircraft category:	<input type="radio"/> Aeroplane <input type="radio"/> Helicopter

*Hint: Mixed aircraft/helicopter operators shall select "Aeroplane" if a change of commonly used processes (e.g. Management system processes) will be conducted.*

### 3.5 Layer 3 – Specification of changes

Select the operation to which the requested/notified change shall be applicable (scope of application/notification).

Aircraft Category	
Select <b>one</b> aircraft category:	<input type="radio"/> Aeroplane <input checked="" type="radio"/> Helicopter
Specification of Change(s)	
Select the affected operations(s) for changes requiring <b>Approval</b> :	
<input checked="" type="checkbox"/> CAT - Commercial Air Transport operations	Certificate No: <input type="text" value="CH.AOC:xxxx"/>
<input type="checkbox"/> NCC - Non-Commercial operations with Complex motor-powered aircraft	
<input type="checkbox"/> SPO - Specialized Operations	
<input type="checkbox"/> NCO - Non-Commercial air operations with Other than complex motor-powered aircraft	
Select the affected operations(s) for changes <b>NOT</b> requiring <b>Approval</b> :	
<input type="checkbox"/> CAT - Commercial Air Transport operations	
<input type="checkbox"/> NCO - Non-Commercial air operations with Other than complex motor-powered aircraft	

A combination of approval and non-approval changes is possible (e.g. a manual revision with approval and non-approval points).

Enter the respective Certificate No. if option "AOC" is chosen (especially required for clear identification at organisations with more than one AOC, e.g. mixed aeroplane/helicopter operators).



The gray shaded option “Operations Manual / Document Revision” is not yet used. **Please provide all Manual Revisions with PRA/NMR and compliance list as before.**

~~Operations Manual / Document Revision~~

~~Operations manual / document revision(s) is/are enclosed with this application / notification (specify below)~~

**Aircraft / Fleet:** If the change does not apply to a specific Aircraft / Fleet, do not select anything on this layer. If the change applies to one or more aircraft or a whole fleet, list all aircraft to which the latter specifications will apply.

**Aircraft / Fleet**

If your application concerns one or more specific aircraft, please complete the following list (except for MEL). For the approval of MEL please refer to ORO.MLR.105. Please note that all aircraft specific changes listed below (e.g. SPA) will apply to all aircraft listed here. For changes of type/area of operation, additionally select ORO.GEN.130(a) below and specify further.

Select category:  **Applicable for entire fleet**  **Applicable for single/several aircraft**  **Not applicable**

*Hint: “Not applicable” is only to be selected after inadvertent selection of one of the other options; once selected, a selection cannot be deleted.*

### 3.6 Layer 4 – Selection of Approvals / Non-approvals

Carefully assess which approvals are affected by the intended change and select exactly those **approvals** (i.e. do not select approvals that have already been granted and are not to be changed. This is not a compliance list but a “declaration” of the scope of the intended change).

Changes Requiring Approval - Scope of Application				
Commission Regulation (EU) No 965/2012 - Annex III - Part-ORO ORGANISATION REQUIREMENTS FOR AIR OPERATIONS				
<input checked="" type="checkbox"/> Paragraph	Sub-para.	Title and Subject	EASA Form No.	Details below
<input type="checkbox"/> ORO.GEN.110	(j)	Dangerous goods training programmes		
<input type="checkbox"/> ORO.GEN.120	(b)	Implementation of Alternative Means of Compliance (AltMoC)		
<input checked="" type="checkbox"/> ORO.GEN.130	(a)(1)	Changes affecting the scope of the AOC or the operation specification	(Form 138/139)	Details below
<input type="checkbox"/> ORO.GEN.130	(c)	Procedure for the management of changes NOT requiring prior approval		
<input type="checkbox"/> ORO.GEN.200	(a)(1)	Lines of responsibilities and accountabilities		
<input type="checkbox"/> ORO.GEN.200	(a)(2)	Safety policies		

The corresponding implication on AOC/OpSpec etc. is shown for each approval,

- e.g. if ORO.GEN.130 (a)(1) will be affected by the change applied for, **EASA Form 138/139** might be affected and need to be renewed/amended. Further it also indicates when **further details** are to be inserted on a layer 5 element.

