

RCAA Ramp Inspection Manual (RCAA-RIM)

Issue 02/ February 2021

Log of issues		
Issue	Issue date	Change description
001	10-09-2020	Creation of the document -initial version-
002	10-02-2021	<p>Correction & amendments:</p> <ul style="list-style-type: none"> - Alcohol testing procedures - Change of the foreword to better involve the RICS for any RIM and Appendices modification and avoid consultation when minor changes such as (typo, changes with no impact on procedures, no additional guidance...) are implemented - Clarification of definition of EASA PS - Minor clarification/improvements in text - Included some additional best practices - Included information from training bulleting 1, 2 and 3 - Addition of explanatory material on the GDPR - Addition of the explanation "safety report" was formerly "Standard Report" - Clarification of the "double penalty" principle - Added a chapter in findings on: "special cases, examples"

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1 Introduction

1.1 History, background & purpose of the manual

Ref.: GM1 ARO.RAMP.005 Scope

In 1996, the European Civil Aviation Conference (ECAC) launched its Safety Assessment of Foreign Aircraft programme (SAFA) to complement the ICAO audits by concentrating on actual aircraft checks at airports ("ramp inspections") aimed at ensuring that relevant ICAO standards were being complied with.

In 2004, European Commission Directive 2004/36/CE created a legal obligation upon EU Member States to perform ramp inspections on third country aircraft landing at their airports, where 'third country aircraft' implied aircraft not used or operated under control of a competent authority of an EU Member State. Nevertheless, the Directive did not prohibit in any way EU Member States from inspecting aircraft from other EU Member States.

On 28 October 2012, the Implementing Rules on Air Operations entered into force as the new legal basis for the EU ramp inspection programme, replacing the original system established by the SAFA Directive and its implementing regulations with a new system represented by the new EU Ramp Inspections Programme.

Under the EC SAFA programme as implemented until the 28th of October 2012, foreign aircraft (either EU or third country) may be inspected. EU carriers are checked against EU standards (SACA) when inspected in EASA States, whereas all other inspections are performed against international standards (SAFA). In case of significant irregularities, the operator and the appropriate Aviation Authority (state of operator or state of registry) are contacted in order for corrective measures to be taken not only with regard to the aircraft inspected, but also with regard to other aircraft which could be concerned in case of a generic nature irregularity. Where irregularities have an immediate impact on safety, inspectors may demand corrective actions before they allow the aircraft to leave.

The European regulatory requirements for SAFA & SACA have been established in Commission Regulation under Part-ARO and is fully applicable from the 28th of October 2014. Romania, as a member state, adopted the European regulatory requirements as they are.

The purpose of this Manual is to describe the processes and procedures put in place by the RCAA in order to implement the RAMP inspection requirements. It covers the performance of RAMP inspections, management and administration of data obtained on RAMP inspections as well as the RAMP inspectors qualification process.

The document has the same legal status as the European regulations, it has the same content of mandatory items (including the attachments) as EASA RIM, whilst the Appendixes (9.1 – 9.2) are mandatory (unless an AltMoC is defined in accordance with ARO.GEN.120) since they are directly related to the PART.ARO AMCs.



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As the manual consists of processes, procedures and regulatory AMC requirements the following update sequence could be foreseen. Any AMC update shall be reflected in the manual, and amended guidance or best practises resulting from such update will be notified to the SAFA participating states by email and during the RICS meetings. Updates proposed by EASA or by the SAFA participating states will also be notified and agreed upon during RICS meeting.

The manuals chapter order follow to a large extent the logic structure of the ramp inspection process.

1.2 Glossary: definitions of words and acronyms

1.2.1 Acronyms

ACMI	Aircraft crew maintenance insurance (provided in a wet lease arrangement)
AD	Airworthiness Directive
AIP	Aeronautical Information Publications
AMC	Acceptable Means of Compliance
AMM	Aircraft Maintenance Manual
AMP	Approved Maintenance Programme
ARO	Authority Requirements for air Operations
ASC	Air Safety Committee
ATC	Air Traffic Control
CDL	Configuration Deviation List
CFMU	Control Flow Management Unit
CoA	Certificate of Airworthiness
EASA	European Aviation Safety Agency
EASA-RIM	EASA Ramp Inspection Manual
EC	European Commission
ECAC	European Civil Aviation Conference
EU	European Union
GM	Guidance Material
ICAO	International Civil Aviation Organisation
IDEA	In-Depth Expert Analyses
MEL	Minimum Equipment List
MPD	Maintenance Planning Document
NAA	National Aviation Authority
NC	National Coordinator
NMIR	Network Manager Interactive Reporting
NOP	Network Operations Portal
POI	Proof Of Inspection
RAMP	Ramp inspection process
RCAA	Romanian Civil Aeronautical Authority
RCAA-RIM	RCAA Ramp Inspection Manual
RICS	RAMP Inspection Coordination and Standardisation
RITO	RAMP Inspection Training Organisation
SACA	Safety Assessment of Community Aircraft

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SAFA	Safety Assessment of Foreign Aircraft
SANA	Safety Assessment of National Aircraft
SRM	Structural Repair Manual
SWC	System Wide Coordination
SWPM	Standard Wiring Practices Manual
TCO	Third Country Organisation
VMC	Visual Meteorological Conditions
WDM	Wiring Diagram Manual
TBFD	To Be Further Developed

1.2.2 Definitions

'EASA Member States' (EASA PS): All EU and EFTA States (Switzerland, Iceland, Norway) participating in the EU Ramp Inspection Programme.

'Participating States' (PS): States participating in the EU Ramp Inspection Programme, consisting out of EASA Member States and Non-EASA Member States that have entered into a working arrangement with EASA.

'SANA inspections': Ramp inspection (by a competent authority) of aircraft used by organisations under its own regulatory oversight.

'SAFA Participating states': Non-EASA Member States that have entered into a working arrangement with EASA for the participation in the SAFA programme and EASA Member States.

'SANA inspections': RAMP inspection (performed by RCAA) of aircraft used by organisations under its own regulatory oversight.

'SAFA inspections': RAMP inspections performed by SAFA participating state on any aircraft and ramp inspections performed by EASA State on an aircraft operated by an operator under the regulatory oversight of a non-EASA Member State.

'SACA inspections': RAMP inspections performed by an EASA Member State on aircraft operated by an operator under the regulatory oversight of another EASA Member State.

'System wide coordination (SWC)': In agreement with all EASA Member States, the Agency has developed a common risk-based system where the Agency calculates target number of inspections on certain operators meeting a pre-defined traffic threshold criterion. Overseas territories and non-EASA Member States are not included in this system, however the latter have a possibility to opt in.

'SWC participating states': All EASA Member States and voluntary SAFA participating states.

'Layer 1 operators': Operators having traffic above a threshold established by the Agency as per chapter 5.1.1 in this manual.



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'Layer 2 operators': All remaining operators/aircraft which could be inspected under ARO.RAMP as per Regulation (EU) 965/2012. Typically, but not limited to, low utility commercial operators, Business operators/aircraft, General Aviation and similar types of operation.

1.3 Data protection

All procedures described in the present manual involving processing operations shall comply with applicable data protection rules. The applicable rules are:

- Regulation (EU) 679/2016
- Law No. 190/2018

1.4 Objectives

The purpose of ramp inspections is to perform on-the-spot assessments of aircraft on the ramp to check compliance with the applicable standards for the type of operation. The inspection covers a check of the flight crew licenses, flight operation documentation, relevant aircraft documents, aircraft condition, mandatory cabin safety equipment and cargo area.

1.5 Inspection matrix

Operators licensed by EASA PS and inspected by other EASA PS are checked against EU Standards; those inspections are referred to as "Safety Assessment of Community Aircraft (SACA) inspections. All other inspections use ICAO Standards and are commonly known as Safety Assessment of Foreign Aircraft (SAFA) inspections. In addition, each ICAO contracting State should perform ramp inspections on operators licensed by them; although out of the scope of the Programme, such inspections are called Safety Assessment of National Aircraft (SANA) inspections.

Inspected Operator licensed by:	Operator inspected by:	
	EASA Member state	Non-EASA Participating state
EASA Member State	SACA	SAFA
Non-EASA state	SAFA	
Inspection on Romanian operator	SANA	

Ramp inspections are part of a European Union safety programme and should be performed in a harmonised and standardised way by all EASA Member States and all states with which EASA signed a working arrangement (participating states). State aircraft as defined in the Chicago Convention (aircraft used in military, customs and police services and declared as such in the flight plan) are outside the scope of the EU Ramp Inspections programme.

SANA inspections should follow, as far as possible, the same principles as applied to SAFA and SACA inspections in accordance with Part ARO.RAMP.

2 EASA's role in the EU Ramp Inspections programme

The Agency is responsible for the overall coordination of the programme to all ramp inspection states and for reporting the results thereof to the Commission.

The specific role and responsibilities of EASA in the EU Ramp Inspections programme are:

- to collect, by means of a centralised ramp inspection tool, the inspection reports of the participating states engaged in the EU Ramp Inspections Programme and results of alcohol tests performed on cabin crew and flight crew performed within EASA PS;
- to develop, maintain and continuously update the centralised ramp inspection tool (e.g. explore possibilities to introduce update of ramp inspection tool to run on mobile devices) including tracking for ramp inspector currency;
- to provide necessary changes and enhancements to the ramp inspection tool application;
- to analyse all relevant information concerning the safety of aircraft and its operators;
- to report potential aviation safety problems to European Commission and all the participating states;
- to inform the European Commission and all the participating states on follow-up actions;
- to propose coordinated actions to the Commission and to the competent authorities, when necessary on safety grounds, and ensure coordination at the technical level of such actions;
- to liaise with other European institutions and bodies, international organisations and third country competent authorities on information exchange;
- In exceptional cases engage in resolving disputes over findings between operators and inspecting authorities, or delegate a third party to facilitate resolutions;
- To submit a yearly report to European Commission, Member States and public to reflect the activities of European ramp inspections programme;
- To establish a list of prioritised operators, which includes:
 - Third Country states (i.e. states outside the EU) deemed to have deficiencies in their safety oversight capability (all operators based in these states are subject to additional scrutiny);
 - Third Country and European Union operators that should be prioritised for regular inspections;
 - Newly authorised Third Country operators,

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- Individual aircraft/operators suspected of engaging in illegal commercial operations, and
- a list of Union and third-country operators for prioritisation of alcohol testing based on a risk assessment performed by the Agency, taking into account robustness and effectiveness of existing psychoactive substance testing programmes.

Besides, the Agency has the following tasks and obligations:

- Monitor the level of activities agreed upon for each state;
- Perform standardisation visits to confirm competency and activities;
- Organise regular meetings to facilitate exchange of information (RICS, IDEA) in cooperation with the participating states;
- Arrange for working groups on new or emerging topics;
- Develop the ramp inspection programme globally;
- Harmonise inspection methodology between states;
- Maintain and develop a risk-based model for fair number of inspections and distribution;
- Calculate and distribute inspection targets to the SWC participating states;
- Develop and maintain a rewarding system for certain inspections to promote effective use of inspection resources on “layer 2” operators;
- Monitor state compliance and adherence to EASA system wide calculated targets and distribution for “layer 1” operators;
- Collect and analyse traffic data with regards to SWC coordination and provide it to the SWC participating states.

3 Organisation

3.1 Ramp National Coordinator duties and responsibilities

A national coordinator (NC) should be appointed by the Romanian CAA (RCAA) and tasked with the day-to-day coordination of the programme at national level to facilitate the implementation of the programme in accordance with ARO.RAMP applicable requirements. The national coordinator is full-time contracted, in order to fulfil his/her tasks relating to all aspects of the national ramp inspections programme.

In addition to the ramp national coordinator, RCAA may appoint a coordinator for national operators to act as the focal point for other participating states regarding ramp inspections performed on operators under its oversight.

The NC for the RAMP inspection has (according to Job Description of RAMP NC in the RCAA) , mainly, the following responsibilities and attributions:

- (a) Ensure that the RAMP inspections are planned and performed in accordance with criteria for prioritizing the inspection referred to in para. ARO.RAMP.105(a) of Annex II of Regulation (EU) 965/2012;
- (b) Develop of an annual ramp inspection programme, taking into account the list of prioritised operators and the assigned “layer 1” and “layer 2” operator targets and the list for prioritisation of alcohol testing;
- (c) collect and analyse traffic data (using Eurocontrol OneSky TCO-Utility Tool) for “layer 2” operators and supervise the ramp inspectors planning process;
- (d) to supervise ramp inspectors’ planning process;
- (e) to monitor the implementation of the annual ramp inspection programme, including alcohol testing and adherence to inspection targets assigned by the Agency to prevent both over- and under-inspections;
- (f) Ensure that the annual programme leaves appropriate time and resources to enable the inspections of aircraft operated by “layer 2” operators suspected of non-compliance with the applicable requirements;
- (g) Provide RAMP inspectors with information relevant to the conduct of inspections, such as, where applicable: current editions of EASA prioritization lists and other information, SAFA Warning and SAFA Alert messages to Eurocontrol by e-mail , daily flight schedules sent by airports, information on charter flights received from the AACR Overflight Department, etc.;
- (h) Ensure that RAMP inspectors are equipped with protective equipment, inspection tools and with appropriate, approved and properly maintained alcohol breath analyser testing devices, in accordance with national requirements;
- (i) Ensure that information collected as a result of RAMP inspections contained in inspection reports are entered in the database EASA as soon as possible but no later than 21 of calendar days from the date of inspection , in accordance with the provisions of para. ARO. RAMP.145 para. (a) of Appendix II to Regulation (EU). 965/2012 ;

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- (j) to ensure the quality of data and reports uploaded into the ramp inspection tool, including reports uploaded by other officials performing alcohol tests;
- (k) Decide whether and when a non-compliance reported in a RAMP inspection may be closed and ensure that the necessary actions are taken to close it in the Centralised ramp inspection tool ;
- (l) Validate information entered by the RAMP staff in the Centralised ramp inspection tool;
- (m) Ensures the storage and archiving of the Inspection reports and of the documents related to them, according to the provisions of the AACR PI-QM-ARH procedure, regarding the archiving of documents;
- (n) Ensure the transmission, whenever necessary, of written communications by e-mail, fax or official address to air operators, competent authorities, EASA and other EU Member States;
- (o) Provide immediate information to the competent authorities of the State of the operator and, where applicable, of the State of registry of the aircraft and of EASA in the event of the application of the grounding / temporary loss of airworthiness of an aircraft, in accordance with ARO. RAMP.140 paragraph (b) of Annex II to Regulation (EU) no. 965/2012 and ensure the immediate notification of EASA and the other EU Member States whenever there is information on the occurrence of a potential risk to flight safety, in accordance with para. ARO.RAMP.145 paragraph (c) of Annex II to Regulation (EU) No. 965/2012 ;
- (p) to provide information on safety reports to the Agency, the Commission and the Member States in the domain of ramp inspections; and to notify the Agency and the Commission of additional testing for psychoactive substances other than alcohol.
- (q) acts as a national focal point for the training of RAMP inspectors and supervise training, initial and recurrent of staff ui of the AACR involved in the program inspection platform (ramp inspection, inspectors from the main platform, users of the database EASA , etc.);
- (r) Coordinate the evaluation activity for the approval of the training organizations for the platform inspectors, according to the provisions of para. ARO. RAMP.120 of Annex II of Regulation (EU) No. 965/2012 ;
- (s) Ensure that all platform inspection personnel are properly qualified and trained in accordance with the provisions of para. ARO. RAMP.115 of Annex II of REGULATION (EU). 965/2012 ;
- (t) organizes regular working meetings and internal training sessions with staff involved in RAMP inspection in order to ensure a high standard of quality inspections, especially if:
 - i. Changes / updates on legislative requirements regarding RAMP inspections;
 - ii. problems appeared on quality of data entered in the reports of RAMP inspection (entering incorrect information, mistakes, omissions, etc.);
 - iii. staff problems (ex. new staff, etc.) ;

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- (u) Ensure that specific AACR procedures are updated in order to implement the new legislation in the field of RAMP inspections;
- (v) Ascertain distribution of new legislation on RAMP inspections and updated versions of the procedures related to all personnel involved in ramp inspection;
- (w) implements at national level , a control system for quality of RAMP inspection, using the functions of the Centralised ramp inspection tool;
- (x) Manages the access of AACR staff and national operators to the Centralised ramp inspection tool;
- (y) Collaborate with the AACR spokesperson to resolve requests for access to information obtained from RAMP inspections ;
- (z) represents Romania at meetings of the Group of the European Expert ramp inspections (RICS - Ramp Inspection Coordination and Standardization) and, where appropriate , other meetings on ramp inspections ;
- (aa) Propose for designation of national representatives of the working groups on RAMP inspection;
- (bb) Promote and put in place national program of inspectors exchange referred to in ARO. RAMP.115 para. (e) of Annex II of Regulation (EU) No. 965/2012;
- (cc) Act as focal point nationally for inspection and authorities ramp , in the context of standardization activities conducted by EASA in accordance with Regulation (EU) No. 628/2013 ;
- (dd) Propose the members in standardization visit teams, in accordance with Article 6.2 of Regulation (EU) No 1095/2010. 628/2013;
- (ee) Provides EASA, the European Commission and Member States , upon request, information keep on correspondents AACR competent authorities and air carriers and inform when there are changes in information contact personnel nominated involved in the inspection platform.

3.2 Ramp Inspector duties and best practices

Ramp inspectors have the following duties and responsibilities:

- Follow RCAA procedures and guidance on EU Ramp Inspection Programme implementation;
- Follow the defined criteria for unforeseen inspections of “layer 2” operators;
- Inspect items selected from the Ramp Inspection checklist according to assigned items of competence;
- Comply with RCAA procedures related to inspections of aircraft not being prioritised or not being suspected (‘unforeseen’);
- Plan inspections (and items) based on the preparation module (use all available sources, e.g. EASA/National/Eurocontrol/local sources/etc);

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- to plan and perform alcohol tests according to the annual plan and procedures developed by the RCAA;
- to check serviceability of alcohol test equipment (when alcohol tests are planned to be performed by RAMP inspectors).
- Submit Ramp Inspection paperwork and other evidence to the National Coordinator, i.e. Proof of inspection forms, and upload inspection photos and other relevant information and evidence gathered while performing ramp inspector duties;
- Attend the regular internal team meetings with the ramp national coordinator to discuss all aspects of the ramp inspection process (e.g. time management, efficiency of the inspection, team coordination, problems encountered, lessons learned, etc.).

3.3 Ramp Inspector equipment and access credentials

The authority should provide inspectors with the necessary access rights to all the airports they are eligible to perform the inspections, as well as necessary equipment (e.g. flashlights, digital camera, and mobile phone) and protective clothing suitable for various environmental circumstances (e.g. fluorescent vests, ear protection etc).

In addition, RCAA provides the following tools to its inspectors:

- Inspection credentials allowing the access on airport premises;
- Technical documentation, if available (A/C manuals, MEL updates, etc.);
- Operational documentation (status of NOTAMS, weather, charts, AIP, etc);
- Laptop/tablet (document storage and/or internet data to access information sources or the SAFA ramp inspection tool, etc);
- Inspection mirror (mainly for cabin);
- Access to expected traffic data (e.g. from slot coordinator where there is a slot system in place for a specific airport);
- Access to actual airport traffic data (e.g. public and non-public if available);
- Suitable means of transportation at the airport/inspection site (e.g. dedicated car);
- Relevant contact information (e.g. airport phone numbers, airport GROUND Dispatch, Police, Airport Security etc.).
- When performing alcohol test, ramp inspectors should be equipped with an appropriate and approved testing device following the national requirements on alcohol testing of individuals. This equipment should be a breath alcohol analyser and should be maintained properly. Additional guidance on equipment to be used can be found in chapter A11

3.4 Management of safety / third party information

Safety information may be received from various external sources (e.g. whistle-blower reports). Even ramp inspectors themselves may be a source of safety related information.

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A structured approach on how to process such information and who to notify should be as follows.

3.4.1 The collection of Information

For the purpose of conducting platform inspections, AACR collects and processes the following information:

- a. Relevant safety information, collected from sources such as:
 - Pilot reports;
 - Reports received from maintenance organizations;
 - Reports on civil aviation events;
 - Reports of other organizations, independent of AACR;
 - Complaints received from the public using the template as in RIM Attachment 11.8 (Template accesible on RCAA website);
 - Information received from various observers, such as: handling or maintenance personnel, regarding defective maintenance, damage or defects, incorrect loading of the aircraft, etc.
- b. Information on actions following a RAMP inspection, such as:
 - Aircraft detained on the ground;
 - Aircraft or operators whose operation has been prohibited by the Member State in accordance with Article 6 of Regulation (EC) No 2111/2005;
 - Necessary corrective measures;
 - Communication with the competent authority of the operator; and
 - Restrictions on flight operations.
- c. Further information on the operator, such as:
 - Implementation of corrective actions; and
 - Recurrence of nonconformities.

3.4.2 The lines of communication

The information referred to in paragraphs 3.4.1 (a), (b) and (c) shall be received using the following means of communication:

- a) The reports of the pilots shall be received by the Director-General of the RCAA and distributed in accordance with the internal PI-QM-CIC procedure, to the directorate and the service in which the department responsible for platform inspections operates. The head of the service makes available to the NC the reports received;
- b) Complaints received from the public (the "Flight Safety Notice" form set out in Annex 4 to this procedure, published on the AACR website or in any other format used) - are received by the Director General of the AACR and distributed according to the PI-QM-CIC procedure to the AACR Spokesperson. If they contain relevant information on flight safety, the

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complaints are sent, in copy to the directorate and the service in which the department responsible for platform inspections operates, the head of the service makes available to the NC the reports received;

- c) Civil aviation event reports, transmitted to AACR in accordance with the provisions of the RACR-REAC regulation on civil aviation event reporting, shall be managed in accordance with the PI-SG-GRE civil aviation event reporting procedure management by the Directorate and the service of which is part of the department responsible for platform inspections. The head of the service makes available to the NC the reports received or, as the case may be, they are accessed directly from the internal RCAA Events Database;
- d) Reports of non-compliance received from authorized maintenance organizations shall be received by the Director-General of RCAA and distributed in accordance with the PI-QM-CIC procedure to the directorate of the department responsible for platform inspections. The head of the service makes available to the NC the reports received;
- e) Other sources of information, such as those resulting from statistical analysis, synthetic reports, safety reports, etc. are managed according to the PI-SG-GRE procedure, by the department and the service of which the department responsible for platform inspections is part. The head of the service makes available to the NC the respective documents or, as the case may be, they are directly accessed by the inspectors at the platform within the current activities;
- f) Centralised ramp inspection tool - information in the database is accessed directly by inspectors on the platform, using the EASA website;
- g) "SAFA Warning" and "SAFA Alert" messages - are sent daily by Eurocontrol directly to the NC by e-mail;
- h) Information on a new operator or the introduction of a new type of aircraft / flight operations for existing operators, as well as information on requests for a flight or a series of charter flights shall be provided by the AACR Overflight Service directly, by e-mail to the RAMP Compartment Coordinator.

