

Issue	Section	Analysis/Standards Board Decision
<p>I believe we need more clarification regarding the AE and with them being ultimately responsible for the SMS, not the Safety Manager. It seems auditors do not get the difference and allow the operator to appoint the SM as the AE erroneously.</p>	<p>3.2</p>	<p>ICAO is currently considering a change to Annex 19 to provide this clarity, i.e. the Accountable Executive is accountable for the performance of the SMS, while the SM and other Managers are responsible for ensuring the SMS is functioning effectively on a day to day basis. Said another way, It is the AE's SMS and run by the SM. SB Decision: Modify the SARP's: Clarify accountability of the AE and responsibility of the SM. Modify notes to provide clarity and therefore the Appropriateness and Effectiveness questions on the protocols will be modified to reflect this.</p>
<p>Suggest moving section 3.2.1d to Section 11 for a more coherent review of the ERP.</p>	<p>3.2</p>	<p>IS-BAO 3.2.1d is congruent with Annex 19. Deleting the ERP requirements from the SMS may introduce an SMS inconsistency with ICAO, which could diminish the value of the IS-BAO SMS in the eyes of NAA's around the globe. Recommend No Change to SARP's. However, recommend deleting chapter 11 and putting in IG for ERP as part of Chapter 3. There are no ERP standards in A6P2 or Annex 19 other than the one standard in the SMS, "The service provider shall ensure that an emergency response plan is properly coordinated with the emergency response plans". This is reflected in IS-BAO 3.2.1d, where the term "service provider" is replaced with "organization". ICAO provides ERP elements as guidance material in Doc 9859. IBAC should move the current Chapter 11, ERP to Guidance Material in the IG to support Standard it to our IG likewise. Chapter 11 can then be dedicated to Fatigue Management Program and all the sections related to Fatigue Management (IS-BAO 4.8, 6.13, 9.1.4k) should be relocated to the new Chapter 11.</p>
<p>Any chance of the fatigue management for ALL department members being removed? Very uncomfortable defending this for a admin person that lives ten minutes from the airport....as well as the regulatory foundation for that situation?</p>	<p>4.8</p>	<p>4.8 is a recommended practice (RP). It is not a requirement for registration. SB discussions in 2014 upheld the value of this RP. Recommend No Change Reword FMP applicability to cover everyone involved in the "safe operation of aircraft". Move all FMP elements to Ch. 11.</p>
<p>5.1.6c is a difficult standard to implement and audit. Recommend the wording be modified to be more realistic and practical.</p>	<p>5.1</p>	<p>This requirement is ambiguous and not practical. Delete 5.1.6(c)</p>

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Change wording of 5.2.1 Difficult for auditor to evaluate if all aircrew understand and apply CRM.	5.2	It may not be reasonable to expect an auditor to validate that the pilots understand CRM. Interviews could cover this topic somewhat, but not to the extent to ensure the general understanding of CRM. It would therefore be more appropriate to expect the auditor to determine if the operator has a program to ensure the pilots are receiving CRM training. The auditor then could explore the TCO, which is required for all training programs under 5.1, to see if the CRM training is adequate or appropriately designed. Recommend the revision to state. "The operator's training program shall ensure that all aircraft crew members are trained in CRM principles." Recommend adding guidance material in the IG on how this could be done.
Single Pilot operations should require SOPs	6.1	6.1.1b is a RP instead of a standard. SOPs apply to Single pilot operations just as much as multi-crew and therefore integrity of the IS-BAO program would be improved if this RP were converted to a Standard, especially with NTSB's highlight on compliance with procedures. Recommend making this RP a Standard.
NTSB Recommendation to add guidance	6.12.2, 6.12.3	Modify 6.12.2 as follows: Every crew member shall utilize these checklists in the performance of their assigned duties using the methods required by the operator. Add 6.12.3: The operator shall ensure that flight crews comply with best practices for checklist execution. <i>Note: See IG for information related to human factors and checklist design and usage.</i>
6.13.1 "non-aircraft crew" needs to be defined	6.13	Recommend changing the term to "other operator personnel". Move all FMP to Chapter 11.
