Australian Government
Civil Aviation Safety Authority

FRAMEWORK

Operations protocol framework

October 2024

Acknowledgement of Country

The Civil Aviation Safety Authority (CASA) respectfully acknowledges the Traditional Custodians of the lands on which our offices are located and their continuing connection to land, water and community, and pays respect to Elders past, present and emerging.

Inside front cover artwork: James Baban.

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Terminology

Acronyms and abbreviations

Table 1. List of acronyms and abbreviations

Acronym/abbreviation	Description
AC	advisory circular
AMC	acceptable means of compliance
AMOC	alternate means of compliance
AOC	air operator's certificate
CASA	Civil Aviation Safety Authority
CASR	*Civil Aviation Safety Regulations 1998*
EDTO	extended diversion time operations
GM	guidance material
MOS	manual of standards
OPS	operations (all aspects associated with the operation of an aircraft)
RVSM	reduced vertical separation minimum

Reference to regulations

Unless specified otherwise, all subregulations, regulations, Divisions, Subparts and Parts referenced in this Principle are references to the *Civil Aviation Safety Regulations 1998* (CASR).

Operations protocol framework

Policy

As the national aviation authority of Australia, we are focused on how we can embed our vision for safe skies for all. In doing so, we need to make sure our decisions and processes follow the principles we've outlined in our Regulatory Philosophy.

The operations protocol framework has been developed to ensure that CASA's regulatory oversight activities are conducted in a consistent manner in accordance with the principles of outcome-based legislation, where they apply, and assessment.

Operation protocols help you, and ultimately CASA make decisions that are effective, efficient, fair, timely, transparent and compliant with our legislation. They ensure our oversight activities are consistent and consider the overall safety outcome of what is being proposed.

Importantly, operations protocols help you, our inspectors, have a clear understanding of the intent of the legislation and what should be considered to help guide your decision-making. While you need to understand the regulations themselves, you can rely on the protocol suite to support your assessment and decision.

Adherence to the procedures described in the protocol suites will help guide and inform the decisions you make and ensure that safety is front of mind in all our actions and decisions.

We are committed to reviewing and improving the protocol documents in response to any feedback we receive as well as regulatory changes or issues that may arise. Where things don't work, we will evolve and improve.

Please make sure you read the protocol documents and follow-up with [your managers] if you have any questions or comments.

Pip Spence
Chief Executive Officer and
Director of Aviation Safety

1. Purpose

CASA's Operations protocol framework provides a structure for how CASA makes regulatory decisions in relation to aircraft operations.

The operations protocol framework is made up of multiple protocol document suites, which are used by CASA to make consistent decisions on:

- the assessment of an initial issue, significant change or surveillance of authorisation holders under the following regulations:
  - Part 42 Continuing airworthiness requirements for aircraft and aeronautical products
  - Part 43 Maintenance of certain aircraft
  - Part 119 Australian air transport operators—certification and management
  - Part 121 Australian air transport operations—larger aeroplanes
  - Part 131 Balloons and hot air airships
  - Part 133 Australian air transport operations—rotorcraft
  - Part 135 Australian air transport operations—smaller aeroplanes
  - Part 137 Aerial application operations—other than rotorcraft
  - Part 138 Aerial work operations
  - Part 141 Recreational, private and commercial pilot flight training, other than certain integrated training courses
  - Part 142 Integrated and multi-crew pilot flight training, contracted training and contracted checking
  - Part 145 Continuing airworthiness—Part 145 approved maintenance organisations
- applications for specific approvals, such as extended diversion time operations (EDTO) or reduced vertical separation minimum (RVSM)
- the suitability and competence of personnel to hold key personnel positions
- the suitability of an applicant's exposition/operations manual for the conduct of specific activities, such as the management of continuing airworthiness or the carriage of dangerous goods by air.

Each protocol document suite is drafted in accordance with the criteria in the relevant legislation; it guides the decision-maker in making correct regulatory decisions, from a technical perspective. Part 11 of CASR, the CASA Regulatory Philosophy and broader considerations, including the principles of administrative law, must be applied to all decisions.

1.1 Outcome-based legislation and assessment[1]

Outcome-based legislation expresses the high-level safety outcomes sought. The regulations allow for an outcome to be reached via various pathways, while still maintaining an acceptable safety case. A safety outcome-based regulation system involves three levels:

- regulations expressed by reference to a particular operational outcome (rather than prescribing specific conduct that would achieve that outcome). These regulations provide flexibility as to how compliance can be achieved according to the circumstances of each individual
- acceptable means of compliance (AMC) material that set out acceptable methods of demonstrating compliance with specific regulations. If an applicant follows an AMC that is suitable for the applicant, the applicant should expect that CASA will issue the requested authorisation
- guidance material (GM) that provides suggestions, explanations and amplification of a regulation's policy intention, rather than prescribed means of compliance with a regulation.

[1] Taken and adapted from AC 1-01 Understanding the legislative framework

While many provisions are a blend of outcome-based and prescriptive elements, a significant advantage of the outcome-based approach is the flexibility provided to an organisation or individual to use the systems and procedures most appropriate to them to achieve the required safety outcomes and compliance with legislative requirements.

AMCs provide straightforward and positive methods for satisfying CASA but are not binding on those industry participants who wish to put forward alternative methods of compliance, thus allowing for innovation and improvement to occur naturally.

For the Australian aviation industry, this means:

- more safety responsibility is devolved to industry
- industry organisations can use systems, methods and procedures most appropriate to them to meet safety outcomes.

1.2 Assessment terminology

To maintain consistency and standardisation in assessment, it is essential to use the terminology below. Principle documents aim to provide a level of detail that allows all inspectors to come to a similar determination based on the information supplied by the applicant.