The NC, supported by RCAA specialists (operations, airworthiness, traffic etc.), is responsible for reviewing and assessing the credibility of the available information to determine if it can be verified during a ramp inspection. If the suspicions or allegations of any kind of deficiency can be investigated during a ramp inspection, such inspection should be planned. If the operator or airframe cannot be checked by the related state, the NC may decide to file a safety report to alert the other participating states. Alternatively, the EASA ramp coordination section could be contacted for a proposed coordinated action by the state of inspection. A further feedback could be generated through the TCO interface via the confidential information exchange.

3.4.3 Safety Reports

Ref.: AMC1 ARO.RAMP.145 Safety reports

Collected safety related information on operators may be distributed using the Safety Reports form (the formerly called Standard Report) in the ramp inspection tool. However, it should be verified by the reporting authority, as far as possible, before insertion in the centralised ramp inspection tool. Examples of important safety related information could be, but are not limited to:

- Communication failure or difficulties;
- ATC reports on shortage of fuel (declared fuel emergencies), problems with TCAS system, abnormal take-off lengths;
- Information received from maintenance organisations concerning lack of AD compliance or maintenance work performed incorrectly;
- Reports from the general public/whistle-blowers concerning perceived unsafe situations;
- Reports from pilots on incorrect use of radio-telephony phraseology;
- Reports from airport personnel on observed unsafe practice;
- Relevant information concerning accidents and incidents which occurred in Member States' airspace, or
- Unsafe practice observed by ramp inspectors outside the scope of ramp inspections programme.

Safety reports entered into the centralised ramp inspection tool may be further enhanced with useful information like documents, pictures, etc.

3.4.4 TCO WEB-INTERFACE

The TCO database is only accessible for EASA Member States which may use this information under a separate confidentiality agreement. Non EASA Member states have to rely on their own systems or intelligence information received or obtainable from other sources.

The centralised ramp inspection tool could and should, whenever possible, be used for the planning/preparation phase for "layer 1" and "layer 2" operators. Below is a list of items that might be checked in the ramp inspection tool instead of during the inspection:

- Approvals, such as AOC, TCO authorisation and ETOPS;
- Certificates, such as Certificate of Airworthiness, registration and radio licence;
- Aircraft data and equipment installed (versions), such as TCAS, BRNAV;
- Information on leasing arrangements.

The documents accessible via the TCO database might not reflect the actual status, therefore it is recommended to use the data with caution.

4 Coordination (alcohol testing)

4.1 With other officials

When alcohol tests are performed outside of the scope of the EU Ramp Inspection Programme by other officials, the national coordinator may need to define appropriate national requirements for coordination with other national bodies.

This coordination may address the following (not limited to):

- the transmission of the priority list developed in accordance with ARO.RAMP.106;
- the quality check of reports before approval in the ramp inspection tool;
- overlapping of ramp inspections and alcohol test on the same operator at the same moment; and
- the follow-up of a positive test.

Further guidance can be found in Chapter A11.

4.2 With legal enforcement bodies

RCAA and law enforcement bodies should agree on follow-up procedures in case of positive test and refusal of alcohol test during ramp inspection, including the appropriate location to handover the process.

The competent authority may coordinate the necessary exchange of information between ramp inspectors and legal enforcement body (e.g.: reporting of time of inspection, license numbers, proof to be collected, photography of results...).

Further guidance can be found in Chapter A11.

5 Annual Ramp Inspection Programme

Ref.: AMC1 ARO.RAMP.100(c) General

Ramp inspections should always be planned on a long, mid and short-term basis to ensure that sufficient inspecting resources are available and adequate to inspect foreign operators and individual aircraft landing in the state. Terms are defined as follows:

Long terms basis: scheduled operators of L1 + L2 – leading to the initial annual programme;

Medium term basis: EASA update on scheduled operators of L1 + L2, plus L2 schedule new entries – leading to the mid year update (EASA) and usually to a quarterly update (RCAA);

Short term basis: L1 prioritised unscheduled (weekly) + L2 unscheduled (information received from Traffic rights Dept., ATC, ground handlers, etc.) – leading to short notice planning (1 or 2 weeks in advance) and “a posteriori” update of the programme;

Unforeseen basis: on the apron (information retrieved on the spot – e.g.: observed or reported situation, EUROCONTROL alert/warning, etc.) – leading to the “a posteriori” update of the programme

Based upon updates received from the Agency, the state should amend their annual planning. Furthermore, apart from planned inspections, the state should have sufficient

flexibility in their system to allow for unforeseen inspection demands on prioritised operators and aircraft suspected of non-compliances. Ramp inspections should verify the compliance against laid down standards for their particular type of operation and covering as many relevant areas as possible from the standard checklist. Additionally, the preparation phase of the plan should take into account the principles of non-discriminatory approach, widest possible coverage and over-/under- inspection.

5.1 Annual programme for Romania

When defining the annual ramp inspection programme, RCAA should take into account:

- The target number of inspections assigned by the Agency on each “layer 1” operator

Based on analysis made by the Agency, RCAA receives every year inspection target numbers per “layer 1” operators for the annual planning, only and if the operator traffic exposure to state is above the defined threshold and reliable data is available.

- The total target number of inspections assigned by the Agency on “layer 2” operators

Based on analysis made by the Agency, RCAA receives every year a minimum total number of inspections to be planned on “layer 2” operators.

Note: The annual targets assigned by the Agency should be treated as confidential.

5.1.1. Annual programme on “layer 1” operators

The list of “layer 1” operators is established by the Agency with the help of the SWC participating states, taking into account the traffic exposure and the level of confidence on these operators.

Determination of the list of “layer 1” operators

Every year before the 3rd Friday of November, the Agency communicates the list of “layer 1” operators.

The methodology used by the Agency to determine if an operator (a) is to be considered a “layer 1” operator is in line with the following principles:

- An operator (a) may be considered a “layer 1” operator for the year (Y) when its traffic exposure (T) in the year (Y-1) exceeds 250
- (T) is calculated with the use of Eurocontrol data, applying the following formula:

$$T = \frac{\text{Number of landings of (a) in all EASA Member States}}{\text{Number of EASA Member States with more than 50 landings of (a)}}$$

Assignment of target numbers of inspections on “layer 1” operators

A number of inspections is then established for each of these “layer 1” operators, considering a “confidence level” (C) and the “traffic exposure” (T) calculated as explained above. The calculations are based on reliable data and all “layer 1” operators are processed towards the same parameters.

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Note: Only operators for which the Agency has reliable basic data for confidence and traffic exposure are considered.

The matrix used to determine the number of inspections to be performed on “layer 1” operators is defined by the Agency, after consultation with the SWC participating states, and has two axes:

- The x-Axis is displaying the “traffic exposure” (T), calculated as explained above;
- The y-axis is displaying the “confidence level” (C) whereby the Agency has established a sufficient level of confidence in an operator and/or the state of the operator.

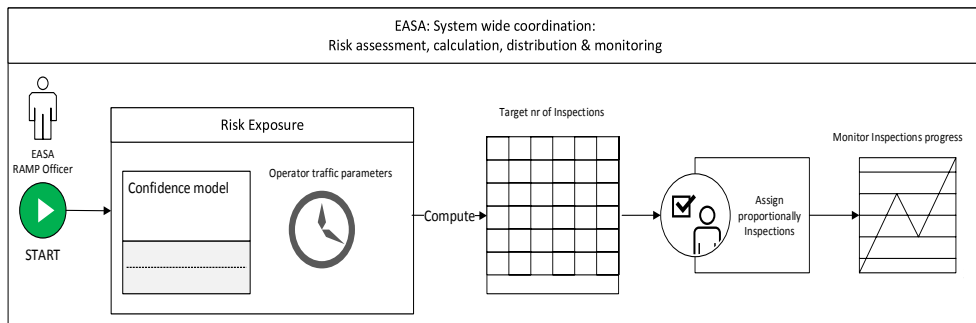
Once the traffic exposure (T) and the confidence level (C) are established for a specific “layer 1” operator, the Agency can then define the target number of inspections to be performed on this operator, using that matrix.

Once the target numbers of inspections are determined for each “layer 1” operator, the Agency assigns national targets for each SWC participating state, with respect to the following principles:

- 1) a target of “0” inspection is assigned to states where the historical traffic level of the operator is below a defined threshold;
- 2) each state in which the historical traffic level of the operator is above this defined threshold should receive a target number of inspections of 1 or more;
- 3) the Agency may redistribute the target numbers of inspections defined per states, in case one state has an extraordinary amount of inspections on one operator.

Inspection target numbers on “layer 1” operators are updated by the Agency at least once a year, after consultation with the SWC participating states.

The drawing below illustrates the system schematically:



Establishment of the national annual ramp inspection programme

RCAA defines its annual ramp inspection programme on “layer 1” operators, based on the target numbers of inspections assigned by the Agency. Any request to change such inspection numbers (e.g. in case an operator ceases, increases or starts its operation to the state) needs to be documented and forwarded to EASA for update. In cases where the programme requests more than one inspection, these should as far as possible be evenly spread over the year, depending on the operator’s schedule, type of operation and cover as many aircraft types as possible.

Based on the list provided by the Agency as per ARO.RAMP.105 (a) (see RIM Attachment 11.4 Table 1), NC will establish schedule of inspections, taking into account the seasonal program of flights, inspectors availability, number of assigned inspections on a certain operator and risk assessment analysis. The output is a program of inspections, as illustrated in RIM Attachment 11.4 Table 2. Progress of inspections could be supervised every month. Changes in program could be made only by NC, based on solid evidences.

The RCAA annual ramp inspection programmes defined for “layer 1” operators should not exceed the allocated inspection targets, except for prioritised operators (identified as such in the RIM Attachment 11.4 Table 1) or for safety reasons which should be documented.

Note 1: The number of national inspections to be carried out on prioritized layer 1 operators and operators in the prioritized States should be reasonable, where this number differs from that assigned by the Agency.

Note 2: Ramp inspectors should refrain from conducting such unforeseen inspections on “Layer 1” operators if it would result in Romania’s target number being exceeded per operator, unless they are clearly justified for safety reasons. This evidence should be well documented and recorded.

5.1.2. Annual programme on “layer 2” operators

Romania (RCAA) will not receive individual targets for “layer 2” operators, which are operators with traffic exposure below the defined threshold and/or for which no reliable data is available. Instead, a total planned number of inspections to be performed on “layer 2” operators is calculated and assigned by the Agency for each member state. This target for “layer 2” operators is defined as a statistical assumption for the state without individual risk assessment or distribution of inspections.

Pre-planned RAMP inspections shall be performed at air operators operating regular/ charter/ad-hoc/business flights at Romanian airports.

The information to be taken into account when planning this type of RAMP inspections are:

- Prioritization lists issued by EASA;

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- Requests for seasonal operation of foreign air operators;
- Information that may lead to suspicions of non-compliance of aircraft with the applicable requirements;
- performance of a national risk assesment, taking into account the SAFA ratio of the operator, number of flights (traffic information) and estimation of operation for the planning period;
- a

ny other written documents or information that can be used to plan inspections for a period of at least 6 months.

The list of the operators in" layer 2" is exemplified in RIM Attachment 11.5 Table 1.

The planning form (as in RIM Attachment 11.5 Table 2).

- The planning of RAMP inspections is prepared by the RAMP National Coordinator (NC), using the EASA issued list of the operators, the number of inspections assigned to be performed and the RCAA established prioritisation criteria;
- In order to standardize the inspection program, by planning inspections, a number of operators / inspections are assigned to the inspection teams;
- The planning of inspections is approved by the RAMP NC;

The change / modification of the planning in respect of the operators to be inspected and the composition of the teams of inspectors shall be made operative, by daily or monthly scheduling.

Inspections planned shortly in advance

- a) This type of inspection (usually for "layer 2" operators) shall be carried out if the information leading to the suspicion of non-compliance and / or the date and time of landing of the aircraft are not known in advance;
The information on the basis of which aircraft / operators to be subject to this type of RAMP inspection is determined as follows:

- Previous inspections performed by RCAA;
- Centralised ramp inspection tool, developed in accordance with para. ARO.RAMP.150 (b) of Annex II to Regulation (EU) no. 965/2012;
- Complaints received from the public;
- Reports from air traffic service providers (e.g. on the abnormal evolution of an aircraft on route/approach/taxi);
- Evidence that the surveillance exercised by the state of registration of the aircraft is not carried out properly;
- "SAFA Warning" and "SAFA Alert" type messages received from Eurocontrol, regarding the flight operations on the Romanian territory of an operator / aircraft on the priority list issued by EASA;
- Priority inspection list issued by EASA, current edition.

Note: Romania receives its individual total number of inspection targets for “layer 2” operators at the same time as the targets for “layer 1” operators.

The total planned number of inspections to be performed on “layer 2” operators, should not be less but may exceed the number assigned by the Agency.

5.1.3. Annual programme for alcohol testing

RCAA should include alcohol tests as part of the annual ramp inspection programme and make use of the list provided by the Agency in accordance with ARO.RAMP.106.

RCAA should avoid planning ramp inspections consisting only of alcohol tests. However, whenever operational reasons or tight time constraints prevent completion of alcohol test during regular ramp inspections (e.g.: short turn-around), RCAA can programme ramp inspections with a stand-alone alcohol test. For operators including in layer 1 of System-Wide Coordination (SWC), stand-alone alcohol tests won't be counted as ramp inspections within the framework of SWC. The number of stand-alone alcohol tests conducted for operational reasons should not exceed the SWC target number of inspections for layer 1 operators not included in the priority list for alcohol testing; for operator included in the priority list for alcohol testing the number of stand-alone alcohol tests may exceed the SWC target. The RCAA annual ramp inspection with alcohol tests included for operators should not exceed the allocated inspection targets, except for prioritised operators (identified as such in the RIM Attachment 11.4 Table 3)

Example:

- if the target was two (and even if those two inspections were already performed but without alcohol tests), up to two additional stand-alone alcohol tests may be performed.
- If the target was zero and the operator is included in the priority list for alcohol testing, stand-alone alcohol test may be performed.

Stand-alone alcohol tests will be defined as ramp inspection strictly limited to alcohol test on crew members. Further guidance can be found in Chapter A11.

5.2 Unforeseen Inspections

5.2.1 Safety information related

Unexpected and unforeseen traffic may occasionally occur at the aerodrome(s) where and when the inspecting team is onsite. This kind of traffic might, in some cases, be more important to inspect from a flight safety perspective than the pre-planned operators, and therefore, the ramp inspectors should have the flexibility to deviate from the plan and inspect those operators instead.

The list below is a non-exhaustive list of situations where the ramp inspectors might, and in some cases should, deviate from the plan in favour of valuable unforeseen inspections:

- Identification of immediate aviation safety hazards which seriously threaten flight safety (potential CAT3 situation) or any other safety related information justifying an inspection;

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- Operators or aircraft suspected of non-compliance in accordance with the principles listed in AMC1 ARO.RAMP.100(b), including those listed on the priority list, as provided by the Agency as per ARO.RAMP.105(a);
- Series of incidents or accidents on a certain operator with a suspected root cause that could be confirmed via a ramp inspection;
- Third country operators not holding a TCO authorisation identified by the EUROCONTROL alert system;
- Operators identified by a safety report included in the ramp inspection tool and containing information that could be checked via a ramp inspection;
- Operators identified by whistle blower information that could be checked via a ramp inspection;
- “Layer 2” operators which were subject to less than 6 inspections during the last 12 months across the SAFA participating states.
- Observation of obvious non-conformities (by inspectors at the platform, by handling or maintenance personnel, etc.), such as:
 - obvious leaks of fuel, oil, other liquids (hydraulic, water);
 - the appearance of smoke;
 - obviously suspicious noises;
 - headlights, position, navigation or emergency lights not working;
 - obvious defects in the structure of the aircraft;
 - tires worn over limits or which do not have the prescribed pressure;
 - obvious defects of the cockpit windshield or of the passenger cabin windows;
 - incorrect loading of the aircraft;

5.2.2 Follow up Inspections

The need for follow-up inspections should be determined by RCAA based on the results of an inspection and/or if the follow-up process indicates that corrective action(s) might have been ineffective.

Follow-up inspections could be foreseen to verify:

- Implementation of corrective action(s);
- Reoccurrence of non-compliance;
- Maintenance or operational measures taken after an earlier ramp inspection which identified non-compliances or operations outside limits in breach of requirement;
- Information given by another state requesting follow-up inspection.

If a follow up inspection is required on a “layer 1” operator but it has already reached the target number for such operator, one of the following options should be considered:

- Requesting another state to perform the follow up inspection (providing that state has enough inspections left to do so), or
- Exchange an inspection with another state via the trading scheme.

5.3 Monitoring of the Annual Ramp Inspection Programme

5.3.1 Updates of the Annual Programme

Once defined, the annual ramp inspection programme should be regularly updated. These updates should be based on, but not limited to, operational information on the operators (ceasing of operation, start of new regular services, increase or decrease in traffic level...), updates of the priority list provided by the Agency as per ARO.RAMP.105(a), update of the assigned targets by the Agency and feedback from ramp inspections.

RCAA should keep track of the annual ramp inspection programme updates including records of the reasons for any implemented changes.

In order to ensure that the annual programme is delivered in line with best practices, RCAA should continuously monitor the programme and take appropriate actions with the aim of achieving the following (below list is non-exhaustive):

- the assigned numbers for “layer 1” operators;
- the widest possible coverage of operators;
- proportionate distribution of inspections throughout the year;
- inspecting different aircraft types and types of operation;
- performing alcohol tests on flight crew and cabin crew according to a risk based approach as defined in chapter 11.3; and
- avoiding over-/under-inspection.

The control mechanism that prevents over-inspection should be used by comparing figures in the “Progress” column and figures in the “MIN Target” and “MAX Target” (RIM Attachment 11.4 Table 2 and RIM Attachment 11.5 Table 2) during inspection preparation phase. The value of the “Progress” figure has to be between “MIN Target” and “MAX Target” figures.

5.3.2 Updates on the target numbers of inspections assigned by EASA

The target numbers of inspections on “layer 1” and “layer 2” operators are to be updated and communicated by the Agency to RCAA at least once a year. Any such update gives new range of possible target numbers of inspections on “layer 1” operators, giving RCAA an option to either update its objectives or to keep the previous ones. Here are examples of how to deal with such updates:

- Situation 1 on “layer 1” operator “YYY”:
 - First target number of inspections: 4 inspections
 - Already performed inspections: 4 inspections
 - Updated target number of inspections: 6 inspections
 - New range of possible targets: 4 to 6 inspections
- Situation 2 on “layer 1” operator “ZZZ”:

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- | | |
|---|--------------------|
| ○ First target number of inspections: | 2 inspections |
| ○ Already performed inspections: | 2 inspections |
| ○ Updated target number of inspections: | 0 inspections |
| ○ New range of possible targets: | 0 to 2 inspections |

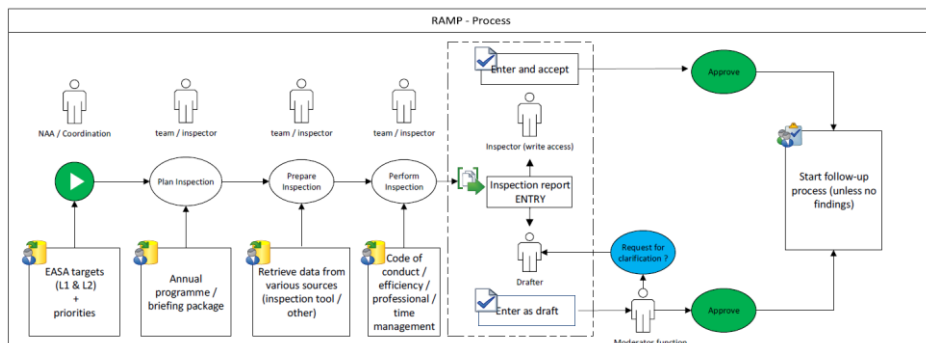
5.3.3 Trading System of Inspections on “layer 1” operators

In cases where RCAA, is unable to fulfil its target number of inspections or needs an extra inspection on a particular “layer 1” operator, other states may be approached for exchange of such inspections. It is NC responsibility to identify such situation, to initiate trading process and to keep track and records of any confirmed exchanges and to inform EASA about such exchange, using Ramp inspection tool.

Trading of inspections may be helpful with training delivery when one state provides OJT to another. In cases where the trainer state does not have enough allocated numbers for the “layer 1” operators to deliver required OJT, the trainee state could offer to trade their inspection numbers for training.

6 Ramp inspection process

The drawing below visualises the ramp inspection process:



6.1 Planning/Preparation

Ref.:AMC1 ARO.RAMP.100(b) General

6.1.1 Ramp inspection team composition

As a general rule, ramp inspections should be performed by two inspectors (may be more in special cases, such as inspection on “super wide body A/C”, short turn-arounds, etc.). Inspections performed by solo inspectors should be limited to cases where only one inspector is available. The inspection team should have access to an un-disturbed place to plan, prepare, report and debrief confidentially after an inspection.

The ramp inspectors involved should distribute the tasks between them, especially in the case of limited inspection time and/or size of the aircraft, different type of operation (PAX/Freight/ Combi) or other complexity of the aircraft.

Ramp inspections should be performed by appropriately qualified inspectors. The visual inspection of the aircraft exterior, the inspection in the flight deck and the inspection of the passenger cabin and/or cargo compartments may be divided among the inspectors, according to their privileges.

6.1.2 Preparation of the actual inspection

Ref.: AMC1 ARO.RAMP.110 Collection of information

The inspection team should make use of the annual planning programme, EASA regular reports and the inspection preparation module when selecting an operator to inspect prior to the mission. The following should be taken into account when selecting an operator or aircraft as inspection target (below list is non-exhaustive):

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- Check the annual plan and observe if there are currently any operators on the list due for inspections including or not alcohol test;
- Check if the operator is “layer 1” or “layer 2”. If “layer 1”, ensure that the allocated target number allows for an inspection to be performed. If “layer 2”, follow the planning;
- Check the date of the last own inspection in the inspection preparation module to ensure an even distribution as far as possible;
- Check if there are operators or aircraft being suspected of non-compliance;
- Check if there are operators with no inspections or a low number of inspections as per AMC1 ARO.RAMP.100(c) (only “layer 2” operators);
- Check if there are unique inspection opportunities, such as unusual types of operators, operations or aircraft not previously inspected;
- Check the time available for the RAMP inspection.

In general, operators submit operating schedules twice per year, however there might be ‘last-minute changes’ to these schedules. Therefore, inspecting team members should ensure that they have the latest schedule update which could be obtained from various available sources (the operator, airport authorities, or ground-handling agents).

On airports having a website displaying information on arrival and departure times of scheduled flights or a non-public system that covers all the traffic, inspectors have to have access to such a system. Information on special flights, such as cargo and unscheduled or private flights, should be specifically requested from airport authorities. Specific online applications for flight tracking may be used when checking the actual arrival information for most operators.