Fatigue Management is addressed in 3 separate Elements in the IS-BAO Protocols. Under Element 4, Fatigue Management is a Recommended Practice. Under Elements 6 and 10 Fatigue Management appears to be a required protocol. This makes it confusing for the auditors to address fatigue management correctly. During this audit the Audit Team treated the protocols as requirements and audited to that end. IBAC should combine the three protocols and require fatigue management for all personnel involved with the aviation program.	6.13	Recommend removing ERP elements from Chapter 11 and new chapter "Fatigue Management Program" to cover all fatigue management elements of the organization in one place.

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Suggest moving section 6.13 to Section 3. Although this suggestion does not concur with the guidance in ICAO Annex 19, in reality a Fatigue Management System is best developed and implemented in the broader context of the SMS. While Flight and Duty Limitations may have been appropriate for Section 6, the expansion of this Standard to a Fatigue Management System provides a juncture for reconsideration of the location of this Standard.	6.13	To include FMP in SMS would depart from the ICAO SMS Framework. This could induce risk if the IS-BAO SMS is perceived as different or too challenging compared to ICAO's model. NAA's around the globe are aligned with ICAO's SMS framework. Recommendation - Move all Chapter 11 ERP information to the IG. Move all FMP SARPs to Chapter 11.
Based on Aviation Week Article 8Apr2015, the NTSB has asked the FAA to ban dive and drive approaches. The FAA has not. UPS is prohibiting this kind of approach after the fatal accident in Alabama. Suggest a recommended practice in Chapter 6 that the operator make policy to restrict dive and drive approaches.	6.22	Add a RP which states, <i>6.22.2 The operator should establish policy to ensure flight crews utilize constant descent angle on final approach to landing to the maximum degree practical. (Recommended Practice)</i>
Standard 6.6.1 b. CNS Requirements. Is there a process to ensure that prior to operations in airspace where special CNS requirements exist such as Performance Based Navigation (PBN) Specifications, Minimum Navigation Performance Specification (MNPS), Reduced Vertical Separation Minimums (RVSM), Controller Pilot Data Link Communication (CPDLC), or Automatic Dependent Surveillance (ADS) B/C: the aircraft meets the aircraft system, airworthiness, continuing airworthiness (including maintenance personnel training) and operational requirements for the operations concerned; and..... Recommend this item be moved to Standard 9, Aircraft Maintenance Requirements.	6.6	6.6.1a and 6.6.1c are operationally oriented and are appropriate as is. However 6.6.1b states, <i>"the aircraft meets the aircraft system, airworthiness, continuing airworthiness (including maintenance personnel training) and operational requirements for the operations concerned;"</i> and therefore is redundant to the maintenance requirements of Chapter 9. Delete the Maintenance requirements from 6.6.1b but ensure the operational requirements remain. Modify the wording to state, "the aircraft meets the operational requirements for the operations concerned;" Remove the word "special" and replace with "specific".
The "noise abatement" portion of the protocol in 12.1a is covered in 6.8.2. Maybe we should use another example in 12.1a instead of Noise Abatement since it's already covered in 6.8.2.	12.1	6.8.2 and 12.1 are redundant. Annex 16 covers inflight noise abatement procedures as well as ground operations, to include engine run ups. Recommend rewording 12.1a to read "noise abatement procedures during ground operations to include engine run ups and auxiliary power unit operations." This will differentiate the two standards.
6.9.1: Aircraft Airworthiness: "Does the operator have procedures to ensure that aircraft are maintained and operated in accordance with their C of A and the provisions of the company maintenance program? (Also see 9 Aircraft Maintenance)". This item is redundant vis 9.1.7. Recommend deleting 6.9.1.	6.9	Addressing maintenance requirements in Chapter 6 does introduce unnecessary redundancy. Reword 6.9.1 to read, "6.9.1 An operator shall ensure that aircraft are operated in accordance with their certificate of airworthiness and any limitation thereof."

