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SBOC – Complex Aeroplane Operations

Roger Wellauer, Head of SBOC
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Welcome to the SBOC-part of SASOC



SBOC News



News from Cologne... by Thomas Gass, Head of SBFF



Let's talk about safety



Operations manuals – Quo vadis?



Please interrupt at any time if you have a question / comment.



SBOC News - Oversight



Cycle Cat.	A	B	C	D	E
Oversight activity	24 months increased oversight	24 months standard oversight	36 months	48 months	12 months (after initial certification)
No. of Operators (today)	3	12	4	-	1

- Oversight Cycle according to ARO.GEN.305
- After Base Audit -> Oversight Cycle Meeting in FOCA will be conducted
- Output is review and oversight programme
- Dispatch reports some difficulties to plan flight inspections in business aviation
- Maybe we should think about cat. D cycle



SBOC News - Oversight



	AOC		SPO		NCC	
	2024	2025	2024	2025	2024	2025
Audits	6	12	2	2	5	14
Inspections	84	85	-	-	7	5

- 20 AOC, 4 SPO, 37 NCC operator
- Overall good results, a positive reception and cooperation, both blunt end and sharp end
- Dispatch reports some difficulties to plan flight inspections in business aviation
- About 400 - 500 cases per year
- Your schedule / priority of a change is often challenging... we do our best



SBOC News - Handling of Changes



Information and form 330 to be found on [FOCA Website](#)

 *FOCA Form 330 – Changes @ Aircraft Operator*

-> Notification/application form for all changes related to MS, CAT, SPO, NCC

 **Note**

The FOCA Form 330 – Changes at Aircraft Operator includes the valid EASA requirements and will be updated in case of changes in the regulations.

 *FOCA GM/INFO – Annex II – ARO.GEN.330 - Changes @ Aircraft Operator*

-> Guidance on how to process changes

Feedback from operators or needs/ideas are highly appreciated.



Changes - what is to be done?



- **How will my organisation look like after the change?**

What has to be added, amended or deleted, e.g. policies, procedures, training, risks and risk controls (SPI, FDM etc.). Are we clear about the scope of change incl. risk assessment and mitigation.

- **How will we get there?**

Management of change, e.g. transition plan incl. risk assessment and mitigation and realistic schedule.

- **How will we ensure continuous safety and compliance over all phases?**

What about life cycle management and decommissioning? How is it ensured, that the additional mitigations will remain during life cycle?

Continuous safe operations and compliance before, during and after implementation of a change is to be ensured by the organisation.



Changes – Approval / Non-approval



Changes requiring FOCA approval

- ⇒ Application by form 330
- ⇒ Verification by FOCA before and during implementation

Changes not requiring prior approval (Non-Approval)

- ⇒ Application by form 330
- ⇒ compliance evaluation by FOCA before implementation

Option 1: **BASIC**

- ⇒ Notification by form 330
- ⇒ Basically, no evaluation by FOCA will be conducted.
- ⇒ Instead FOCA will conduct focussed inspections on a single change or on a specific topic based on RPBO principles.

Option 2: **ADVANCED**



Changes - Amendment since last SASOC



Form 330

- Updates as required; no major change

LofA (List of Approvals)

- Note added

The FOCA hereby confirms the validity of this list of approvals.

Note: This document lists all approvals issued by FOCA that are required for EASA-compliant flight operations under the referenced certificate. In accordance with EASA regulations, FOCA does neither issue a formal release for operations manuals nor approves them, except for the MEL. It only approves specific content.



~~RoD~~ (Release of document)

- Release of document (RoD) will not be provided further as a formal document
- For changes requiring prior approval, the 'go' for publication of a document will be given by email or directly within the operator's web-based tool (e.g. webmanual)

Changes - Aim for next SASOC



All operators in flight operations are handling changes according to two processes

Changes requiring approval

Changes NOT requiring approval (former option 2)

i.e. all Operators are handling their changes according to option 2... so option 2 is no more an option but the only solution.

One of the key requirements is a robust system for labelling the content of the OM and clearly categorising it into the two categories (approved / not approved).