When using an airport’s flight information system, inspectors should bear in mind that code-share flights may appear which might give misleading information regarding the actual operator of the aircraft on the flight. Furthermore, in the event of a wet-lease, airport information systems and data provided by the slot co-ordinator is unlikely to indicate the actual operator. These data sources should be read in conjunction with flight plan data at the time of the inspection to ascertain the actual operator. This might help to avoid any unintentional over inspections of certain “layer 1” operators.

RAMP inspectors could be supported in the decisions on which operators to inspect by NC and/or other office-based support staff because they may be more likely to:

- (i) have access to the latest, and most complete, operational data, and
- (ii) have more expertise and operator knowledge, than an inspector who is more likely to specialise in a technical discipline.

Liaison with various authority teams such as traffic rights/foreign carrier permits/ wet-leasing in by national operators may be of benefit while planning inspections.

Eurocontrol alert messages may also be useful as a short-term source of planning information.

6.1.3 Preparation of the inspection

After having planned the inspection the inspector should check the operator in the 'Inspection preparation' module of the ramp inspection tool for previous RAMP inspection(s) results and safety report(s). The inspection should be pre-planned with focus on safety relevant areas and specific areas where previous inspections results have revealed a weakness. In addition, in cases where previous inspections were incomplete, the remainder of the checklist items could be verified.

The following information sources are recommended to be considered during the inspection preparation phase, depending on the situation and time available (list is non-exhaustive):

- Ramp Inspection tool (inspection preparation module)
- EASA "layer 1" operator list;
- National annual programme for "layer 1" and "layer 2" operators;
- TCO Website;
- Eurocontrol information;
- Manufacturer data;
- Notams, weather, MMEL status, AIP
- Revision status list of navigation charts

Depending on the items to be inspected (as many as possible based on the time available), inspections may be performed on landing or on departure of the aircraft. The remaining fuel and cargo area (overloading, restraining, segregation, etc.) are examples of items that could be checked on landing, while flight preparation and storage of baggage in the cabin could be checked on departure.

As a good practice, the proof of inspection form could be filled in with basic data prior to the inspection to save valuable inspection time for the inspectors and to minimise document and equipment checks during the inspection.

In case of an inspection on a delayed (late incoming) aircraft, inspecting team should be mindful not to jeopardise crew duty times.

The main generic elements of the POI, such as the registration of the aircraft, flight number or the verified name of the Operator should be pre-filled during the preparation phase or when travelling to the related aircraft, thus enabling more efficient use of inspection time.

Inspector may contact the operator's representative at the airport so that he or she can be present during the ramp inspection. Operator's representative may be helpful in

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providing support, especially in facilitating communication with the crew or the operator's home base.

Inspecting teams have to be able to perform their inspecting task on the ramp in cooperation with security, ground handling, and all other officials involved in airport activities. When officials from different organisations (i.e. customs, security, Police of transports, Dangerous Goods inspectorate) have to work in cooperation during the inspection, the national bilateral procedures of co-operation are used. RAMP inspectors are specially informed about the aspects of these co-operations and state organisations should, from their part, provide personnel with appropriate credentials in order to ensure an unrestricted and unimpeded access in line with the applicable airport procedures.

6.2 Conduct of ramp inspections

6.2.1 Standards

For aircraft used by third country operators, applicable requirements are the ICAO international standards. The letter "I" should be indicated in the column "STD".

The relevant EU requirements apply to aircraft used by operators under the regulatory oversight of another member state. The letter "E" should be indicated in the column "STD".

Manufacturers' standards "M" could be used for evaluating damages. Evaluation should not be done by the inspectors themselves but by the operator's authorised certifying staff.

Note: For fasteners and bonding wires findings, the letter "M" should be indicated in the column "STD". For Category 1 and 2 findings no reference to any manufacturer data is required in the field "custom standard reference" in the ramp inspection tool, whereas category 3 findings require such a reference in this field.

Published national standards (e.g., Aeronautical Information Publications (AIPs) that are declared applicable to all operators flying to that state should be checked. Deviations from national standards should be reported as findings only if they have an impact on safety. For such findings, the report should indicate the letter "N" in the column "STD". Any other deviation from national standards, which does not have an impact on safety (e.g. insurance certificate in USD instead of local currency), should be recorded as a general remark. RCAA use its inspectors on the enforcement of national standards.

The Chicago convention warrants a level playing field for all operators which are ICAO compliant, as it allows for international flights for such compliant operators. If an operator is sub-ICAO standards, it shall not participate in International Aviation "except with the permission of the State or States whose territory is entered". In cases where there is an implicit mutual acceptance between two contracting States on a certain sub-ICAO Standard, one could consider that the operation is meeting the requirements of Article 40 of the Convention and therefore is ICAO compliant. In addition to the mutual acceptance by the two States, the sub-ICAO Standard might also require the acceptance of any overflown State (depending on the concerned Standard, like e.g. in the case of the ACAS

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II standard). Where such acceptance is in place involving one of the States participating in the EU ramp inspection programme, such State is not required to raise a finding on the accepted non-compliance, provided that a General Remark is entered into the ramp inspection report specifying the details.

6.2.2 Code of conduct

Ref.: AMC1 ARO.RAMP.125(b) Conduct of ramp inspections

Inspectors should identify themselves to the pilot-in-command/commander of the aircraft or, in his/her absence, to a member of the flight crew, or to the most senior representative of the operator prior to commencing the on-board part of their ramp inspection. When it is not possible to inform any representative of the operator, or when there is no such representative present in or near the aircraft, the general principle should be not to start a ramp inspection until such representative is available. However in such cases the exterior inspection of the airplane may be performed prior to the representative arriving at the airplane. In special circumstances where there is a severe suspicion of not being compliant with the applicable requirements, it may be decided to perform a ramp inspection, but this should be limited to a visual check of the aircraft exterior. Inspection data may be obtained through the A/C tail number and flight information from the airport traffic department.

Inspectors should show tact and diplomacy when performing a ramp inspection. A certain amount of inconvenience to flight and cabin crews, handling agents and other personnel involved in ground handling activities may arise but inspectors should try to reduce it to the minimum, for example:

- Try to be as precise as possible when asking for A/C documents from flight crew. This should result in a minimum of discussion time allowing the flight crew to deal with their primary task of flight preparation;
- Debrief the commander of the aircraft, or in his/her absence the operator representative, after the inspection task is completed;
- Inform (where applicable) cargo loading staff of possible hindrance due to inspection task in cargo compartment;
- Ask the senior cabin crew member to assign a crew member to assist the inspecting team with their inspection tasks;
- When carrying out inspections on the flight deck, the flight crew should be allowed to give priority to staff directly involved in the flight preparation (e.g. fuel master, technician, load-planning agent, handling agent passenger information, etc.);
- Where possible A/C documentation and other relevant documents should be reviewed in the cabin in order to enable the flight crew to perform their normal duties with minimal disturbance;
- In cases where a document is only available on the EFB (e.g. operations manual, MEL, technical logbook, operational flight plan, mass and balance calculation etc.) the operator should be asked to assist the inspector to prevent any unforeseen delay.

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- In particular when alcohol tests are performed, ramp inspectors should:
 - keep the tested crew member informed using an appropriate briefing;
 - maintain the privacy of the alcohol test results that will only be communicated to the tested crew member and to relevant competent authorities via an appropriate means; and
 - ensure an alcohol testing environment as discreet as possible with no visibility on the procedure for outsiders.

Any unnecessary contact with passengers should be avoided and the inspection should not interfere with the normal boarding/dis-embarking procedures. However, inspecting certain elements in the cabin may be justified, such as:

- excessive overweight in overhead luggage bins;
- baggage in front of emergency exit;
- baggage stowed in lavatory;
- cabin luggage under the seat;
- infants/children over the minimum age determined by the state of operator should have their own seat;
- distribution of infant life vests where applicable;
- allocation of passengers in the cabin, compared to the load sheet data;
- sufficient number of seats;
- observing the boarding process during normal operations and/or during refuelling in process;
- attempt to establish the commercial nature of a flight, which is suspected to be performed illegally (e.g. transport of passengers on cargo only flight) to collect evidence for illegal commercial operations (e.g. ask for ticket / booking modalities);

A delay of the flight might be justified for safety reasons, such as whenever non-compliances are detected and either need a corrective action before departure, or need proper identification/assessment by the operator, for example, if:

- tyres appear to be worn beyond the limits;
- oil leakage is to be checked against the applicable AMM to determine the actual limit;
- a flight crew member cannot produce a valid licence. Clarification is to be sought from the operator and/or NAA to confirm that the flight crew member has a valid licence by requesting, for instance, a copy of the licence to be sent to the inspectors for verification;
- missing relevant flight operational data (e.g. missing or incorrect performance calculation, incorrect operational flight plan, incorrect weight and balance calculation);
- Damages, being assessed as having a Major influence on flight safety.

6.2.3 Difficulties in performing an inspection

In cases of uncooperative crew or refusal to be inspected without a valid reason, RCAA should consider preventing the a/c from departing (provided that the national legislative framework allows for this). This should be regarded as a refusal to grant access as per ORO.GEN.140 for EU operator and in accordance with TCO.115 of Commission Regulation (EU) n°452/2014 in the case of a third-country operator. In any such case, RCAA must as soon as possible inform the state of the operator. A safety report should be raised to inform the SAFA participating states.

Valid reasons to allow the departure of the operator without performing an inspection might be as follows, unless the inspecting team has clear safety concern:

- A/c is close to departure (passengers on board);
- Emergency medical flight (outbound).

6.2.4 Difficulties in performing an alcohol test

If the reasons for refusal are considered as unacceptable and the crew member is not cooperative then the refusal should be considered as a positive test; it should be regarded as a refusal to grant access in accordance with ORO.GEN.140 for EU operator and in accordance with TCO.115 of Commission Regulation (EU) n°452/2014 in the case of a third-country operator. A grounding as defined in paragraph 6.4.6 might be appropriate in case of suspicion of alcohol consumption by flight crew or cabin crew members while having the intention to perform duties.

Further guidance can be found in chapter 11.3

6.2.5 Inspection methodology

Ramp inspections should start as soon as practicable, e.g. at the moment the aircraft is safely on blocks, engines are shut-down and anti-collision light turned off. Inspections may also take place after a prolonged stop (day or night) with access to the outbound flight crew, or in case the flight will stay for a long stop with access to the inbound flight crew. One inspector should start the walk-around, while the other one awaits the earliest opportunity to start the inspection at the aircraft's entrance. The team should notify the operator's representative or identify itself to the commander as soon as possible. However, an inspection may not be commenced inside without any crew member available unless receiving specific approval from the operator (any authorised operator staff member).

The inspectors should pay attention to time management and be always aware of the time available they have for the conduction of the inspection to avoid any delay. Best practice is to maintain direct communication with the crew. The inspection of a late incoming aircraft with a short turnaround time should focus on the evidenced safety concern and safety critical elements instead of covering all items. The critical inspection items (as

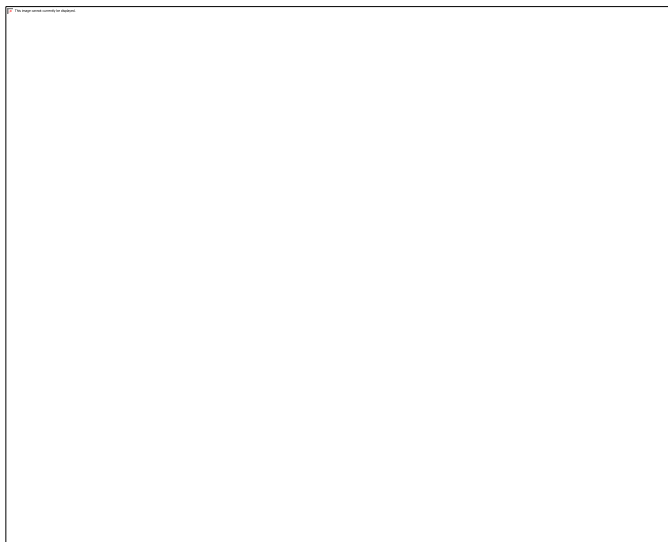
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established in RIM Attachment 11.7) are to be performed in case of such short or “hurry” turnarounds. The inspection should be ended within the planned turnaround time if no deficiencies are detected to avoid undue disturbances.

Any aircraft inspection should not exceed the normally prescribed depth for a walk-around inspection. Inspection tools like cameras are only for collecting evidences. Opening of access panels and wheel well bay doors are not allowed, unless it becomes necessary for the use of tracing the source of a leakage, but only after consulting and with the assistance of the crew.

If no defects are detected, a normal walk-around inspection is depicted below and should typically, for narrow body aircraft, take no more than 10-15 minutes and, for larger wide bodies, between 20-25 minutes max, excluding the inspection of the cargo compartments/area.



Ramp inspectors should try to inspect as many ramp checklist items as possible without endangering the departure time of the operator enabling debriefing and addressing of possible findings within the turnaround time.

The ramp inspection checklist contains 53 items. Of these, 24 relate to operational requirements (A-items) to be checked on the flight crew compartment, 14 items address safety and cabin items (B-items), 11 items are concerning the aircraft condition (C-items) and 3 items (D-items) are related to the inspection of cargo (including dangerous goods) and the cargo compartment. In case of any general inspection items not addressed by

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the other items of the checklist, they may be administered by the E-item (General) of the checklist.

When circumstances (time, manpower, etc.) prevent inspection of all checklist items, inspectors should try to inspect those elements which, according to the inspectors' preparation and experience, are likely to be more safety critical depending on the particularities of the inspected flight. For this purpose, the table in RIM Attachement 11.7 should be taken into account, stressing on the following:

- Certain elements are less safety critical, and should, therefore, be given lower priority (e.g., a noise certificate has far less impact on safety than incorrectly completed mass and balance documentation, or incorrect calculation);
- Differences in aircraft configuration. Furthermore, for a cargo configuration the securing of the cargo and the segregation of dangerous goods is considered safety critical;
- Previous ramp inspection results: if serious and/or recurrent findings were raised during previous inspections such as on the Minimum Equipment List (MEL), such items might deserve higher attention compared to items on which no non-compliances were reported during the previous inspections;
- Type and age of the aircraft: some aircraft types are known to have issues with e.g. leakages or missing screws, therefore, the age of the aircraft should also be taken into consideration.

In any case, the elements inspected need to be inspected sufficiently in-depth (e.g. just looking if an MEL is on the flight deck is not sufficient, look for proper customisation before ticking the A07 box; when O₂ masks are checked, ask also for a test of the boom/mask microphone; while looking at the checklists for revision date/nbr, compare this with the version marked in the Ops manual; etc.).

Attachment 11.2 gives an example of a detailed "dirty fingerprint" (DFP) checklist to allow for a convenient recording of findings and remarks. The DFP checklist is available also as downloadable PDF from the SINAPSE website in the SAFA library of documents.

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The following principles should be considered during an inspection:

- Inspections of aircraft arriving late, with a significant reduction of the turnaround time which endangers the planned departure time and/or slots. As a general principle, the focus should be to inspect the safety critical elements, as listed in RIM Attachment 11.7, unless the inspector have safety related information that needs further verification on this particular flight;
- One of the inspectors should try to gain entrance to the flight deck and introduce himself/herself to the team, briefly explaining the purpose of the inspection. Depending on the situation, the team might need to wait for the passengers to disembark or, if needed, board the aircraft before disembarkation. In all situations, the ramp inspectors should remain professional, diplomatic and friendly;
- The team should have previously defined how the information exchange between the outside and inside inspection will take place;
- After the introduction to the commander, the inspector should always ask for the scheduled departure time / slot time / EOBT (estimated off block time);
- The ramp inspection team members should be made aware of the available time in order to not hinder any crew duties (or at least to avoid reducing the time left for the crew to perform their tasks);
- Unless there is a suspicion, the inspector does not necessarily have to inspect each checklist item to the fullest (e.g. all life jackets), a sampling may be sufficient;
- Inspectors should not open panels, remove items for inspection, but always request the crew for assistance. Furthermore, no special tools should be used other than mirrors or flashlights;
- When inspection items are checked, they should be done to the greatest possible depth taking into consideration that many checklist items have sub-items, just inspecting e.g: the A03 Equipment item, the sub-items like TAWS / E-GPWS, TCAS / ACASII, PBN, etc. try to be as comprehensive as possible;
- Some spare time should be kept to allow an internal debriefing on each inspector observations;
- Any non-compliance with the applicable requirements detected during the inspection should be reported on the POI as a finding. The findings should be clearly and unambiguously written down;
- Sufficient time should be kept at the end of the inspection for a debriefing on the POI. In particular, the operator should be reminded of its obligation to assess and take corrective action on any findings with a potential to become an aviation safety hazard;
- The team should leave the aircraft as soon as their presence is no longer needed for the inspection, in order not to disturb the crew since the crew needs dedicated time (8-10 minutes) for the start of the next flight.

Ramp inspectors should be aware of the main differences between SAFA and SACA inspections. For example, ramp inspectors should know that ICAO SARPs do not

require to have NOTAM on board but require the flight crew to be aware of the particulars of those relevant for the flight while EASA regulation requires the NOTAM to be carried on board (electronic versions are allowed).

6.2.6 Alcohol testing methodology

Alcohol tests should be carried out only on flight crew and cabin crew assigned with safety duty and in adequate locations to ensure a private environment. Ramp inspectors should not prevent crew members being tested to ask a witness to assist the test.

Alcohol test should be preferably carried out at the beginning of the ramp inspection. A test result is considered negative when the breath alcohol concentration (BrAC), measured by a breath alcohol tester is equivalent level of 0.0 grams of blood alcohol concentration (BAC) in accordance with Aerial Code, Chapter XIV-Sanctions, Art.114. A test result is considered positive when the breath alcohol concentration (BrAC), measured by a breath alcohol tester is higher than the equivalent level of 0.0 grams of blood alcohol concentration (BAC) per liter of blood in accordance with Aerial Code, Chapter XIV-Sanctions, Art.114.

The alcohol test consists of an initial test followed by a confirmation test whenever the initial test result was positive. A CAT 3 finding should be raised when the initial and confirmation test results are both positive. A waiting time of minimum 15 min should be observed between the initial and the confirmation test; during this time the crew is still on duty but ramp inspectors should observe that the crew member does not eat or drink or ingest something into her/his mouth, in order to prevent residual alcohol in the mouth affecting the result of the confirmation test. A lack of cooperation during the waiting time preventing the performance of the confirmation test should be regarded as a positive result.

Alcohol test procedures are summarised in a flowchart presented in Chapter 11.7.3.

6.3 Findings

6.3.1 General

Ref.: AMC1 ARO.RAMP.130 Categorisation of findings

Before findings can be categorised, a pre-assessment of the encountered situation should be made, based on the knowledge and experience of the inspector. The inspector may only allocate a proper category to the finding, if the extent of the non-compliance is clear. The inspector should not raise any category 3 findings with the only intent to perform a further investigation/assessment.

Ramp inspectors should not raise finding with the only intent to have a follow-up of the finding or remark. Findings or remarks made should not be raised to a higher category just for the reason of creating an easier follow-up process.

As a general principle, a double penalty should be avoided. Only one finding should be raised to address multiple non-compliances if these non-compliances have the same probable root cause and relate to the same system or the same procedure. E.g.: In case

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a re-fuelling with passenger on board is started without 2-way communication, and there is no personal staffing at the exits, the result should be one finding only (but in the details of the finding, the actual situation should be described).

When a non-compliance with the applicable requirements is identified, the inspector should be certain that the finding is applicable to the specific circumstances of the inbound and/or outbound flight. (e.g. for third country operators, no independent portable lights on board is a finding, but only during night-flight operations; similarly, an insufficient number of life-vests on-board, but only if the flight is overwater on a distance greater than 50 NM from the shore or when taking off or landing at an aerodrome where the take-off or approach path is so disposed over water that there would be a likelihood of a ditching). Nevertheless, such information should be reported as a general remark.

Non-compliance regarding missing fasteners or bonding wires should be assessed and categorised in accordance with the established Matrix in RAMP Inspections Instructions (Appendix 10.1). Findings which are assessed as being Major (CAT 3) should be debriefed soonest to the operator. This “early” pre-debriefing should include an instruction to proceed in accordance with their approved procedures and report in technical logbook system or equivalent immediately. The flowchart in 5.3.3 “technical defects” gives further guidance to procedures in use for missing fasteners and bonding wires. Findings assessed as category 1 or 2 should be included in the normal debriefing without additional requirements for the operator at the time of inspection.

Note:

Any state may file a difference with ICAO as per ICAO Article 38 “NOTIFICATION OF DIFFERENCES”. However, whether such filed differences are accepted or not is down to the individual contracting state and should be taken into account during the follow-up process.

All findings should be substantiated by evidences; these should be uploaded into the inspection ramp inspection tool under the tab of the respective finding. Elements of supporting evidences could be any of the following:

- picture(s) of the deficiency itself (detailed and clear);
- pictures of the manufacturer references used to assess the technical defects, if available to the inspector;
- documents received via email;
- pictures or copy of the technical logbook entries performed;
- pictures from operator’s manuals (MEL, OM’s., licences, AOC’s, etc.).

Such documents or records could be very useful in the follow-up phases of the ramp inspection either to explain in detail and illustrate detected findings or to be able to exchange appropriate documented evidence when findings are challenged. Please take

care that pieces of evidence are uploaded in the ramp inspection tool under the correct **finding and as a finding attachment and not as a “report attachment”**. The option to upload the document as **report** attachment should be avoided except to provide attachment not related to a finding e.g.: a copy of the actual Pol, or a picture of the inspected aircraft, or any other inspection general item/issue.

Whenever a licence or a certificate is not carried on board (including AOC and OPS Specs), it may become clear that the impact on safety is less than initially foreseen after receiving a copy of a missing licence or certificate before departure. In this case, a category 1 finding should be raised and the relevant pre-described findings (PDFs) should be used regarding certificates and licenses not carried on board at the time of the inspection. If evidence is not provided before departure, a higher category of finding should be raised (for a missing certificate of registration or radio station license, the appropriate category 2 PDF should be used; for all other cases, the relevant category 3 PDF should be used). Under no circumstances should a flight crew member be permitted to perform flying duties without receiving confirmation that he/she has been issued an appropriate and valid licence.

Although not classified as a non-compliance, any relevant safety issues identified during ramp inspections should be reported as a General Remark (category G) under each inspection item. For example:

- insufficient number of life jackets/flotation devices, however the flight was/will be over land;
- during a SAFA inspection: some flashlights not working, but only daytime flight;
- minor defects without safety influence, but considered as relevant information.

6.3.2 General Instructions on Finding

The inspection instructions (Appendix 10.1) include the description, categorisation and reference to the applicable requirement.

- Findings on arrival flights being identical to the findings raised for departure flights should lead to the same categorisation, although the corrective action might not be possible when the flight has been completed. For example, an incorrect mass and balance sheet (outside operational limits) found on arrival should be categorised as a category 3. Obviously, this cannot be corrected; however, the appropriate class 3 action could be to confirm that the mass and balance calculations are within operational limits for the outbound flight.
- No finding should be raised if relevant flight preparation documents (e.g. mass and balance calculation, operational flight plan) are stored in an approved electronically system (EFB) and are not accessible / reproduced by the crew at

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the time of inspection. In any case the inspector could inspect the outbound flight preparation in detail (including the procedure of the electronic stowage).