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Does IS-BAO Chapter 7 apply only to flights out of sovereign airspaces? Some questions are applicable to international flights over sovereign areas, such as 7.1.1.a, 7.2.1, and 7.2.2. It always seems to me that the items which refer to "non-sovereign" airspaces would be 7.1.1.b, 7.3, and 7.5. I would suggest revising the concept and making Chapter 7 applicable to all international operations, which would simplify evaluation on applicability to the operator.	7	Revise the chapter title to "International Operations". Modify the applicability paragraph to describe domestic, foreign domestic, and international airspace. No change to SARPs. Change the last sentence of the lead in paragraph to read as follows: For the purpose of this chapter, all airspace outside the territory of a State is referred to as international airspace which includes the sovereign airspace of other contracting States and the airspace over the high seas.
Request redundant standards (questions) be removed. i.e. 7.1.1b and 7.3.2.	7.1	7.1.1b is not redundant. 7.3.2 is redundant. This requirement is covered by 6.6.2. Delete 7.3.2 and sub-elements and making 7.3.2 RESERVED
Recommend requirement to have documents that are not required on the flight deck by regulation to be changed to a recommended action in section 8.2.1 depending on the flight operations. Most helicopter operators will have to have the intercept procedures memorized, as there will be no opportunity to access and use the document in-flight because there is no co-pilot or auto-pilot to assist with flying the aircraft.	8.2	Intercept procedures are a requirement found in both A6P2 and A6P3. Recommend maintaining this requirement. IS-BAO 8.2.1 states, "The following documentation and information (in written or electronic form) shall be carried on board the aircraft and the operational information shall be accessible on the flight deck." However, neither ICAO Annex requires the information to "be accessible on the flight deck." Modify 8.2.1 to require accessibility for airplanes, but not helicopters.
ICAO A6P2 includes SARPs for EFB usage. These are not addressed in the IS-BAO	8.7	A6P2 2.4.17 Electronic flight bags (EFBs) Note.— Guidance on EFB equipment, functions and establishing criteria for their operational use is contained in the Manual on Electronic Flight Bags (Doc 10020). 2.4.17.1 EFB equipment Where portable EFBs are used on board an aero plane, the pilot-in-command and/or the operator/owner shall ensure that they do not affect the performance of the aero plane systems, equipment or the ability to operate the aero plane. 2.4.17.2 EFB functions 2.4.17.2.1 Where EFBs are used on board an aero plane the pilot-in-command and/or the owner/operator shall: a) assess the safety risk(s) associated with each EFB function; b) establish the procedures for the use of, and training requirements for, the device and each EFB function; and c) ensure that, in the event of an EFB failure, sufficient information is readily available to the flight crew for the flight to be conducted safely. Add this information as 8.7 in Chapter 8. ADD IG material from EASA and FAA.

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<p>8.5.3: Operators see little upside in preserving data for a flight that's already been successfully completed vs. exposure to the larger risk of not resetting an intentionally opened critical circuit breaker prior to next flight. Thus, they are largely not inclined to incorporate any such procedures.</p>	<p>8.5</p>	<p>8.5.3 does not require the protection of CVR and FDR following an uneventful flight. A6P1/2 do not provide this guidance. However, ICAO Annex 13, Appendix E does provide guidance on the protection of safety data from inappropriate use. Modify 8.5.3 to focus on the intent of protecting safety data from inappropriate use and also provide a note which provides more information on ICAO Annex 13. Also, operators need to be educated that this standard does not intend for them to pull circuit breakers after a successful flight, or any flight for that matter.</p>
<p>Chapter 9.0 of Standard needs to be modified to more detail the cases of aircraft operations under 83bis, Bermuda, EASA, etc. E.g. it is not clear "EASA rules apply" works for EU Member States AOC holder only, or also good when EU registered aircraft operated in third country, but Continuous Airworthiness and Maintenance performed under EASA Part M and Part 145 requirements under 83bis. At least need to be detailed in IG 9.0 Aircraft Maintenance Requirements 9.1.2 Other Than EASA Operators: the operator assigning his continuing airworthiness management responsibilities to a continuing airworthiness management organization, CAMO, holding a Regulation (EC) No 2042/2003, Annex 1, Subpart G continuing airworthiness management approval.</p>	<p>9</p>	<p>Modify 9.1.2 to state, "An operator which has outsourced their maintenance control system to a maintenance organization certified by a NAA shall provide proper oversight to ensure the maintenance organization conforms to the standards and recommended practices of this chapter and in areas they do not conform, the operator shall identify these gaps in their SMS."</p>