To avoid any regulatory over-reach, or under-reach, that may arise due to the flexibility provided by outcome-based legislation, inspectors are expected to use and understand the specific terms in Table 2.

Table 2. Assessment terminology

Present (P)	There is evidence that the relevant indicator is documented within the organisation's documentation.
Suitable (S)	The relevant indicator is suitable based on the size, nature and complexity of the organisation and the inherent risk in its activity.
Operating (O)	There is evidence that the relevant indicator is in use and an output is being produced.
Effective (E)	There is evidence that the relevant indicator is achieving the desired outcome and has a positive safety impact.
Yes	There is evidence that the relevant indicator is compliant with the regulations.
No	There is evidence that the relevant indicator is not compliant with the regulations.
Satisfactory	There is evidence that the relevant indicator is achieving the desired outcome and has a positive safety impact.
Unsatisfactory	There is evidence that the relevant indicator is not achieving the desired outcome which may have a negative impact on safety.

Must

When this document states a requirement as a 'must', the term will reference a legislative requirement and as such it cannot be omitted or changed from the stated requirement without further legislative variation or exemption

Should

The use of the term 'should' reflects a requirement that CASA considers should be satisfied to grant an authorisation, but where the legislation does not explicitly express such a requirement. For example, some legislative provisions do not express criteria to be met for the issue of an authorisation. In such a case, it is open to CASA to identify what requirements should be met.

May

The term ‘may’ will signify something that is permitted but not required through legislation or deemed important for approval. The term is used to provide options, alternate methods or examples.

1.3 Structure

The operations protocol framework does not have a hierarchy (when compared to a more traditional structure of manuals and procedures) to depict policy and process.

This framework comprises two types of protocol document suites:

- Part related authorisations
- component approvals

1.3.1 Part related authorisations

Part related Protocol suites, such as those listed below are used for the assessment of an initial application to issue an AOC or certificate, the significant change to an existing authorisation, or for ongoing surveillance of the operators authorised activities.

Part-related AOCs and certificates for operators

Part 121 AOC **(OPS.121)**	Part 131 AOC **(OPS.131)**	Part 133 AOC **(OPS.133)**	Part 135 AOC **(OPS.135)**	Part 138 certificate **(OPS.138)**

Part-related AOCs and certificates for training organisations

Part 141 certificate **(OPS.141)**	Part 142 AOC or certificate **(OPS.142)**

1.3.2 Component approvals or assessments

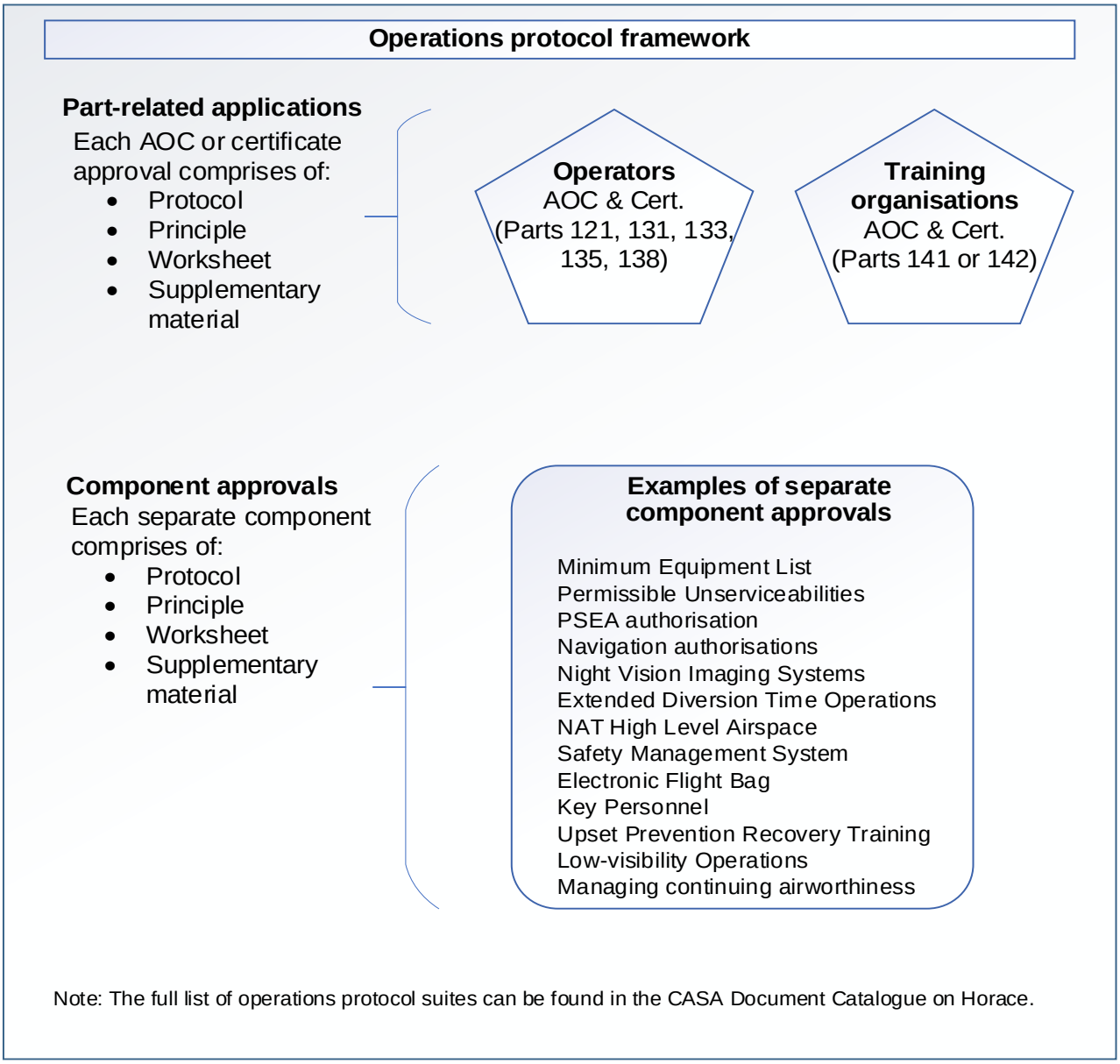
A number of components have commonality in the operations application / assessment / surveillance scheme. Where required, these components have been extracted from the Part- related AOC and certificate protocol suites and given their own protocol document suite. Having separate common approval components allows inspectors to conduct assessments on specific applications, rather than an entire organisation. For example, should an assessment be required on an organisation’s change to key personnel, the inspector can use the specific protocol document suite for key personnel (OPS.10), instead of using the protocol document suite for the part-related initial application.