Web-based tools are of help and have further potential to support that process, e.g. workflow to release a document for publication with/without involvement of FOCA.



SBOC News – Publications



FOCA GM/INFO Guidance Material / Information

Guidance for Aircraft Operations

Contains all GM/INFO's, Forms and Checklists officially published by FOCA relating to aircraft operations

The content is

- grouped according to EASA Regulation
- marked in terms of approval/non-approval and applicability to aeroplanes/helicopters
- either displayed directly or available via a link to another GM/INFO document



News from Cologne



CHANGING REGULATIONS
WHAT YOU NEED TO KNOW

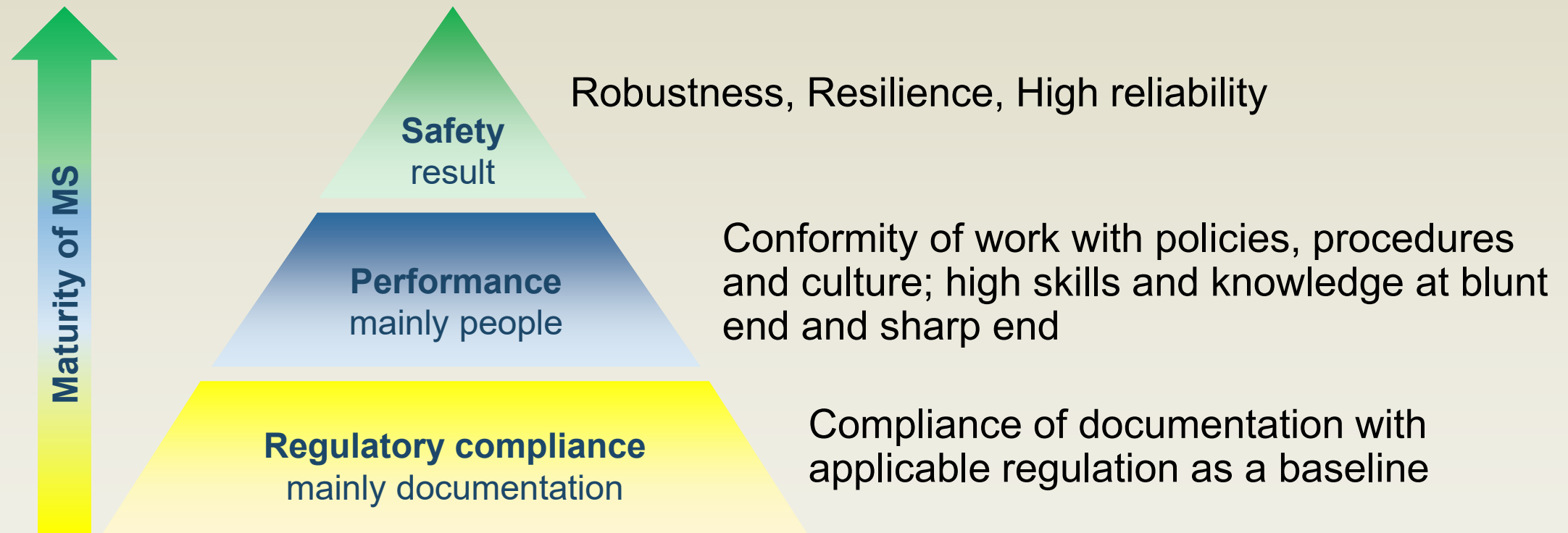
➤ **By Thomas Gass, Head of Section SBFF**



Safety and compliance



My view on the relation of safety and compliance



Note: EASA and FOCA do not distinguish between compliance and conformity; it's all compliance.



Performance



Key questions of safety performance monitoring

- **Does the system / organisation “behave” as expected?**
e.g. according to the risk management, provided that a mature and comprehensive risk management incl. risk controls is in place
- **Do people behave as expected?**
Skills, knowledge, attitude -> adherence to safety policy and procedures
- **Are people competent to deal with unexpected external factors?**
Skills, knowledge, attitude, experience -> Resilience, robustness

Of course, there are many external contributing factors like airspace design, airport management, ATC etc. which are outside of our operational control.