<p>Re. 9.1.2: The Regulation (EC) 2042/2003 has been replaced by Regulation (EU) 1321/2014!</p>	<p>9.1</p>	<p>See recommendation to 9.1.2 above</p>
<p>The note under ISBAO 9.1.2 ("CAMO oversight process should be integrated into the compliance monitoring...") should be moved and better annunciated to indicate that the concept is applicable to EASA and non-EASA regulated operators. Further confusion also currently exists due to the 9.1.2 subtitle indicating "Other than EASA operators", but the first note states that the section applies only EASA CAMO certified operations.</p>	<p>9.1</p>	<p>See recommendation to 9.1.2 above</p>

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<p>With reference to Maintenance 9.2.3, suggest this recommended practice be re-worded to reflect the requirement for a maintenance provider to have a fatigue policy which can be included in the operators external vendor audit checklist.</p>	9.2	<p>IS-BAO 9.2.3 states, <i>"It is recommended that operators include provisions in maintenance agreements that ensure that maintenance personnel do not carry out maintenance work when they are fatigued."</i> It is performance-based and flexible. However, to align with the previous recommendations, this RP could be moved to Chapter 11 to be integrated with the rest of the Fatigue Management Program elements. Also, recommend the RP to be revised to state, <i>"It is recommended that operators include provisions in maintenance agreements that ensure that the maintenance organization has a fatigue management program to ensure maintenance personnel do not carry out maintenance work when they are fatigued."</i> The SB is invited to determine not only the correct wording of this RP, but which chapter it belongs as the secretariat sees value in it being in both chapters and concurrence could not be reached on which chapter is best.</p>
<p>Standard 10.4, Is the design of the company operations manual and all associated manuals based on good Human Factors principles? (Recommended Practice) Recommend this RP be deleted on the grounds that it is highly impractical to impossible to adequately audit, Guidance is inadequate, auditors in general are likely not trained or experienced in this subject.</p>	10.4	<p>A6P2 (3.6.1.2) and A6P3 (4.1.4) state "An operator should provide operations staff and flight crew with an aircraft operating manual...The design of the manual should observe Human Factors principles". IS-BAO 10.4 states, "10.4 The design of the company operations manual and all associated manuals should observe Human Factors principles. (Recommended Practice) These are in agreement. However, HF Principles is a very large spectrum and the RP could be improved by indicated what part of HF this is referring to. Recommend modifying the RP to state, "10.4 The design of the company operations manual and all associated manuals should observe Human Factors principles related to the design of manuals. (Recommended Practice) and Change the note to say "Note: See IG 10.4 for information on human factors principles related to the design of manuals."</p>
<p>Chapter 11, ERP: As ERP is actually an element of the SMS, as described in ICAO Annex 19, it would make sense to incorporate the Chapter 11 content in Chapter 3.</p>	11	<p>See decision to move all ERP SARPs and notes in Chapter 11 to the IG and move FMP elements to Chapter 11</p>
<p>Standard 12.1 (f) should read: "The construction and/or operations of the operator's..." The "and" signifies logically that both conditions must be met for the standard to apply.</p>	12.1	<p>Revise 12.1(f) as suggested.</p>

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<p>Recommended Practice 12.2 is currently worded as a statement. Recommended rewording as follows: "Operators should implement a process to determine local environmental rules and procedures at destination airports," The reference to "en route airports" and "frequently visited" should be removed.</p>	<p>12.2</p>	<p>Keep 12.2 However, modify to state, "airports frequently visited". Delete Note 1 as it is redundant.</p>