An example of the separate components is provided in Figure 1 to facilitate navigation through the wide array of protocol document suites.

Initial applications require a full assessment, while existing operators may not need such an integral approach, hence, the structure’s design.

The framework is not hierarchical. That is, in Figure 1 the pentagons are not superior to the separate approval components listed.

Figure 1. Operations protocol framework



2. Operations protocol document suite

2.1 Protocol document suite

Within a protocol document suite, each document plays a specific role:

a. **Protocol:** This document summarises the policies, including the concept and philosophy behind the protocol document suite, while identifying the approved supplementary documents that are applicable.

b. **Principles:** These documents are intrinsically aligned to the worksheet and provide inspectors with the underlying principles related to specific regulations, the relevant Manual of Standards (MOS) and any pertinent guidance provided by CASA. They often expand on the coinciding question in the worksheet to assist inspectors in deciding on the suitability of any aspect submitted by an applicant.

c. **Worksheets:** The worksheet is the record of the assessment conducted by the inspector. Worksheets provide inspectors with questions (developed by subject matter experts within CASA) based on the regulations and manuals of standards. They are designed to guide an inspector through an assessment in a logical and consistent manner. In addition, the worksheet contains an assessment summary page to record the outcome of the assessment and, where required, an approval data sheet to provide information to Regservices about what approvals can be issued as a result of the assessment.

d. **Supplementary documents:** These documents, where provided, ensure consistency across CASA's inspectorate and facilitate retention of records of the assessment. These may include:

   - forms (specifically for applications)
   - work instructions
   - checklists
   - instruments and letters
   - interviews (script and records)
   - other specific documents (specific formats).

The protocol in each protocol document suite outlines all the documents (principles, worksheets and supplementary documents) required. A protocol document suite will always consist of one protocol. However, the number of principles, worksheets and supplementary documents can vary according to the nature of the approval. An approval may, in some cases, simply require just a protocol.

2.2 Protocol document suite identification

The protocol document suites for operations are numbered using an identification code comprising:

a. the acronym OPS

b. the respective Part number (e.g. 121) or, in the case of component approvals, a sequential number (e.g. 01, 02, 03).

Table 3 lists examples of the identification codes for protocol document suites. The full list can be found in the Document Catalogue on Horace.

Table 3. Example identification codes for OPS protocol document suites

Operations	Separate approvals
(OPS.121) Australian air transport operations—larger aeroplanes (OPS.131) Balloons and hot air airships (OPS.133) Australian air transport operations—rotorcraft (OPS.135) Australian air transport operations—smaller aeroplanes (OPS.138) Aerial work operations	(OPS.01) Minimum equipment list (OPS.02) Permissible unserviceabilities (OPS.03) Prescribed single-engine aeroplane (PSEA) assessment (OPS.04) Navigation authorisations (OPS.05) Night vision imaging systems (OPS.06) Extended diversion time operations (OPS.07) North Atlantic high-level airspace (NAT HLA) (OPS.08) Safety management systems assessment (OPS.09) Electronic flight bag (OPS.10) Key personnel assessment (OPS.12) Aircraft low visibility operations Note: the full list of protocol document suites can be found in the Document Catalogue.
Training	
(OPS.141) Recreational, private and commercial pilot flight training, other than certain integrated training courses (OPS.142) Integrated and multi-crew pilot flight training, contracted training and contracted checking	

The identification code is used for the entire protocol document suite (protocol, principle, worksheet and supplementary materials). Table 4 exemplifies the code applied to the Part 121 AOC protocol document suite.

Table 4. Protocol document suite for Part 121 AOC initial application

PROTOCOL **(OPS.121)**	PRINCIPLE **(OPS.121)**	WORKSHEET **(OPS.121)**	SUPPLEMENTARY MATERIAL (forms, checklists etc.)

In this example, note that the code is identical across the entire document suite. This system is used for all protocol document suites whether they are initial applications or specific components. Table 5 exemplifies the protocol document suite for key personnel.

Table 5. Protocol document suite for key personnel

PROTOCOL **(OPS.10)**	PRINCIPLE **(OPS.10)**	WORKSHEETS **(OPS.10)**	SUPPLEMENTARY MATERIAL (forms, checklists etc.)

All documents within a protocol document suite are located in the Document Catalogue.