- In exceptional cases, where multiple findings are inter-related and the impact on safety is higher, the category of such findings may be increased to reflect the impact on safety. The increase in category should be explained in the detailed description of the finding.

The inspection instructions and list of pre-described findings may be found in Appendix 10.1

6.3.2.1 Special cases, examples

- **Power cable metal hook;** in several cases, the power cable has a strap and hook to relief the weight of the cable to the A/C power recess panel. Usually, there is an attachment point in or near the A/C power inlet where the hook should be connected. However, such connection is not always there and ground handlers may just simply hook the cable in the recessed area of the power inlet, possibly causing scratches and damaging the structure particularly when a metal hook is used. Ramp inspectors should be careful to raise findings only when clear evidence of damage is visible and raise the finding in accordance with the flowchart for the assessment of technical defects. No finding should be raised if the cable is hooked to the structure without damaging it, a General Remark may be raised instead.
- **High-speed tape;** in many cases, high-speed tape is applied on the aircraft without detailed information recorded in the technical logbook; in such case, a CAT 2 finding is appropriate. When the high-speed tape is applied in such a way that it may have a detrimental effect on the safe conduct of the flight or the aircraft airworthiness, ramp inspectors should request the operator to assess the situation before categorising the finding. Speed tape applied without being detailed in the technical logbook may be:
 - grouped under one finding, if they can be linked to the same issue and have no major impact on the flight safety (e.g.: speed tape covering corrosion applied on several panels);
 - discarded if the operator provides proof during the follow-up that the relevant defect was managed and didn't affect in any way the conduct of the flight or the airworthiness of the A/C; or
 - upgraded to category 3 if they are related to a maintenance action not performed according to the manual (e.g.: missing screw hidden, ...).

Note: If the speed tape repair is recorded in the tech log then it is no finding. Notwithstanding, when ramp inspectors have valid reasons to assume it is an improper repair, further assessments may be requested through the crew.

- **Paint damages including exposed composites;** in almost all cases this type of damages (e.g.: Loss of colours coating/ paint ...) will be tackled by the approved maintenance programme (AMP) during normal maintenance checks. Clear and large exposed composite area without damage should be brought to

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the attention of the crew for their (operator/maintenance) assessment, this assessment may be received during the follow-up process, and it should be reported as a CAT 2 finding under A23 item. A damage to the underlying composite structure should be raised as a CAT 3 finding when outside limits (e.g.: Loss of resin and physical exposure of individual fibres ...) Note: Fairly large exposed composites on secondary structure are usually allowable.

- **Static pressure port;** where some kind of visual damage or contamination is noticed, inspectors should differentiate between damage or blockage of the port and contamination of the static port area like dirt or glue residue. In the latter cases, no relation could be found between contaminated static pressure port and aircraft incidents/accidents. To address contaminated static pressure port, ramp inspectors should make use of a UDF and take into account the before mentioned limited impact. In the case of a damaged or blocked static pressure port a category 3 finding is justified.
- **Cargo door open/locked indicator (green) light;** often this light is found to be u/s, as the light itself poses no safety hazard to the flight, a category 1 for raising the issue to the operator should be sufficient.
- **Cargo height limit exceedance;** in many cases during the opening of the cargo compartment findings category 3 are raised for height exceedance by just 1 or 2 suitcases sticking out just slightly above the limit. Ramp inspectors should only raise findings if those pieces of luggage are blocking firefighting equipment or sensors or have caused damage to the ceiling panels. If the height limit is exceeded by one or several items in the cargo compartment without damaging the cargo ceiling panels, or hindering the proper function of smoke detectors and/or fire extinguishing equipment ramp inspectors can raise the proper CAT 1 finding.
- **Passenger hand luggage relocated in cargo compartment with DG inside (Lithium batteries);** The TI of ICAO doc 9284 requires that baggage intended to be carried in the cabin that is relocated to the cargo compartment must only contain dangerous goods permitted in checked baggage. When baggage intended as carry-on is taken by the operator and placed into the cargo compartment for carriage, the operator must confirm with the passenger that dangerous goods which are only permitted in carry-on baggage have been removed. During a ramp inspection where there is suspicion of cabin luggage being diverted to the cargo hold with DG (lithium battery) inside, ramp inspectors should check which procedure or risk assessment was done to mitigate potential fire hazards. This procedure should be found in the operations manual or should be explained by the crew.
- **For inspections where the aircraft shows sign of corrosion,** an analysis on the ever increasing numbers of findings on corrosion has a negative impact on the safety rating of operators and does not constitute any contribution to the actual safety relevance on the flight. Over the years many aircraft parts where corrosion has been observed (e.g.: screws, fasteners, panels, landing gear, etc..) and subsequently mentioned as finding in a RI report, are not having any

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significant impact on the safe operation of the flight and will be dealt with by the regular maintenance programme of the operator. Even significant corrosion is not considered to have a short term safety impact and should be mentioned as CAT 1 finding (e.g.: landing gear struts indicating clear signs of corrosion, gear door(s) showing large exposed areas of bare metal with corrosion, etc...). Whenever ramp inspectors observe major corrosion (e.g.: flaking delamination of stringers, extreme pit corrosion on major structural parts, clear signs of inter-crystalline corrosion cracks, etc.) this needs proper assessment and should be raised as a CAT 3 finding when found to be outside dispatch limits/conditions; however, such situations would be found only exceptionally.

- **On item A04 (Manuals), A05 (checklist) and A07 (MEL)** a special note for the attention of the inspectors:

- *Note: If a MEL/operations manual/checklist problem was already identified during a previous ramp inspection and if the following 4 conditions are fulfilled, only a CAT G remark should be raised:*

- *The finding was identified less than 3 months ago;*
- *A corrective action plan has been proposed by the operator in the follow-up process of the finding;*
- *The problem is still the same; and*
- *The problem doesn't have a major impact on safety (i.e. the finding was not a CAT 3 finding).*

6.3.3 Technical defects

An aircraft begins to 'age' after its first flight, and various effects of aging begin to occur almost immediately, which is considered as normal "wear and tear". This "ageing" phase is considered a part of the normal lifecycle and the applicable approved maintenance programme will cover the normal deterioration of an aircraft. RAMP inspector should not raise findings relating to the normal wear and tear, as long as such technical defects are properly managed by the operator, at most a general remark for the attention of the crew. Without jeopardising the overall safety of the aircraft, it is the special care dedicated during the development of the MPD and subsequent AMP that allows for the identification of such "failures" within acceptable time frames (maintenance schedules). This is very much true by considering the increasing deepness of the different inspection types (minimum level for the pre-flight, maximum level for the D check). Pre-flight inspection is intended to provide a very general assessment of the airworthiness status of the aircraft (are wings, tail and control surfaces in place and free from evident damages – also when checked at night while raining or snowing -, are air intakes unobstructed, are engines and landing gear in apparently good shape, etc.) and is not expected to identify deficiencies which would require a much more accurate inspection also supported by dedicated

documentation (AMM, CMM, SRM, etc.). Therefore, the use of those maintenance data should be limited to very specific cases and not be the normal practice during ramp inspections. It is also interesting to consider that during the pre-flight inspection only a portion of the entire aircraft is clearly visible, many areas should remain uninspected.

The flowchart in figure 1 gives an overview on the assessment of technical deficiencies.

With regards to non-compliances on missing fasteners and bonding wires, findings should be raised in accordance with the assessment matrix found in INSPECTION INSTRUCTIONS ON THE CATEGORISATION OF RAMP INSPECTION (SAFA/SACA) FINDINGS in Appendix 10.1 of this manual. The flowchart in figure 2 gives a detailed overview of the process and procedures to follow when non-compliances regarding missing fasteners and bonding wires are detected.

Definition of an airworthiness finding:

A technical defect is considered to be any material fault pertaining to the aircraft, its systems or components:

- Minor defects are typically without influence on safety and should therefore be brought to the attention of the operator using a category 1 finding.
- Significant defects are those defects, which are potentially out of limits and a further assessment may be needed to determine if the significant defect is within or outside the applicable limits. These defects should be recorded as category 2 findings.
- Major defects are those defects which are out of limits. A category 3 finding against manufacturer standards should always be demonstrated in relation to the operator's aircraft technical documentation such as: Aircraft Maintenance Manual (AMM), Structural Repair Manual (SRM), Configuration Deviation List (CDL), Wiring Diagram Manual (WDM), Standard Wiring Practices Manual (SWPM), etc., and MEL references. In the absence of clear manufacturer standards, inspectors should only raise findings if their expert judgement (possibly supported by licensed maintenance personnel) is such that similar circumstances on comparable aircraft would be considered to be out of limits.

In exceptional cases, a single fault may give rise to more than one finding under different inspection items, for example: a tyre worn beyond limits whilst the pilot-in-command

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refuses to enter the defect in the Technical Log (or equivalent) would trigger raising findings under both C04 and A23 (more details under the inspection procedure).

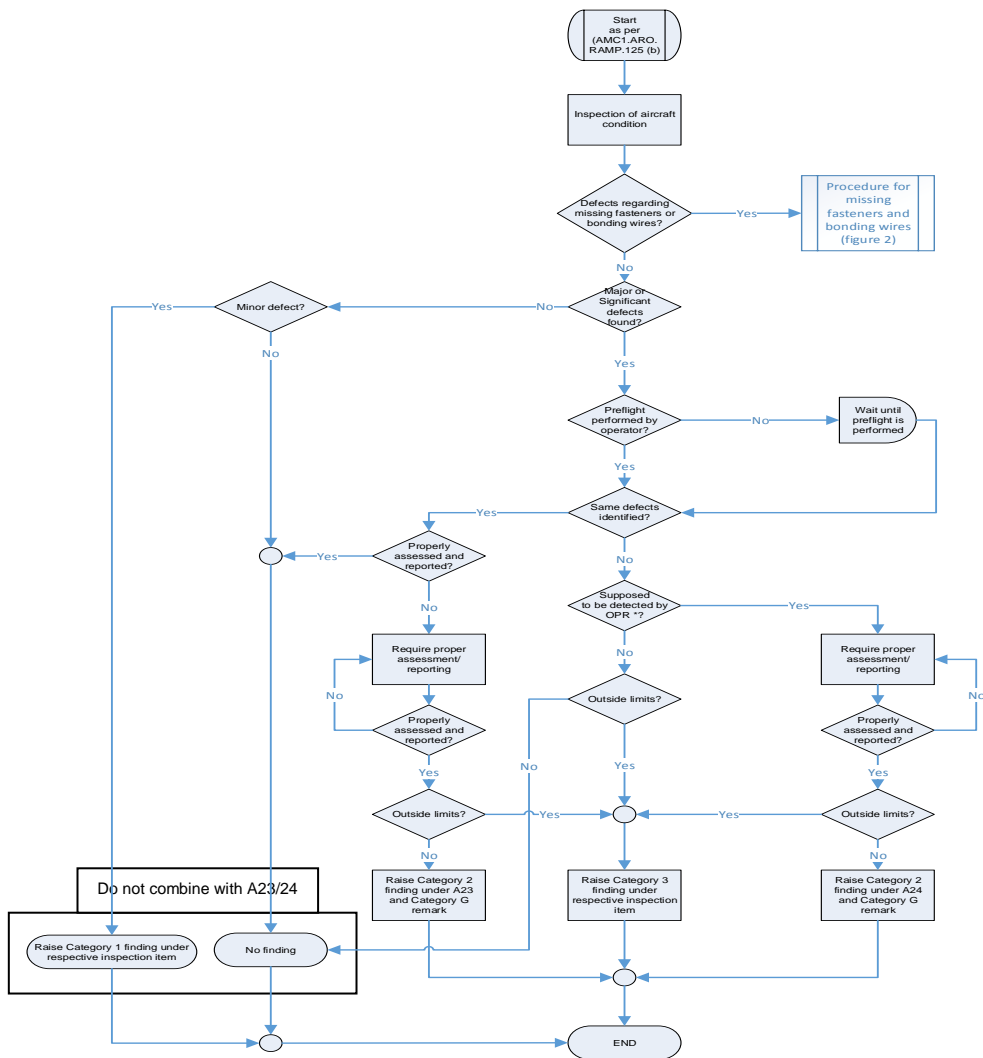
Any defect needs to be recorded and documented in the operator's log system, however such a system does not need to be carried on board of the airplane, but it should be available if required.

Significant defects might have appeared during the inbound flight. In such cases, the ramp inspector should not raise a finding before the operator has performed its pre-flight inspection for the outbound flight.

Manufacturer's data often contains limits on certain defects. This data is normally to be used during line and scheduled maintenance. It is generally accepted that, in between scheduled maintenance, defects that are beyond those manufacturer's limit might appear. The inspector should only request the operator to assess damages, that are deemed to have a significant or major influence on flight safety, towards manufacturer's standard limits, and appropriately report them in the technical log system or equivalent. However, where the manufacturer has specified dispatch limits, and the defect is beyond the dispatch limits, a category 3 finding should be raised except for the case of loose/missing fasteners and bonding wires.

A "defect within limits but not detected or not recorded" should not be considered as a technical non-compliance. If the technical non-compliance appears to be within limits, the safety focus changes from the defect itself to the non-compliance not being detected/assessed/recorded by the operator and should be recorded under item A23 or A24.

Flowchart for the assessment of technical defects



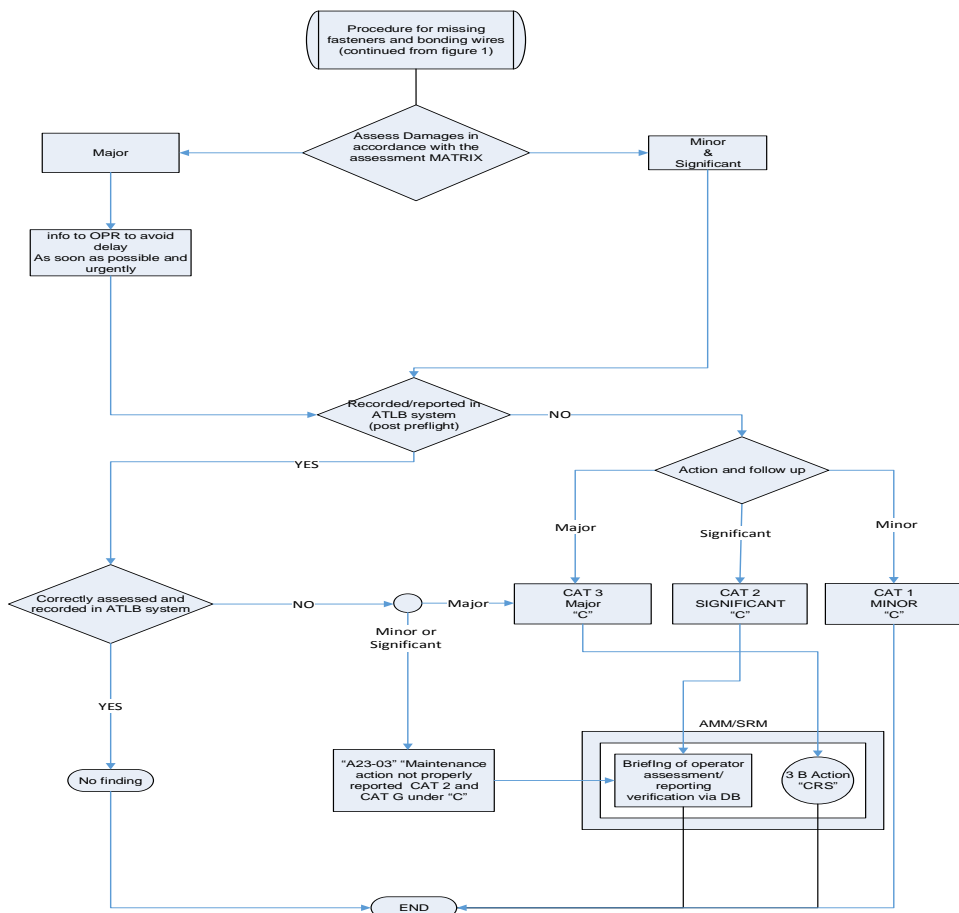
Note: Some technical defects are not supposed to be detected by the operator during a “normal” pre-flight inspection and should therefore not constitute a finding. Examples of defects could be:

- cabin emergency lighting;
- defects only visible when performing an in-depth examination;
- defects only visible using special equipment, platforms or unorthodox working positions.

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Continued flowchart for the assessment of findings relative to missing fasteners and bonding wires:



6.3.4 Alcohol testing findings

In case of a positive confirmation test result, a CAT 3 finding should be raised under item E01. The pre-described findings to use in case of positive confirmation test may be found in Appendix 9.1. The crew member should be informed about the result and that she/he will not be permitted to resume her/his duties.

Inspectors should indicate on the proof of inspection that alcohol test has been carried out, the number of positive results and the number of flight crew and cabin crew tested. Inspectors should use the corresponding pre-described finding (PDF).

After a positive confirmation test, ramp inspectors or the person in charge of the confirmation test should provide the tested crew member with a written confirmation of the actual BrAC measured, the national statutory limit as well as the device serial number and test sequence number.

This information should neither be on the proof of inspection nor uploaded in the ramp inspection tool. The national rules on data protection (for the EU Member States, the General Data Protection Regulation (GDPR) should be respected, including an explanation to the concerned crew member about the means and the duration of storage of his/her personal information.

Inspectors should coordinate with the pilot in command and/or the representative of the operator the required immediate corrective actions before departure. In case the pilot in command is tested positive, inspectors should inform the representative of the operator or in his absence the operator directly.

Inspectors should take a photo of the flight crew license and medical certificate or the cabin crew attestation for follow-up reasons, when not available a photo of the ID should be collected.

RCAA, as inspecting authority, shall notify and transmit needed personal information on the positively tested crew member to:

- The State of Operator;
- If different from the State of Operator, the authority in charge of the issuance of the CC attestation whenever it can be identified by ramp inspectors (only for CC);
- The licensing authority (only for FC).

This notification should include the following information:

- The State of licence issue; (only for FC)
- Pilot license number; (only for FC)
- Medical certificate number; (only for FC)
- Name of the license holder or name of CC;
- Result of the breath alcohol concentration (BrAC) testing (the references of the device used for the measure) and the time and date of the test.

The notification template is accesible on Chapter A11, Annex 1.

RCAA should inform the above mentioned competent authorities that the operator was not provided with any personal data concerning positively tested crew members and that they may coordinate follow-up action with the operator.

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6.4 Follow-up actions

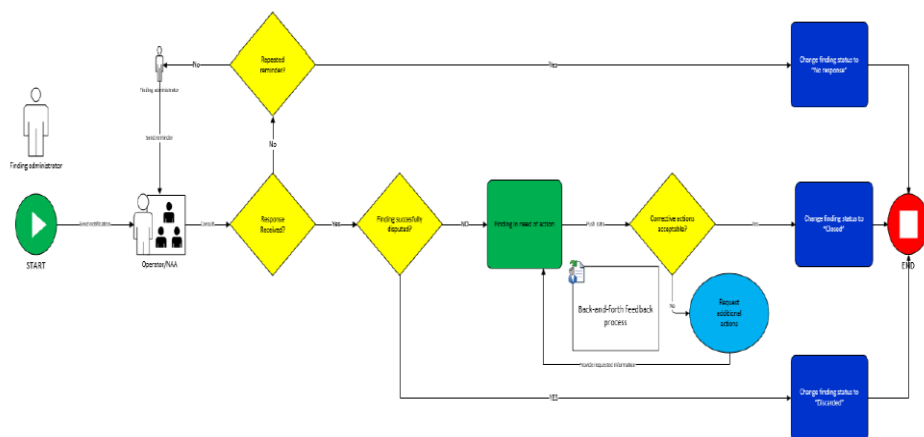
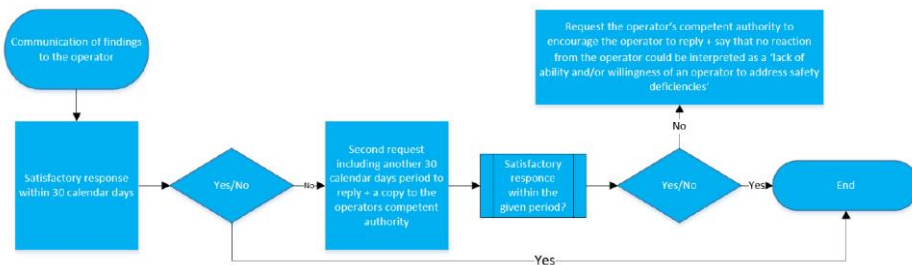
Ref.: AMC1 ARO.RAMP.135(a) Follow-up actions on findings

AMC1 ARO.RAMP.135(b) Follow-up actions on findings

Based on the results of the inspection and on how the findings have been categorised, common follow-up actions have been defined. The relations between the category of findings and the resulting class of actions to take are given in the following table:

ACTIONS TO BE TAKEN AFTER INSPECTIONS		Class of actions		
		Class 1 Information to Captain (POI)	Class 2 Information to the operator and the responsible NAA	Class 3 Immediate action
Category of findings	General Remark Any observation from the inspector not classified as safety relevant	Yes	Not applicable	Not applicable
	Cat 1 - Minor: any detected non-compliance with the applicable requirements or the terms of a certificate that has a minor influence on safety.	Yes	Possible Debriefing and notification through the ramp inspection tool without further communication	Not applicable
	Cat 2 - Significant: any detected non-compliance with the applicable requirements or the terms of a certificate that has a significant influence on safety.	Yes	Yes Normal communication through the ramp inspection tool for follow-up actions Note: Written communication to the operator and to the NAA (findings of several inspections may be summarised in one communication). This should only be used if the inspecting NAA have a national requirement for this	Not applicable
	Cat 3 - Major: any detected significant non-compliance with the applicable requirements or the terms of a certificate that has a major influence on safety.	Yes	Yes All communication are normally to be uploaded in the inspection tool for follow-up transparency. In case of aircraft damage affecting airworthiness and not possible to be rectified before flight, the operator should establish a direct communication with the responsible NAA regarding return to flight status (e.g. "permit to fly").	Yes Note: the specific actions consisting of operational restrictions, corrective actions before flight or at maintenance base, grounding and/or entry permit repercussions have to be reorted

6.4.1 General communication and follow-up flowchart



6.4.2 Class 1 action (to operators)

A class 1 action is to be taken after each inspection and consists of providing information about the results of that ramp inspection, regardless of whether findings have been identified or not. The Proof of Inspection should always be provided to the pilot in command or representative of the operator after the completion of the inspection.

6.4.3 Class 2 action

In case of category 2 findings, communication to the operator and to the state of the operator is necessary. All communication should, as a rule of thumb, be done via the ramp inspection tool.