<p>Standard 3.2.3 a. Are priorities regularly reviewed, reassessed and, if required, reassigned to address safety issues? Suggest that consideration be given to moving this item into the "Effective" category, as the need and opportunities for the process described increase over time as SMS processes mature with increased operational experience under the SMS; i.e., seems like a longer term item.</p>	<p>3.2</p>	<p>This performance attribute is better aligned with validating effectiveness. No Change to SARPs. Revise Notes and protocols to move this question to validate Effectiveness.</p>
<p>IS-BAO 3.2.4a A2 Although there is value in creating a positive transference between the operational environment and the training environment, most operators do not understand how to make this happen in coordination with their training providers. In addition, there is not enough explanatory information or examples in the IG to warrant making this a Standard. I suggest that this Standard be downgraded to a Recommended Practice until there is evidence that significant value is extracted from conformity to this Standard.</p>	<p>3.2</p>	<p>3.2.4.a A2 is a performance attribute related to the standard. It asks, "Does technical training (i.e. pilot, maintenance, dispatch/scheduling, etc.) reinforce SMS principles (i.e. human factors, organizational factors, risk assessments, risk management, etc.)?" Recommend No Change to the SARPs. Revise 3.2.4.a A2 to read "Do pilot, maintenance, dispatch/scheduling training programs reinforce safety risk management principles?" Subsequently rescinded by the IS-BAO Mgt Team.</p>
<p>With reference to Element 8 items 8.14.1A, 8.14.2A, 8.14.3A it would be a great help to US operators to specify the difference between Type 1, Type 1A & Type II FDR's by adding the number of parameters recorded by each type</p>	<p>8</p>	<p>Prescriptive standards removed for 2015. This information is now in the IG. Recommend No Change to SARPs. Add GM in IG related to FDRs.</p>

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<p>Standard 3.2.3 b. Do staff members always use up-to-date documents, manuals, checklists, and/or procedures? 1. Why do we use the term "staff members"? Recommend we change this language to read "personnel" or "employees" or some other term more consistent with the rest of IS-BAO. At a minimum, recommend we pick one term and use it throughout the IS-BAO and the Protocols. 2. There are two levels of "up-to-date". The first is that effected personnel are using the most current and up-to-date document that they have been issued or has been made available to them. The second is whether the organization has processes and procedures to ensure that it has the most up-to-date and current documents available to then distribute to its personnel. The auditor has observed failures at both levels. Recommend we consider revising the Standard to establish a requirement that this issue be managed at both levels.</p>	<p>3.2</p>	<p>This is a performance attribute question to support a standard. 3.2.3b A2 can be improved to provide clarity. Suggest it be reworded to ask, "Are there procedures for managing the revisions of documents, manuals, and checklists, <u>to include procedures to ensure all revisions are distributed and available to the affected personnel?</u>" This addresses the level 2 related to this suggestion. However, 3.2.3b E2 asks "Do staff members always use up-to-date documents, manuals, checklists, and/or procedures?" This should be revised to ask "Is there evidence that documents, manuals, checklists have been updated in a timely manner?" Recommend No Change to SARPs. Subsequently rescinded by IS-BAO Mgt Team.</p>
<p>6.2.8 should be broken down in several sub-items, e.g. Does the operator have requirements that meet the aircraft performance standards, regarding:</p> <ul style="list-style-type: none"> a. Accelerate Stop Distance b. Take-off distance c. Take-off climb requirement d. Take-off obstacle clearance requirement e. Enroute obstacle clearance requirement f. Approach climb requirement g. Landing climb requirement h. Landing distance 	<p>6.2</p>	<p>The current wording of the IS-BAO is congruent with A6P2, while the suggestion begs for an approach more aligned with A6P1. Recommend No Change to SARPS but add more guidance in the IG to support aircraft performance requirements indicated in A6P1 Attach C, which the IS-BAO currently makes reference to in a note.</p>
<p>Recommend a review of 6.3.3. Is this recommended practice significant or meaningful?</p>	<p>6.3</p>	<p>A6P2 includes this recommended practice. The PIC having Search and Rescue information does improve the chances of survival in a post accident scenario. Recommend No Change. However, clarification as to the content of the information should be made in the IG.</p>
<p>Need a definition of Self-Dispatch and Dispatch</p>	<p>App A</p>	<p>TC defines "pilot's self-dispatch" as means a flight where the pilot-in-command is solely responsible for Flight Watch. A6P1/2/3 do not address this term. Recommend the term be added to Appendix A. Self-dispatch: When the pilot-in-command is solely responsible for all flight planning, passenger and load manifests, weight and balance calculations, performance computations, and flight following.</p>