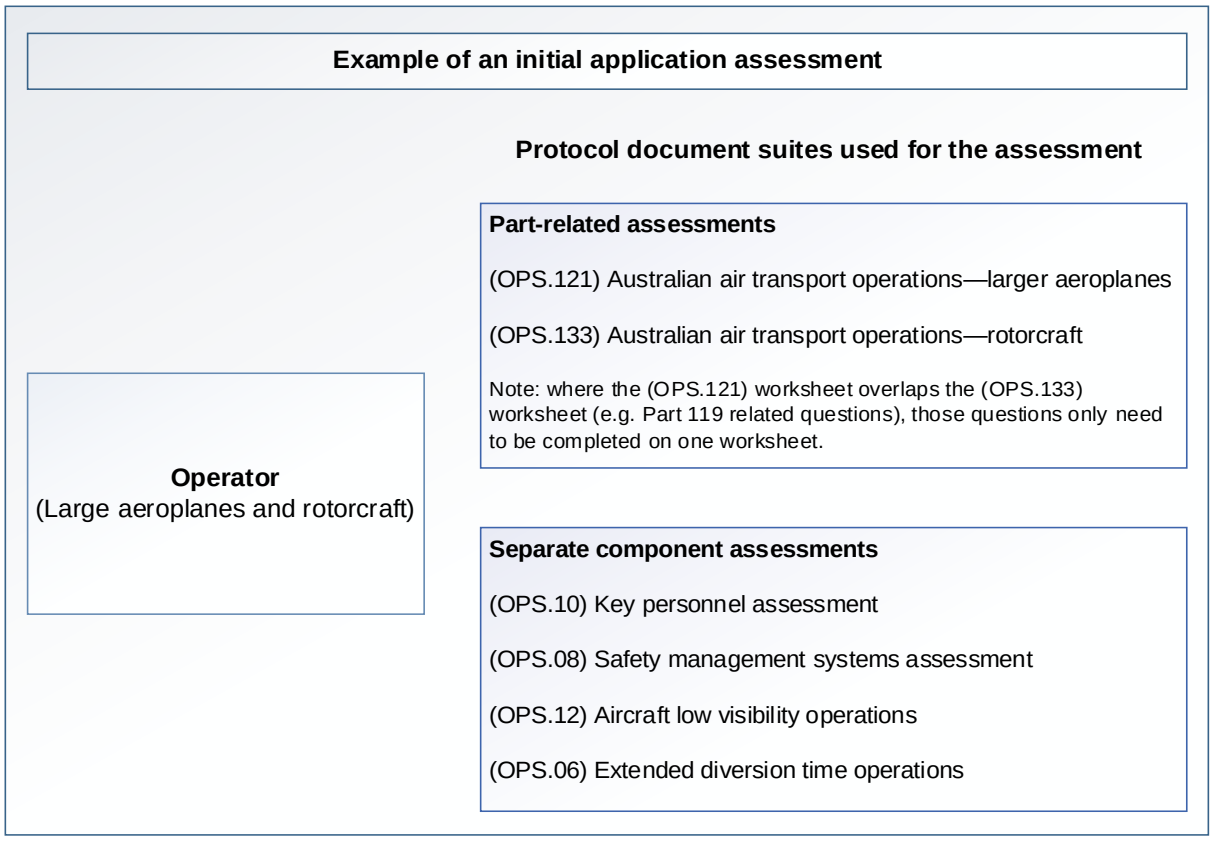
2.3 Multiple protocol document suites

2.3.1 Initial applications

There may be instances where an inspector is required to use multiple part-related protocol document suites to conduct an assessment. For example, if an organisation is making an initial application and plans to operate primarily under Part 121 of CASR but also conduct some operations that fall under Part 133, the inspector is required to use two Part-related initial application protocol document suites – the (OPS.121) protocol document suite and the (OPS.133) protocol document suite. However, the inspector does not need

to complete the entire worksheet for each operational Part (see example in Figure 2). Where one worksheet overlaps with the other (e.g. the Part 119 questions which apply to all air transport operators), the inspector is not required to duplicate responses on both worksheets – they need only complete those specific questions on one of the worksheets. The assessment summary and approval data sheet tabs must be completed in both worksheets and should reference the other Part-related protocol document suite.

Figure 2. Example of an initial application assessment



2.3.2 Multiple components

There may be instances where an inspector is required to use multiple protocol document suites for specific components to conduct an assessment. For example, due to changes in an applicant's operations, specific assessments may need to be simultaneously conducted on the key personnel and the organisation's new safety management system (SMS). In this instance, the inspector is required to use two protocol document suites for these two specific assessments – (OPS.10) Key personnel and (OPS.08) Safety management systems. The assessment summary and approval data sheet tabs must be completed in both worksheets and should reference the related component protocol document suite.

2.4 Significant change applications

Where the application is for a significant change (variation) that is not covered by a separate approval protocol document suite, the inspector should complete the sections of the Part- related worksheet appropriate to the application. The inspector must detail the scope of the assessment on the assessment summary.

2.5 Record keeping

Once an assessment has been conducted, inspectors must complete the assessment summary and approval data sheet in the worksheet(s), including comments and references to other worksheets, and ensure appropriate approval is obtained.

Each business area should have a series of files set up in RMS to keep records on all assessments and the respective outcomes

3. Initial and significant change applications

Protocol document suites have been developed to support the assessment of an initial application for an AOC or certificate under the relevant Part (e.g. Part 121, Part 131, Part 133, Part 135, Part 138, Part 141 or Part 142) or any combination of multiple Parts (e.g. Part 121 and Part 133). They can also be used to support a significant change to an existing AOC or certificate. To recommend an authorisation, inspectors must be satisfied the regulatory requirements have been met using the assessment decision making process of **present** and **suitable**.

Inspectors will use the worksheet to record their assessment by completing the relevant sections. To assess an application as compliant, the inspector must determine that the elements are both **present** in the operations manual/exposition and **suitable** for the size, nature and complexity of operations. In some cases, the inspector may need to conduct a site visit to assess suitability.

For guidance on the assessment of a specific rule, and to assist with the decision-making process (present and suitable), refer to the associated principle document.