A category 2 finding always needs further follow-up, since it contains a request for corrective actions taken or planned. The inspecting state should monitor if a reply was received and if sufficient feedback/evidence to close the finding(s) was given, or if there is a need to request further information. In order to close the finding, the reply of the operator does not necessarily need to contain evidence that the deficiency has been corrected. The “corrective action taken” by the operator might also be included in the implementation of a corrective action plan. It is up to the inspecting NAA to decide, based on the related risk and impact, whether or not a finding may be closed based on future corrective actions taking into account the severity and recurrence of the detected findings. Depending on the severity and recurrence of the findings detected, the Inspecting NAA may consider the actual closure of the associated report(s) only after having received satisfactory documented evidence of appropriate implementation of preventive actions.

Regarding the state of the operator, no reply is expected. Only where appropriate or when the follow-up process has revealed operations outside limitations, the state of the operator should be asked for “confirmation that they are satisfied with the corrective actions taken” by the operator. In this case, RCAA who performed the inspection should monitor if such a reply is received and if the content is satisfactory.

6.4.4 Class 3a action (Restrictions on the aircraft operation)

When a class 3a restriction has been agreed/imposed, the verification of the adherence to the restrictions should be considered whenever possible.

Examples of Class 3a actions, and related verification, are, but not limited to:

- Restrictions on flight altitudes if oxygen system deficiencies have been found. This might be verified by checking the ATC flight plans and/or the actual altitude flown as reported by the Air Traffic Control system;
- A non-commercial flight to the home base, if allowed by applicable requirements and the MEL (provided that the validity of the CofA is not affected);
- Seats that may not be used by passengers might be verified just before departure to confirm that seats are not occupied;
- A cargo area that may not be used;
- Operational restrictions mandating the use of specific runways;
- Restrictions to specific environmental conditions (such as departure under visual meteorological conditions (VMC) only).

In certain cases it might not be necessary to verify if the restrictions resulting from a category 3 finding are followed or if corrective actions have been taken (e.g. if the

inspector has indications that appropriate actions will be taken), or if they are operating outside the EUROCONTROL area. The inspecting authority should determine on a case by case basis if it is necessary or feasible to verify that restrictions are respected or if corrective actions have been taken.

6.4.5 Class 3b action (Corrective actions before flight)

When a class 3b corrective action is required from the operator, the verification of the corrective actions taken should be envisaged whenever possible.

Examples of immediate corrective actions to be taken before departure are:

- Assess, report and record damages in technical log-book or equivalent;
- (temporary) repairs to defects according to the manufactures definitions (e.g. AMM and/or SRM);
- recalculation of mass and balance, performance calculations and/or fuel figures;
- a copy of a missing licence/document to be sent by email or other electronic means;
- proper restraining of cargo;
- deferral of technical defects as per manufacturer/operator's data.

If the inspectors have imposed corrective actions, they should review the actions done by the operator and mention them in the 'Class of actions' field on the final ramp inspection report. If the operator took voluntarily corrective actions to address a category 1 or a category 2 finding before the flight, it should be reported in the 'Additional information' field only.

Evidence related to findings on licences and certificates should be provided by the authority that issued the licence or certificate. However, if that authority is not able to provide such evidence in time, the inspecting authority may accept evidence from other sources, if it seeks confirmation of the validity of such evidence at the earliest opportunity with the authority that issued the licence or certificate. The ramp inspection report should mention which evidence was provided and by whom, including when necessary subsequent confirmation from the authority that issued the licence or certificate.

6.4.6 Class 3c action (Aircraft grounded by inspecting RCAA)

The aircraft should be grounded only if the crew/operator/operator's representative:

- Refuse to accept the RAMP inspection or significantly hinders the inspection;
 - refuses to take the necessary corrective actions;
 - does not respect imposed restrictions on the aircraft flight operation.;
- (a) In the event that the operator refuses, without just cause, access by inspectors to perform the RAMP inspection (contrary to the provisions of para ORO.GEN.140 of Annex III to Regulation (EC) no. 965/2012, in the case of an

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operator in the EU and Regulation (EU) 452/2014, in the case of an operator from a third country), this may raise doubts to the flight safety, and may determine the measure of grounding the aircraft; and

- (b) RAMP inspectors who proposed the measure of grounding the aircraft, have to take all the necessary measures in order to ensure that the aircraft will not take off as long as the reasons for the withholding thereof, on the ground, have not been eliminated;

6.4.6.1 The procedure of grounding an aircraft

In case the RAMP inspectors had observed a condition that turns the action of grounding the aircraft, they must:

- immediately inform the pilot-in-command/ representative of the operator, that the aircraft is not allowed for the start of the flight until further notice;
- inform airport authorities about the situation occurred and request assistance in blocking the aircraft on ground;
- notify by telephone the NC level, about the situation occurred, the nature of non-compliances, and the measures proposed.

Subsequent the following measures have to be taken:

- the NC shall immediately notify by telephone the designated Director for RAMP inspection supervision about the situation occurred and the measures proposed;
- In a case in which the measure of grounding the aircraft is supported by the leadership of the RCAA, the NC notify the RAMP inspectors team leader who carried out the inspection, to inform the airport authorities and, in accordance with cooperation procedures, to take the necessary steps to retain the aircraft on the ground, to announce the passengers and other measures to be taken, as the case may be;
- NC needs to take the necessary steps to immediately inform the competent authority of the state of the operator and, if applicable, to the state of registry of the aircraft, and EASA, in the case of an operator in a third country. For the purpose, the fastest way to communicate information is a telephone communication with the national co-ordinator for the ramp or, where appropriate, the business manager who is responsible for the operations of the flight from the competent authority of the state of the operator/ state of registry of the aircraft, and the manager in charge of the coordination of the EASA SAFA programme;
- A copy of the PoI must be submitted to the pilot-in-command/ operator's representative;
- On request of management or if he deem necessary, RAMP team leader that proposed the measure of grounding the aircraft could draw up an

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internal report containing the details of the nonconformities, actions taken, the evidence, and the evidence collected;

- Any records of communication undertaken pursuant to the provisions of para. ARO.RAMP.140(b) of Annex II to commission Regulation (EU) no. 965/2012, as well as any other relevant evidence are gathered as material evidence, and be retained in the RAMP inspections department, in the framework of the RCAA;

Actions to be taken for rising the measure of grounding the aircraft:

- NC needs to take the necessary measures in order to communicate with the controller, and/ or, if applicable, the state of registry of the aircraft to establish, by mutual agreement, the conditions for the termination of the detention of the aircraft on the ground;
- In a case in which the non-compliance affects the validity of the certificate of airworthiness of the aircraft, the NC needs to ensure that the grounding of the aircraft stops only when the operator submits supporting evidence of compliance with the requirements of para. ARO.RAMP.140(d) of Annex II to commission Regulation (EU) no. 965/2012;
- the verification of the conditions referred to above, and in view of the termination of the grounding the aircraft shall be carried out in accordance with the ramp specifically designed procedures for this purpose;
- For an aircraft holding a permit to fly issued by a competent authority of a member state, an overflight approval is not required for the airspace of other member states of the EU;

As a conclusion, the grounding should only be lifted by RCAA when:

- ramp inspection can be performed adequately;
- compliance with the applicable requirements has been re-established;
- the operator has obtained a permit-to-fly in accordance with Commission Regulation (EU) No 748/2012, for aircraft registered in a Member State;
- the operator has obtained a permit-to-fly or equivalent document of the state of registry or the state of the operator for aircraft registered in a third country and operated by an EU or a third country operator; and
- the operator has obtained permissions from third countries which will be overflown, if applicable.

6.4.7 Class 3d action (Immediate operating ban)

When a class 3d action is imposed, it is usually in addition to a Class 3a, 3b or 3c action. Therefore, the further follow-up for the RAMP inspection programme is considered to be covered by the follow-up of those actions. However, when class 3d action is taken, Romania (RCAA) should be mindful of its obligations and always keep the Agency in copy

as the actions might result in a follow-up through hearing in the air safety committee at the European Commission.

6.4.8 General follow-up issues

In general, no reply is expected when informing the state of oversight. However, findings which indicate possible shortcomings at the state level should be highlighted, e.g. when the medical certificate does not indicate the medical class or type/instrument rating validation/expiration date is not mentioned. For such findings, which are out of the control of the operator, the state of the operator should be asked for corrective actions. When assessing the operator's corrective action (plan), it should be accepted that, for such non-compliances, the issue should be escalated to the oversight authority.

The following are examples requiring a confirmation of the inspecting authority regarding the acceptance of the corrective actions taken by the operator:

- identification of a high number of non-compliances;
- repetition of same findings;
- lack of an adequate response from the operator;
- evidence of consistent non-compliance with a particular standard also detected during ramp inspections of other operators from that state;
- action by RCAA may be required given the severity of the findings.

RCAA should monitor if the state of the operator has replied to any requests for confirmation made and if the response is satisfactory. Should the response be unsatisfactory, the communication should be re-launched.

Any follow-up communication from the operator and the state of oversight should be acknowledged, and they should be informed about the closure of findings. Requests for clarification should be responded to by the RCAA. Acknowledgement or clarifications from the inspecting authority should be given within 30 calendar days after receipt of communication or requests.

Operators who have received findings which in their opinion are incorrectly made may request to discard that finding while providing the reasoning. The inspecting authority has to carefully verify if a mistake has been made and when accepted, to **discard** and not **close** the finding as a closed finding will continue to have a negative effect on the operator's ratio.

When communicating a finding to the operator, and in any further correspondence from the RCAA, the operator's competent authority should, as much as possible, be copied in, as it might contain relevant information for its oversight activities. This is particularly the case for information on the closure of ramp inspection finding(s) sent by RCAA (where the operator has no connection to the ramp inspection tool sent either by e-mail or by official letter in the format specified in Director General Decision nr. 687/27.06.2019 and having the content as in Attachement 11.9 and Attachement 11.10, upon case).

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If RCAA receives evidence from a relevant oversight authority showing that the operator does not exist anymore, all related findings should be closed and the reason for closure explained in the justification.

When there is none or no satisfactory feedback from operators after 1 year from the last notification, the state of inspection may decide to close such findings. The following statement should then be entered as a comment in the closure: *“the operator has not provided an acceptable corrective action plan and is considered unresponsive”*.

6.4.9 Specific case of the follow-up of “fasteners and bonding wires” findings (the assessment matrix)

In case of category 2 findings related to loose/missing fasteners and/or broken/missing bonding wires, the operator should assess and report such findings that potentially lower safety in accordance with its approved procedures under its own responsibility and accountability; no further assessment by the inspector is needed at the time of the inspection.

RCAA should request that the operator uploads AMM/SRM dispatch limits in the follow up process via the ramp inspection tool. Such findings should not be closed prior to the upload of dispatch limits or equivalent. In cases where the operator has flown outside the manufacturers limitations, RCAA may also request a comment from the operator's oversight NAA.

When the post inspection follow-up reveals breaches or violations for technical defects, the following statement could be entered into the ramp inspection tool (follow-up tab) “RCAA would like to point out that the outbound flight was operated outside the limits of AMM/SRM without appropriate rectification or deferral and repetitive breaches will be reported to your oversight authority”.

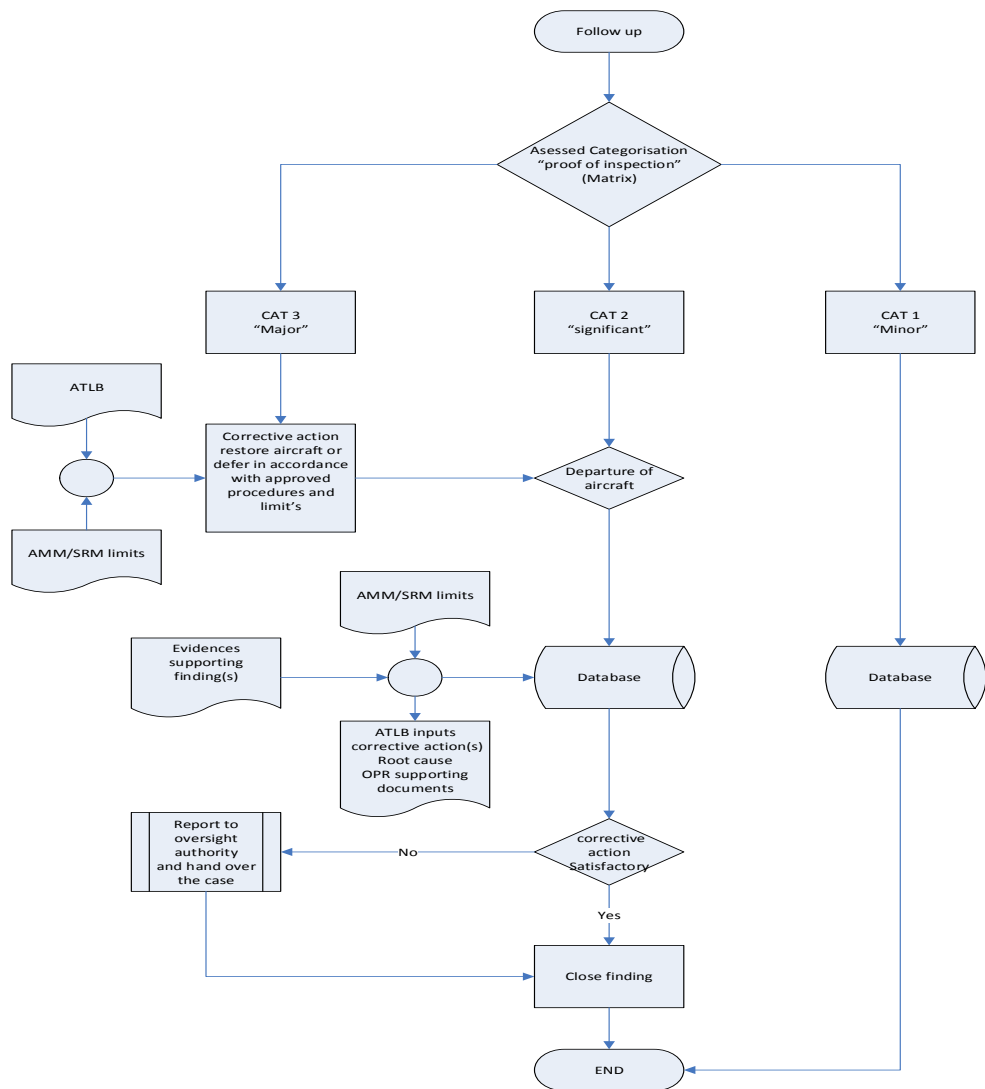
In case of category 3 findings related to loose/missing fasteners and/or broken/missing bonding wires, the operator should be debriefed as soon as possible to avoid any delays and with clear instructions to record defect(s) in aircraft's technical logbook or equivalent and perform an assessment. The operator should perform the assessment in accordance with the manufacturer dispatch limits prior to departure as per the operator's approved procedures with a certificate of release (CRS). Any non-compliances that significantly hazard flight safety should be resolved by the operator prior to departure.

Manufacturer limits as described in AMM/SRM should only be used where the assessment indicates major impact on flight safety and the operator should provide the inspector with evidence for corrective action (3b).

If the assessment results in defect being within dispatch limits, then it should be categorized as significant category 2 finding.

Note: Standard Class 1 action process applies for category 1 findings related to fasteners and bonding wires.

Below is the flow chart for the follow-up process of missing fasteners and bonding wires:



6.4.10 Specific case of the follow-up of crew member tested positive to an alcohol test

Follow-up of findings raised after a positive alcohol test should not focus on a specific crew member but should focus on the crew fitness control management of the operator. A finding on a flight crew member could be closed after receiving confirmation that the competent authority will assess the case.

Should any individual follow-up be deemed necessary, the inspecting authority should coordinate with the licensing authority or the competent authority of the operator to obtain satisfactory follow-up actions. For these exceptional follow-up actions it is suggested to involve the medical section of the inspecting authority. In case of disagreement between inspecting authority and licensing authority, the ICAO and EASA advisory bodies in charge of medical matters could be consulted.

7 Ramp inspection tool

The ramp inspection tool containing all the EASA ramp inspection reports may be found via the following page on the internet <https://safa.easa.europa.eu/site/login>. The instructions on how to register may be found through a link in the login-page accessible before the user login.

7.1 General instructions

The User Guide downloadable from the ramp inspection tool contains detailed instructions for registering, logging in and navigating through the centralised tool making use of the various functions available.

There are two types of ramp inspection tool users: RCAA User and Operator User. The operator users only have access to the reports on their own operator. For RCAA users, there are different types of access rights depending on the setup privileges, including drafter, moderator, oversight inspector and read-only.

The below instructions for logging in are applicable to all registered users:

- Open an internet browser;
- Type <https://safa.easa.europa.eu/site/login> in the address bar and press 'Enter';
- Enter your username (email address);
- Enter your password;
- Click 'Login'.

7.1.1 Drafter's role

- Draft the inspection report as soon as possible after the inspection completion;
- Avoid the use of capital letters other than starting sentences unless the technical term requires it;
- Ensure that the details of the inspected operator are correctly entered;
- Ensure that the inspected items are correctly entered;

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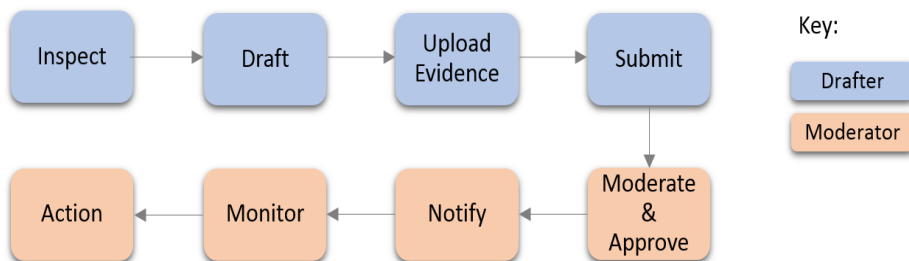
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- Verify that all findings are entered correctly with applicable references and their detailed description;
- Select an appropriate class of action (it should have at least the class 1 ticked for informing the pilot in command);
- Upload evidence under the individual finding(s) (e.g. pictures, PDF documents, emails, videos etc);
- Perform a quality check before submitting the report for approval;
- Review the operator's response(s) as and when required.

7.1.2 Moderator's role

- Access the 'Approve Ramp Inspections' function under the 'Reporting' tab;
- Moderate the individual reports, making any amendments as necessary;
- Perform a final quality check on data entered;
- Approve the report and notify the operator and its NAA;
- Monitor and review the responses from the inspected operator in order to act timely on any feedback provided;
- Act on the operator's response (e.g. request additional information, close/discard finding(s) etc.)

The below figure illustrates the basic steps that should be followed by the drafter and the moderator.



7.2 User administration

It is the RCAA's responsibility to administrate the access to the ramp inspection tool for its operators and the users within RCAA. The RCAA administrator creates, approves or deletes users' access.

Once a user has registered for access to the ramp inspection tool, it is the RCAA administrator's role to validate their details. The validation process should cover at least the following: type of user requested (RCAA or operator), company and user's role within it, email address etc. The RCAA administrator may approve or reject the user registration. Rejection does not preclude the user to re-register their details at any time in the future.

If approved, the user will receive automated email detailing further instructions. The operators should notify RCAA in case of any required user change with regards to staff leaving the company or no longer needing access to the ramp inspection tool.

In cases where a state does not have access to the ramp inspection tool, the Agency should be approached via safa@easa.europa.eu.

More detailed information on user administration may be found in the User Guide.

8 Ramp Inspector qualification process

Ref.: AMC: 1, 2, 3, 4, 5, 6, 7 & 8 to ARO.RAMP.115(a)(b) Qualification of ramp inspectors

8.1 Ramp inspector privileges

When determining the inspector's privileges, RCAA could take into account the interrelation of the intended inspection privileges with other disciplines (e.g.: a former cabin crew member may require additional training on MEL issues before being considered eligible for inspection of safety items in the cabin).

The following examples show the typical privileges of a ramp inspector based on his/her background as being previously a commercial pilot licence/airline transport pilot licence (CPL/ATPL) holder, an aircraft maintenance engineer (AME) holder or a cabin attendant:

CPL/ATPL holder:

- A items
- B items
- C items
- D1/D3 items

AME holder:

- A items except for A13, A14
- B items
- C items
- D1, D3 items

Cabin attendant:

- A15-A19
- B items

8.2 Initial Training

8.2.1 Eligibility criteria

RCAA should ensure that the trainee has sufficient knowledge of the English language. This may be attested by a certificate such as ICAO English Proficiency Level 4, Common European Framework of Reference for Languages: Level B2, or another equivalent certificate. English language proficiency may also be demonstrated by means of a diploma of secondary or higher education where English was used as the medium of instruction.

8.2.2 Theoretical

The scope of the initial theoretical training is to familiarise the inspectors with the Ramp Inspection Programme, and with the common inspection, finding categorisation, reporting and follow-up procedures. The primary scope of the theoretical training is not the transfer of technical (operational, airworthiness, etc.) knowledge, as the trainees should already possess such knowledge, either from previous work experience or through specialised training, prior to attending the theoretical course.

The initial theoretical training programme should be developed in accordance with the syllabus developed by the Agency (see Appendix 10.2.1).

8.2.3 Practical

The scope of practical training is to instruct on inspection techniques and specific areas of attention without any interference with the flight crew. Preferably, this should be done in a non-operational environment (e.g. on an aircraft in a maintenance hangar). Alternatively, aircraft with an adequate turnaround time may be used. In the latter case, the flight and/or ground crew should be informed about the training character of the inspection.

The initial practical training may be split into several sessions if an adequate tracking system is put in place.

The practical training programme should be developed in accordance with the syllabus developed by the Agency as in Appendix 10.2.2.

8.2.4 On-the-job training

The objective of the on-the-job training (OJT) is to familiarise the trainees with the particularities of performing a ramp inspection in a real, operational environment. RCAA should ensure that the area of expertise of the trainee is compatible with the one of the senior ramp inspector(s) delivering OJT.

When selecting the operators to be inspected during the on-the-job training programme, the senior ramp inspector should ensure that:

- before starting the OJT, the trainee is briefed about the general objectives and working methods of the training;

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- the training can be performed sufficiently in depth but without undue hindrance or delay of the inspected operator;
- the ramp inspections are conducted as much as possible on different operators (i.e. EU operators, third country operators), different aircraft types and aircraft configurations (i.e. jet and propeller aircraft, single aisle and wide-body aeroplanes, passenger operations and cargo operations), different types of operations (i.e. commercial and non-commercial operations, long-haul and short-haul operations);
- before every inspection, the trainees briefed regarding the objectives and lessons to be learned during that particular inspection;
- after every inspection day, the trainees debriefed regarding his/her performance and progress and areas where improvement is needed.

OJT Training may also be performed by foreign senior ramp inspectors.

While the observation phase may be conducted with more than one trainee per senior ramp inspector, the under-supervision phase should be conducted with no more than one trainee per senior ramp inspector. In real operational environment, the duplication of A and most of the B-items during normal turn-around time is not considered feasible, therefore RCAA should ensure a proper identification of the inspection items performed by each trainee during the under-supervision phase within the OJT forms.