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There is no IMC (Instrumental Meteorological Conditions) abbreviation definition in the Standard. Term is used on page Appendix B - 53 of the Standard and in the Audit Protocols Element 8.2.2H.	Terms	Provide the definition
Greater degree of clarity needed for IS- BAO 3.2.1 , specifically looking at Leadership and the accountabilities of the AE. For instance, some possible considerations currently in use are: 1. Clear and positive safety leadership from the AE, 2. timely allocation of funds for safety improvements; 3. chairing of the Safety Risk Review and approving the risk levels as "As low as reasonably practical" 4.there is evidence that the AE monitors and actively engages in performance monitoring	3.2	This suggestion does add clarity. Recommend: No Change to SARPs. Modify the Notes related to this Standard, which are represented as Appropriateness / Effectiveness questions on the protocols to reflect this improvement.
Consider Implementing a FRAT programme to assess the risk for each flight.	3.2	A FRAT program is a tool which may or may not be utilized by the operator. No standard requires the use of a FRAT, the operator is expected to proactively manage safety risks proactively. Recommend No Change
Standard 3.2.3 a. E2 Is there a means to measure and monitor trends and take appropriate action when necessary? It is not clear to this auditor what we mean by "is there a means". (Do we mean are there adequate resources available?) Again, this term is not used in the IS-BAO itself; only in the associated Protocol. If we mean is there a process in place for taking the described action, recommend we change the wording to say that.	3.2	"Means" can be changed to policy, process, and/or procedure (PPP). Recommend No Change to the SARPs. Include PPP in terminology in both the IS-BAO and APM. Modify the protocol questions to ensure the organization <i>measure trends (appropriate), and acts on these trends and making informed decisions from the data (effective)</i> .
Standard 3.2.3 b. The auditor has observed that there is an industry wide problem with aviation organizations failing to timely become aware of, and react to changes taking place in the external operating environment. Climb Via, OAPM Airspace and Procedure changeovers (Houston, North Texas), AC revisions, new AIM, new IPH, NextGen ADS elements, evolving NextGen Comm Data procedures are examples. The current language of the IS-BAO's Change Management language focuses on changes taking place inside the organization. Recommend the Change Management section of the Standard be revised to address this problem.	3.2	Recommend No Change to SARPs

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Recommends the addition of more protocols relating to training records and the audit of training records and assessments. This would help to improve operator's evaluation of employees and their training histories.	5.6	A new standard, 5.6.3, was added in 2015 to ensure the operator maintains training records for all personnel. Recommend No Change to SARPs. However, recommend revising Appropriateness performance attribute for 3.2.3c to address internal evaluation of training records.
I would suggest adding a caveat to the effect that aircraft manufactured after January 1, 2007, need not worry about installation of GPWS, TCAS, boom microphone jacks/headset, as these are all OEM "standard" equipment.	8	Prescriptive standards removed for 2015. OEM manufacturing requirements stated appear to be U.S. centric. The IS-BAO serves the international community. No Change to SARPS
In section 3.2.1 Safety policy - the current standard reads "The safety policy shall include the safety reporting procedures; clearly indicate which types of operational behaviors are unacceptable, and include the conditions under which exemption from disciplinary action would be applicable." This is somewhat contrary to accepted current "just culture" processes. A well written safety policy should define to employees that certain types of errors – human error, at risk behavior or reckless behaviors will be evaluated and judged in a fair and consistent format. This better supports a true non-reprisal reporting policy and better encourages employee to report instances that maybe of a human error format.	3.2	IS-BAO 3.2.1 is congruent with Annex 19. No Change to SARPs
3.2.1. b: Safety Accountabilities. Items S2, S3, and S4 overlap and are at least partially redundant. Do we need all three? Recommend combining them.	3.2	This standard is well aligned with Annex 19 No change to SARPS.