> Note: The principle document is not designed to replace advisory circulars (AC) or acceptable means of compliance and guidance material (AMC/GM) but rather assist the inspector in their decision making.

As illustrated in Figure 3, inspectors are required to complete the worksheets by selecting the relevant responses to the questions. Responses include:

- Yes - compliant
- N/A - not applicable to the assessment scope
- MI - more information is required
- No - not compliant.

Additionally, inspectors should ensure that the site visit option is selected for those questions that require a site visit to determine compliance.

Further guidance for completing the worksheets can be found in the instructions in the associated worksheet.

3.1 Applications submitted by an agent

An operator may authorise a person to act as their agent to make applications/submissions to CASA on their behalf. CASA does not maintain a list of authorised agents however the regulations require the agent to provide their signed declaration with each application even if they have made a previous application on a different matter for that operator.

3.1.1 Applications by an agent

If an agent makes an application to CASA on behalf of an operator, they must provide a copy of the signed declaration of authorisation from the operator to act on their behalf. Entry Control Coordination (ECC) will place of a copy of the agent authorisation into the application subfile within RMS.

If an application is being made by an agent, and the inspector cannot locate the authorisation from the operator, a query should be raised with the RSO to confirm the status of the agent.

An agent authorisation does not automatically provide the authority to represent the operator on all matters covered by the application. Both the inspector and the RSO must confirm the scope of the agent's authorisation covers the elements in the application.

In some circumstances CASA will receive an application where it is unclear whether it has been submitted by a person who is part of the operators personnel.

Example

The submission may come from an email address/domain that is different to that recorded in the EAP contacts list.

Unless the application is accompanied by a declaration of authorisation, the application should not be considered to be one made by an agent.

Note: Where the application involves cost recovery, the veracity of the application will usually be confirmed as a result of the operator paying the associated cost recovery invoice for the proposed regulatory service.

If there is doubt as to whether the application is genuine, contact should be made directly with the operator by use of the operator contacts listed in EAP.

3.1.2 Communication between CASA and the operator

If an application is made by a validly appointed agent, CASA is only required to communicate with the nominated contact person listed in the application which may be the agent rather than the operator's key person. As part of the ECC process for case creation, the nominated contact person in the application will have their details listed in the EAP participant tab for the EAP case.

The use of an agent does not preclude CASA from sending direct communications to the operator or choosing to include them as a cc on communications about the assessment. Dependent on the circumstances, it may be appropriate to include the operator in all communication as a means to ensure that the organisation has been advised of all relevant developments. It remains up to the inspector to determine what is necessary in the circumstances to safeguard the integrity of the process.

Note: Where the application is not made by an agent, communication will be directed to the operator and the contact person listed on the application form.

3.2 Onsite inspections and verification

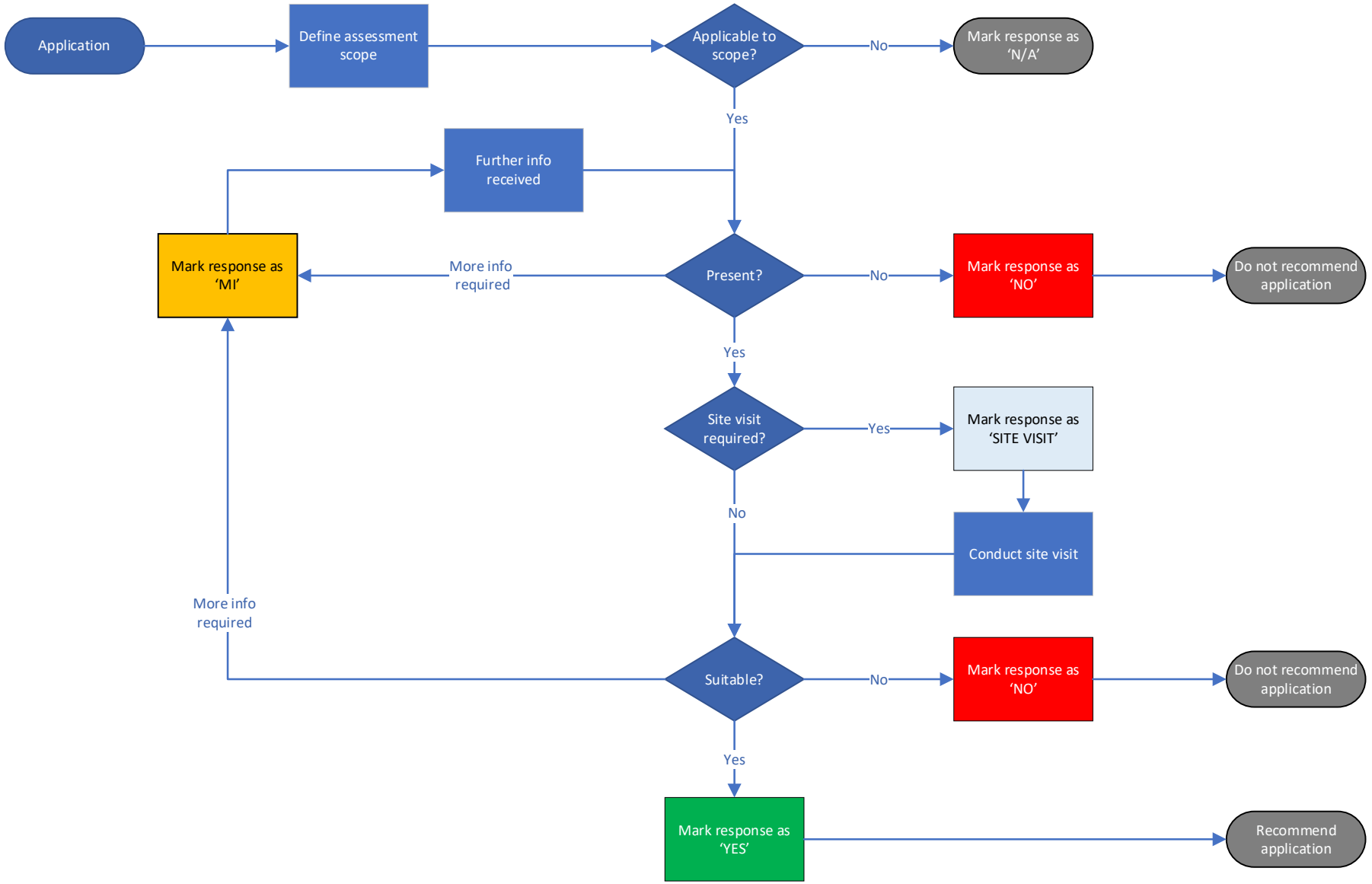
Section 27AC of the *Civil Aviation Act 1988* (the Act) provides for CASA to undertake an inspection or test.