In addition to the OJT, RCAA should provide the trainee with the necessary information on administrative issues related to the conduct of ramp inspections, and on the process relating to the cooperation with the airport and air navigation service providers.

The OJT should cover at least the elements described in Appendix 10.2.3.

The senior ramp inspector should do the assessment of the trainee while the trainee is performing the ramp inspections under supervision. The trainee should be considered to have successfully completed the OJT only after demonstrating to the senior ramp inspector that he/she possesses the professional capacity, knowledge, judgment and ability to perform ramp inspections in accordance with the requirements.

Some ramp inspection OJT items may be replaced by a classroom training (AMC4 ARO.RAMP.115(a)(b) paragraph (h) *“using representative examples when no operational environment is required, e.g. documents, dangerous goods”*).

To establish confidence of the trainee, additional ramp inspections may be observed by the trainee after the observation phase.

8.2.5 Final Assessment

The final assessment should be carried out by Senior Inspector(s) and/or the National Coordinator or any other nominated person to verify the inspector's competency. At this

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assessment the results of the theoretical, practical and on-the-job training should be taken into consideration.

If the trainee is found to be fully qualified, the RCAA should issue a Decision of the Director General for appointment as RAMP Inspector. In case the trainee does not pass the assessment, RCAA could request an additional theoretical, practical or on-the-job-training.

8.3 Periodical Assessment

When performing the periodical assessment of a qualified ramp inspector's competence and performance as mentioned in AMC2 ARO.GEN.200 (a)(2), RCAA may use any of the following assessment methods or a combination thereof:

- A theoretical examination;
- A number of ramp inspections under the supervision of a senior ramp inspector covering all inspector's privileges;
- A sample analysis of ramp inspections, during which the inspector has raised findings in his domain of competence.

Such assessment should take place every 3 years as a minimum.

8.4 Extension of inspector privileges

RCAA may extend the privileges of a ramp or senior ramp inspector, provided that the following conditions are met:

- (1) the relevant knowledge of the inspector has been satisfactorily complemented by additional theoretical and/or practical training relevant to the scope of the extension; and
- (2) the inspector has received a OJT on the new inspection items that will be added to his/her privileges.

RCAA should determine the necessary number of ramp inspections of the OJT on a case-by-case basis, taking into account both the complexity and the criticality of the new items to be covered during this training, as well as the inspector's aeronautical education and practical knowledge. Furthermore, for senior ramp inspectors additional criteria may be required before delivering training.

8.5 Alcohol Testing (AT) privilege

A candidate ramp inspector can be granted with an AT privilege following initial theoretical and practical training developed on the basis of the syllabus covered in appendix 10.2.4. The related on-the-job training can be replaced by alternative training.

A ramp inspector can be granted with an AT privilege after successful completion additional theoretical training developed on the basis of the syllabus covered in appendix 10.2.4. The related on-the-job training can be replaced by alternative training.

Previous training on AT can be grandfathered by the national coordinator if it is proved that it meets the minimum standards of required training in this manual.

8.6 Senior ramp inspectors

8.6.1 Use of foreign senior ramp inspectors

RCAA as authority on which territory an OJT is delivered may authorise foreign senior ramp inspectors to perform ramp inspections on their behalf. These privileges may contain limitations (e.g.: A/C grounding) and could be fully or partially done based on relevant evidence provided by the competent authority of the senior ramp inspector.

When the OJT is delivered by a foreign senior ramp inspector, RCAA as competent authority for the trainee, should request the competent authority of the senior ramp inspector to confirm the validity of his/her seniority.

If a foreign senior ramp inspector is delivering the recurrent training, RCAA should verify if the training material is developed in accordance with the content communicated by the Agency and if it is updated with the information provided by the EASA Training Bulletins.

8.7 Loss of qualification

8.7.1 Missed recurrent training

When the qualification is lost because of failure to undergo the recurrent training, it may be regained provided that the ramp inspector attends the missing recurrent training.

8.7.2 Insufficient number of inspections

A ramp inspector may regain his qualification as inspector by performing half the missing inspections from last year under supervision of a senior inspector, half of those may be performed on national operators if performed in accordance to ARO.RAMP.

A senior ramp inspector may regain his qualification as inspector by performing 2 inspections under supervision of a senior inspector.

8.8 RAMP Inspector Personal File

The personal file of the RAMP inspector shall contain:

8.8.1 Decision

The decision of the Director General of the AACR to nominate the RAMP inspector and the following information;

- The personal data of the RAMP inspector, which constitutes an annex to the Decision of the Director General for the nomination of the RAMP inspector, completed using the form provided in 11.6 to this Manual;
- Diplomas / certificates and any other documents attesting the completion of the initial theoretical and practical training of RAMP inspector and the minutes of the completion of the on-the-job training program provided;
- Documents certifying the performance of the recurrent training;
- The inspector's CV, accompanied by copies of the relevant documents, highlighting the knowledge and experience necessary to meet the eligibility conditions and the status of inspections carried out in the last 3 years;
- Inspector's initials / number of identification and signature specimen certifying that the RAMP inspection has been completed and that the RAMP inspection reports have been filled in;
- Periodical assesment results (part of the trakking system)

8.8.2 RAMP National Coordinator:

Shall ensure that the personal files of the RAMP inspectors contain the documents specified in above and are updated accordingly, annually or whenever necessary;

8.8.3 Preservation

The personal files of the RAMP inspectors shall be kept by the RAMP National Coordinator. The retention period of the personal files of inspectors who no longer hold a valid RAMP inspector qualification is 5 years from the date of loss of qualification.

9 RITO (Ramp Inspector Training Organisations)

Ref.:AMC1 ARO.RAMP.120(a) Approval of training organisations

Checklists for the verification of compliance and continuous compliance of RITO(s) may be found in Attachment 11.1.

9.1 Organisational structure

RCAA should verify that the training organisation has appointed a head of training with corporate authority to ensure that the training organisation:

- has a sufficient number of properly qualified instructors to develop, update and deliver the training courses referred to in ARO.RAMP.115(b)(2)(i);
- makes use of adequate training facilities and properly equipped office accommodation;
- has established appropriate training procedures;
- delivers training developed in accordance with the syllabi developed by the Agency;
- periodically evaluates the effectiveness of the training provided; and
- makes available an annual review summarising the results of the feedback system together with the training organisation's corrective actions (if any).

9.2 Training course and facilities

The approving competent authority should verify that:

- the content of the training courses to be delivered complies with the syllabi developed by the Agency, also by attending at least one initial theoretical and practical training course;
- the training course material is accurate and up to date and has been developed for the type of training to be delivered (including course slides, reference documents, etc.);
- the training organisation provides a copy of the complete training course material and the relevant EU aviation legislation, as well as any relevant examples of technical information to all course participants;
- classrooms have appropriate presentation equipment ensuring that students can easily read presentation(s) text/drawings/diagrams and figures from any position in the classroom. Where necessary, audio amplification should be available to assist instructors in verbal communication. Internet access should also be available to enable instructors to use the online applications used in the EU Ramp Inspection programme;
- a suitable aircraft is available for practical training for an adequate period.

9.3 Instructors

Instructors delivering training on the regulatory framework for ramp inspections should have at least 3 years of experience either as national coordinators or as aviation safety legislative experts involved in the EU ramp inspections programme.

All instructors should attend or familiarise themselves with the content of available recurrent training, organised by the Agency to update their knowledge of the EU Ramp Inspection Programme and to promote standardisation.

Attachment 11.1.2 contains a checklist, which should be used for the evaluation of ramp inspections training instructors.

9.4 Verification of compliance by the Agency

Ref.:AMC2 ARO.RAMP.120(a) Approval of training organisations

When RCAA requests the Agency to verify a training organisation's compliance or continuous compliance with the applicable requirements, the following should be taken into account:

- the request should be submitted to the Agency at least 90 days prior to the intended date of issuing the approval or to the intended date of ending the continuous compliance verification; and
- the training organisation should be notified that the verification of compliance will be performed by the Agency, and, therefore, full cooperation and unimpeded access to the organisation staff, documentation, records and facilities should be ensured.

Verification may also include an on-site audit and/or unannounced inspection of the training organisation.

The Agency should provide the requesting competent authority with a report containing the results of the compliance verification as soon as the process is finalised, but no later than 10 days prior to the anticipated date of approval.

When the Agency identifies a non-compliance with the applicable requirements, it should:

- immediately inform the competent authority concerned of non-compliance and indicate the level of finding(s), providing all the supporting evidence available;
- provide the training organisation concerned with all the necessary information on the identified non-compliance indicating that the certifying competent authority has been informed in order to take action.

RCAA may approve that organisation, if the results of the Agency's report indicate that the training organisation meets the applicable requirements.

When verifying continuous compliance with the applicable requirements, the Agency may:

- request the training organisation to provide updated versions of information, evidence and documents related to the training;
- sample the training course material delivered during any training session to trainees or qualified ramp inspectors;
- use the results of the standardisation inspections.

10 Appendixes

10.1 Inspection instructions and PDFs

Refer to the separate document “INSPECTION INSTRUCTIONS ON THE CATEGORISATION OF RAMP INSPECTION (SAFA/SACA) FINDINGS”.

10.2 Training syllabi

10.2.1 Syllabus of theoretical training for RAMP inspectors

INITIAL (THEORETICAL) TRAINING COURSE

- Module (GEN): General overview of the ramp inspection programme
- Module (A): Flight crew compartment inspection items
- Module (B): Cabin safety inspection items
- Module (C): Aircraft condition inspection items
- Module (D): Cargo inspection items and general item

Lists of detailed items from each module and content of elements to be inspected are contained in EASA RIM para 9.2.1.(Current issue).

10.2.2 Syllabus of practical training for RAMP inspectors

INITIAL (PRACTICAL) TRAINING COURSE

- Module (A): Flight crew compartment inspection items
- Module (B): Cabin safety inspection items
- Module (C): Aircraft condition inspection items
- Module (D): Cargo inspection items and general item

Lists of detailed items from each module and content of elements to be inspected are contained in EASA RIM para 9.2.2. (Current issue).

10.2.3 Elements and checklist for the OJT training for ramp inspectors

Elements to be covered during the initial OJT

- Preparation of an inspection:
 - Selection of operator(s) to be inspected (use of the annual ramp inspection programme and of prioritisation lists);
 - Use of the ramp inspection tool to prepare an inspection, including:
 - Follow-up of previous inspections;
 - Safety reports;
 - Areas of concern, repetitive and/or open findings;
 - Other sources of information (such as passenger complaints, whistle-blowers, maintenance organisation reports, air traffic control (ATC) reports);
 - Retrieval of updated reference materials: Notices to Airmen (NOTAMs), navigation and weather charts;
 - Task allocation between team members.
- Administrative issues:
 - Ramp inspector's credentials, rights and obligations;
 - Special urgency procedures (if any);
 - National (local) aerodrome access procedures;
 - Safety and security airside procedures; and
 - Ramp inspector kit (independent portable light, fluorescent vest, ear plugs, camera, mirror, checklists, etc.).
- Cooperation with airport and air navigation services to obtain actual flight information, parking position, time of departure, etc.
- Ramp inspection methodology:
 - Introduction to the pilot-in-command/commander, flight crew, cabin crew, ground crew;
 - Selection of inspection items, according to the area of expertise of the trainee;
 - Findings (identification, categorisation, reporting, evidencing);
 - Corrective actions — class 3:
 - Class 3a) “enforcement of restriction(s) on aircraft flight operations”: cooperation with other services/authorities to enforce a restriction;
 - Class 3b) “request of an immediate corrective action(s)”: satisfactory completion of an immediate corrective action;
 - Class 3c) “grounding of an aircraft”: notification of the grounding decision to the aircraft commander, national procedures to prevent the departure of a grounded aircraft; communication with the State of operator/registry;
 - Proof of inspection:
 - Completion and delivery of the proof of inspection;

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- Request of acknowledgement of receipt (document or a refusal to sign);
 - Debriefing to the flight crew or operator representative.
- Human factors elements:
 - Cultural aspects;
 - Resolution of disagreements and/or conflicts; and
 - Avoidance of crew stress.

Checklist on-the-job training of inspectors

The content of the following checklist should be used for ramp inspections performed with the trainee during the “observation” and “under supervision” phases of the OJT training. The information gathered by the senior ramp inspectors involved in the OJT phase should be then considered by RCAA whilst performing the final assessment of the trainee. The senior ramp inspectors involved during the OJT training phase should use the inspection instructions referred to in AMC1 ARO.RAMP.125 when assessing the knowledge of the trainee concerning each inspection item.

10.2.4 Syllabus of alcohol testing training

Principal elements to be cover during the training session has to be as follows:

Cover a typical alcohol test from start to finish:

- Preparation
- Initial test and confirmation
- Positive or refusal
- Proof of inspection
- Notification of positive
- Ramp inspection tool
- National requirements for legal actions
- National requirements for data protection

Objectives:

Candidates should be able to use their technical knowledge and ramp inspection techniques satisfactorily during the subsequent on-the-job training

Correct use of breathalyser:

- Start up
- Operation
- Calibration
- Hygienic principles

Conflict management:

- Handling confrontations tactfully and constructively.

11 Attachments

11.1 RITO check-lists

11.1.1 Check-list for the evaluation of a RITO

Ref: EASA-RIM para 10.1.1.

11.1.2 Check-list for the evaluation of RAMP inspection training instructors

Ref: EASA-RIM para 10.1.2.

11.2 Dirty Fingerprint Procedure

Dirty fingerprint checklist (optional)

The following procedure might be used on a voluntary basis.

This form is aiming at assisting inspectors not having the Pol document (which is usually in hands of the operational inspector in on the flight deck). This list may be very useful as a so-called dirty finger print checklist, which contains:

- Inspection items and their more in-depth sub items;
- some extra details and general information concerning most inspected elements;
- a chart where to put down notes and remarks as not to forget what was observed during the inspection.

Additionally, this document may be stored with a copy of the Pol in the office for later questions from the inspected operator relating to the inspection performed on what was found.

Note: A PDF version in two different layouts (alphabetic item structure and inspection logic structure) of this form is available on the SINAPSE website <http://europa.eu/sinapse/directaccess/safa/> in the SAFA library of documents for the most recent version.

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A/C reg.: Date:	C. Aircraft Condition D. Cargo	Page: 4/4 Issue 02/ Feb. 2021
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C. Aircraft Condition		Ramp Inspection Detailed Findings	
C01 General External Condition	Airframe: -General condition -Corrosion -Cleanliness	Item	Notes / Remarks
	Markings - legibility		
	Fasteners - missing		
	Antennas - condition		
	Static Discharger - condition		
	Exterior Lights - function		
	C02 Doors & Hatches		
	Doors & Hatches - condition		
	Bonding Wires - condition		
	Seals - condition		
C03 Flight Controls	External markings		
	Operation instructions		
	Flight Controls - condition		
	Hydraulic - leakage		
	Static dischargers - condition		
	Bonding wires - condition		
	C04 Wheels, Tyres & Brakes		
	Wheels, Tyres - damage & wear		
	Tyre - pressure		
	Braking system - condition		
C05 Undercarriage, Skids / Floats	Snubbers - condition		
	Deflectors - condition		
	Skids / Floats - damage		
	Markings & Placards - legibility		
	Undercarriage		
	-Condition		
	-Lubrication		
	-Corrosion		
	-Leaks		
	-Damage		
C06 Wheel Well	Strut		
	-Serviceable		
	-Extension		
	Lubrication		
	Leakage		
	Corrosion		
	Cleanliness		
	Damage		
	Door Fittings & Hinges		
	-Lubrication		
C07 Powerplant & Pylon	-Corrosion		
	-Leakage		
	-Wear		
	Dents		
	Tears		
	Damages		
	-Leaks		
	Fasteners - missing or loose		
	LPT/LPC Blades - damage		
	Sensors - obvious damage		
Panels - alignment			
Handles - flushness			
Thrust Reverser - condition			
Acoustic Liner - condition			
Markings & Placards - legibility			
C08 Fan Blades, Propellers, Rotors	Fan Blades		
	-Nick		
	-Cracks		
	-Distortion		
	-Erosion		
	-Other damage		
	Propeller Blades		
	-Looseness		
	-Foreign Object Damage (FOD)		
	-De-Ice Boots - Damages		
C09 Obvious Repairs	Unusual design		
	Poorly performed		
	C10 Obvious unrepaired damage		
	Unassessed damage		
	Unrecorded damage		
	Corrosion		
	Lightning strike		
	Bird strikes		
	Dent and buckle chart		
	Available records		
C11 Leakage	Fuel Leaks		
	Hydraulic Leaks		
	Toilet Fluid Leaks		
	Cargo		
	D01 General Condition of Cargo Compartment		
	Lighting		
	Fire Protection		
	Smoke Detectors		
	Extinguishing System		
	Condition of:		
-Floor/ Side/ Overhead Panels			
-Slow out Panels			
-Smoke Barrier			
-Dividing Net			
Loading Instructions			
D02 Dangerous Goods	NOTOC (Ref. A13)		
	Operations Manual (Ref. A04)		
	ICAO T.I./ Doc. 9284 applied:		
	-Stowage		
	-Packaging		
	-Labelling		
	-Securing		
	-Segregation		
	Contamination - Removed		
	Ops Spec - Accessibility of D/G		
D03 Cargo stowage	Limitations / Restrictions (CAO)		
	Properly distributed		
	Floor & Height - Limits		
	Pallets & Containers – Max Gross Weight		
	Cargo - Correctly Secured		
	Fly Away Kit - Secured		
	Condition of:		
	-Pallets & Containers		
	-Lock Assembly		
	-Lashing & Dividing Net		
Cargo - Access			
Emergency exits - Access			



AUTORITATEA AERONAUTICĂ CIVILĂ ROMÂNĂ

ROMANIAN CIVIL AERONAUTICAL AUTHORITY

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11.3 Proof of Inspection (POI) form

Date	Local time start	Local time end	Place																																																																																																																																																																																																																								
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11.4 Scheduled Inspections (Layer 1) delivered by EASA – sample

Table1. Scheduled inspections (Layer 1)

3LC	Operator Name	Operator State	MYU Status	Traded	Progress	MIN Target	Mean Target	MAX Target
AEE	AEGEAN AIRLINES S.A.	Greece			1	1	1	1
AEG	AIREST	Estonia			0	3	3	3
AFL	AEROFLOT - RUSSIAN INT. AIRL.	Russian Federation			1	1	1	1
AFR	AIR FRANCE	France			0	1	1	1
ASL	AIR SERBIA (AD BEOGRAD)	Republic of Serbia			0	2	2	2
AUA	AUSTRIAN AIRLINES AG	Austria			0	2	2	2
BAW	BRITISH AIRWAYS	United Kingdom			0	1	1	1
BTI	AIR BALTIC CORPORATION SIA	Latvia			0	1	1	1
CAI	TURISTIK HAVA TASIMACILIK AS dba CORENDON	Turkey			0	1	1	1
CGF	CARGO AIR LTD.	Bulgaria			0	4	4	4
CLH	LUFTHANSA CITYLINE	Germany			0	2	2	2
CSA	CZECH AIRLINES J.S.C.	Czech Republic			0	1	1	1
CTN	CROATIA AIRLINES	Croatia			0	1	1	1
DHK	DHL AIR LIMITED	United Kingdom			0	1	1	1
DLA	AIR DOLOMITI	Italy			0	4	4	4
DLH	DEUTSCHE LUFTHANSA, A.G.	Germany			0	1	1	1
ELY	EL AL - ISRAEL AIRLINES LTD.	Israel			0	1	1	1
EWG	EUROWINGS GMBH	Germany			0	1	1	1
FDB	FLY DUBAI	United Arab Emirates	New Layer 1		1	4	4	4
FHY	FREE BIRD AIRLINES	Turkey			0	1	1	1
GWJ	GERMANWINGS GMBH	Germany			0	1	1	1

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Table 2. Scheduled Inspections (Layer 1)

3LC	Operator Name	Operator State	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Progress	MIN / MAX Target
AEE	AEGEAN AIRLINES S.A.	Greece						X							1	1/1
AEG	AIREST	Estonia				X			X			X			0	3/3
AFL	AEROFLOT - RUSSIAN INT. AIRL.	Russian Federation								X					1	1/1
AFR	AIR FRANCE	France											X		0	1/1
ASL	AIR SERBIA (AD BEOGRAD)	Republic of Serbia			X						X				0	2/2
AUA	AUSTRIAN AIRLINES AG	Austria						X						X	0	2/2
BAW	BRITISH AIRWAYS	United Kingdom	X					X							0	1/1
TOTAL			1	0	1	1	0	3	1	1	1	1	1	1	2	11

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11.5 List of operators Scheduled Inspections (Layer 2) – sample

Table1. List of operators (Layer 2) established on national criteria

3LC	Operator Name	Operator State	Progress	MIN Target	MAX Target
UKL	Ukraine Air Alliance	Ukraine	0	2	4
APK	Air Pink	Serbia	0	1	3

Table 2. Annual inspection program (Layer 2) – sample

3LC	Operator Name	Operator State	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Progress	MIN / MAX Target
UKL	Ukraine Air Alliance	Ukraine				X					X				0	2/4

11.6 List of operators Scheduled for Alcohol Test – Sample

Table 3 - List of operators scheduled for alcohol test

3LC	Operator Name	Operator State	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Progress
UKL	Ukraine Air Alliance	Ukraine					X								0



11.7 FIȘA INDIVIDUALĂ A INSPECTORULUI LA PLATFORMĂ

RAMP INSPECTOR INDIVIDUAL RECORD FILE

Anexă la Decizia Directorului General Nr. _____ / _____

DATE PERSONALE

Nume:	
Prenume:	
CNP:	
Data nașterii:	
Domiciliu:	
Telefon:	
Telefon mobil:	
e-mail:	

Vechimea în aviație:

Funcția actuală: Inspector aeronautic AACR

Cursuri SAFA/ RAMP absolvite:

Nr	Denumire curs	Locul desfășurării	Perioada	Calificare obținută	Observații

Calificare:

Inspector la platformă / Inspector principal la platformă

Privilegii de inspecție deținute:

A – (A1 până la A24)

B – (B1 până la B14)

C – (C1 până la C11)

D– (D1/D3)

SUMARUL ACTIVITĂȚII DE INSPECȚIE LA PLATFORMĂ

Anul	Nr. inspecții la platformă	Calificative obținute	Observații

PREGĂTIRE GENERALĂ

DE BAZĂ:

Studii:	Instituția	Perioada	Act absolvire

SUPLIMENTARĂ DE SPECIALITATE:

Curs de pregătire:	Instituția	Perioada	Act absolvire

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11.8 List of inspection items when short turnaround

Inspection Item	
A	Flight deck
01	<i>General condition</i>
02	<i>Emergency exit</i>
03	<i>Equipment</i>
06	<i>Navigation/ Instrument Charts</i>
10	<i>AOC or equivalent</i>
12	<i>Certificate of Airworthiness</i>
3	<i>Flight Preparation</i>
14	<i>Mass and Balance calculation</i>
15	<i>Hand fire extinguishers</i>
18	<i>Oxygen Equipment</i>
20	<i>Flight Crew Licences/ Composition</i>
23	<i>Defect Notification and Rectification</i>
24	<i>Preflight Inspection</i>
B	Safety / Cabin
01	<i>General internal condition</i>
04	<i>Hand Fire extinguisher</i>
07	<i>Emergency exit, lighting and marking, independent portable light</i>
9	<i>Oxygen supply (Cabin crew and Passengers)</i>
10	<i>Safety Instructions</i>
12	<i>Access to Emergency Exits</i>
C	Aircraft condition
01	<i>General external condition</i>
02	<i>Doors and hatches</i>
03	<i>Flight Controls</i>
04	<i>Wheels, Tyres and Brakes</i>
07	<i>Powerplant and pylon</i>
08	<i>Fan blades, Propellers, Rotors (main / tail)</i>
10	<i>Obvious Unrepaired Damages</i>
11	<i>Leakages</i>
D	Cargo
01	<i>General condition of cargo compartment</i>
02	<i>Dangerous Goods</i>
03	<i>Safety of cargo on board</i>



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Note 1: Inspection elements may vary from case to case, depending on the type of operation (passenger, freight or combined transport), the type of aircraft or any non-conformities reported in previous inspections. In the latter case, the decision on the items to be inspected as a matter of priority will be taken by the inspectors at the platform carrying out the inspection.