3.2.2. a: Hazard Identification: A2 and E3 overlap regarding the use of external information. Do we need both? E3 seems redundant if external information is being effectively employed per A2.	3.2	There is overlap. These two are not good questions to support either appropriateness / effectiveness. No Change to SARPS. Revise IS-BAO notes and protocols to remove overlap and to better support appropriateness and effectiveness validation.
Protocol 3.2.2b is not clearly defined, which leads to confusion and therefore methods of complying with 3.2.2b are inconsistent.	3.2	The protocols reflect the standard with minor differences, the standard mirrors Annex 19. Recommend No Change to SARPs. Improve the protocols to better reflect the standard.

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Standard 3.2.3 a. Is the information from occurrences analyzed and where appropriate, used to upgrade policies and procedures? The auditor is not able to locate what the IS-BAO means by "occurrences". The term is not used in the IS-BAO itself but only in the associated Protocol. Should we define or explain this term as it is intended to be understood in this item of the Standard?	3.2	Annex 19 defines "incident" as "an occurrence, other than an accident, associated with the operation of an aircraft which affects or could affect the safety of operation." Add this definition to Terminology section of IS-BAO and replace "incident" for "occurrence" in the note and 3.2.3.a A3 protocol. No Change to SARPs. Revise note and protocol 3.2.3a A3 to be more clear on occurrences.
4.3.1 iv: "has fulfilled the requirements of the operator's ground and flight training programme referred to in sections 5.1, 5.2, 5.3 and 5.4" This item is redundant vis Element 5 Training and Proficiency. Recommend it be deleted from Element 4.	4.3	4.3.1iv requires the operator to ensure all training requirements are met, while training program requirements in chapter 5 generally, with a few exceptions, describe what the training programs must consist of. No Change to SARPs
Request clarification of need for IS-BAO 7.3.1 for a FAR Part 91 operator, specifically one that currently only travels internationally to Canada. Also unsure as to the regulation requiring conformity with IS-BAO 4.8.	4.8	IS-BAO standards, to include 7.3.1 and 4.8, are not based on NAA regulations. They are intended to reflect ICAO A6P2 & P3 and industry best practices. No Change to SARPs
The Fatigue Management Program should include all areas of Maintenance and include third party Maintenance Suppliers.	4.8	All aircraft maintenance personnel are required to be covered by the FMP IAW 6.13. Maintenance 3rd party providers are addressed by IS-BAO 9.2.3 " <i>It is recommended that operators include provisions in maintenance agreements that ensure that maintenance personnel do not carry out maintenance work when they are fatigued.</i> " No Change to SARPs
FRMS should include initial training for all new hires.	6.13	It is up to the operator to decide on how to train the individual. Mandating the FMP to be part of indoctrination training is a good idea, but prescriptive and does not align with IS-BAO principle of flexibility. No Change to SARPs
ISBAO 3.2.2 should be revised to indicate that a formal Safety Risk Profile "shall" be developed, vs. "should" be developed.	3.2	The SRP is addressed in a note, and therefore should not be worded as a requirement. This is offered only for guidance. No Change to SARPs
There should be a standard on how an operator should audit and choose a charter operator.	4.9	4.9 is a recommended practice and addresses this issue. No Change to SARPs
Consider moving 4.9.1 to section 6.	4.9	Choosing a charter operator is a management function. No Change to SARPs

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Consideration should be given to recurrent training for high altitude training.	5.4	There is no mention of high altitude training in A6P2 nor other industry best practice information that would support this. No Change to SARPs
There is some frustration regarding the requirements of IS-BAO 6.6.2.c and 7.3.1 and how they also apply to a FAR Part 91 operation.	6.6	Although these standards are not driven by A6P1/2/3, they are professional practices to ensure management is adequately involved in the training and qualification of pilots who fly in airspace where CNS approvals and International requirements exist. No Change to SARPs
Standard 3.2.1d asks if “the ERP is regularly tested and updated.....” (This question is found in the protocols, though it is not in the actual IS-BAO). I recommend this standard to be prescriptive and not subjective. “Regularly” is very much open for interpretation. Additionally, IS-BAO 11.5 prescribes training and testing of the ERP, but it doesn’t specify frequency.	3.2	The standard does not ask this. This is a performance attribute for auditing purposes. No Change to SARPs
I think the IS-BAO Standards Board should consider a standard, which requires flight departments to designate/document someone whose responsibilities include the oversight of training records and requirements. The standard is clear regarding the training requirements and training records. However, the standard does not require flight departments to designate/document someone to be responsible for oversight of training requirements and training records.	4	There is no requirement such as this in ICAO Annexes. Adding this requirement would create an unnecessary burden for small operators. Nothing precludes the operator from appointing a Training Manager, and many larger operators do this without having a standard. No Change to SARPs.