In some instances, the inspector may require a site visit to determine suitability. The requirement for an onsite inspection will depend on the nature and complexity of the system being assessed. To ensure a system is suitable, the inspector may need to interview staff, observe a process or inspect facilities. Inspectors will use Protocol suite (OPS.26) Checklists for onsite inspections where available.

3.2.1 Work health and safety

Inspectors conducting an industry onsite visit must assess potential work health and safety (WHS) risks for the site and take steps to mitigate identified risks. If clarification is required on the site WHS risks or mitigations, confirm with site contacts prior to the visit. In addition, inspectors must receive a work health and safety briefing/induction to the location and confirm emergency procedures and access to first aid treatment. Identified risks must be documented on your worksheet, along with the steps taken to mitigate them. For a list of identified potential onsite WHS risks, and the controls that are part of CASA's WHS management system, refer to the WHS Checklist for 3rd party workplaces and consider which risks are relevant to the site being visited. Ensure you have appropriate personal protective equipment (PPE) where required.

Figure 3. Application assessment



3.3 EAP stop alert function

Where a non-compliance matter has been identified, the business area responsible for oversight of the matter should ensure that an EAP 'Stop' alert is raised against the operator.

The EAP stop alert function will provide staff with a method to quickly identify if a non- compliance matter is present prior to the assessment of an application for a significant change.

Where the operator is not compliant with mandatory regulatory requirements, issuing a significant change cannot proceed until the requirement is complied with by the operator.

If there is any confusion on whether a matter falls into this description, the business area responsible for oversight of the non-compliance matter should seek advice from the Branch Manager, Advisory and Drafting, Legal, International and Regulatory Affairs (LIRA).

3.4 Alternative means of compliance (AMOC) approvals

Certain provisions of the regulations refer to a person or operator holding an approval.

Where an application includes an approval, the inspector is required to consider the matters mentioned in regulations 11.050 and 11.055. In addition, the inspector may elect to use the provisions of regulations 11.035, 11.040 and 11.047 to support their determination of whether the approval should be granted using the standard of safety mentioned in subregulation 11.055(1B).

This standard of safety is whether 'granting the authorisation will preserve a level of aviation safety that is at least acceptable'. To determine whether the level of aviation safety is acceptable, paragraph 4.1.2 of AC 11-04 states that where the approval would permit the

operator to conduct the activity using an alternative means of compliance (AMOC) to the rules, the inspector must determine that the AMOC will ensure an equivalent level of safety to that established by the rule. Refer to section 3.5 for information on the standards for safety cases/safety assessments provided by applicants.

There are generally 2 kinds of approvals:

- the kind that authorises a particular activity (e.g. a minimum equipment list as required by regulation 91.935); or
- the kind that allows CASA to authorise a means of compliance other than that prescribed by a rule (e.g. alternative maximum period of use of a foreign registered aircraft in Australian territory under regulation 119.260).

In considering an approval requesting the use of an AMOC the inspector should:

- understand the intent of the rule, as this context is essential to determining that the approval will not reduce aviation safety
- assess the operator's safety case to understand how the proposed activity will maintain or improve aviation safety when compared to the level of aviation safety established by the rule before an approval is granted
- ensure that the safety controls on which the level of aviation safety determination is based are included in the approval itself or the operator's documentation (exposition/operations manual)
- if the safety controls are included in the operator's documentation - ensure the approval is subject to a condition that amendments, other than editorial amendments, to the relevant section of the documentation are not permitted, thereby requiring the operator to apply for a new approval if the operator desires to change the underlying safety controls.

> Note: The condition should detail the specific section of the exposition/operations manual relating to the approval.

The assessing inspector for an AMOC application is to seek peer review of their assessment by Flight Standards Branch in the following cases:

- where the application involves a first issue by CASA to any operator of a particular kind of approval
- where the safety controls proposed by the operator to ensure an acceptable level of safety are significantly different to the controls utilised by other operators who have been issued with the same approval
- where the inspector is unsure as to whether the safety controls proposed by the operator to support the issue of the approval will ensure an equivalent level of safety.

When an approval is issued under the regulations, the inspector must select the approval to be issued on the approval data sheet. In this case the approval should be subject to a condition that an amendment to the relevant section of the exposition/operations manual is a significant change under the regulations.

> Note: The condition should detail the specific section of the exposition/operations manual relating to the approval.

3.4.1 Conditions

Regulation 11.056 permits CASA to grant an authorisation subject to conditions. If required, the approval data sheet makes provision for the inspector to recommend a condition for an approval, however in most cases conditions will not be required. An authorisation requires the operator to comply with their exposition/operations manual, which should include any specific limitations or operational requirements. This negates the need to place conditions on the authorisation. Conditions should not be used as a substitute for an operator's inadequate or missing exposition/operations manual content. The content should instead be rectified.