Note 2: The elements of the inspection in the case of the short time allocated to the inspection are highlighted separately on the form "Proof of inspection" used during the platform inspection, provided in Annex 1 to this procedure.

11.9 Template of Air Safety Complaint

Complaint Concerning Air Safety **Sesizare referitoare la Siguranța Zborurilor**

Date received by RCAA: Data primirii de către AACR:	RCAA No.: AACR nr.:
--	--------------------------------------

The information contained in the "Reporter identifications" fields are not mandatory. Please entry these fields only if you desire to receive a personal reply or to permit us to contact you for more information.

Informațiile conținute în câmpul "Identificarea raportorului" nu sunt obligatorii. Vă rugăm să completați aceste informații numai în cazul în care doriți un răspuns personal sau pentru a ne permite să vă contactăm ulterior pentru a ne furniza detalii suplimentare.

Reporter identification / Identificarea raportorului:

Name: Prenume:		Surname: Nume:	
Address: Adresă:		Telephone number: Număr telefon:	
E-mail:	Post code, city: Cod poștal, oraș:	Country: Țara:	

Information concerning the flight / Informații privind zborul în cauză:

Airline: Compania aeriană:
Ticket number: Număr biliet:
Airport of departure: Aeroport de plecare:
Date of flight: Data zborului:
Flight number: Număr de zbor:
Place of occurrence: Locul producerii evenimentului:
Airport of arrival: Aeroport de sosire:



Time of occurrence:

Ora producerii evenimentului:

DESCRIPTION OF THE OCCURRENCE / DETALII PRIVIND EVENIMENTUL:

The information on this form will be used only for the purpose for which you have provided it. We will not use this information for any other purpose, and will not disclose it without your consent.



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Informațiile cuprinse în acest formular vor fi folosite numai în scopul în care au fost furnizate. Nu se vor folosi aceste informații pentru alte scopuri și nu vor fi dezvăluite fără acordul raportorului.

11.10 Written communication to aircraft operators

The written communication to the operator to report category 2 and 3 findings should contain the following information:

- a short reference to the RAMP programme,
- why this written communication has been sent (class 2 / 3 actions),
- reference to the ramp inspection report,
- request for evidence for corrective actions of the deficiencies,
- request the operator to include, as a copy, its competent State of Oversight in the exchange of the corrective actions requested.

Note: The template contains the required information mentioned above. Although the use of this template is encouraged in order to standardise the written communication, elements of this template may be amended where necessary to match the individual cases.

Example:

Dear Sir,

I kindly ask your attention for the following:

Your aircraft has been inspected in the scope of the EU Ramp Inspections Programme. As described by the RAMP programme procedures, the ramp inspection reports are, in the case of significant and/or major findings, sent to both the concerned operator and the authorities responsible for the oversight of that operator. A copy of the ramp inspection report, as it has been entered into the centralised European database, is attached.

Concerning the findings categorised as category 2 or 3, the RAMP procedures require me to request evidence of corrective action(s) that have been or will be undertaken to correct these findings and to prevent re-occurrence in the future. You may inform me (in writing) either directly or through your authority.

As your authority is the entity responsible for the safety oversight of your operations, they might be asked to confirm that they are satisfied with corrective actions. In this frame, I would kindly invite you to also transmit to their services a copy of the elements requested aforementioned.

I thank you for your cooperation in the field of air transportation safety, and inform you that additional ramp inspections may occur when aircraft of your airline lands on the territory of one of the States participating in the RAMP programme.

Should you require any additional information on this matter, do not hesitate to contact our services.

Yours faithfully,

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11.11 Written communication to National Aviation Authorities

The written communication to the NAA to report category 2 and 3 findings should contain the following information:

- a short reference to the RAMP programme,
- why this written communication has been sent (class 2 / 3 actions),
- reference to the ramp inspection report,
- optional: request for confirmation that the NAA is satisfied with the corrective actions.

Note: The template contains the required information mentioned above. Although the use of this template is encouraged in order to standardise the written communication, elements of this template may be amended where necessary to match the individual cases.

Example:

Dear Sir,

I kindly ask your attention for the following:

Aircraft from one or more operators for which you ensure the oversight, have been inspected in the scope of the EU Ramp Inspections Programme. As described by the RAMP programme procedures, the ramp inspection reports are, in the case of significant and / or major findings, sent to both the concerned operator and the authorities responsible for the oversight of that operator. A copy of the ramp inspection report, as it has been entered into the centralised European database, is attached.

The operator has been requested to provide evidence of any corrective actions taken.

The information contained in the ramp inspection report as well as the corrective actions taken by the operator might be useful for your oversight activities.

I thank you for your cooperation in the field of air transportation safety, and inform you that additional ramp inspections on the operator(s) may occur when their aircraft land on the territory of one of the States participating in the RAMP programme.

Should you require any additional information on this matter, do not hesitate to contact our services.

Yours faithfully,

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11.12 Alcohol testing procedure – Index A11

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A11.1 Data protection

All procedures described in the present manual involving processing of personal data should comply with applicable data protection rules.

In particular, EU Member States shall comply with the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) (Text with EEA relevance) and implement the corresponding data protection policies for the processing activities defined in the present manual, such as notification of findings, ramp inspection tool reporting and proof of inspection management.

A11.2 Risk based approach

The Agency shall communicate a list of EU and third-country operators for the prioritisation of alcohol testing. This list should be updated on the same timeframe as the major updates of the priority list (i.e.: update following the regular analysis) and whenever necessary.

This list will be established taking into account the robustness and effectiveness of existing psychoactive testing programmes. When doing so, the Agency shall consider:

- information on existing national psychoactive testing programme (such as random alcohol tests performed on crew members by national officials not employed by the operator); and
- information on existing operator's psychoactive testing programme (such as random alcohol tests performed on crew members by employees of the operator or subcontractors).

The Agency will send a questionnaire to third-country operators' States to gather relevant data. In case the States do not provide data, operators can provide the Agency with information on their own psychoactive testing programme.

This list will identify operators without a robust and effective psychoactive testing programme at national and operator level. Operators for which no data have been received are considered to have no testing programmes in place.

EASA States' Competent Authorities (CA) should make use of this list when establishing the annual ramp inspection programme.

The Agency will analyse the results of alcohol tests included in the ramp inspection tool after 3 years and amend this risk based approach, should the analysis provide enough indicators.

A11.3 Including alcohol testing in an annual ramp inspection programme

Guidance on how to set an annual programme for alcohol testing on crew members compliant with ARO.RAMP.105 and ARO.RAMP.106 is provided below.

RCAA should include alcohol tests as part of the annual ramp inspection programme. and should ensure a reasonable coverage of operators from the priority list for alcohol testing. The planned annual number of alcohol tests to be performed on a given operator should be adjusted based on the priority for alcohol testing assigned to the operator by the RCAA.

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The priority for alcohol testing assigned to an operator should take into account the priority list for alcohol testing established by the Agency.

The annual target of the number of alcohol tests to be performed on a given operator can be set by either adjusting the number of inspections with alcohol tests and/or adjusting the proportion of crew members to be tested during an inspection with alcohol test.

E.g.:

- for an operator on the priority list for alcohol testing, X % of ramp inspections planned will contain alcohol test of crew members and for an operator not included on the priority list for alcohol testing this proportion will be Y %. With $X > Y$; or
- X % of inspection included in the annual ramp inspection programme will contain alcohol test of crew members, and for operators included on the priority list for alcohol testing Y % of the crew will be tested, for other operators this proportion will be Z %. With $Y > Z$.

As a Flight Crew (FC) under influence of alcohol represents a greater danger for flight safety than a Cabin Crew (CC) under influence of alcohol, a higher priority should be given to perform alcohol test on FC rather than on CC. This can be achieved within the annual ramp inspection programme or within the daily planning.

RCAA should avoid to plan ramp inspections consisting only of alcohol tests (hereinafter referred to as stand-alone alcohol tests). However, whenever operational reasons or tight time constraints prevent completion of alcohol test during regular ramp inspections (e.g.: short turn-around), RCAA can programme ramp inspections with stand-alone alcohol test. The number of stand-alone alcohol tests should not exceed the System Wide Coordination (SWC) target number of inspections for layer 1 operators not included in the priority list for alcohol testing; for operator included in the priority list for alcohol testing the number of stand-alone alcohol tests may exceed the SWC target.

Examples:

- if the target is two and the operator is not included in the priority list for alcohol testing up to two additional stand-alone alcohol tests may be performed;
- if the target was two and the operator is included in the priority list for alcohol testing RCAA may plan to perform additional stand-alone alcohol tests; and
- if the target is zero and the operator is included in the priority list for alcohol testing, RCAA may plan to perform stand-alone alcohol tests.

For operators including in the layer 1 of SWC, stand-alone alcohol tests won't be counted as ramp inspections within the framework of SWC.

RCAA may define the maximum number of alcohol tests they are able to perform in a year and adjust the annual programme for alcohol testing accordingly. It is suggested to keep a margin in order to allow for alcohol test not including in the annual programme (e.g.: alcohol test following whistle-blower information). RCAA may establish its annual maximum capacity in term of number of inspections with alcohol test (or number of alcohol test) by taking into account:

- the number of available devices that comply with all requirements set in this manual; or

- the number of ramp inspectors properly trained and qualified available.

National Coordinator (NC) responsibilities:

The NC should be responsible to develop, monitor and amend an annual ramp inspection programme including the number of alcohol tests to be performed. This can be achieved by monitoring the number of alcohol tests or the number of ramp inspections including alcohol tests performed per operator. These numbers should be consistent with the annual programme.

The NC will keep record of alcohol tests performed. Ramp inspectors will ensure the availability of this information, in particular by reporting on the Proof of Inspection (PoI) the number of tested FC and CC.

The ramp inspection tool should support the implementation of alcohol testing during ramp inspection. Alcohol testing results provided by ramp inspections performed in other EASA Member States may also be taken into account to set and monitor the number of alcohol tests (or the number of ramp inspections including alcohol test) to be performed per operator.

The NC may want to enhance its planning oversight by monitoring:

- number of operators tested for alcohol consumption during ramp inspection;
- number of alcohol tests performed on operators included in the priority list for alcohol; and
- list of airports where ramp inspections including alcohol tests were performed.

This information may be used to track positive cases per airport, adjust the annual ramp inspection programme etc.

A11.4 Daily planning

A11.4.1 How to plan an initial alcohol test

A risk based approach should be applied for daily planning.

When selecting the date and/or the time and/or the place to perform an alcohol test, ramp inspectors may consider that:

- short-turnaround lets less opportunity for crew members to consume alcohol than overnight or long stays;
- last minute member crew replacement increases the risk for the replacing crew to be under influence of alcohol; and
- when a crew member is tested positive, other crew members are at higher risk to be under influence of alcohol as well.

Alcohol tests performed following whistle-blower information are more likely to detect crew members under influence of alcohol. Reliability of this information should be taken into account.

The widest possible sampling rate of inspected operators for alcohol consumption will increase the deterrent effect of alcohol testing performed during ramp inspections, as more and more crew members will be aware of it.

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Alcohol tests can also be performed on operators not listed in the annual programme or on crew members operating in general aviation. A risk based approach should also be followed for these inspections.

A11.4.2 Selection of items to be inspected

Ramp inspectors will take into account operating factors when planning to include alcohol test during an inspection. This should be assessed in the same way than for other items of the checklist. Taking into account the risks criteria above, ramp inspectors may decide to include alcohol test during a ramp inspection.

Available time for the inspection remains the key element. Previous experiences in EASA Member States which pioneered alcohol-testing indicate that it can be rather long to test the whole cabin crew whereas only few minutes may be enough to test the FC. Therefore when time dictates ramp inspectors may consider to limit alcohol test to FC.

Ramp inspectors may decide to perform alcohol tests separately during a stand-alone alcohol test whenever operational reasons prevent to perform alcohol tests during regular ramp inspections (e.g.: short turn-around). As mentioned above, stand-alone alcohol tests won't be counted as ramp inspections within the framework of SWC (see paragraph 3).

Ramp inspectors may take into account next inspection opportunities for the operator and aim to avoid to perform alcohol test when not enough time is available (e.g.: inbound flight already delayed, short-turnaround).

In any case, ramp inspectors should pay attention to crew apparent fitness for the flight. For this purpose, ramp inspectors may have been properly trained about visual elements, possibly not as obvious as alcohol smelling, mumbling or erratic ability to provide consistent answers.

Any consideration about crew duty time remains as usual.

A11.4.3 Postponing or cancelling an alcohol test

When ramp inspectors decide to postpone or cancel an alcohol test for valid reasons, this should not be reported on the Pol or in the ramp inspection tool as it would not indicate a lack of cooperation. However, ramp inspectors should inform the NC for planning reasons.

Hereafter are presented examples of reason that may justify to cancel or postpone an alcohol test (this list is not exhaustive):

- privacy of the test towards third parties cannot be guaranteed;
- availability of further opportunities for alcohol tests, including stand-alone tests;
- operator not included in the list of Union and third-country operators for the prioritisation of alcohol testing;
- crew already tested for alcohol consumption as evidenced by document;
- other items are deemed more critical for flight safety; and
- a situation where, in the opinion of the inspector, the increase in crew member stress due to alcohol testing is deemed unnecessary or might jeopardize the safety of the flight.

A11.4.4 Alcohol tests not included in the annual programme

In some cases ramp inspectors may receive whistle-blower information about crew members' alcohol consumption. National procedures ensuring the follow-up of whistle-blower information can be used.

These situations will not be, in general, covered by annual programme and so, will be taken as extraordinary and exceptional cases where general principles previously exposed can be left aside to ensure the risk mitigation.

A11.5 Quality of reports entered on the ramp inspection tool

The NC should ensure the quality of reports entered on the ramp inspection tool by ramp inspectors or by other officials; in particular, the NC will ensure that reports are anonymous and that pre-described findings are used in an appropriate way.

The NC should ensure that the quality control process is followed.

The RCAA may use the drafting function available on the ramp inspection tool in order to allow for a quality check by a moderator.

A11.6 Initial test

A11.6.1 General principles

Alcohol tests should be carried out in consultation with the crew in such a way that third parties (e.g.: passengers, ground handling personnel etc...) are not aware / informed about the alcohol test performance. Alcohol tests should be preferably done at the aircraft, but can also be done outside the aircraft (e.g. at crew centre...). When performing alcohol tests outside the aircraft, the RCAA should establish procedures ensuring the principles described in this manual are complied with (notably confidentiality of the test, only crew members with safety task assigned should be tested...).

Care should be taken on the following when selecting the location.

- Cockpit: area could be visible from outside, pending on the parking position of the aircraft.
- Galley: ground handling personnel might be present.
- Cabin: cleaning might be ongoing or has to be delayed by the operator.
- Lavatory compartment should be, by the nature of this place, considered as inadequate to perform the test.

To test FC and CC, the following locations could be seen as adequate to perform the initial alcohol test to ensure a discrete environment.

- In the cockpit when the door is closed (sunshades down) (preferable location for cockpit crew testing).
- In a crew rest compartment (if available).
- In passenger cabin if empty, (doors closed, window shades down).
- Galley area curtain(s) closed (preferable location for CC testing).

The crew member might propose a different place for the test; if the place is appropriate, ramp inspectors may consider this alternative.

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Inspectors should decide to postpone the test to a later date if privacy cannot be guaranteed.

Inspectors should request a list of all crew members to identify which crew members are on duty in the inspected flight. The selection of which crew member to test has to be non-discriminatory (e.g.: random sampling or no sampling).

In general all FC assigned to safety tasks should be tested in priority when the operator is selected. Depending of the crew size and time available, a sampling of CC can be an option. Only CC assigned to safety tasks (Cabin Crew Members as per R965/2012 Annex I – definition) should be tested. Alcohol test of positioning crew members is to be avoided. Before the alcohol test, ramp inspectors should make sure that the device is operational and suitable for the test (e.g.: correctly calibrated, within due date for maintenance ...).

For electronic devices, the English operating mode should be preferably used (if available). The displayed test result should not leave any doubt (e.g. the blood alcohol concentration displayed or showing a “pass” or “fail” indication).

Since a second alcohol test will be necessary to confirm a first positive result, the first test should be carried out preferably at the beginning of the ramp inspection. In case of a positive result, the exact time of the initial and confirmation test should be noted down.

Inspectors may first request the licence and or ID of the crew member to be tested in order to clearly identify the crew member. This might be relevant in case of a positive test and for further follow-up.

Prior to starting the test, ramp inspectors should introduce:

- the alcohol testing process, avoiding the use of discriminatory or discreditable words;
- the device / test equipment to be used;
- the consequences of positive results to the crew members; and
- that a lack of cooperation will be regarded in the same way as a positive test.

All parts of the equipment, which come into contact with the mouth of the crew member, should be visibly removed from the original packaging in front of or by the tested crew member, and must not be touched by a third person at the relevant points. Since the measurement requires an active involvement of the crew, this can only be done with their consent.

Where compatible with the testing procedures and if requested by the crew member, the crew member should have the option of asking a witness/work colleague to observe the test.

A11.6.2 Initial test results

When the result appears on the device display, the inspectors should inform the tested crew member of the result.

A test result is considered negative when the breath alcohol concentration (BrAC), measured by a breath alcohol tester is equivalent level of 0.0 grams of blood alcohol concentration (BAC) in accordance with Aerial Code, Chapter XIV-Sanctions, Art.114.

A test result is considered positive when the breath alcohol concentration (BrAC), measured by a breath alcohol tester is higher than the equivalent level of 0.0 grams of blood alcohol concentration (BAC) per liter of blood in accordance with Aerial Code, Chapter XIV-Sanctions, Art.114.

A11.6.2.1 Negative initial test

In case of negative initial test, no finding or remark should be raised and the tested crew member will be allowed to resume her/his duties normally.

At the end of the inspection, and if all alcohol tests are negative, inspectors should indicate on the Pol that alcohol tests have been carried out and the number of tested FC and CC, using the dedicated field of the Pol header. No remark should be added on the Pol to avoid mis-interpretation by operators.

A class 1 action is to be taken and the Pol should be provided to the pilot in command or operator's representative after completion of the inspection.

No further notification is required as the operator will be informed of the negative results via the Pol and the ramp inspection tool.

A11.6.2.2 Positive initial test

In case of a positive result, no finding should be raised and a confirmation test should be performed.

After a positive initial test, crew members may react emotionally due to disbelief, fear of loss of licence/certificate, fear of loss of job, sense of shame, delays, sanctions, etc..

However in case the crew member clearly shows signs of or admits being under the influence of alcohol, law enforcement bodies may be notified by ramp inspectors as soon as possible. Early notification of law enforcement body should be described by national procedures.

During the waiting time, before the confirmation test is conducted, and in order to limit the stress of the tested crew member, ramp inspectors should provide a clear briefing to the concerned crew member and ensure that:

- the crew member receives proper communication, explanation and information on the national procedures after a positive test;
- the crew member is informed about the applicable national statutory limit; and
- no finding will be raised in case the confirmation test happened to be negative.

A11.7 Confirmation test

A11.7.1 General principles

Aromatic beverages (e.g. fruit juices), alcoholic mouth sprays, medical juices and drops, and belching and vomiting may corrupt the alcohol test results and trigger false positive. Therefore in the case of a positive initial alcohol test, a confirmation test should always be performed. The confirmation test should be performed at least 15 minutes but not more than 30 minutes after the completion of the initial test. However, when operational procedures of the testing device prescribe more than 15 minutes of waiting time between two tests, ramp inspectors can either observe this higher delay or use another testing device for the confirmation test. Confirmation testing should be conducted as soon as possible after the 15 minute delay.

The 15 minute delay is deemed sufficient to prevent the above mentioned corruption of alcohol test results; the 30 minute limitation guarantees similar results between initial and confirmation tests as the alcohol metabolism in the body in 30 minutes will be of limited impact.

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During this time the crew is still on duty, but ramp inspectors should observe that the tested crew member does not eat or drink or ingest something into her/his mouth, for the reason mentioned above. If the crew member disregards this requirements in such a manner that it prevents the conduct of the confirmation test within the 30 minutes, this can be considered as a lack of cooperation to the test, and could be considered as a refusal to the test. It is also possible to delay the confirmation test for another 15 minutes after the ingestion time, but without exceeding the 30 minute maximum timeframe. There is no safety reason to invalid the result of a confirmation test performed more than 30 minutes after the initial test, but it should not be a standard.

Where compatible with the testing procedures, and if requested by the crew member, the crew member should have the option of asking a witness/work colleague to observe the test.

The general principles previously mentioned for the initial test remain:

- Selection of the location of the test (confidentiality criteria).
- The operational status and suitability of the device.
- The original packaging and opening procedures of the mouthpiece.

Only if possible and suitable the confirmation test could be performed outside the aircraft (e.g. car/bus, police car..., separate room near to the aircraft parking position).

A11.7.2 Confirmation test results

A confirmation test result is considered negative when the breath alcohol concentration (BrAC), measured by a breath alcohol tester is lower or equal to the equivalent level of 0.0 grams of blood alcohol concentration (BAC) per litre of blood or the national statutory limit, whichever is the lower.

A confirmation test result is considered positive when the breath alcohol concentration (BrAC), measured by a breath alcohol tester is higher than the equivalent level of 0.2 grams of blood alcohol concentration (BAC) per litre of blood or the national statutory limit, whichever is the lower.

A11.7.2.1 Negative confirmation test

When an initial positive test is followed by a negative confirmation test, the overall result of the test should be negative. No findings should be raised.

The tested crew member can resume her/his duties.

At the end of the inspection and if all overall results of alcohol tests are negative, inspectors should indicate in the header of the Pol the number of tested FC and the number of tested CC. No remark should be added on the Pol to avoid mis-interpretation by operators.