IS-BAO R.P. 4.8.1 Despite decision in 2015 to keep that standard as recommended practice, I strongly believe that the first step of a sound FRMS goes through the development of a program that would asses the risks inherent to fatigue in all departments. Besides, standard 6.13.1.(e) requires an evaluation process to assess the effectiveness of the FRMS. To measure effectiveness you need some basic performance indicators that can only be extracted from a preliminary fatigue risk analysis. Therefore, I believe that 4.8.1 should be set as a standard, or better, incorporated in 6.13.1	4.8	No Change to SARPs. (Move all FMP SARPs to Chapter 11.)
Standard 4.8.1 is a “Recommended Practice” and it’s essentially the same as Standard 6.13 which is a required element. I believe a clarification is in order or either make both a recommended or both required elements. Please note that 9.1.4.n in the Protocols is actually 9.1.4.l in the IS-BAO.	4.8	They are not the same. 4.8.1 applies to persons not involved with the safe operation of aircraft. No Change to SARPs. Protocol error will be corrected.

Issue	Section	Analysis/Standards Board Decision
The wording of IS-BAO 8.6 (MEL) is identical to ICAO Annex 6 Part 2, Section 3.6.1.1. However, it appears the wording of both could be reconsidered to provide a more practical application/understanding.	8.6	No change to SARPs
We need clarification on how to proceed if the operator also owns a Certified Repair Station, CAMO, MRO, and use this organization to document the operator's maintenance policy and procedures vs documenting this in their manuals.	9.1	No Change to SARPs.
The SMS Protocol format (Sound, Appropriate and Effective) is not the same structure as the ICAO 3 Level model (ICAO Doc 9859, Appendix 12 to Chapter 4 EXAMPLE OF AN SMS REGULATORY ACCEPTANCE/ASSESSMENT CHECKLIST). Recommend you align Stage 1, Stage 2, Stage 3 questions with this model. This will align IS-BAO better with ICAO principles of evaluating the SMS, and would be more intuitive for the auditor.	SMS Eval	Standards Board would like for IBAC to evaluate the need for a change in the SMS protocol structure and if a significant change is needed develop a change management plan for implementation. NO CHANGE
Modern EGPWS systems do not have a data base that requires a scheduled update, the manufacturer Honeywell issue new versions periodically and notify all operators accordingly. I suggest re-wording the standard to confirm that the operator has the latest version of EGPWS.	8.4	All TAWS systems require periodic updates to their databases. The manufacturer determines how this is accomplished and maintenance normally carries out this task. IS-BAO 8.4.1 states, "Operators shall have a process to ensure that the data base for ground proximity warning systems with predictive terrain hazard warning is kept current." However, neither A6P2 or A6P3 support this Standard. A6P1 does not mention it either. The standards board discussed and decided NO CHANGE to SARPs
Recommend that IS-BAO consider upgrading the following recommended practices to standards, 5.1.6e and 5.2.2. Recurrent Training and Human factors for maintenance personnel should be considered essential components of the SMS program especially for Stage 2 and 3 operators.	5.1	No Change to SARPs.