In the rare case where an authorisation requires a condition, the inspector must provide a draft copy of the authorisation, that includes the reasons for the condition, to LIRA for review.

> Note: Section 3.4 discusses one standard circumstance where a condition will be placed on an approval relating to exposition/operations manual content that is fundamental to a safety case.

3.5 Safety assessments

As outlined in section 3.4 above, CASA can only grant authorisations under regulation 11.055 (where the regulation specifies that these approvals are subject to regulation 11.055) if the required level of aviation safety is met. To make this determination, the applicant should provide some form of safety assessment. Other common phrases used to describe a safety assessment include 'risk assessment' or 'safety case'. These descriptions are largely interchangeable.

For approvals authorising a particular activity, the applicants' policies, processes and procedures for that activity must be reviewed to determine if they ensure that the required level of safety will be met.

For approvals authorising an AMOC, the applicant should provide their assessment regarding how the level of safety will be met.

> Note: Some rules require the applicant to provide a safety assessment.

If an applicant does not provide this information as part of their application, the inspector should request it using the relevant power under regulation 11.040.

Since risk assessments and safety cases produced by operators will be developed using operator-specific procedures, documentation and risk/control effectiveness rankings, it may not be possible to reliably assess an operator-generated risk assessment outcome or a safety case conclusion against consistent criteria that is acceptable to CASA.

Chapter 7 of AC 11.04 explains in detail the methodology and processes to be followed by industry and CASA in relation to safety assessments. Inspectors should be thoroughly familiar with the content of this chapter and ensure than any operator submissions in support of an approval conforms as much as possible to the intent of this section.

Notably, rules are designed to provide a level of safety assurance against the realisation of an underlying hazard, i.e. reduce the probability of a hazard eventuating to an acceptable level. Therefore, where an applicant proposes to remove the safety control, or part of the safety control, provided by a rule and substitute alternative safety controls (i.e. the different means of compliance), the applicant must explain how the alternative safety control will achieve an equivalent level of safety assurance to the original rule.

The explanations of how the applicant will achieve the equivalent level of safety assurance should explain how the applicant's proposed control framework will operate on the risks arising from the change in approach to compliance with the relevant rule. Generic or generalised statements about how the required level of safety will be preserved are not acceptable in this regard. Some examples of inadequately specific descriptions of safety controls include, but are not limited to, the following:

- That the applicant has a training and checking system.
  The rules are predicated on some operators having a training and checking system. Unless the applicant specifically outlines training and checking measures above the minimum required measures in the rules and explains how those enhanced measures control the relevant risks, statements by an applicant that a training and checking system will compensate for the substitution of a rule will not sufficiently substantiate that an equivalent level of safety assurance exists.
- That the applicant has a safety management system.
  The rules are predicated on some operators having a safety management system and the same considerations apply as outlined for a training and checking system above.
- That the applicant previously uses the proposed alternative safety control under the pre-2 December 2021 rules and no safety instances were identified, recorded or reported.
  The rules for air transport operations are designed to provide an appropriate margin of safety above the absolute minimum standards of safety to provide greater assurance of safe outcomes. Statements that an applicable safety margin has not previously been applied without adverse safety outcomes occurring or has not previously been needed to ensure safe outcomes, is not evidence that the relevant safety margin might not ever be needed.

For an inspector to be able to assess the application, the operator needs to explain how their proposed safety controls are **directly relevant** to the hazard and mitigates the risk of that hazard being realised.

3.6 Significant change Part 11 considerations

Approval of a significant change is subject to Part 11 since such an approval is encompassed by the definition of authorisation in regulation 11.015. Accordingly, the requirements of the regulations are subject to the requirements of Part 11 for the approval of a significant change.

The inspector must take into account a combination of the criteria within subregulation 11.055(1A) and the provisions mentioned in the regulations for approval of significant change.

4. Surveillance

Policies and procedures for the conduct of surveillance are documented in the CASA Surveillance Manual.

> Note: Inspectors will need to refer to the interim surveillance process 2023-2024 instruction for further details.

Surveillance activities are conducted using the same worksheets as initial or significant change applications. However, are modified by the surveillance managers as follows:

- the applicant name and ARN is replaced with authorisation holder
- EAP is replaced with 'Event number'
- the user instructions are amended to describe the modified worksheet
- only those regulations relevant to the surveillance scope are visible
- a new column is added that details the scope of the surveillance activity.

As illustrated in Figure 4, inspectors will use the worksheet to record their assessment by selecting the relevant statement in the compliance column(s). Prior conducting the onsite activity, the inspector can use the worksheet to identify deficiencies in the exposition/operations manual. The compliance column on the Part related worksheet (e.g. OPS.121) allows the inspector to select:

- Compliance (Yes or No)
- N/A (not applicable to the authorisation holder activities)
- MI (more information required to confirm present and suitable)
- Site visit (required to confirm **operating** and **effective**).

> Note: Separate approval worksheets do not have this function.

For guidance on the assessment of a specific rule, and to assist with the decision-making process (present and suitable), the inspector must refer to the associated principle document.

> Note: The principle document is not designed to replace AC or AMC/GM but rather assist the inspector in their decision making.

4.1 Onsite inspections and verification

Section 27AC of the Act provides for CASA to undertake an inspection or test.