Our people as a key factor



What can we do, to support our people especially at the sharp end in a best way?

- Clear policies and procedures
- Effective assessment of competencies and training
- Customer friendly tools and gadgets (EFB, Manuals, Apps etc.)
- Easy and prompt access to required information

-> Reduce complexity and workload



Information Management



Which brings me to the next topic, which I already covered during the last SASOC





But first let's have a break



Operations manual – quo vadis?



The challenges of digitalisation

- amount of information has increased rapidly
 - almost no influence on the costs of documentation (no paper printing)
 - no incentive to keep it short, simple and understandable
 - tendency to document for lawyers and FOCA
- tools are available to get information electronically, but still in same structure / thinking as paper books (except the possibility to link other documents)
- operator divided information into many individual “documents” (e.g. OMB)



Operations Manual – quo vadis?



A provocative thesis

Over the last ten years, I got the impression that documentation has increasingly being designed for those who write it, rather than for those who read it.

What do you think about that?

What kind of innovation in regard to information management do we expect?

What are your experiences with providers of web-based solutions?



Our concerns



SBOC experiences a few concerns in the document REV process

1. Outsourcing of formal OM content in so called “uncontrolled documents”
2. Out of that, numerous interim solutions such as ops notes and bulletins etc. emerged, which are now part of the change process. However, they contain e.g.
 - amendments of OM content and useful information for crew regarding skills and knowledge (e.g. extensive ops note about GPS spoofing)
 - amendment of content of more than one OM (e.g. OMA, OMB, OMC) in one ops note
3. To leave these ops notes as they are, rather than incorporating the content into the official OM
4. Splitting one OM in numerous annexes with separate revision numbers

None of these points are particularly customer-friendly for the crew either.



Your needs



The known and accepted means of publications are

- the OM as the regular means of publication (paper or digital form)
 - standard changes are processed directly in the OM
- the means of publication agreed in the change process for urgent revision
 - only for safety and time critical changes, therefore rather rare

We observed a need for a more flexible way for publication of a change that is not part of a regular OM revision, but is not urgent either, e.g.

- change of ACM with a specific effective date, outside the OMM revision cycle
- change/amendment of procedure change due to GPS spoofing



An idea / proposal



If needed, create a **single annex to each OM** (A, B, C, D) containing exclusively all content that has been revised in the respective OM outside a regular OM revision; **similar to a NOTAM**. Such annexes may be revised separately with an own revision number. However, they must be mentioned in the change process.



etc.

The entries in an annex should contain at least the following information

- Ref. to exact document and article to be replaced
- What did change
- New content
- Effective date (end date, if only temp revision)
- Formality of change (Approval/non-approval)



Annex to OM



We expect the following benefits

- Much better readability and traceability for crew
- Better transparency for compliance management by dividing content, which is formally relevant for the change (policy, procedure, limitations etc.), and content, which is made to improve skills and knowledge of crew.
- Systematic and structured approach for the transfer of content from annex to the main OM, preferably with next revision.
- Much more effectiveness in the change process reducing time and costs



Annex to OM



Supplementary information, such as guidance or further explanations, may still be provided to the crew. But such information / documents are not relevant for the formal compliance management and therefore for the change process.

Note: The annex is subject to the change process (approval/non-approval content)

What do you think about the proposal?

How much does this issue affect you?

What other ideas do you have?



Annex to OM



Intended solely as a temporary solution that would be straightforward to implement.

However, we should aim to get rid of any additional “documentation” other than the OM... We could focus on having the necessary information for the various phases of flight compiled digitally... single source... multiple use

We’re looking forward to your innovation..

...and don’t forget us... it’s maybe much easier to develop a suitable workflow for the authority within your publication tool than to export each single content for transfer to FOCA.



Closing SASOC 2026



- ... for participating to this SASOC 2026
- ... for that open and inspiring discussion
- ... for the pleasant and positive cooperation with our SBOC-team