*Hint: Only approvals applicable/available for the operations selected in layers 2 and 3 are displayed.*

*Hint: For changes of personnel in the function of accountable manager or its deputy, please provide Form 330. For organisation holding other certificates (CAMO, ATO), the provision of Form 330 only is sufficient.*

In the **non-approvals** section, only those items requiring further specification are listed. All other non-approval items are handled via the known manual revision process, as applicable.

Changes NOT Requiring Approval - Details of Notification				
Commission Regulation (EU) No 965/2012 - Annex III - Part-ORO ORGANISATION REQUIREMENTS FOR AIR OPERATIONS				
<input checked="" type="checkbox"/> Paragraph	Sub-para.	Title and Subject	EASA Form No.	Details below
<input type="checkbox"/> ORO.GEN.200 / 210		Management Personnel (ohne ACM, SM, CMM, NPCA)		Details on next pages

### 3.7 Layer 5 – Specifications of approval

It is important to enter the correct desired specifications here. These are partly the basis for the amendment of EASA Forms 138/139/140/151.

The box "Nature of change" contains

- add SPA -> add Specific Approval to formal EASA Forms
- delete SPA -> delete Specific Approval from formal EASA Forms
- change -> process in the field of approval will be changed

### 3.8 Formal statement

After the form has been filled in and reviewed, complete it by entering the responsible person which has to sign it. FOCA will accept the digital signature.

When all entries are done, the form may be signed digitally by just clicking on the signature field and follow the instructions. The form has usually to be saved with a new name. The unsigned form will remain for further inputs or modifications.

Once the form is signed, it can of course no longer be changed. For further changes, either use the still existing unsigned form or remove the signature from the signed form.

### 3.9 Submission of the Form

If the Form is filled in correctly, the email address for submitting of the form is displayed here.

Send the form to this email address. FOCA will acknowledge receipt latest within 10 working days.

## 4 Recommended sequence to fill in FOCA Form 330

Before starting to prepare the “Form 330”, coordinate the intended change with your technical department as applicable. Aeroplane operators should first apply for airworthiness approval, if applicable.

Find below a recommended sequence to fill in the “Form 330”

1. Make sure you use the latest version of the “Form 330” (refer to [FOCA webpage](#))
2. Save the empty form with your preferred file name
3. Fill in *Organisation Information* etc. (Layer 1)
4. Plan your change and be aware about project management (timeline, dependencies)
5. Fill in brief description of the change
6. Select *Aircraft category* (Layer 2)
7. Select applicable *Specifications of Change* (Layer 3)
8. Select *Aircraft / Fleet* as applicable (Layer 3)

Note: The sequence below shall only be started if the above items are confirmed. If any change of the selection above will take place, the inputs below may be reset and inserted data may be lost.

9. Fill in *airworthiness contact* as applicable (Layer 1)
10. Select all *approval points* affected by the change (Layer 4)
11. Select all *non-approval points* affected by the change (Layer 4)
12. Fill in all displayed blocks *further specifications*
13. Save your inputs
14. Conduct internal control process as applicable
15. Fill in person responsible for release of “Form 330”
16. This person shall sign the “Form 330”
17. Store the signed form with same file name with the addendum “\_signed”
18. Send the signed version to the corresponding email shown under “submission of form”

Note: if you need to modify your inputs, adapt the unsigned version as applicable, sign again and overwrite the old signed file.

The steps and sequence above have to be seen as a recommendation only.

## 5 Administrative

Whenever you are in doubt with the process or the “Form 330”, or if any malfunction occurs, do not hesitate to contact FOCA (preferably your focal point of operational oversight, e.g. Dispatch, assigned FOI) and ask for help.