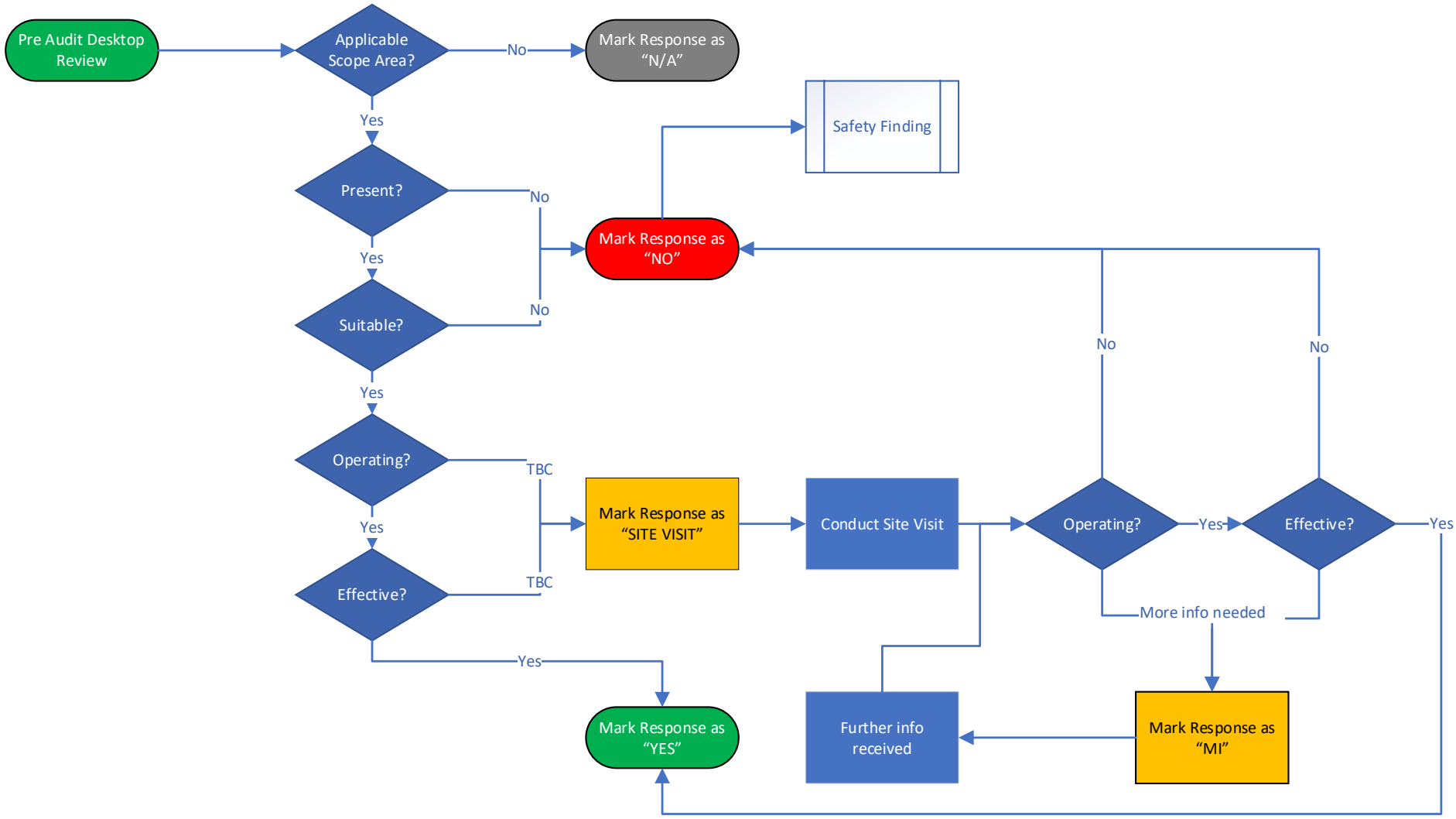
The requirement for an onsite inspection will depend on the nature and complexity of the system being assessed. To ensure a system is **operating** and **effective**, the inspector may need to interview staff, observe a process or inspect facilities. Inspectors will use Protocol suite (OPS.26) Checklists for onsite inspections where available.

4.1.1 Work health and safety

Inspectors conducting an industry onsite visit must assess potential work health and safety (WHS) risks for the site and take steps to mitigate identified risks. If clarification is required on the site WHS risks or mitigations, confirm with site contacts prior to the visit. In addition, inspectors must receive a work health and safety briefing/induction to the location and confirm emergency procedures and access to first aid treatment. Identified risks must be documented on your worksheet, along with the steps taken to mitigate them.

For a list of identified potential onsite WHS risks, and the controls that are part of CASA's WHS management system, refer to the WHS Checklist for 3rd party workplaces and consider which risks are relevant to the site being visited. Ensure you have appropriate personal protective equipment (PPE) where required.

Figure 4. Surveillance assessment



5. Operations protocol framework quality assurance

To ensure the operations protocol framework continues to assist CASA to make outcome-based legislation assessments and decisions that are consistent and compliant with our legislation, the framework is supported with a quality assurance and continuous improvement process contained in the Operations Protocol Framework Quality Assurance Manual.

6. Revision history

Amendments/revisions for this principle are recorded below in order of the most recent first.

Table 6. Revision history table

Version No.	Date	Parts / Sections	Details
2.2	October 2024	Section 3.1 (new)	Added information to support applications submitted by an agent.
2.1	October 2023	Part 3 and 4 Part 5 (new)	Added WHS information. Added information about the continuous improvement process.
2.0	July 2023	Various	Changed name to Operations protocols, added a policy statement from the CEO/DAS. Various updates to images and wording.
1.2	October 2022	Various	Names of protocol document suites updated to reflect correct names of published documents. Purpose (section 1.1) updated. Additional paragraph added to section 2.4.1. Minor typo and word changes throughout.
1.1	November 2021	Acronyms and section 2	Reviewed numbers for all protocol document suites (changed from FOPS to OPS) and reordered (section 2.2)
1.0	November 2021	All	First issue