The actual result of a negative alcohol test should not be mentioned on the Pol.

A class 1 action is to be taken and the Pol should be provided to the pilot in command or the operator's representative after completion of the inspection.

No further notification is required. The operator will be informed of the performed alcohol tests and of the negative results via the Pol and the ramp inspection tool.

It is not necessary to inform law enforcement bodies. In case law enforcement bodies were already informed about the positive initial test, national procedures should require

that ramp inspectors inform them that the confirmation test is negative and that no further action is required.

A11.7.2.2 Positive confirmation test

In case of a positive confirmation test, a CAT 3 finding should be raised under item E01. As soon as the test result is known and positive, the tested crew member should be informed about the result and that she/he should not be permitted to resume her/his FC or CC duties.

Inspectors should indicate on the Pol that an alcohol test has been carried out, the number of positive results and the number of tested FC and CC. In the finding description, inspectors should use the corresponding PDF. The name, the BAC measured or any other personal data should not be mentioned on the Pol.

Ramp inspectors should provide the positively tested crew member with a written confirmation of the alcohol test result of the initial and confirmation test, the national statutory limit as well as the device serial number and test sequence number. Inspectors should take a photo of either the ID, the FC's licence and medical or CC's attestation for follow-up. This information should not be on the Pol. This transmission of the written confirmation should be done in accordance with national requirements.

Inspectors should coordinate the immediate corrective actions before departure. Such coordination should be done with the representative of the operator or, if not available, with the pilot in command. In case the pilot in command is under the influence of alcohol, inspectors should inform the representative of the operator or, in his absence, the operator directly.

Examples of class 3 actions are, but not limited to:

- Class 3b : corrective actions
 - Crew member removed from duty (the crew composition should be reviewed in order to cover at least the minimum operator's requirements on crew composition with crew members fit to fly and task repartition between remaining crew members should be reviewed; if the minimum requirements are not met, restrictions may apply).
 - Replacement of crew member (this might lead to flight delays).
 - Flight cancellation.
- Class 3a : restrictions on the aircraft operations
 - Restrictions on number of passengers (only in case the positive alcohol test result concerns a CC. In this case, operator's procedures should be checked before acceptance of the class 3 action).
 - Ferry flight (only in case the positive alcohol test result concerns a CC or if single-pilot operation are possible. In this case operator's procedures should be checked before acceptance of the class 3 action).

In case of a confirmed positive test, subpart ARO.RAMP does not entitle ramp inspectors to act on the privileges of a licence or attestation holder. Any action restricting the privilege of a licence or attestation holder should be supported by national requirements or taken by the competent licensing or medical authority. Indeed, the medical certificate of a crew member is not rendered invalid whenever he/she is under the influence of alcohol; instead, the crew member is to be considered as temporarily unfit to fly. Therefore, ramp



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inspectors can't prevent a crew member, holding a valid licence and medical certificate, who is fit to fly to resume duty, even if this crew member was previously tested positive, except otherwise specified by national requirements. Therefore, it is of the utmost importance that national requirements ensure a proper follow-up of ramp inspections findings.

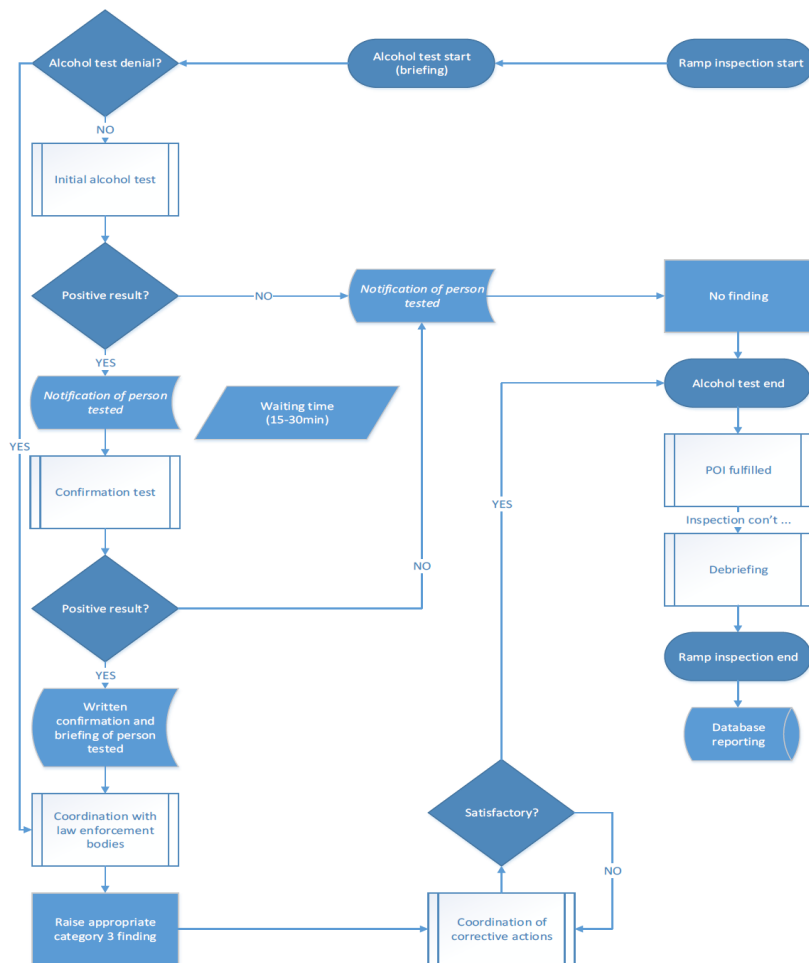
In case the tested crew member is replaced by another qualified crew member, the replacing crew member may be tested as well. Following elements should be taken into account: time of arrival of replacing crew member, time available for test after replacing crew arrival, stress on replacing crew ...

If the crew/operator's representative refuses to take the necessary corrective actions or does not respect imposed restrictions on the aircraft flight operation, the aircraft should be grounded and the usual procedure should be applied.

The PoI should be provided to the pilot in command or operator's representative after completion of the inspection.

Personal data (including those which could lead to the identification of the crew member) on alcohol test results should not be communicated via the ramp inspection tool, please refer to chapter 11 of this document for the description of the notification process.

A11.7.3 Flow chart of alcohol testing inspection:



A11.8. Test refusal

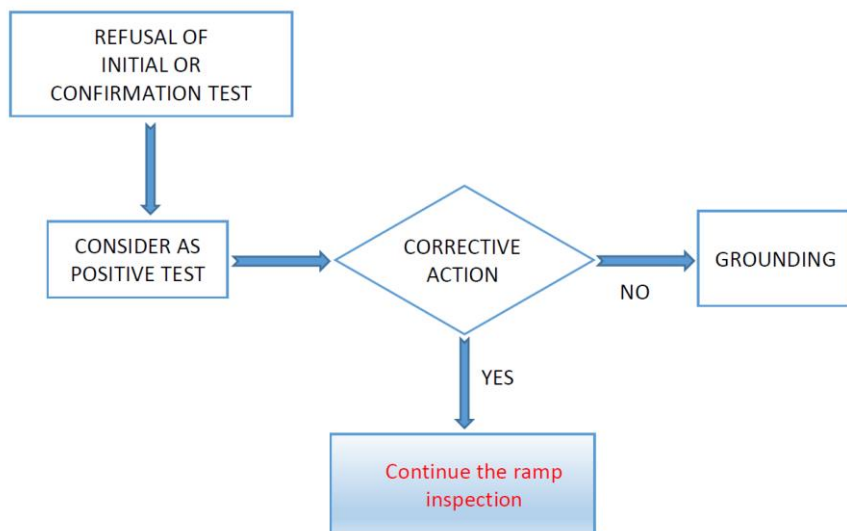
A11.8.1 Definition of a test refusal

A refusal to cooperate during an alcohol test is:

- when FC or CC don't accept to undergo the initial or confirmation alcohol test; and
- when FC or CC don't cooperate with the testing procedures.

A11.8.2 Consequences of a test refusal

The refusal should be considered as a positive test and should be regarded as a refusal to grant access in accordance with ORO.GEN.140 for EU operator and in accordance with TCO.115 of Commission Regulation (EU) No 452/2014 in the case of a third-country operator. In any case, the concerned crew member should not be allowed to continue his/her duty.



A11.8.3 List of follow up actions after a test refusal by crew member

In case of a denial to perform an alcohol test for no valid reason, ramp inspectors should raise the appropriate CAT 3 finding and pursue immediate follow-up actions in accordance with national requirements. These follow-up action should include:

- Information to the crew member on the consequences of refusal;
- Information of the operator's representative;
- Crew member removed from duty; and
- Notification to law enforcement bodies in accordance with national requirements.

When ramp inspectors accept to postpone or cancel an alcohol test (see chapter 4.3), it should not be seen as a lack of cooperation and therefore should not be reported on the Pol or in the ramp inspection tool. However, ramp inspectors should coordinate this postponement or cancellation with the NC for planning reasons (chapter 4.3).

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A11.9 Crew member unable to provide a sufficient breath sample to undergo an alcohol test performed with a Breathalyzer

In case a crew member is unable to provide a sufficient breath sample to undergo an alcohol test during a ramp inspection:

A11.9.1. If the medical certificate of the crew member clearly mentions that the crew member cannot undergo an alcohol test performed with a breathalyser (use of SSL restriction):

- a. This will be reported as a CAT G remark on the POI (proposal of remark: “medical certificate delivered to a crew member with a breath deficiency”)
- b. The State of Inspection will coordinate with EASA and the Licensing Authority the proper follow-up actions
 - i. EASA doesn't support the delivery of a medical certificate to a crew member with such a medical condition.
- c. Then ramp inspectors should still perform the initial test and:
 - i. If the crew member refuses to undergo this initial alcohol test this should be considered as a refusal. The appropriate CAT 3 finding is raised, the crew member cannot resume his or her duty.
 - ii. The ramp inspectors witness the inability to perform the test:
 1. The crew member can resume his or her duty, except if it is prevented by national requirements on alcohol testing of individuals (national procedures may be developed to render mandatory the alcohol test with another testing methodology)
 - iii. The initial test result is negative:
 1. The crew member can resume his or her duty.
 - iv. The initial test result is positive:
 1. Then the ramp inspectors should proceed with the confirmation test and follow the regular procedure;
 2. In case the confirmation test cannot be performed due to an insufficient breathe sample the ramp inspectors should consider the result as a positive test and raise the appropriate CAT 3 finding, the crew member cannot resume his or her duty;
 3. In case the confirmation test cannot be performed due to a refusal to perform the confirmation test the ramp inspectors should consider this as a lack of cooperation and raise the appropriate CAT 3 finding, the crew member cannot resume his or her duty.

A11.9.2. If the medical certificate of the crew member doesn't mentions any restriction and the crew member produces another document and/or justifies that he/she cannot undergo an alcohol test performed with a breathalyser

- a. The ramp inspectors should disregard the justification and/or the document produced even seemingly delivered by a medical officer,
- b. This will be reported as a CAT G remark on the POI (“Crew member on duty with a known breath deficiency not mentioned on the medical certificate”),
- c. The State of Inspection will coordinate with EASA and the Licensing Authority the proper follow-up actions

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- i. EASA doesn't support the delivery of a medical certificate to a crew member with such a medical condition.
- d. The ramp inspectors should perform the initial test and:
 - i. If the crew member refuses to undergo this initial alcohol test this should be considered as a refusal. The appropriate CAT 3 finding is raised, the crew member cannot resume his or her duty.
 - ii. The ramp inspectors witness the inability to perform the test:
 - 1. The crew member should first prove that the medical condition of the crew member is known by the Licensing Authority.
 - 2. After the previous point is proven the crew member can resume his or her duty, except if it is prevented by national requirements on alcohol testing of individuals (national procedures may be developed to render mandatory the alcohol test with another testing methodology)
 - iii. The initial test result is negative:
 - 1. The crew member can resume his or her duty.
 - iv. The initial test result is positive:
 - 1. Then the ramp inspectors should proceed with the confirmation test and follow the regular procedure;
 - 2. In case the confirmation test cannot be performed due to an insufficient breathe sample the ramp inspectors should consider the result as a positive test and raise the appropriate CAT 3 finding, the crew member cannot resume his or her duty;
 - 3. In case the confirmation test cannot be performed due to a refusal to perform the confirmation test the ramp inspectors should consider the result as a refusal test and raise the appropriate CAT 3 finding, the crew member cannot resume his or her duty.

A11.9.3. If the medical certificate doesn't mention any restriction and the crew member wasn't aware of this medical conditions before the initial test failure (the crew member doesn't refuse the test and doesn't justify a special medical condition to avoid the test)

- a. This will be reported as a CAT G remark ("crew member unable to provide a sufficient breath sample to undergo an alcohol test performed with a breathalyser")
- b. The State of Inspection will coordinate with EASA and the Licensing Authority the proper follow-up actions
- c. The crew member cannot resume his or her duty unless otherwise specified by national requirements on alcohol testing of individuals (national procedures may be developed to render mandatory the alcohol test with another testing methodology)
- d. In case the crew member disregards his or her inability to provide a sufficient breath sample and continues his or her duty without reporting as unfit, the ramp inspectors should consider this as a lack of cooperation and raise the appropriate CAT 3 finding.

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A11.10 Notification

After a confirmed positive alcohol test, ramp inspectors should provide the crew member with a written confirmation of the measurement of the initial and confirmation test, the national statutory limit as well as the device serial number and test sequence number. Inspectors should take a photo of the FC licence and medical or CC attestation for follow-up. This information should not be on the Pol. This notification should be done in accordance with national requirements.

The operator is notified using the Pol and the ramp inspection tool, this notification doesn't include personal data such as BAC or name of the tested crew member.

An ad-hoc process to notify and transmit needed personal information on the positively tested crew member should be defined by the inspecting authority; this ad-hoc procedure should ensure a notification of:

- the State of Operator;
- if different from the State of Operator, the authority in charge of the issuance of the Cabin Crew Attestation whenever it can be identified by the ramp inspectors (only for CC); and
- the licensing authority (only for FC).

This ad-hoc notification should include the following information:

- the State of Licence issue; (only for FC)
- pilot's licence number; (only for FC)
- medical certificate number; (only for FC)
- name of licence holder or name of CC;
- result of the breath alcohol concentration (BrAC) testing (the references of the device used for the measure) and the time and date of the test; and
-
- the national statutory limit of alcohol concentration (either BrAC or BAC) not complied with.
- The inspecting authority should inform the competent authorities above mentioned that the operator was not provided with the personal data concerning positively tested crew members and that they may coordinate follow-up action with the operator.
- A refusal of alcohol test is notified in the same way as a positive case, except for the result of BrAC which is replaced by an indication of the refusal.

A11.11 Coordination with legal enforcement bodies

RCAA and law enforcement bodies should agree on follow-up procedures in case of positive confirmation test and refusal of alcohol tests including the appropriate location to handover the process.

The agreement may include the following items:

- when inspectors should inform law enforcement bodies;
- how inspectors should inform law enforcement bodies;
- follow-up of positive results (enforcement actions, notification to State of Operator and/or Licensing Authority);



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- follow-up of refusal of alcohol test; and
- conservation of evidence and process of personal data related to the positive (or refusal) case.

RCAA may decide to inform law enforcement bodies in advance when alcohol tests are planned to ensure their availability in case of positive results. Besides, in case the FC or CC clearly show signs of or admit being under the influence of alcohol, law enforcement bodies may be notified by inspectors as soon as possible. Early notification may be described by national procedures.

RCAA may coordinate the necessary exchange of information between ramp inspectors and legal enforcement body (e.g.: reporting of time of inspection, licence numbers, proof to be collected, photography of results, etc. ...).

A11.12 Ramp inspection tool

No personal data such as name of the crew member and the BAC shall be entered in the ramp inspection tool.

A11.12.1 Negative results

Negative results should not be reported under a general remark in order to avoid confusion for operators. There should be no mention of negative test elsewhere than in the Pol header.

A11.12.2 Positive results

If during a ramp inspection several crew members are tested positive for alcohol consumption, each positive case should be reported by using the appropriate finding (no grouping of these findings).

A11.12.3 Refusal

Refusal of inspection should be clearly mentioned with the proper PDF.

A11.13 Equipment requirements (for instruction use)

Each EASA Member State should define appropriate technical requirements in accordance with national requirements. This technical requirements should be set consistently with the national statutory limit, e.g. a national statutory limit of 0.0 grams of alcohol per litre of blood should result in the selection of testing devices allowing a proper accuracy.

The use of two different devices, even of different type, is recommended but not necessary for initial and confirmation test.

Hereafter is some guidance on breath alcohol testing devices which measure the concentration of alcohol contained in an exhaled breath sample, intended to be used for screening or preliminary testing.

Further technical specifications can be found in the standard EN 15964. This European standard should have been given the status of a national standard since September 2011, either by publication of an identical text or by endorsement within the following countries:

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Austria, Belgium, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Iceland, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Norway, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden, Switzerland and the United Kingdom.

A11.13.1 Type

Breathalyzers do not directly measure blood alcohol content or concentration (BAC), which requires the analysis of a blood sample. Instead, they estimate BAC indirectly by measuring the amount of alcohol in one's breath.

In general, two types of breathalyzer are used:

1. non evidential: usually small hand-held breathalyzers are reliable enough to confirm the non-compliance of an administrative law requirement; and
2. evidential: Larger breathalyzer devices can then be used to produce evidence to be used in criminal law enforcement.

Due to the particular circumstances when alcohol tests will be performed, in the context of a ramp inspection, devices used do not need to be evidential and will be:

- portable;
- handheld;
- appropriate for breath alcohol testing; and
- designed for professional use.

A11.13.2 Accuracy

The maximum permissible error is ± 0.02 mg/L for alcohol concentrations up to and including 0.20 mg/L expressed in milligrams of ethanol per litre of exhaled volume.

The maximum permissible error is ± 10 % of nominal concentration for alcohol concentration above 0.20 mg/L expressed in milligrams of ethanol per litre of exhaled volume.

Devices used should be calibrated according to manufacturer's instructions.

A11.13.3 Technical specifications

The following technical specifications are deemed necessary to ensure a proper behaviour of a breath alcohol testing device during normal circumstances in ramp inspections, taking into account that the interior of an aircraft, and more specifically the flight deck, will be the most common place where this tests will take place.

- Temperature range: -5° to $+45^{\circ}$.
- Display graphic alcohol values shown in numbers and English language available.
- Measuring range: 0‰ - 4‰.

For practical reasons, it could be useful to have a small printer to get information output tickets of the testing device. Bluetooth connected printers are already available and commonly used in other domains like road traffic breath alcohol tests.

Equipment chosen by RCAA that fulfil these specifications are:

- Dräger 7510, 6820, 5820;

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RAMP inspectors will be trained on how to use the alcohol tester by qualified instructors, in accordance with user instruction manual.

A11.13.4 Maintenance

The maintenance of the testing device will be done according to national requirements, the manufacturer manual and in accordance with European Standard on alcohol screening device. The maintenance of the testing device should be documented and the last maintenance document should be available on demand during the ramp inspection or at later stage.

A11.14 Alcohol tests performed by other officials

Each State is entitled to decide the way alcohol testing will be carried out and so different options can be chosen:

- alcohol testing fully integrated in the EU Ramp Inspection Programme and performed by ramp inspectors;
- alcohol testing fully integrated in the EU Ramp Inspection Programme but performed by other officials being part of the inspection team;
- stand-alone alcohol testing managed and performed by other officials; and
- a combination of the above options.

The NC need to create appropriate procedures for the coordination with other national bodies, including the notification of alcohol tests results to the licensing authority and the State of Operator. A model of notification is presented in Annex 1 to this procedure.

Results of alcohol tests performed by other officials need to be entered into the ramp inspection tool. Therefore, other officials should be trained to identify the operator of the tested FC and CC. This identification should comply with current practice of ramp inspectors. The verification of the pilot licence or CC attestation is not enough to identify the operator. It is recommended to define a process to correctly identify the operator by other officials. For commercial aviation, a picture of the AOC would be useful, whereas for all type of flight a photography of the certificate of registration may be taken.

Other officials don't have to use the PoI, but it is necessary that the information requested by the PoI header is collected to correctly upload the report. For this reason, national procedures may require that the correct information is collected by other officials. Other officials could be trained on the handling of the PoI form and specifically on how to fulfil the header. Such a training could guarantee the quality of data entered in the ramp inspection tool.

States may familiarise the other officials performing alcohol tests with the proper verification of a FC licence and/or advise to take a photography of the licence to allow for the correct identification and notification of the licensing authority.

Other officials may be trained on the definition of FC and CC and on the inspection techniques to identify FC and CC on duty.

ANNEX 1

Notification of alcohol test result

In accordance with ARO.RAMP.106, alcohol testing on flight crew and cabin crew members are carried out in [name of the Member State] by ramp inspectors. For these crew members, while on flight duty, the breathalyser test results should not exceed the level equivalent to [0.2 grams/national statutory limit if lower] of Blood Alcohol Concentration per litre of blood, as published here: [link to the national AIP, national laws, EU regulation].

During an alcohol test performed under the conditions described in table 1 below, your test results exceeded the above-mentioned limit, or you refused to cooperate during this test. You, as identified in table 2, were on flight duty on a flight conducted for the operator identified in table 3.

The operator will be informed that one of its crew members assigned with flight duties in the concerned flight was tested positive or refused to undergo an alcohol test but will not be informed of any personal data. The operator may contact the State of Operator or the Licensing Authority to obtain these personal details.

The Licensing Authority and the State of Operator will be notified of this positive case detection and will be provided with every data contained in this form.

The information contained in this form will also be communicated to the national law enforcement body.

Table 1: Test conditions and results

*Testing date:	*Place of test:
Initial testing time:	*Confirmation testing time:
Initial testing device: [brand], [model], [part number]	*Confirmation testing device: [brand], [model], [part number]
Initial test result:	*Confirmation test result:
<i>The alcohol testing procedure includes an initial alcohol test followed by a confirmation test performed at least 15 minutes later. The tested crew member was instructed not to ingest any liquid or solid of any type during the waiting time.</i>	
<input type="checkbox"/> The crew member refused to undergo the alcohol test and therefore was considered positive.	

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Table 2: Crew member identification data

*Last name, first name:	*Assigned role:(senior cabin crew member, cabin crew member or Pilot in Command/Commander, Co-pilot)
Identification document number: ID or passport	State of issue:
**Licence number or certificate number:	**Licensing Authority:
Medical certificate number:	Medical certificate issued by:

Table 3: Operator and flight identification

*Operator name:	*Operator reference: (AOC number or other)	*State of Operator:
*Aircraft registration:		
***Flight from:	***Flight to:	
***Flight number:	***Flight number:	

All your personal data is processed in compliance with the provisions and requirements of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).

* Mandatory information

** the licence number and Licensing Authority are mandatory fields when the test concerns a flight crew member

*** at least one flight should be identified

Other fields should be fulfilled when relevant and when the information is available

RCAA Document Number: