

1.7 Avvikelser från ICAO standards, rekommenderade förfaranden och procedurer

1 Avvikelser från ICAO standards, rekommenderade förfaranden och procedurer

Paragrafnumren nedan tillhör rubricerat Annex. Avvikelser från Annex och Doc redovisas endast på engelska.

ANNEX 1 – PERSONNEL LICENSING
(*Fourteenth Edition, July 2022 including amd. 178*)

- 1.1 Aircraft avionics. It is not defined in EU rules. **Less protective or partially implemented or not implemented.**
- 1.1 Aircraft required to be operated with a co-pilot. Under Reg. (EU) 1178/2011, Annex I, Part-FCL it is limited to the aeroplane, while the ICAO definition is about aircraft. **Different in character or Other means of compliance.**
- 1.1 Airship. Under Reg. (EU) 1178/2011, Annex I, Part-FCL the hot-air airships do not fall under this definition but under the definition of "balloon". **Different in character or Other means of compliance.**
- 1.1 ATS surveillance service. Not defined in EU rules.
Less protective or partially implemented or not implemented.
- 1.1 ATS surveillance system. Not defined in EU rules.
Less protective or partially implemented or not implemented.
- 1.1 Certify as airworthy (to). The definition set out in Regulation (EU) No 1321/2014 excludes the pre-flight inspection from maintenance activities.
Less protective or partially implemented or not implemented.
- 1.1 Command and control (C2) link. Regarding the 'certified category' this is part of RMT.0230.
Less protective or partially implemented or not implemented.
- 1.1 Detect and avoid. Regarding the 'certified category' this is part of RMT.0230.
Less protective or partially implemented or not implemented.
- 1.1 Dual instruction time. Regarding dual instruction time for regarding the remote pilot, see remark under 2.11.1.1.
Less protective or partially implemented or not implemented.
- 1.1 Flight crew member. No definition as such in Commission Regulation (EU) No 1178/2011, Annex 1, Part-FCL, but the different crew member is licensed in their specific chapters. The wording 'flight crew member' is used several times in the Basic Regulation (EC) 2018/1139, Annex IV, Essential requirements for aircrew, under 2 and 3. **Different in character or Other means of compliance.**
- 1.1 Flight procedures trainer. No definition in EU rules.
Less protective or partially implemented or not implemented.
- 1.1 Flight time — remotely piloted aircraft systems. Regarding flight time for RPAS, see remark under 2.11.1.1.
Less protective or partially implemented or not implemented.
- 1.1 Handover. Handover is an act in the RPAS environment. See remark under 2.11.1.1.
Less protective or partially implemented or not implemented.
- 1.1 Likely. In the EU rules different phrases used such as "likely to interfere with the safe exercise of the privileges of the applicable licence(s)". **Different in character or Other means of compliance.**
- 1.1 Maintenance. The definition set out in Regulation (EU) No 1321/2014 excludes the pre-flight inspection from maintenance activities. **Different in character or other means of compliance.**
- 1.1 Pilot (to). No definition as such in Commission Regulation (EU) No 1178/2011, Annex 1. Part-FCL.
Less protective or partially implemented or not implemented.
- 1.1 Pilot flying (PF). No definition as such in Reg. (EU) No 1178/2011, Annex 1, Part-FCL.
Less protective or partially implemented or not implemented.
- 1.1 Pilot monitoring (PM). No definition as such in Reg. (EU) No 1178/2011, Annex 1, Part-FCL.
Less protective or partially implemented or not implemented.

1.7 Differences from ICAO Standards, Recommended Practices and Procedures

1 Differences from ICAO Standards, Recommended Practices and Procedures

Paragraph numbers below refer to headlined Annex. Differences from Annex and Doc only shown in English.

- 1.1 Remote co-pilot. The requirements for the RPAS 'certified' category' is being developed in EASA's rulemaking task RMT.0230. **Less protective or partially implemented or not implemented.**
- 1.1 Remote flight crew member. The requirements for the RPAS 'certified' category' is being developed in EASA's rulemaking task RMT.0230. **Less protective or partially implemented or not implemented.**
- 1.1 Remote pilot. Different wording: 'remote pilot' means a natural person responsible for safely conducting the flight of an unmanned aircraft by operating its flight controls, either manually or, when the unmanned aircraft flies automatically, by monitoring its course and remaining able to intervene and change the course at any time; **More Exacting or Exceeds.**
- 1.1 Remote pilot-in-command. The requirements for the RPAS 'certified' category' is being developed in EASA's rulemaking task RMT.0230. **Less protective or partially implemented or not implemented.**
- 1.1 Rendering (a licence) valid. It is not precisely defined in EU rules, for AMLs it is not applicable. **Less protective or partially implemented or not implemented.**
- 1.1 Solo flight time — remotely piloted aircraft systems. See remark under 2.11.1.1. **Less protective or partially implemented or not implemented.**
- 1.2.1.1 *Standard:* Regarding general rules concerning remote pilot licensing, see remark under 2.11.1.1. **Less protective or partially implemented or not implemented.**
- 1.2.1.3 *Standard:* See remark under 2.11.1.1. **Less protective or partially implemented or not implemented.**
- 1.2.2.1 *Standard:* The licences issued by an EASA Member State are recognised as valid by all the other Member States without administrative issuance of an additional authorisation. **Different in character or Other means of compliance.**
- 1.2.4.2 *Standard:* Task not currently performed by EASA, although some member states do apply safety management principles to the medical assessment process. Sweden requires a quality system. **Different in character or other means of compliance.**
- 1.2.4.11.2 *Standard:* Not specifically mentioned in EU rules. **Less protective or partially implemented or not implemented.**
- 1.2.8.4 *Standard:* Regarding CBTA for RPAS, see remark under 2.11.1.1. **Less protective or partially implemented or not implemented.**
- 1.2.9.2 *Recommendation:* No such a specific requirement in the EU rules. **Less protective or partially implemented or not implemented.**
- 1.2.9.5 *Standard:* No such requirements for glider, free balloon pilots, remote pilots. Also for remote pilots, see remark under 2.11.1.1. **Less protective or partially implemented or not implemented.**
- 1.2.9.6 *Recommendation:* Pilots who have demonstrated language proficiency at operational level are reevaluated every 4 years. No such requirements for glider, free balloon pilots, remote pilots. Also for remote pilots, see remark under 2.11.1.1. **Less protective or partially implemented or not implemented.**
- 2.1.1.1 *Standard:* The requirements for the remote pilots 'certified' category' is being developed in EASA's rulemaking task RMT.0230. **Less protective or partially implemented or not implemented.**
- 2.1.10 *Standard:* Pilots aged 60-64 may act as pilots in command in the single-pilots international CAT operations of aircraft other than aeroplanes and helicopters. **Less protective or partially implemented or not implemented.**
- 2.3.2.1 *Standard:* Reg. (EU) 1178/2011, Annex I, Part-FCL differs here from ICAO in that sense that the holder of a PPL to provide flight instruction may receive remunerations. **Different in character or Other means of compliance.**
- 2.3.3.1.1 *Standard:* Applicant for a PPL (A) shall have completed at least 45 hours of flight instruction in aeroplanes, 5 which may have been in an FSTD. **More Exacting or Exceeds.**
- 2.3.4.1.1 *Standard:* Applicants for a PPL (H) shall have completed at least 45 hours of flight instruction on helicopters, 5 of which may have been completed in an FNPT or FFS. **More Exacting or Exceeds.**
- 2.3.4.2.1 *Standard:* The total dual flight instruction in ICAO Annex 1 is 20 hours and in Reg. (EU) 1178/2011, Annex I, Part-FCL 25 hours. See general difference in 2.3.4.1.1. **More Exacting or Exceeds.**
- 2.3.5.1.1 *Recommendation:* Reg. (EU) 1178/2011, Annex I, Part-FCL, requires to have a CPL (A) or (H) Part FCL license, and due to which of these 2 a pilot has – requirements are listed in provision FCL.720.PL. **More Exacting or Exceeds.**

- 2.3.5.1.2 *Recommendation:* Reg. (EU) 1178/2011, Annex I, Part-FCL, requires to have a CPL (A) or (H) Part FCL license, and due to which of these 2 a pilot has – requirements are listed in provision FCL.720.PL.
More Exacting or Exceeds.
- 2.3.5.1.3 *Recommendation:* Reg. (EU) 1178/2011, Annex I, Part-FCL, requires to have a CPL (A) or (H) Part FCL license, and due to which of these 2 a pilot has – requirements are listed in provision FCL.720.PL.
More Exacting or Exceeds.
- 2.3.5.2 *Recommendation:* Reg. (EU) 1178/2011, Annex I, Part-FCL, requires to have a CPL (A) or (H) Part FCL license, and due to which of these 2 a pilot has – requirements are listed in provision FCL.720.PL.
More Exacting or Exceeds.
- 2.3.6.1 *Standard:* The total flight time in ICAO Annex 1 is 25 hours and in Reg. (EU) 1178/2011, Annex I, Part-FCL 35 hours. **More Exacting or Exceeds.**
- 2.4.3.1.1 *Standard:* FCL.315 CPL together with Appendix 3 to Annex I (Part-FCL) of Reg.1178/2011 allows a maximum of 10 hours credit. **More Exacting or Exceeds.**
- 2.4.4.1.1 *Standard:* The total flight time in ICAO Annex 1 is 150 hours and in Reg. (EU) No 1178/2011, Annex I, Part-FCL 185 hours. The amount of hours is taken over from the JAR-FCL 2 where the difference was already there. **More Exacting or Exceeds.**
- 2.4.4.1.1.1 *Standard:* Total flight time in ICAO Annex 1 is 150 hours and in Reg. (EU) No 1178/2011, Annex I, Part-FCL 185 hours. **More Exacting or Exceeds.**
- 2.4.5.1.1 *Recommendation:* Reg. (EU) 1178/2011, Annex I, Part-FCL, requires to have a CPL (A) or (H) Part FCL license, and due to which of these 2 a pilot has – requirements are listed in provision FCL.720.PL.
Different in character or Other means of compliance.
- 2.4.5.1.2 *Recommendation:* Reg. (EU) 1178/2011, Annex I, Part-FCL, requires to have a CPL (A) or (H) Part FCL license, and due to which of these 2 a pilot has – requirements are listed in provision FCL.720.PL.
Different in character or Other means of compliance.
- 2.4.6.1.1 *Standard:* The total flight time for experience in ICAO Annex 1 is 200 hours and in Reg. (EU) 1178/2011, Annex I, Part-FCL 250 hours. **More Exacting or Exceeds.**
- 2.4.6.1.1.1 *Standard:* Division of hours is different. In Reg. (EU) 1178/2011, Annex I, Part-FCL it is 5 hours cross-country flight time and 5 hours of night flight. **Different in character or Other means of compliance.**
- 2.6.3.1.1.1 *Standard:* Reg. (EU) 1178/2011, Annex I, Part-FCL requires in addition 500 hours in multi-pilot operations on aeroplanes. **More Exacting or Exceeds.**
- 2.6.4.1.1.1 *Standard:* Reg. (EU) 1178/2011, Annex I, Part-FCL requires in addition 350 hours in multi-pilot helicopters. **More Exacting or Exceeds.**
- 2.9.1.3.1 *Standard:* EU figures for total flight time and number of launches are higher than ICAO figures.
More Exacting or Exceeds.
- 2.10.1.3.1 *Standard:* EU figures for total flight time and number of launches are higher than ICAO figures.
More Exacting or Exceeds.
- 2.10.1.3.3 *Standard:* In BFCL.210 an applicant for a night rating shall have completed at least two instruction flights at night of at least one hour each. **More Exacting or Exceeds.**
- 2.10.1.3.4 *Recommendation:* EU figures for flight experience (50 hours as PIC) are higher than ICAO figures (35 hours total time, 20 hours PIC time). **More Exacting or Exceeds.**
- 2.11.1.1 *Standard:* Regulation not in place for certified category. Regarding the 'certified category' this is part of RMT.0230. **Less protective or partially implemented or not implemented.**
- 2.11.1.2 to 2.14.2.2 See remark under 2.11.1.1.
- 3.3.1.5 *Standard:* The applicant shall hold a current class 1 medical assessment. **More Exacting or Exceeds.**
- 4.2.1.2 *Standard:* Certain subjects enumerated in ICAO Annex 1 under 4.2.1.2 do not match exactly the modules from the Appendix of Reg. (EU) 1321/2014, Annex III, Part-66.
Less protective or partially implemented or not implemented.

- 4.2.1.4 *Recommendation:* Reg. (EU) 1321/2014, Annex III, Part-66, 66.A.25 only requires for basic training that the level of knowledge is demonstrated by examinations. For aircraft type training - Approved type rating courses are only required for Group 1 aircraft. For other 2 groups it is optional.
Less protective or partially implemented or not implemented.
- 4.2.1.5 *Standard:* The skill assessment is not required in case of licence issue based on the Basic knowledge examination only. For Cat A CS the assessment is performed in Reg. (EU) 1321/2014, Annex II, Part-145 Organisations. For type examination for Group 2 and 3 aircraft the skill assessment is not mandatory.
Different in character or Other means of compliance.
- 4.2.2.2 *Standard:* No certifying staff licensing for the release of the components, the entire aircraft can be released by Cat. C CS after the base maintenance. **Less protective or partially implemented or not implemented.**
- 4.2.3.1 *Standard:* Regarding the RPA, RPS and RPAS, see remark under 2.11.1.1
Less protective or partially implemented or not implemented.
- 4.2.3.2 *Standard:* Regarding the RPA, RPS and RPAS, see remark under 2.11.1.1
Less protective or partially implemented or not implemented.
- 4.4.1.1 *Standard:* In Reg. (EU) 2015/340, Annex I, Part ATCO, there is implicitly no age requirement for the issuance of an air traffic issuance of an air traffic. **Different in character or Other means of compliance.**
- 4.4.1.3.1 *Standard:* The unit endorsement course duration is not established by Reg. (EU) 2015/340.
Different in character or Other means of compliance.
- 4.4.1.3.2 *Standard:* EU regulation 2015/340 addresses the referenced standard in detailed manner as regards experience and training of on-the-job training instructors. **More Exacting or Exceeds.**
- 4.5.1 *Standard:* The list of ratings in Reg. (EU) 2015/340, is slightly different: a) aerodrome control visual; b) aerodrome control instrument; c) approach control procedural; d) approach control surveillance; e) area control procedural; f) area control surveillance. **Different in character or Other means of compliance.**
- 4.5.2.2.1 *Standard:* The unit endorsement course duration is not established by Reg. (EU) 2015/340.
Less protective or partially implemented or not implemented.
- 4.5.2.2.2 *Standard:* The validity period of unit endorsements for initial issue and renewal shall commence not later than 30 days from the date on which the assessment has been successfully completed.
Different in character or Other means of compliance.
- 4.5.3.1 *Standard:* Some ratings are slightly different, although Reg. (EU) 2015/340 covers all of them.
Different in character or Other means of compliance.
- 4.5.3.3 *Standard:* Holders of an instructor endorsement shall be authorized to provide on-the-job training and supervision at a working position for areas covered by a valid unit endorsement. **More Exacting or Exceeds.**
- 4.5.3.4 *Standard:* Although the concept of "invalidation of a rating" as implemented or not implemented requirements, the holder of an air traffic controller licence is not allowed to exercise the privileges of a rating after a period of absence of more than 90 days or if the revalidation of the unit endorsement fails due to the non availability of the minimum number of working hours. **Less protective or partially implemented or not implemented.**
- 5.1.1 *Standard:* Regarding ICAO Annex 1 paragraph 5.1.1 (b): The requirements for the introduction of EPL is being developed in EASA's rulemaking task RMT.0737.
Less protective or partially implemented or not implemented.
- 5.2.1 *Standard:* The aircraft maintenance licence (EASA Form 26), as set out in Reg. (EU) No 1321/2014, Annex III (Part-66), Appendix VI, additionally includes the holder's place of birth. **More Exacting or Exceeds.**
- 5.2.2 *Standard:* No corresponding provisions on the material of the licence in Reg. (EU) 1321/2014, Annex III, Part-66. **Less protective or partially implemented or not implemented.**
- 5.2.3 *Standard:* For maintenance staff the requirements are different but serve the same compliance purpose, in particular when licence is issued by the MS in the national language and the bearer is working in that MS, the rule allows for such licence not to have any English translation.
Different in character or Other means of compliance.
- 5.3.1 *Standard:* Not implemented. The requirements for the introduction of EPL is being developed in EASA's rulemaking task RMT.0737. **Less protective or partially implemented or not implemented.**
- 5.3.1.1 to 5.3.7 See remark under 5.3.1.
- 6.1.1 *Standard:* Flight engineers are required to hold a class 1 medical certificate. **More Exacting or Exceeds.**

- 6.2.3.2 *Recommendation:* Not defined in EU regulations.
Less protective or partially implemented or not implemented.
- 6.2.4.2 *Standard:* For ATCO the requirements in Reg. (EU) 2015/340, Annex IV, Part ATCO.MED, are more restrictive: applicants shall be normal trichromates. **More Exacting or Exceeds.**
- 6.2.4.3 *Standard:* For aircrew regulations state that applicants shall pass the Ishihara test. For ATCO the requirements are more restrictive: pseudoisochromatic plate testing alone is not sufficient. Colour vision should be assessed using means to demonstrate normal trichromacy. **More Exacting or Exceeds.**
- 6.2.4.4.1 *Recommendation:* Not specified in EU regulations.
Less protective or partially implemented or not implemented.
- 6.2.5.5 *Recommendation:* Performed only when an instrument rating is to be added to licence.
Less protective or partially implemented or not implemented.
- 6.3.2.9.1 *Recommendation:* Only required on clinical or epidemiological indication.
Less protective or partially implemented or not implemented.
- 6.3.2.21.1 *Recommendation:* In Reg. (EU) 1178/2011, Annex IV, Part-MED, MED.B.045, Fit assessment permitted from start of pregnancy until end 26th week (restricted to multi crew operation).
Less protective or partially implemented or not implemented.
- 6.3.3.2.3 *Standard:* In Reg. (EU) 1178/2011, Annex IV, Part-MED, MED.B.070 and associated AMC, Ophthalmic reports requirement is dependent on refractive error limits rather than visual acuity limits.
Different in character or Other means of compliance.
- 6.4.2.6.2 *Recommendation:* Not implemented in the EU rules.
Less protective or partially implemented or not implemented.
- 6.4.2.21.1 *Recommendation:* In Reg. (EU) 1178/2011, Annex IV, Part-MED, MED.B.045, Fit assessment permitted from start of pregnancy until end 26th week. **Less protective or partially implemented or not implemented.**
- 6.4.3.2.3 *Recommendation:* Not required under EU regulations.
Less protective or partially implemented or not implemented.
- 6.4.3.5 *Standard:* AMC2 MED.B.070 to Reg. (EU) 1178/2011, Annex IV, Part-MED, states that visual field should be examined but does not define that the fields should be normal.
Different in character or Other means of compliance.
- 6.4.3.6 *Standard:* AMC2 MED.B.070 to Reg. (EU) 1178/2011, Annex IV, Part-MED, states that binocular function should be examined but does not define that the binocular function should be normal.
Different in character or Other means of compliance.
- 6.5.1.1 *Standard:* Not implemented for remote pilot licences, also see remark under 2.11.1.1.
Less protective or partially implemented or not implemented.
- 6.5.1.2 *Standard:* Not implemented for remote pilot licences, also see remark under 2.11.1.1.
Less protective or partially implemented or not implemented.
- 6.5.2.6.1 *Standard:* Reg. (EU) 2015/340, Annex IV, Part ATCO.MED, requires annual after age 40.
More Exacting or Exceeds.
- 6.5.2.20 *Standard:* In Reg. (EU) 2015/340, Annex IV, Part ATCO.MED this is not permitted for initial issue of class 3 certificate. **More Exacting or Exceeds.**
- 6.5.2.21.1 *Recommendation:* Not implemented in EU rules.
Less protective or partially implemented or not implemented.
- 6.5.3.2 *Standard:* In Reg. (EU) 2015/340, Annex IV, Part ATCO.MED it is stated that applicants with hypermetropia exceeding +5.0 dioptres, myopia exceeding -6 dioptres, an astigmatic component exceeding 3 dioptres or anisometropia exceeding 3 dioptres: shall have a corrected visual acuity of 6/6 or better in each eye.
More Exacting or Exceeds.
- 6.5.3.2.3 *Standard:* In Reg. (EU) 2015/340, Annex IV, Part ATCO.MED is stated that all initial Medical assessments include a comprehensive eye examination which is repeated periodically depending on the refractive error and the functional performance of the eye. **Different in character or Other means of compliance.**

- Chapter 1 The definitions
Definitions *Current flight plan, Filed flight plan, Flight plan and Repetitive flight plan* according Regulation (EU) No 923/2012.
- 3.2.2 b) Right-of-way.
An aircraft that is aware that the manoeuvrability of another aircraft is impaired shall give way to that aircraft.
- 3.2.3.2 b) Lights to be displayed by aircraft.
Unless stationary and otherwise adequately illuminated, all aircraft on the movement area of an aerodrome shall display lights intended to indicate the extremities of their structure, as far as practicable;
- 3.2.5 Operation on and in the vicinity of an aerodrome.
An aircraft operated on or in the vicinity of an aerodrome shall:
- c) except for balloons, make all turns to the left, when approaching for a landing and after taking off, unless otherwise indicated, or instructed by ATC;
 - d) except for balloons, land and take off into the wind unless safety, the runway configuration, or air traffic considerations determine that a different direction is preferable.
- When AFIS is provided, right turns are accepted if they cause no hazard to others and the intention is notified in advance to the AFIS unit.
If equipped with radio and in the vicinity of an aerodrome, the aircraft shall:
- a) when a AFIS unit is available; maintain continuous air-ground voice communication watch on the appropriate communication channel of, and report its position as necessary to, the air traffic services unit providing flight information service. (see 4.9, 5.3.2 and 5.3.3);
 - b) if the ATS is closed; stand by on the ATS frequency and transmit blind the position and the intention;
 - c) when ATS is not provided at the aerodrome; stand by on a published frequency or, if not published, on 123,450 MHz and transmit blind information of use to others, like position, level and intention.
- In published VFR holding IAS is limited to maximum 140 kt. If not possible ATS shall be advised.
The published holding pattern shall be followed.
- 3.2.2.4 i) Overtaking.
A sailplane overtaking another sailplane may alter its course to the right or to the left.
- 3.3.1.2 Submission of a flight plan.
A flight plan shall also be submitted for:
- a) VFR and IFR flights planned to operate at night, if leaving the vicinity of an aerodrome;
 - b) IFR flights in airspace class G flying above the highest of 5 000 ft AMSL or 3 000 ft AGL;
 - c) VFR and IFR flights which will affect a traffic information zone and/or a traffic information area.
 - d) Any flight across international borders, unless otherwise prescribed by the States concerned.
- 3.3.1.3 SERA.4001(c) A flight plan shall be submitted, before departure, to an air traffic services reporting office or, during flight, transmitted to the appropriate air traffic services unit or air-ground control radio station, unless arrangements have been made for submission of repetitive flight plans.
- 3.8 Interception.
The words 'in distress' are not included in the national regulation, thus enlarging the scope of escort missions to any type of flight requesting such service.
Furthermore the provisions contained in Appendix 2 Parts 1.1 to 1.3 inclusive as well as those found in Attachment A, are not contained in national regulation.
- 4.4.6 Visual Flight Rules.
Except when necessary for take-off or landing, or except by permission from the competent authority, a VFR flight shall not be flown:
- a) over the congested areas of cities, towns or settlements or over an open-air assembly of persons at a height less than 300 m (1 000 ft) above the highest obstacle within a radius of 600 m from the aircraft;
 - b) elsewhere than as specified in a), at a height less than 150 m (500 ft) above the ground or water, or 150 m (500 ft) above the highest obstacle within a radius of 150 m (500 ft) from the aircraft.

ANNEX 3 – METEOROLOGY

(Twentieth Edition, July 2018, amd. 81)

- Chapter 5 Competent authorities shall prescribe as necessary other conditions which shall be reported by all aircraft when encountered or observed.

ANNEX 4 – AERONAUTICAL CHARTS

(Eleventh Edition, July 2009, amd. 62)

- 2.4.4 Requirement concerning Symbol 121 Reporting and Fly-by/Flyover functionality is not shown on all charts as required in 2.4.2 and 2.4.3.

- 9.9.4.1.1 a) 6) Minimum obstacle clearance altitudes, along the route or route segment are not shown on standard departure charts.
- 9.9.4.1.1 h) Designation of the navigation specification(s) including any limitations is not shown on standard departure charts.
- 10.8.1 Bearings and tracks provided as true values for RNAV segments are not shown on standard arrival charts.
- 10.9.4.1.1 a) 6) Minimum obstacle clearance altitudes along the route or route segment and altitudes required by the procedures are not shown on standard arrival charts.
- 10.9.4.1.1 g) Designation of the navigation specification(s) including any limitations is not shown on standard arrivals charts.

ANNEX 5 – UNITS OF MEASUREMENT TO BE USED IN AIR AND GROUND OPERATIONS
(Fifth Edition, July 2010)

No differences.

ANNEX 6 - OPERATION OF AIRCRAFT

ANNEX 6 Part I
(Twelfth Edition, July 2022, including amd. 48)

- 3.3.1 *Recommendation:* The European rules on Air Operations Reg. (EU) 965/2012 ORO.AOC.130 requires that an operator establish and maintain a flight data analysis programme as part of its safety management system only when operating aeroplanes with a certificated take-off mass in excess of 27 000 kg..
Less protective or partially implemented or not implemented.
- 3.3.3. *Standard:* The European rules on Air Operations Reg. (EU) 965/2012 ORO.AOC.130 requires in addition that the FDM programme is non-punitive, regardless of the date.
More exacting or exceeds.
- 3.5.1 *Standard:* The European rules on Air Operations for aircraft tracking is only applicable to some categories of aeroplanes. See Regulation (EU) 965/2012 CAT.GEN.MPA.205 and supporting EASA AMC/GM.
Less protective or partially implemented or not implemented.
- 3.5.2 *Recommendation:* The European rules on Air Operations for aircraft tracking applies only to aeroplanes which are equipped with a capability to provide a position additional to the secondary surveillance radar transponder or which are first issued with an individual on or after 16 December 2018. See Regulation (EU) 965/2012 ORO.GEN.110 and CAT.GEN.MPA.205 and supporting EASA AMC/GM.
Less protective or partially implemented or not implemented.
- 3.5.3 *Standard:* The European rules on Air Operations for aircraft tracking applies only to aeroplanes which are equipped with a capability to provide a position additional to the secondary surveillance radar transponder or which are first issued with an individual on or after 16 December 2018. In addition the provisions in Regulation (EU) 965/2012 CAT.GEN.MPA.205 includes aeroplanes with a MCTOM of more than 27 000 kg and a MOPSC of more than 19 as well as aeroplanes with a MCTOM of over 45 500 kg whatever their MOPSC. The provisions also requires tracking everywhere where ATC surveillance cannot track the aeroplane, not just in oceanic areas. **Different in character or Other means of compliance.**
- 3.5.4 *Standard:* The European rules on Air Operations for aircraft tracking introduces some flexibility and variations to automated reporting intervals in AMC1 and AMC2 CAT.GEN.MPA.205.
Different in character or Other means of compliance.
- 4.1.2 *Standard:* The provisions in the European rules on Air Operations ORO.GEN.200 (a)(3) addresses the safety risk assessment without being so specific. Guidelines on the specific risk assessment for conflict zones will be added through rulemaking action (EASA RMT.0392).
Less protective or partially implemented or not implemented.
- 4.2.1.3.1 *Standard:* The European rules on Air Operations Reg. (EU) 965/2012 ORO.GEN.205 prescribe that the operator remains responsible that the contracted services comply with the applicable requirements and that the aviation safety hazards associated with contracted services or products are considered by the operator's management system. However, it is not specified in the European rules on air operations that the operator shall develop policies and procedures for third parties.
Different in character or Other means of compliance.
- 4.2.1.5 *Standard:* The European rules on Air Operations Reg. (EU) 965/2012 Appendix I to Part-ARO; ORO.AOC.100 stipulates that The AOC has no expiration date. The AOC is issued for an unlimited duration, but its validity is confirmed as per compliance with ORO.GEN.135. Several other entries requiring prior approval by the Competent Authority have been added to the EU Operations Specifications.
Different in character or Other means of compliance.

- 4.2.1.7 *Standard:* The European rules on Air Operations Reg. (EU) 965/2012 Part-ARO Appendices I & II has several other entries where prior approval by the Competent Authority have been added to EU Operations Specifications in Appendix II. The AOC has no validity date.
Different in character or Other means of compliance.
- 4.2.2.1 *Standard:* The EU regulation Reg. (EU) 452/2014 PART-TCO: TCO.200 (a)(1) also requires compliance with ICAO Annexes 1, 2, 8, and 18. Additionally, compliance with the mitigating measures accepted by EASA in accordance with ART.200(d); the relevant requirements of Part-TCO; and the applicable Union rules of the air.
More Exacting or Exceeds.
- 4.2.11.2 *Standard:* Art. 35 pt. 3 Protection to air crew Council directive 96/29 EURATOM. Swedish Radiation Safety Authority regulation SSMFS 2018:11 including guidelines for Radiological Protection from Cosmic Radiation in Aviation. A commercial operator shall maintain records for crew members. **More Exacting or Exceeds.**
- 4.3.1
4.3.3.1 *Standard:* In the basic regulation Reg. (EU) 2018/1139 Annex V pt. 2.(c) and The European Rules of Air Operations Reg. (EU) 965/2012: CAT.OP.MPA.175 provide an alleviation stating that an operational flight plan is not required for operations under VFR of other-than-complex motor-powered aeroplane taking off and landing at the same aerodrome or operating site.
Less protective or partially implemented or not implemented.
- 4.3.4.1.2 *Standard:* The European rules on Air Operations do not yet address ICAO EDTO provisions. Sweden uses ETOPS provisions as described in the European rules on Air Operations Reg. (EU) 965/2012 CAT.OP.MPA.180 (a). Sweden is awaiting future amendments to the European rules on Air Operations regarding EDTO. No differences are expected at the end of 2025.
Less protective or partially implemented or not implemented.
- 4.3.4.1.3 *Standard:* The European rules on Air Operations requires a period commencing one hour before and ending one hour after the estimated time of arrival at the aerodrome. **More Exacting or Exceeds.**
- 4.3.4.3.1 *Standard:* The European rules on Air Operations requires a period commencing one hour before and ending one hour after the estimated time of arrival at the aerodrome. **More Exacting or Exceeds.**
- 4.3.4.4 *Standard:* According to EU provisions on Air Operations an operator need to establish a system to collect relevant data for a period of 2 years of continuous operations before applying for an Individual Fuel Scheme. Moreover, it is mandatory to implement an effective continuous reporting system to the competent authority on the safety performance and regulatory compliance. In addition, EU provisions adds to the elements minimum to take into account for determining the extent of the deviation, the type of ATS provided and characteristics and procedures of the ATFM and of the airspace management. **More Exacting or Exceeds.**
- 4.3.6.3 *Standard:* Partially implemented through Reg. (EU) 965/2012. The European rules on Air Operations do not yet address ICAO EDTO provisions. No differences are expected at the end of 2025.
Less protective or partially implemented or not implemented.
- 4.3.6.4 *Recommendation:* The European rules on Air Operations requires a final reserve fuel value for each estimated mass and every flight. **More Exacting or Exceeds**
- 4.3.8.1 *Standard:* The European rules on Air Operations Reg. (EU) 965/2012 CAT.OP.MPA.200 allows refuelling with passengers on board except for Avgas type fuels or a mixture of these types of fuel.
More Exacting or Exceeds.
- 4.3.9.2 *Standard:* The European rules on Air Operations Reg. (EU) 965/2012 CAT.IDE.A.235 has additional and more specific requirements on the quantities of oxygen and the percentage of passengers. Also specific requirements on automatically deployable masks for aeroplanes certified to fly above 25.000 ft.
More exacting or exceeds.
- 4.3.10.1 *Recommendation:* Time capability of cargo compartment fire suppression is not yet addressed in European rules on Air Operations. Sweden is awaiting future amendments to the European rules on Air Operations. No differences are expected at the end of 2025. **Less protective or partially implemented or not implemented.**
- 4.6.1
4.6.2 *Standard:* The European rules on Air Operations do not give any formal status to flight operations officers/flight dispatchers as European rules doesn't require licensing of operations officers/flight dispatchers. Sweden requires an operator to ensure that the operations manual contains instructions and information necessary for operations personnel to perform their duty including training for those other than crew members. The European rules on Air Operations will be further developed for alignment with ICAO provisions which is expected to be in force by the end of 2025.
Less protective or partially implemented or not implemented.

- 4.7.1.1 *Standard:* The European rules on Air Operations do not yet address ICAO EDTO provisions. Sweden is awaiting future amendments to the European rules on Air Operations. No differences are expected at the end of 2025. **Less protective or partially implemented or not implemented.**
- 4.7.1.2
- 4.7.2.1
- 4.7.2.2
- 4.7.2.3
- 4.7.2.4
- 4.7.2.6
- 4.9.2 *Standard:* Partially implemented through the European rules on Air Operations Reg. (EU) 965/2012 ORO.FC.200 (c) ORO.FC.202. The European rules do not have provisions for maximum certified take-off mass (MCTOM). However there is a limitation in the number of passengers to 9 or less.
- 5.1.1 *Standard:* In the European rules on Air Operations, the responsibilities of the State of the Registry are assumed by the State of the Operator instead. **Different in character or Other means of compliance.**
- 5.2.4 *Standard:* In the European rules on Air Operations, the responsibilities of the State of the Registry are assumed by the State of the Operator instead. **Different in character or Other means of compliance.**
- 5.2.10 *Standard:* The European rules on Air Operations provide stricter and more detailed requirements. **More Exacting or Exceeds**
- 5.4.1 *Standard:* The European rules on Air Operations require the operators to ensure that the routes and cruising altitudes are selected so as to have a landing site within gliding range. **More Exacting or Exceeds**
- 6.1.5.1 *Standard:* The European Rules on Air Operations is not aligned with the new ICAO provisions on aeroplanes operated under Article 83 bis agreement. Not implemented.
- 6.1.5.2 **Less protective or partially implemented or not implemented.**
- 6.1.5.3
- 6.1.5.4 *Recommendation:* The European Rules on Air Operations is not aligned with the new ICAO provisions on aeroplanes operated under Article 83 bis agreement. Not implemented. **Less protective or partially implemented or not implemented.**
- 6.2.2.1 *Standard:* Partially implemented in the European rules. Only for Large Aeroplanes: Initial CofA after 18 Feb 2020 (lavatory) and 18 May 2019 (portable). **Less protective or partially implemented or not implemented.**
- 6.3.1.1.1 *Standard:* Partially implemented in the European Rules of Air Operation. Reg. (EU) 965/2012: CAT.IDE.A.190 pt. (a)(3) and (b)(5); CAT.IDE.A.191 pt.(b); AMC1 CAT.IDE.A.191. For those light aeroplanes first issued with an individual CofA before 5 September 2022, only those that are multi-engine turbine powered and have a MOPSC of more than 9 are required to carry a flight recorder. In addition, turbine-engined aeroplanes with a MCTOM of less than 2 250 kg and a MOPSC of 9 or less are not required to carry a flight recorder, whatever their date of issuance of the individual CofA. If an ADRS is used, there is currently no EU requirement addressing the reliability of its power source. **Less protective or partially implemented or not implemented.**
- 6.3.1.1.2 *Recommendation:* Partially implemented in the European Rules of Air Operation Reg. (EU) 965/2012: CAT.IDE.A.191 pt. (b); AMC1 CAT.IDE.A.191. **Less protective or partially implemented or not implemented.**
- 6.3.1.1.3 *Standard:* The European rules on Air Operations regarding specific flight recorders apply to aeroplanes with an individual CofA after 1 June 1990. **Different in character or Other means of compliance.**
- 6.3.1.1.4 *Standard:* The European rules on Air Operations regarding specific flight recorders CAT.IDE.A.190 (a)(1) applies to aeroplanes with an individual CofA after 1 June 1990 and MCTOM of more than 5 700 kg. CAT.IDE.A.190 (a)(2) applies to turbine-engined aeroplanes with an individual CofA before 1 June 1990 and MCTOM of more than 5 700 kg. **Different in character or Other means of compliance.**
- 6.3.1.1.5 *Recommendation:* The European rules on Air Operations on specific flight recorders are not fully aligned with ICAO provisions. CAT.IDE.A.190 (a)(3) applies to aeroplanes with an individual CofA after 1 April 1998. **Less protective or partially implemented or not implemented.**
- 6.3.1.1.7 *Recommendation:* The European rules on Air Operations Reg. (EU) 965/2012 CAT.IDE.A.190 (a) captures all turbine-engined aeroplanes with an individual CofA before 1 June 1990 and MCTOM of more than 5 700 kg. The list of parameters is given in AMC6 CAT.IDE.A.190 and it contains the first 9 parameters of table A8-1. **More Exacting or Exceeds.**

- 6.3.1.1.8 *Standard:* The European rules on Air Operations applies to turbine-engined aeroplanes with an MCTOM of over 5700 kg and first issued with an individual CofA before 1 June 1990 whatever the date of prototype certification. **More Exacting or Exceeds.**
- 6.3.1.1.9 *Recommendation:* According to AMC6 CAT.IDE.A.190 the FDR shall record 16 parameters if installed in aeroplanes with an MCTOM exceeding 27 000 kg that are of a type first type certified after 30 September 1969 except Ground spoiler position and/or speed brake selection, Outside air temperature (OAT) or total air temperature and Autopilot operating modes, autothrottle and AFCS, systems engagement status and operating modes when any of the next conditions are met:
(1) sufficient capacity is not available on a flight recorder system; (2) the sensor is not readily available; and (3) a change is required in the equipment that generates the data. All other parameters exceed those recommended in the SARP. **More Exacting or Exceeds.**
- 6.3.1.1.10 *Standard:* The European rules on Air Operations on specific flight recorders are not fully aligned with ICAO provisions. Sweden is awaiting future amendments to the European rules on Air Operations. **Less protective or partially implemented or not implemented.**
- 6.3.1.1.11 *Standard:* CAT.IDE.A.190 (a)(1) applies to all aeroplanes with a MCTOM of over 5700 kg and first issued with an individual CofA on or after 1 June 1990. **More Exacting or Exceeds.**
- 6.3.1.2 *Standard:* Partially implemented. The use of magnetic tape for the FDR is not forbidden.
- 6.3.1.3 *Standard:* The European rules on Air Operations require longer recording durations. **More Exacting or Exceeds.**
- 6.3.2.1.1 *Standard:* The European rules on Air Operations regarding specific flight recorders do not fully address CVR for light aircraft. Partially implemented. The scope of CAT.IDE.A.185(a)(2) is limited to multi-engine turbine powered aeroplanes with a MCTOM of less than 5 700 kg. The scope of CAT.IDE.A.191 covers aircraft with an individual CofA first issued on or after 5/09/2022; no retrofit. Sweden is awaiting future amendments to the European rules on Air Operations. **Less protective or partially implemented or not implemented.**
- 6.3.2.1.2 *Recommendation:* The European rules on Air Operations regarding specific flight recorders do not fully address CVR for light aircraft. Sweden is awaiting future amendments to the European rules on Air Operations. **Less protective or partially implemented or not implemented**
- 6.3.2.1.3 *Standard:* The European rules on Air Operations is applicable to all aeroplanes with a MCTOM of more than 5700 kg, irrespective of the date of first issuance of the CofA. **More Exacting or Exceeds.**
- 6.3.2.1.4 *Standard:* The European rules on Air Operations regarding CVR applies to all aeroplanes with a MCTOM exceeding 5700 kg whatever the date of delivery of the individual CofA **More Exacting or Exceeds.**
- 6.3.2.1.5 *Recommendation:* The European rules on Air Operations CAT.IDE.A.185 (a) (1) Reg. (EU) 965/2012 states that it applies to all aeroplanes with a MCTOM exceeding 5 700 kg, be they turbine-engined or not. CAT.IDE.A.185 (a) (1) applies whatever the date of certification of the prototype. **More Exacting or Exceeds.**
- 6.3.2.4.1 *Standard:* The European rules on Air Operations on specific flight recorders are not fully aligned with ICAO provisions. Sweden is awaiting future European rules on Air Operations. **Less protective or partially implemented or not implemented.**
- 6.3.2.4.2 *Standard:* The European rules on Air Operations on specific flight recorders are not fully aligned with ICAO provisions. Sweden is awaiting future European rules on Air Operations. **Less protective or partially implemented or not implemented.**
- 6.3.2.4.3 *Recommendation:* The European rules on Air Operations on specific flight recorders are not fully aligned with ICAO provisions. Sweden is awaiting future European rules on Air Operations. **Less protective or partially implemented or not implemented.**
- 6.3.3.1.1 *Standard:* The European rules on Air Operations require recording of data-link communications for aeroplanes issued with an individual CofA on or after 08 April 2014. **More Exacting or Exceeds.**
- 6.3.3.1.2 *Standard:* The European rules on Air Operations on specific flight recorders are not fully aligned with ICAO provisions regarding retrofit of data-link communication recording. Sweden is awaiting future amendments to the European rules on Air Operations. **Less protective or partially implemented or not implemented.**

- 6.3.3.1.3 *Recommendation:* The European Rules on Air Operation is not aligned with the new ICAO provision on flight recorders. **Less protective or partially implemented or not implemented.**
- 6.3.4 *Standards and Recommendations:* Currently the European rules on Air Operations does not contain any provisions on "Flight crew-machine interface recording". Sweden is awaiting future amendments to the European rules on Air Operations. **Less protective or partially implemented or not implemented.**
- 6.3.4.1.1
- 6.3.4.1.2
- 6.3.4.2 *Standard:* Not implemented in the European Rules on Air Operations. **Less protective or partially implemented or not implemented.**
- 6.3.4.3 *Standard:* Not implemented in the European Rules on Air Operations. **Less protective or partially implemented or not implemented.**
- 6.3.5.4 *Recommendation:* The European rules on Air Operations on specific flight recorders are not fully aligned with ICAO provisions regarding FDR documentation in electronic format. Sweden is awaiting future amendments to the European rules on Air Operations. **Less protective or partially implemented or not implemented.**
- 6.3.5.5.1 *Recommendation:* The European rules on Air Operations on specific flight recorders are not fully aligned with ICAO provisions regarding combination recorders. Sweden is awaiting future European rules on Air Operations. **Less protective or partially implemented or not implemented.**
- 6.3.5.5.2 *Standard:* The European rules on Air Operations on specific flight recorders are not fully aligned with ICAO provisions regarding combination recorders. The requirement of a dual combination recorder configuration for aeroplanes with an MCTOM exceeding 15000 kg is not implemented. The use of two combination recorders is an alternative to the use of a separate CVR and FDR for aeroplanes with a MCTOM>5700kg regardless of the date of application for their type certificate.
Sweden is awaiting future amendments to the European rules on Air Operations. **Less protective or partially implemented or not implemented.**
- 6.3.6.1 *Standard:* The European rules on Air Operations are not fully aligned with ICAO provisions regarding flight recorder data recovery. Different in character.CAT.GEN.MPA.210 is also applicable to aeroplanes with MCTOM of over 45 500 kg and less than 19 passengers. CAT.GEN.MPA.210 is applicable to every aeroplane with a CofA first issued on or after 1 January 2024. **Different in character or Other means of compliance.**
- 6.3.6.2 *Standard:* The European rules on Air Operations are not fully aligned with ICAO provisions regarding flight recorder data recovery. Different in character.CAT.GEN.MPA.210 is also applicable to aeroplanes with MCTOM of over 45 500 kg and less than 19 passengers. CAT.GEN.MPA.210 is applicable to every aeroplane with a CofA first issued on or after 1 January 2024. **Different in character or Other means of compliance.**
- 6.4.1 *Standard:* The European rules on Air Operations Reg. (EU) 965/2012 CAT.IDE.A:125 prescribes additional equipment. **More Exacting or Exceeds.**
- 6.4.2 *Standard:* Partially implemented. Reg (EU) 965/2012 mandates the carriage of one barometric altitude measure device, and TWO devices when two pilots are required for the operation. **Less protective or partially implemented or not implemented.**
- 6.5.2.1 *Standard:* The European rules on Air Operations are not fully aligned with ICAO provisions regarding the carriage of life jackets in Reg. (EU) 965/2012 CAT.IDE.A.285. Carriage of life jackets when flying en route over water beyond gliding distance from the shore, in the case of all other landplanes (not operated in accordance with 5.2.9 or 5.2.10) not implemented.
Sweden is awaiting future amendments to the European rules on Air Operations. **Less protective or partially implemented or not implemented.**
- 6.5.3.1 *Standard:* The European rules on Air Operations are not fully aligned with ICAO provisions. The requirement to carry an 8.8 kHz underwater locating device (ULD) applies to aeroplanes with a MCTOM of more than 27000 kg and with an MOPSC of more than 19 and all aeroplanes with an MCTOM of more than 45500 kg. The ULD might not be fitted if the aeroplane is equipped with robust and automatic means to accurately determine, following an accident where the aeroplane is severely damaged, the location of the point of end of flight. **Less protective or partially implemented or not implemented.**
- 6.7.3 *Standard:* The European rules on Air Operations Reg. (EU) 965/2012, CAT.IDE.A.235(b)(4) requires a device to provide a warning indication to the flight crew of any loss of pressurisation for all pressurised aeroplanes operated at pressure altitudes above 25 000 ft. **More Exacting or Exceeds.**

- 6.7.6 *Recommendation:* The European rules on Air Operations are not fully aligned with ICAO provisions.
Less protective or partially implemented or not implemented.
- 6.10 *Standard:* The European rules on Air Operations require portable lights also during daylight.
More Exacting or Exceeds.
- 6.11.1 *Recommendation:* The European rules on Air Operations Reg. (EU) 965/2012 CAT.IDE.A.160 also requires weather detecting equipment for non-pressurised aeroplanes with an MCTOM of more than 5 700 kg; and non-pressurised aeroplanes with an MOPSC of more than nine. **More Exacting or Exceeds.**
- 6.12 *Standard:* Council directive 2013/59 EURATOM. Art 35 Protection to air crew. Act on radiation (2018:396), Ordinance on radiation (2018:506). Swedish Radiation Safety Authority regulation SSMFS (2018:11) and guidelines to the said regulation. According to 4§ SSMFS 2018:11 and guidelines alternative methods could be used. **Different in character or Other means of compliance.**
- 6.15.3 *Recommendation:* CAT.IDE.A.150 para (c) it is only applicable to turbine-powered aeroplanes for which the CofA was first issued after 1 January 2019 and ICAO's SARP recommends it for all turbine-engined aeroplanes regardless the date of issuance of their CofA.
Less protective or partially implemented or not implemented.
- 6.18.1 *Standard:* The European rules on Air Operations are not fully aligned with ICAO provision. The European provisions (CAT.GEN.MPA.210) requires robust and automatic means to accurately locate the point of end of flight, while transmitting a position every minute is one possible solution to address. Furthermore they are only applicable to aeroplanes with an MCTOM of more than 27 000 kg and an MOPSC of more than 19 or an MCTOM of more than 45 500 kg. Furthermore the provisions are applicable to aeroplanes first issued with an individual CofA on or after 1 January 2024. **Less protective or partially implemented or not implemented.**
- 6.18.2 *Recommendation:* The European rules on Air Operations are not aligned with ICAO provisions.
Less protective or partially implemented or not implemented.
- 6.18.3 *Standard:* The European rules on Air Operations are not yet fully aligned with ICAO provisions on operator responsibility to transmit position information when the aircraft is in distress. Reg. (EU) 965/2012 CAT.GEN.MPA.210. In the case of an ELT-based solution (in flight triggered ELT or automatic deployable flight recorder) the ELT signal is detected by COSPAS/SARSAT satellites and then it is directly transmitted to the ground and dispatched to the competent rescue coordination centre.
Different in character or other means of compliance.
- 6.19.2 *Recommendation:* European rules requires mandatory use of ACAS II SW version 7.1 for aeroplanes with an MCTOM of more than 5700 Kg or more than 19 passengers. For aeroplanes outside this category ACAS is not mandatory. If they voluntarily install ACAS, the equipment shall be ACAS II version 7.1.
Less protective or partially implemented or not implemented.
- 6.20.2 *Standard:* The European rules on Air Operations Reg. (EU) 965/2012 CAT.IDE.A.350 are not fully aligned with
6.20.3 ICAO provisions regarding resolution of 7.62 m for the pressure altitude reporting transponder. Sweden is awaiting future amendments to the European rules on Air Operations.
Less protective or partially implemented or not implemented.
- 6.22.1 *Recommendation:* The European rules on Air Operations are not fully aligned with ICAO provisions regarding
6.22.2 forward looking wind shear warning system. **Less protective or partially implemented or not implemented.**
- 7.2.9 *Standard:* The European provisions requires monitoring of height keeping performance but, but not in a specific interval. **Less protective or partially implemented or not implemented.**
- 8.2.1 *Standard:* The European rules on aeroplane maintenance are not fully aligned with ICAO provisions on human factor principles. Sweden is awaiting future amendments to the European rules on Continuing Airworthiness.
Less protective or partially implemented or not implemented.
- 8.2.3 *Standard:* Partially implemented. The European rules on aeroplane maintenance are not fully aligned with ICAO provisions. EU requirements do not explicitly describe that 'Copies of all amendments shall be furnished promptly to all organizations or persons to whom the manual has been issued.
Less protective or partially implemented or not implemented.
- 8.2.4 *Standard:* The European rules on aeroplane maintenance are not fully aligned with ICAO provisions.
Different in character or Other means of compliance.

- 8.3.1 *Standard:* The European rules on continuing airworthiness are not fully aligned with ICAO provisions on human factor principles. Sweden is awaiting future amendments to the European rules on aeroplane maintenance. **Less protective or partially implemented or not implemented.**
- 8.3.2 *Standard:* The European rules on continuing airworthiness are not fully aligned with ICAO provisions. EU provisions do not explicitly describe that 'Copies of all amendments shall be furnished promptly to all organizations or persons to whom the manual has been issued. **Less protective or partially implemented or not implemented.**
- 8.4.2 *Standard:* The European rules on Continuing Airworthiness prescribe retaining periods exceeding limits in ICAO provisions. **More exacting or exceeds.**
- 8.5.2 *Standard:* The European provisions on continuing airworthiness in Reg. (EU) 1321/2014 Part M is applicable for aeroplanes with an MCTOM above 2730 kg, while Part ML applies to 2730 kg or below. This means that the mass range between 2730 and 5700 is obliged to comply with a higher standard. **More exacting or exceeds.**
- 8.8.2 *Standard:* The European rules on Continuing Airworthiness and on aeroplane maintenance are not fully aligned with ICAO provisions. Sweden is awaiting future amendments. **Less protective or partially implemented or not implemented.**
- 8.8.3 *Standard:* Not implemented. **Less protective or partially implemented or not implemented.**
- 9.1.4 *Standard:* Provisions for flight navigator is not within the scope of the European rules on Air Operations. **Less protective or partially implemented or not implemented.**
- 9.2 *Standard:* The European rules on Air Operation Reg. (EU) 965/2012 ORO.FC.130 (a) establishes provisions for each type and variant. ORO.GEN.110(h) requires also the use of a checklist. **More exacting or exceeds.**
- 9.4.1.1 *Standard:* For single pilot IFR, the European rules on Air Operations also requires 5 IFR flights including 3 IFR approaches in the single pilot role under Reg. (EU) 965/2012 ORO.FC.202. **More exacting or exceeds.**
- 9.4.2.1 *Standard:* In addition to the requirements in 9.4.2.1 the European rules also requires at least three sectors. **More exacting or exceeds.**
- 9.4.3.3 *Standard:* The European rules on Air Operations have implemented provisions on categorisation of aerodromes (A, B, C) depending on how demanding/not demanding the aerodrome is. Rules achieve same safety level even though the classification is slightly different. For reference see Reg. (EU) 965/2012, ORO.FC.105 (b)(2)&(c), AMC1 ORO.FC.105(b)(2);(c) pts. (a), (b) & (c), AMC2 ORO.FC.105(c) pts. (a) & (b). **Different in character or Other means of compliance.**
- 9.4.4.1 *Standard:* The European rules on Air Operations allows an Alternative Training and Qualification Program (ATQP) as an alternative to the prescriptive training requirements. Even though checking intervals can be extended, the same or even higher level needs to be achieved. For operations under VFR by day of performance class B aeroplanes conducted during seasons not longer than 8 consecutive months one OPC is sufficient. **Different in character or Other means of compliance.**
- 9.4.5.2 *Recommendation:* For IFR operations, the pilot shall have accumulated at least 50 hours of IFR flight time instead of the 25 hours specified in paragraph (b). **More exacting or exceeds.**
- 10.1 *Standard:* The European rules on Air Operations does not give any formal status to flight operations officers/flight dispatchers as European rules on Air Operation doesn't require licensing of operations officers/flight dispatchers. The European rules on Air Operations requires an operator to ensure that the operations manual contains instructions and information necessary for operations personnel to perform their duty including training for those other than crew members. **Less protective or partially implemented or not implemented.**
- 10.2
- 10.3 *Standard:* The European rules on Air Operations do not give any formal status to flight operations officers/flight dispatchers as European rules doesn't require licensing of operations officers/flight dispatchers. The European rules on Air Operations requires an operator to ensure that the operations manual contains instructions and information necessary for operations personnel to perform their duty including training for those other than crew members. Sweden is awaiting future amendments to the European rules on Air Operations through RMT.0392. **Less protective or partially implemented or not implemented.**

- 10.4 *Recommendation:* The European rules on Air Operations do not give any formal status to flight operations officers/flight dispatchers as European rules doesn't require licensing of operations officers/flight dispatchers. Sweden requires an operator to ensure that the operations manual contains instructions and information necessary for operations personnel to perform their duty including training for those other than crew members. **Less protective or partially implemented or not implemented.**
- 10.5
- 11.4.3 *Recommendation:* The European rules on Air Operations only requires a 3 months storage period. Sweden is awaiting future amendments to the European rules on Air Operations. **Less protective or partially implemented or not implemented.**
- 11.6 *Standard:* The European rules on Air Operations Reg. (EU) 965/2012 CAT.GEN.MPA.195 requires preservation of original recorded data after an accident or serious incident or an occurrence identified by the investigating authority. In the absence of indication from the investigating authority, the operator is not required to preserve the data for more than 60 days after the accident or serious incident. AMC3 ORO.MLR.100 lists the minimum information to be contained by the operations manual. According to AMC3 ORO.MLR.100, Part A, section 11 of the operations manual should contain procedures for the preservation of recordings. **Less protective or partially implemented or not implemented.**
- 12.4 *Standard:* In addition to the completion of initial training required by the Air Ops Regulation, the Aircrew Regulation also requires the issuing of a cabin crew attestation to each cabin crew member who will be operating in CAT operations. This attestation is considered valid as long as the holder acts as cabin crew member and completes the other training required by the Air Ops Regulation. If a holder stops operating during more than 5 years, his/her attestation becomes invalid and initial training has to be completed again. **More Exacting or Exceeds.**
- 13.2.4 *Recommendation:* The European Provisions on Air Operations ORO.SEC.100 regarding approved secure flight crew compartment door is only applicable to aeroplanes with 1) an MCTOM that exceeds 54 500 kg; aeroplanes with 2) an MCTOM that exceeds 45 500 kg and have an MOPSC of more than 19; or (3) aeroplanes with an MOPSC of more than 60. **Less protective or partially implemented or not implemented.**
- 15.1 *Standard:* The European rules on Air Operations are not fully aligned with ICAO provisions. Sweden is awaiting future amendments. Rulemaking activities has started. No difference is expected after end of 2025. See EASA NPA 2022-11. **Less protective or partially implemented or not implemented.**
- 15.2 *Standard:* The European rules on Air Operations are not fully aligned with ICAO provisions. Sweden is awaiting future amendments. Rulemaking activities has started. No difference is expected after end of 2025. See EASA NPA 2022-11. **Less protective or partially implemented or not implemented.**
- ANNEX 6 Part II
(Eleventh Edition, July 2022 including amd. 40)
- 1.1 *Aerial work:* Search and rescue operations are not included in Specialised Operations (SPO) in the EU system. They are covered at national level. The term 'specialised operations' is used and defined instead of 'aerial work'. **Different in character or other means of compliance.**
- 1.1 *Aerodrome operating minima:* The EU rules are using the old approach classification. Rulemaking Task RMT.0379 will transpose the ICAO def. and concepts (2D, 3D) into R. (EU) 965/2012. **Different in character or other means of compliance.**
- 1.1 *Combined vision system (CVS):* Term not used in R. (EU) 965/2012. This definition will be inserted in R965 through RMT.0379 (AWO). **Less protective or partially implemented or not implemented.**
- 1.1 *Operating base:* The concept of 'principal place of business' is used in the Air Ops rules. It is defined in Annex I of R. (EU) 965/2012. GM18 to Annex I provides more explanations on the use and meaning of this term for non-commercial operations. **Different in character or other means of compliance.**
- 1.1 *Synthetic vision system (SVS):* Term not used in R. (EU) 965/2012. This definition will be inserted in R965 through RMT.0379 (AWO). **Less protective or partially implemented or not implemented.**

- 1.1 *Continuous Descent Final Approach (CDFA)*: The application of the CDFA technique to apply until circling approach minima (circling OCA/H) or visual flight manoeuvre altitude/height are reached, are planned to be transposed into Regulation (EU) No 965/2012 through the EASA rulemaking task RMT.0379 All-Weather Operations, the Opinion of which is expected to be published in 2021. **Less protective or partially implemented or not implemented.**
- 2.1.1.5 *Recommendation*: No specific requirement for non-commercial operations with other-than complex motorpowered aircraft (NCO). **Less protective or partially implemented or not implemented.**
- 2.1.4 *Standard*: Specific Approvals (SPA) must be issued by the State of the Operator. In addition to the specific approvals listed in Appendix 2.4, SPA are also required for transport of Dangerous Goods and EFB. No difference if the specific approvals for PBN, MNPS, RVSM and LVO are issued for non-commercial operators using aircraft registered in a third country. **Different in character or other means of compliance.**
- 2.2.2.2.1 *Standard*: In NCC, the rule addresses to the operator, not to the PIC. For low visibility operations (LVO), it is the competent authority as established by Annex V (Part SPA): State of the Operator if the aircraft is registered in an EU Member State; or State of Registry if the aircraft is registered in a third country and the State of Registry has already issued the LVO specific approval. **Different in character or other means of compliance.**
- 2.2.2.2.1.1 *Standard*: R.965/2012 currently allows only operational credits for HUDs and EVS. Therefore SVS and CVS rules are more exacting or exceed the provisions of ICAO. The approval for additional operational credits will be introduced through RMT.0379 (All-Weather Operations (AWO)). Classification aspect not mentioned in SPA.LVO.100. For non-commercial operators, the State of Operator approves the operational credits instead of the State of Registry. **Less protective or partially implemented or not implemented.**
- 2.2.2.2.2 *Standard*: Different in character. R.965/2012 has not yet transposed the new approach classification. The EU rules do not yet classify approach operations by Type A and B. RMT 0379 (AWO) is envisaged to update the approach classification, including the removal of the definitions for Category (CAT) IIIA, IIIB and IIIC which are still being used in EU-rules. **Different in character or other means of compliance.**
- 2.2.2.2.3 *Standard*: R.965/2012 has not yet transposed the new approach classification. It will be introduced via RMT.0379 (AWO). No distinction between CDFA with manual calculation (2D) and CDFA with VNAV (3D). **Different in character or other means of compliance.**
- 2.2.3.4.3 *Standard*: No margin defined for destination aerodrome in NCC.OP.150, NCC.OP.180: but margin defined in NCC.OP.151 and NCO.OP.140 for alternate aerodromes. Margin not defined in NCO.OP.160. It is the State of Operator instead of the State of Registry that shall establish those criteria. **Less protective or partially implemented or not implemented.**
- 2.2.3.5 *Standard*: Requirement (a)(2) for separate runways to be usable at the estimated time of use of the destination aerodrome with at least one runway having a operational instrument approach procedure is not implemented in the EU rules. EU rules require a period commencing one hour before and ending one hour after the estimated time of arrival at the aerodrome in accordance with 2.2.3.4.3. EU rules do not require a point of no return but instead require always to have an alternate aerodrome (with very few exceptions e.g. isolated aerodrome) and other conditions (e.g. EU rules require fuel for 2 hours). **Less protective or partially implemented or not implemented.**
- 2.2.3.6.1 *Standard*: Part-NCO allows for lower criteria for VFR A-to A flights when remaining in sight of the aerodrome/landing site. **Less protective or partially implemented or not implemented.**
- 2.2.3.7 *Recommendation*: The EU rules do not allow refueling with passengers on board when aviation gasoline (AVGAS) or wide-cut type fuel or a mixture of these types of fuel are being used. **More Exacting or Exceeds.**
- 2.2.4.6 *Recommendation*: The EU rules contain an alleviation to the availability and use of oxygen on board under NCO.OP.190 and AMC1 NCO.OP.190(a). The PIC can decide to fly at any altitude without using oxygen, and without oxygen being available. AMC1 NCO.OP.190(a) additionally states: "(...) the PIC should: (...) (b)(2) if detecting early symptoms of hypoxia conditions: (i) consider to return to a safe altitude, and (ii) ensure that supplemental oxygen is used, if available." No difference for Part-NCC. **Less protective or partially implemented or not implemented.**

- 2.4.2.2 *Standard:* ELA1 aeroplanes, i.e. aeroplanes with a Maximum Take-off Mass (MTOM) of 1200 kg or less that is not classified as complex motor-powered aircrafts, are exempt from the hand fire extinguisher requirement in NCO.IDE.A.160. For NCC operators in the EU, the State of the Operator is the competent authority not the State of Registry. The State of the Operator also issues the specific approvals. **Less protective or partially implemented or not implemented.**
- 2.4.2.3 *Standard:* Only for Large Aeroplanes Initial CofA after 18 Feb 2020 (lavatory) and 18 May 2019 (portable). No reference for Part-NCO, as it is very unlikely that an NCO aircraft has a lavatory. **Less protective or partially implemented or not implemented.**
- 2.4.3.2 *Recommendation:* The EU rules do not distinguish between VFR flights and VFR controlled flights. The other means of compliance are ensured through the provisions in NCC.IDE.A.120(b) for additional instruments when in conditions where the aeroplane cannot be maintained in a desired flight path without reference to one or more additional instruments, as well as the additional limitations in Part SERA.5010 for VFR controlled flights. **Different in character or other means of compliance.**
- 2.4.11.2, 2.4.11.3 *Recommendation:* EASA SIB 2017-14 (Safety Information Bulletin) recommends the installation of TAWS for light aeroplanes not engaged in Commercial Air Transport. **Not implemented.**
- 2.4.12.3 *Standard:* NCO.IDE.A.170 (a) (3): a survival ELT (ELT(S)) or a personal locator beacon (PLB), carried by a crew member or a passenger, is authorised when certified for a maximum passenger seating configuration of six or less. **Less protective or partially implemented or not implemented.**
- 2.4.15.1 *Standard:* R. (EU) 965/2012 does not contain rules for SVS and CVS. EVS and HUD are addressed in SPA.LVO. SVS and CVS will be addressed with RMT.0379. For single-pilot operations, the minimum RVR/VIS should be calculated in accordance with the following additional criteria: (...) (ii) an approved HUDLS, including, where appropriate, enhanced vision system (EVS), or equivalent approved system. Moreover, in the EU system, for NCC operators, it is the State of the Operator that has this responsibility, not the State of Registry. **Less protective or partially implemented or not implemented.**
- 2.4.15.2 *Standard:* CVS does not receive operational credits. R.(EU) 965/2012 currently allows operational credits only for HUDs and EVS.SVS and CVS will be addressed with RMT.0379. **Less protective or partially implemented or not implemented.**
- 2.4.16.1.1.1 *Recommendation:* There is no flight recorder carriage requirement in Part-NCO, only in Parts CAT, SPO and NCC. The flight recorder carriage requirements in the Air Ops rules are only applicable to commercial operations (CAT and commercial specialised operations). GM19 to Annex I and AMC1 CAT.IDE.A.191 to be published end of 2019 or Q1 2020. 2.4.16.1.1.1: Not addressed. Notes 1 and 2: R. (EU) 965/2012: Annex I Definitions (49c); GM19 to Annex I for the different categories of flight recorders. Notes 4 and 5: R. (EU) 965/2012: AMC1 NCC.IDE.A.160 for the CVR; AMC1 & AMC2 NCC.IDE.A.165 for the FDR; AMC1 NCC.IDE.A.170 for the DLR. Note 6: AMC1 CAT.IDE.A.191 for reference to ED 155. Note 7: Point (f) of NCC.GEN.145 addresses the protection of recordings of flight recorders. **Less protective or partially implemented or not implemented.**
- 2.4.16.1.1.2 *Standard:* NCC.IDE.A.165 is applicable to aeroplanes with CofA issued on or after 1 January 2016. **More Exacting or Exceeds.**
- 2.4.16.1.2 *Standard:* Not implemented into EU rules. Recorders are required by 2.4.16.1.1.2 only for aeroplanes for which application for TC is after 2023. All new models of recorders on the market are solid-state, therefore there is no need to forbid the old recording technologies (metal foil, frequency modulation, photographic film or magnetic tape). See also NPA 2013-26, RIA A. **Less protective or partially implemented or not implemented.**
- 2.4.16.2.1 *Recommendation:* Not implemented into EU rules. The applicability of this recommended practice corresponds to Part-NCO. There is no flight recorder carriage requirement in Part-NCO. **Less protective or partially implemented or not implemented.**
- 2.4.16.2.2 *Standard:* Not implemented into EU rules. 2.4.16.2.1 is only applicable to aeroplanes first issued with an individual CofA on or after 1 Jan 2016, and all modern models of CVR are solid-state. Therefore there is no need to forbid the old recording technologies. See also NPA 2013-26, RIA A. **Less protective or partially implemented or not implemented.**
- 2.4.16.3.3 *Standard:* It is required to record 'information on the time and priority of data link messages'. This is considered sufficient to correlate with the CVR recording. **Different in character or other means of compliance.**

- 2.4.17.2.2
2.4.17.3.3 *Standard:* For NCC operators and for NCO operators using third country registered aircraft, the State of Operator shall establish those criteria. **Different in character or other means of compliance.**
- 2.4.18.1
2.4.18.2
2.4.18.3 The European Rules on Air Operations is not aligned with the new ICAO provisions on aeroplanes operated under Article 83 bis agreement. **Less protective or partially implemented or not implemented.**
- 2.4.18.4 *Recommendation:* The European Rules on Air Operations is not aligned with the new ICAO provisions on aeroplanes operated under Article 83 bis agreement. **Less protective or partially implemented or not implemented**
- 2.5.1.7
2.5.1.8 *Standard:* For operators using third country registered aircraft, the State of Operator shall establish those criteria. **Different in character or other means of compliance.**
- 2.5.1.9 *Standard:* For operators using third country registered aircraft, the State of Operator shall ensure those provisions. **Different in character or other means of compliance.**
- 2.5.2.3
2.5.2.4 *Standard:* For operators using third country registered aircraft, the State of Operator shall establish those criteria. **Different in character or other means of compliance.**
- 2.5.2.5-
2.5.2.7 *Standard:* For operators using third country registered aircraft, the State of Operator shall grant those specific approvals. **Different in character or other means of compliance.**
- 2.5.2.9 *Standard:* For operators using third country registered aircraft, the State of Operator shall ensure those provisions. **Different in character or other means of compliance.**
- 2.5.2.10 *Standard:* EU rules require to monitor the aircraft height keeping performance, but not in a specific interval. For operators using third country registered aircraft, the State of Operator shall establish the requirement. **Less protective or partially implemented or not implemented.**
- 2.5.3.3
2.5.3.4 *Standard:* For operators using third country registered aircraft, the State of Operator shall establish those criteria. **Different in character or other means of compliance.**
- 2.5.3.5 *Standard:* For operators using third country registered aircraft, the State of Operator shall ensure those provisions. **Different in character or other means of compliance.**
- 2.6.1.1 *Standard:* Risk assessment when approving a maintenance programme not based on the type certificate holder's maintenance recommendations not addressed. **Less protective or partially implemented or not implemented.**
- 2.6.2.2 *Standard:* Retaining periods exceed requirements. **More Exacting or Exceeds.**
- 2.6.4.2 *Standard:* Maintenance and release to service by a person can be performed by Part MF, or Part CAO or by a pilot/owner after limited pilot/owner maintenance. Part M subpart F can be applied until 8-7-2021. **Less protective or partially implemented or not implemented.**
- 2.7.2.1 *Standard:* For operators using third country registered aircraft, the State of Operator shall render licenses valid. **Different in character or other means of compliance.**
- 2.8.1 *Standard:* For operators using third country registered aircraft, the State of Operator shall make those changes mandatory. **Different in character or other means of compliance.**
- 2.9.1 *Standard:* Reg. (EC) No 300/2008 does not contain references to pilot in command responsibilities related to the security of aircraft. **Less protective or partially implemented or not implemented.**
- 3.1.2 *Recommendation:* Definition of complex motor-powered aeroplane includes aeroplanes only with a MOPSC of more than 19. **Less protective or partially implemented or not implemented.**
- 3.4.2.1.1 *Standard:* The EU system has the State of Operator instead of State of Registry as the Competent Authority. **Different in character or other means of compliance.**
- 3.4.2.1.2 *Standard:* EU rules provide for the cooperative oversight of activities of operators established or residing in another EU member state. Reg. (EC) 300/2008 establishes requirements for inspections by the Commission in cooperation with Member States. **Different in character or other means of compliance.**
- 3.4.2.7 *Standard:* For NCC operators, the State of Operator establishes the criteria instead of the State of Registry. For low visibility operations (LVO), it is the competent authority as established by Annex V (Part SPA): State of the Operator if the aircraft is registered in an EU Member State; or State of Registry if the aircraft is registered in a third country and the State of Registry has already issued the LVO specific approval. **Different in character or other means of compliance.**

- 3.4.2.8 *Standard:* Reg. (EC) High-level requirements are included in the Essential Requirements, Annex V to Regulation (EU) 2018/1139. Detailed FTL provisions are determined at national level. Fatigue requirements for maintenance personnel not addressed. **Less protective or partially implemented or not implemented.**
- 3.4.3.5.2 *Standard:* Fuel consumption data as required in (a) is not implemented in the EU rules. **Less protective or partially implemented or not implemented.**
- 3.4.3.5.3 *Standard:* European rules do not break down the amount of fuel by phases of flight. **Different in character or other means of compliance.**
- 3.4.3.5.4 *Recommendation:* R. (EU) 965/2012 requires a mandatory final reserve fuel (FRF) of 30 minutes (VFR by day) or 45 minutes (VFR by night and IFR). **More Exacting or Exceeds.**
- 3.4.3.6.2 *Standard:* Part-NCC does not define final reserve fuel as such. Instead NCC.OP.130 gives the amount of minutes for the required final reserve fuel. **Different in character or other means of compliance.**
- 3.4.3.7 *Standard:* Part NCC does not provide such a requirement. **Less protective or partially implemented or not implemented.**
- 3.4.3.8.1 *Standard:* EU rules do not allow embarking, on board or disembarking of passengers while refueling with AVGAS or wide cut type fuel or a mixture of these fuel types. **More Exacting or Exceeds.**
- 3.5.2.3 *Standard:* For operators using third country registered aircraft, the State of Operator shall establish those criteria. **Different in character or other means of compliance.**
- 3.6.1.1 *Standard:* In the EU system, the State of Operator is responsible for approving the MEL. **Different in character or other means of compliance.**
- 3.6.3.1.1.1 *Standard:* Carriage of a flight data recorder is required only for aeroplanes first issued with an individual CofA on or after 1 January 2016. **Less protective or partially implemented or not implemented.**
- 3.6.3.1.1.2 *Standard:* Carriage of a flight data recorder is required only for aeroplanes first issued with an individual CofA on or after 1 January 2016. **Less protective or partially implemented or not implemented.**
- 3.6.3.1.1.3 *Recommendation:* Carriage of a flight data recorder is required only for aeroplanes first issued with an individual CofA on or after 1 January 2016. **Less protective or partially implemented or not implemented.**
- 3.6.3.2.1.1 *Standard:* NCC.IDE.A.160 (a)(2) is applicable to aeroplanes for which the type certificate is issued after 1 January 2016, while 3.6.3.2.1 criterion is the date of submission of the application for a type certificate. **More exacting or exceeds.**
- 3.6.3.2.1.2 *Standard:* NCC.IDE.A.160(a)(1) only requires a CVR for aeroplanes above 27 000 kg MCTOM which were first issued with an individual CofA on or after 1 Jan 2016. **Less protective or partially implemented or not implemented.**
- 3.6.3.2.1.3 *Recommendation:* NCC.IDE.A.160(a)(1) and (2) only requires a CVR for aeroplanes that were first issued with an individual CofA on or after 1 Jan 2016 (see (a)(1)) or for which a type certificate was first issued on or after 1 Jan 2016 (see (a)(2)). **Less protective or partially implemented or not implemented.**
- 3.6.8.2.1 *Recommendation:* The European regulatory system only requires it when the individual CofA was issued after 31 December 1980. **Less protective or partially implemented or not implemented.**
- 3.6.9.1 *Recommendation:* European Regulatory system requires ACAS II for turbine engine aeroplanes with an MCTOM of more than 5700 kg or MOPSC of more than 19. **More exacting or exceeds.**
- 3.8.1.2. *Recommendation:* Initial and continuation training are not specifically addressed in M.A.607 or Human Factors. **Less protective or partially implemented or not implemented.**
- 3.8.2.1 *Recommendation:* Part M, Part CAMO and Part CAO do not observe Human Factors principles in the design of the Maintenance Control Manual. **Less protective or partially implemented or not implemented.**
- 3.8.3.1 *Standard:* Part M Subpart G, Part CAMO and Part CAO do not observe Human Factors principles in the design of the Maintenance Programme. **Less protective or partially implemented or not implemented.**
- 3.8.3.2 *Standard:* EU requirements are not as explicit. **Different in character or other means of compliance.**
- 3.8.4 *Standard:* For the transmission of the information as per Annex 8 there is no alleviation related to MTOW – required from all aeroplanes' owners. **More exacting or exceeds.**
- 3.8.5.2 *Standard:* Maintenance and release to service by a person can be performed by Part MF or Part CAO. Part M subpart F can be applied until 8-7-2021. **Less protective or partially implemented or not implemented.**

- 3.10.0.1 *Recommendation:* The human factor element of training is not specifically mentioned in ORO.GEN.110. Minimum training requirements for OCC personnel will be addressed in RMT.0392. **Less protective or partially implemented or not implemented.**

ANNEX 6 Part III - INTERNATIONAL OPERATIONS – HELICOPTERS
(Eleventh Edition, July 2022, amd. 24)

Section I GENERAL

Chapter 1 Definitions

- 1.0.3 Airworthy
Less protective or partially implemented or not implemented.
Details of Difference: No definition as such.
- 1.0.3 Configuration deviation list (CDL)
Less protective or partially implemented or not implemented.
Details of Difference: Not defined as a term.
- 1.0.3 Flight crew member
Not Applicable.
State reference: No definition.
- 1.0.3 Maintenance organization's procedures manual
Less protective or partially implemented or not implemented.
Details of Difference: Not implemented as a term.
- 1.0.3 Maintenance programme
Less protective or partially implemented or not implemented.
Details of Difference: Not implemented as a term.
- 1.0.3 Maintenance release
Less protective or partially implemented or not implemented.
Details of Difference: Not implemented as a term.
- 1.0.3 Operator's maintenance control manual
Less protective or partially implemented or not implemented.
Details of Difference: Not implemented as a term.
- 1.0.3 Required communication performance (RCP)
Less protective or partially implemented or not implemented.
Details of Difference: Term not used.
RMK: Defined in EUROCAE ED-78A/RTCA DO-264.
- 1.0.3 Required communication performance type (RCP type)
Less protective or partially implemented or not implemented.
Details of Difference: Term not used.
RMK: Defined in EUROCAE ED-78A/RTCA DO-264.
- 1.0.3 Take-off and initial climb phase
Less protective or partially implemented or not implemented.
Details of Difference: No definition as such. Explanation used in European rules. Same safety margins. But differences exist depending of the performance class of the Helicopter. RMK: For performance class 1 and 2 "take off phase" is used. For performances class 3 "take off and landing phases" are used. Different requirement of height (300 m for ICAO) in all of them.

Section II INTERNATIONALCOMMERCIAL AIR TRANSPORT

Chapter 1 General

- 1.1.5 Responsibility for operational control shall be delegated only to the pilot-in-command and to a flight operations officer/flight dispatcher if an operator's approved method of control and supervision of flight operations requires the use of flight operations officer/flight dispatcher personnel.
Less protective or partially implemented or not implemented.
State reference: ORO.GEN. 110, AMC1 ORO.GEN. 110(c). Details of Difference: Reg. (EU) 965/2012 doesn't require licensing of operations officer or flight dispatcher.
- 1.3.1 Safety management
Note – Annex 19 includes safety management provisions for air operators. Further guidance is contained in the Safety Management Manual (SMM) (Doc 9859).
Less protective or partially implemented or not implemented.
Details of Difference: not transposed to (EU) 965/2012.
- 1.3.2 A flight data analysis programme shall be non-punitive and contain adequate safeguards to protect the source(s) of the data.
Less protective or partially implemented or not implemented.
Details of Difference: No requirement for a flight data analysis programme for helicopter operations.
- Chapter 2 Flight Operations
- 2.3.8.2 A flight to be operated with a pressurized helicopter shall not be commenced unless a sufficient quantity of stored breathing oxygen is carried to supply all the crew members and passengers.
Not applicable
Not Applicable.
State reference: No regulation.
RMK: No rules as there are no pressurized helicopters operated in the EU.
- 2.4.6 Safeguarding of cabin crew and passengers in pressurized aircraft in the event of loss of pressurization.
Not applicable
Less protective or partially implemented or not implemented.
State reference: CAT.OP.MPA.285.
Details of Difference: Art 38.
RMK: Art 38; No rules, as there are no pressurized helicopters operated in the EU.
CAT.OP.MPA.285 is the only requirement at this stage.
- 2.6.1 Duties of flight operations officer/flight dispatcher.
Less protective or partially implemented or not implemented.
Details of Difference: The European rules do not required flight operations officer.
- 2.6.2 In the event of an emergency, a flight operations officer/flight dispatcher shall:....
Not applicable
Not Applicable.
Details of Difference: The European rules do not required flight operations officer.
- Chapter 4 Helicopter Instruments, Equipment, and Flight Documents
- 4.3.1.1.1 Flight recorders
State reference: 4.3; Note 1: There is no definition for crash-protected flight recorder; Note 2: AMC1 CAT.IDE.H.200; Note 4 and 7: There is no definition for lightweight flight recorder; 4.3.1 Note 5 AMC1 CAT.IDE.H.190; Note 6 AMC1 CAT.IDE.H.190 and AMC2 CAT.IDE.H.190; 4.3.11 CAT.IDE.H.190 (b)(3).
Less protective or partially implemented or not implemented.
Details of Difference: For installation design requirements, refer to applicable certification specifications (CS 29.1457 for CVR and CS 29.1459 for FDR).

For equipment design requirements, refer to applicable ETSOs (C123 for CVR, C124 for FDR, C176 for AIR, C177 for DLR, 2C197 for ADRS and CARS).
AMC1 CAT.IDE.H.190 recommends compliance with ED-112 only for helicopters manufactured on or after 01 January 2016.
- 4.3.1.2.3 *Recommendation:* All helicopters of a maximum certificated take-off mass of over 3 180 kg, up to and including 7 000 kg, for which the individual certificate of airworthiness is first issued on or after 1 January 1989, should be equipped with a Type V FDR.
Less protective or partially implemented or not implemented.
State reference: CAT.IDE.H.190 (a)(1) and (b)(2).
Details of Difference: Required for helicopters first issued with an individual CofA on or after 01 August 1999.

- 4.3.1.2.4 All turbine-engined helicopters of a maximum certificated take-off mass of over 2 250 kg, up to and including 3 180 kg for which the application for type certification was submitted to a Contracting State on or after 1 January 2018 shall be equipped with:
a) a Type IV A FDR; or
b) a Class C AIR capable of recording flight path and speed parameters displayed to the pilot(s); or c) an ADRS capable of recording the essential parameters defined in Table A5-3 of Appendix 5.
Less protective or partially implemented or not implemented.
State reference: CAT.IDE.H.190 (a).
Details of Difference: Not implemented. To be developed under RMT.0271.
- 4.3.1.2.5 *Recommendation:* All helicopters of a maximum certificated take-off mass of 3 180 kg or less for which the individual certificate of airworthiness is first issued on or after 1 January 2018 should be equipped with:
a) a Type IV A FDR; or
b) a Class C AIR capable of recording flight path and speed parameters displayed to the pilot(s); or
c) an ADRS capable of recording the essential parameters defined in Table A5-3 of Appendix 5.
Less protective or partially implemented or not implemented.
State reference: CAT.IDE.H.190 (a).
Details of Difference: Not implemented. To be developed under RMT.0271.
- 4.3.1.3.2 *Recommendation:* The use of analogue FDRs using frequency modulation (FM) should be discontinued.
Less protective or partially implemented or not implemented.
State reference: CAT.IDE.H.190 (a).
Details of Difference: Discontinuation of frequency modulation FDR not implemented, European rules allows the use of it.
- 4.3.1.3.4 The use of analogue FDRs using frequency modulation (FM) shall be discontinued by 1 January 2012.
Less protective or partially implemented or not implemented.
State reference: CAT.IDE.H.190 (a).
Details of Difference: Discontinuation of frequency modulation FDR not implemented.
- 4.3.1.3.5 *Recommendation:* The use of magnetic tape FDRs should be discontinued by 1 January 2011.
Less protective or partially implemented or not implemented.
State reference: CAT.IDE.H.190 (a).
Details of Difference: Discontinuation of frequency modulation FDR not implemented.
- 4.3.1.3.6 The use of magnetic tape FDRs shall be discontinued by 1 January 2016.
Less protective or partially implemented or not implemented.
State reference: CAT.IDE.H.190 (a).
Details of Difference: Discontinuation of frequency modulation FDR not implemented.
- 4.3.1.4 Duration
Types IV, IVA and V FDRs shall be capable of retaining the information recorded during at least the last ten hours of their operation.
Less protective or partially implemented or not implemented.
State reference: CAT.IDE.H.190 (b).
Details of Difference: Only in the case of helicopters first issued with an individual CofA on or after 01 January 2016 (corresponding to type IVA) is the FDR required to record data for at least the preceding 10 hours.
- 4.3.2.1.1 Cockpit voice recorders
Less protective or partially implemented or not implemented.
State reference: AMC1 CAT.IDE.H.185.
Details of Difference: Compliance with ED-112 is only required for helicopters first issued with an individual CofA on or after 01 January 2016.
- 4.3.2.2 Discontinuation
- 4.3.2.2.1 The use of magnetic tape and wire CVRs shall be discontinued by 1 January 2016.
Less protective or partially implemented or not implemented.
State reference: CAT.IDE.H.185.
RMK: Discontinuation of magnetic tape CVR not implemented, however Opinion 01/2014 proposes discontinuation by 01 January 2019.
- 4.3.2.2.2 *Recommendation:* The use of magnetic tape and wire CVRs should be discontinued by 1 January 2011.
Less protective or partially implemented or not implemented.
State reference: CAT.IDE.H.185.
RMK: Discontinuation of magnetic tape CVR not implemented, however Opinion 01/2014 proposes discontinuation by 01 January 2019.

- 4.3.2.3.3 *Recommendation:* All helicopters for which the individual certificate of airworthiness is first issued on or after 1 January 1990, and that are required to be equipped with a CVR, should have a CVR capable of retaining the information recorded during at least the last two hours of its operation.
Less protective or partially implemented or not implemented.
State reference: CAT.IDE.H.185.
Details of Difference: Not implemented.
- 4.3.3.1.2 All helicopters which are modified on or after 1 January 2016 to install and utilize any of the data link communications applications listed in 5.1.2 of Appendix 5 and are required to carry a CVR shall record on a flight recorder the data link communications messages.
Less protective or partially implemented or not implemented.
State reference: CAT.IDE.H.195.
Details of Difference: Not implemented.
- 4.3.4.4 Flight recorders electronic documentation
Recommendation: The documentation requirement concerning FDR parameters provided by operators to accident investigation authorities should be in electronic format and take account of industry specifications.
State reference: CAT.GEN.MPA.195 (d);
Details of Difference: It is not required that the FDR documentation is in electronic format.
- 4.4.4 *Recommendation:* A helicopter when operating in accordance with IFR and which has a maximum certificated take-off mass in excess of 3 175 kg or a maximum passenger seating configuration of more than 9 should be equipped with a ground proximity warning system which has a forward-looking terrain avoidance function.
Less protective or partially implemented or not implemented.
Details of Difference: European rules do not require Ground Proximity Warning system for helicopters.
- 4.5.2.8 *Recommendation:* On any helicopter for which the individual certificate of airworthiness was first issued before 1 January 1991, the provisions of 4.5.2.6 and 4.5.2.7 should be complied with no later than 31 December 1992.
Not applicable.
Details of Difference: The AMC is applicable to all helicopters regardless of the date of issuance of the CofA.
- 4.5.3.2 *Recommendation:* For offshore operations, a survival suit should be worn by all occupants when the sea temperature is less than 10°C or when the estimated rescue time exceeds the calculated survival time. When the elevation and strength of the sun results in a high temperature hazard on the flight deck, consideration should be given to alleviating the flight crew from this recommendation. **Less protective or partially implemented or not implemented.**
State reference: CAT.IDE.H.295; GM1 CAT.IDE.H.295;
Details of Difference: Considerations on sun not included.
- 4.8.4 *Recommendation:* A helicopter intended to be operated at flight altitudes at which the atmospheric pressure is more than 376 hPa which cannot descend safely within four minutes to a flight altitude at which the atmospheric pressure is equal to 620 hPa, and for which the individual certificate of airworthiness was issued before 9 November 1998, should be provided with automatically deployable oxygen equipment to satisfy the requirements of 2.3.8.2. The total number of oxygen dispensing units should exceed the number of passenger and cabin crew seats by at least 10 per cent.
Less protective or partially implemented or not implemented.
Details of Difference: Not implemented.
- 4.15 Vibration health monitoring system
Recommendation: A helicopter which has a maximum certificated take-off mass in excess of 3 175 kg or a maximum passenger seating configuration of more than 9 should be equipped with a vibration health monitoring system.
Less protective or partially implemented or not implemented.
Details of Difference: NPA 2013-10; Req offshore in hostile sea.; NPA 2013-22 Not req. onshore.
- Chapter 6 Helicopter Maintenance
- 6.1.3 When the State of Registry accepts an equivalent system, the person signing the maintenance release shall be licensed in accordance with Annex 1.
Not applicable.

- 6.2.1 Operator's maintenance control manual
The operator shall provide, for the use and guidance of maintenance and operational personnel concerned, a maintenance control manual, acceptable to the State of Registry, in accordance with the requirements of 9.2. The design of the manual shall observe Human Factors principles.
Less protective or partially implemented or not implemented.
State reference: M.A.704 (a) AMC M.A.704 point 4, Appendix V to AMC M.A.704.
Details of Difference: Non-compliance is only identified in relation to the HF Requirement;
RMK: M.A.704 (a) requires to provide the CAME although it is not specified to whom. The AMC requires the personnel to be familiar with the relevant parts of the manual. The manual is approved by the State of Operator, due to mutual recognition is valid for the State of Registry within EASA MS.
- 6.2.4 The operator shall provide the State of the Operator and the State of Registry with a copy of the operator's maintenance control manual, together with all amendments and/or revisions to it and shall incorporate in it such mandatory material as the State of the Operator or the State of Registry may require.
Less protective or partially implemented or not implemented.
State reference: Part-M M.A.704(b), AMC M.A.704 point 6, Appendix V to AMC M.A.704, Part-M M.B.104(b)(8).
Details of Difference: Non-compliance relates to the requirement to provide the manual to the State of Registry if different from the SofO. It is currently required to be approved by the State of Operator; RMK: Within the member States this requirement is compensated by the mutual recognition.
- 6.3 Maintenance programme
- 6.3.1 The operator shall provide, for the use and guidance of maintenance and operational personnel concerned, a maintenance programme, approved by the State of Registry, containing the information required by 9.3. The design and application of the operator's maintenance programme shall observe Human Factors principles.
Less protective or partially implemented or not implemented.
State reference: Part-M M.A.302(b), AMC 145.45(b)(2), Part-145 145.A.47(b).
Details of Difference: Non-compliance is in relation to the requirement for HF in MP design.
RMK: Current Maintenance programme should be provided by the operator as part of the maintenance data in accordance with Part-145. For the application of MP the HF principles are taking into account with 145.A.47 production planning.
- 6.4 Maintenance records
- 6.4.1 **Less protective or partially implemented or not implemented.**
State reference: Part-M M.A.305(h).
Details of Difference: Non-compliance refers to the item f) where only aircraft and service LLP's records in are concerned Part-M.
RMK: Also Part-M requires the Technical Logbook to be kept for 36 months.
- 6.7.2 A maintenance release shall contain a certification including:
a) basic details of the maintenance carried out including detailed reference of the approved data used;
b) date such maintenance was completed;
c) when applicable, the identity of the approved maintenance organization; and
d) the identity of the person or persons signing the release.
Less protective or partially implemented or not implemented.
State reference: 145.A.50 (a), AMC 145.A.50 (b), Block 14b of item 5 of Appendix II to Part-M.
Details of Difference: Non-compliance is identified in relation to the requirement for Certifying.
Personnel identity in the aircraft CRS.
RMK: Partially EASA requirement exceeds ICAO Standard, because of an additional requirement for information on any life or overhaul limitation in terms of date/flying hours/cycles/landings etc.
- Chapter 8 Flight Operations Officer/Flight Dispatcher
- 8.1 *Not applicable*
When the State of the Operator requires that a flight operations officer/flight dispatcher, employed in conjunction with an approved method of control and supervision of flight operations be licensed, that flight operations officer/flight dispatcher shall be licensed in accordance with the provisions of Annex 1.
Not applicable.
State reference: ORO.GEN.110.
Details of Difference: Not implemented.
RMK: No requirement for flight operations officer/flight dispatchers to be licensed.

- 8.2 In accepting proof of qualifications other than the option of holding of a flight operations officer/flight dispatcher licence, the State of the Operator, in accordance with the approved method of control and supervision of flight operations, shall require that, as a minimum, such persons meet the requirements specified in Annex 1 for the flight operations officer/flight dispatcher licence.
Less protective or partially implemented or not implemented.
 State reference: ORO.GEN.110.
 Details of Difference: No detailed requirement for flight dispatchers training.
 RMK: Article 38.
- 8.3 A flight operations officer/flight dispatcher shall not be assigned to duty unless ...
Less protective or partially implemented or not implemented.
 State reference: ORO.GEN.110.
 Details of Difference: No detailed requirement for flight dispatchers training.
 RMK: Article 38.
- 8.4 *Recommendation:* A flight operations officer/flight dispatcher assigned to duty should maintain complete familiarization with all features of the operations which are pertinent to such duties, including knowledge and skills related to human performance.
Less protective or partially implemented or not implemented.
 State reference: ORO.GEN.110, ORO.AOC.135.
 Details of Difference: Not transposed.
- 8.5 *Recommendation:* A flight operations officer/flight dispatcher should not be assigned to duty after 12 consecutive months of absence from such duty, unless the provisions of 8.3 are met.
Less protective or partially implemented or not implemented.
 Details of Difference: Not transposed.

Chapter 9 Manuals, Logs and Records

- 9.2 Operator's maintenance control manual.
Less protective or partially implemented or not implemented.
 State reference: Appendix V to AMC M.A.704, Part 5, 5.6; n/a, Part-M M.A.704(a)(3), Part-M M.A.704(a)(9), Appendix V to AMC M.A.704, Part 1, 1.3, Appendix V to AMC M.A.704, Part 1, 1.5;1.8, Appendix V to AMC M.A.704, Part 1, 1.8, Appendix V to AMC M.A.704, Part 1, 1.6, Appendix V to AMC M.A.704, Part 1, 1.4, Appendix V to AMC M.A.704, Part 1, 1.5, Appendix V to AMC M.A.704, Part 0, 0.2, Appendix V to AMC M.A.704, Part 1, 1.1, 1.8, Appendix V to AMC M.A.704, Part 1, 1.8, Part-M M.A.704(a)(8), Appendix V to AMC M.A.704, Part 0, 0.6.
 Details of Difference: No procedures are foreseen in accordance with item m) because under the AIR OPS in most of the cases Regulation 2042/2003 applies. The Non-compliance could be only in case AMC1 ORO.AOC.110(c) – special continuing airworthiness requirements related to the 'wetlease in' of the aircraft from the 3d country.
- 9.4.2 *Recommendation:* Entries in the journey log book should be made currently and in ink or indelible pencil.
Less protective or partially implemented or not implemented.
 Details of Difference: Not transposed.
- 9.4.3 *Recommendation:* Completed journey log books should be retained to provide a continuous record of the last six months' operations .
Less protective or partially implemented or not implemented.
 State reference: ORO.MLR.115.
 Details of Difference: 3 months storage period required under Reg. 965/2012.

ANNEX 7 – AIRCRAFT NATIONALITY AND REGISTRATION MARKS

(Sixth Edition, July 2012, amd. 7)

- 3 Unmanned free balloons are exempted from registration and therefore have no marks or identification plates.
 4.2
 8
- 7 No centralized register of unmanned free balloons is kept. Launching of free balloons requires prior permission from Swedish Transport Agency.
- 3.6 In the Swedish aircraft register the following three-letter combination exists following the country code SE- TTT, XXX and ZZZ.

ANNEX 8 – AIRWORTHINESS OF AIRCRAFT

(Thirteenth Edition, November 2022, amd. 109)

Part II EASA format only describes category, and not permitted operations.
 Chapter 3.3
 Standard form of Certificates of Airworthiness

Part IVB Not implemented.
 Chapter 4.7
 Ground handling

ANNEX 9 – FACILITATION
 (Sixteenth Edition, July 2022)

No differences.

ANNEX 10 – AERONAUTICAL TELECOMMUNICATIONS
 Volume I (Seventh Edition, July 2018, amd. 93)

Annex 10 vol I
 Amendments up to 92 is implemented in Sweden through national legislation.

Volume II (Seventh Edition, July 2016, amd. 93)

Annex 10 vol II
 Amendments up to 92 is implemented in Sweden through national legislation.

Chapter 1 Definitions
 Definitions according Regulation (EU) No 923/2012 and Regulation (EU) 2017/373.

3.9 Not implemented.

Chapter 5
 5.2.1.4.1 SERA.14035 Transmission of numbers in radiotelephony
 (a) Transmission of numbers (1) All numbers used in the transmission of aircraft call sign, headings, runway, wind direction and speed shall be transmitted by pronouncing each digit separately.
 (i) Flight levels shall be transmitted by pronouncing each digit separately except for the case of flight levels in whole hundreds.
 (ii) The altimeter setting shall be transmitted by pronouncing each digit separately except for the case of a setting of 1000 hPa which shall be transmitted as 'ONE THOUSAND'.
 (iii) All numbers used in the transmission of transponder codes shall be transmitted by pronouncing each digit separately except that, when the transponder codes contain whole thousands only, the information shall be transmitted by pronouncing the digit in the number of thousands followed by the word 'THOUSAND'.
 (2) All numbers used in transmission of other information than those described in point (a)(1) shall be transmitted by pronouncing each digit separately, except that all numbers containing whole hundreds and whole thousands shall be transmitted by pronouncing each digit in the number of hundreds or thousands followed by the word 'HUNDRED' or 'THOUSAND', as appropriate. Combinations of thousands and whole hundreds shall be transmitted by pronouncing each digit in the number of thousands followed by the word 'THOUSAND', followed by the number of hundreds, followed by the word 'HUNDRED'.
 (3) In cases where there is a need to clarify the number transmitted as whole thousands and/or whole hundreds, the number shall be transmitted by pronouncing each digit separately.
 (4) When providing information regarding relative bearing to an object or to conflicting traffic in terms of the 12-hour clock, the information shall be given pronouncing the digits together such as 'TEN O'CLOCK' or 'ELEVEN O'CLOCK'.
 (5) Numbers containing a decimal point shall be transmitted as prescribed in point (a)(1) with the decimal point in appropriate sequence indicated by the word 'DECIMAL'.
 (6) All six digits of the numerical designator shall be used to identify the transmitting channel in Very High Frequency (VHF) radiotelephony communications except in the case of both the fifth and sixth digits being zeros, in which case only the first four digits shall be used.

Chapter 5
5.2.1.7.3.2.3 ICAO Annex 10, Volume II, Chapter 5.2.1.7.3.2.3 is transposed in point SERA.14055 of Implementing Regulation (EU) No 923/2012 with a difference. The difference between that ICAO Standard and that EU Regulation is as follows:
SERA.14055 Radiotelephony procedures
(b) (2) The reply to the above calls shall use the call sign of the station calling, followed by the call sign of the station answering, which shall be considered an invitation to proceed with transmission by the station calling. For transfers of communication within one ATS unit, the call sign of the ATS unit may be omitted, when so authorised by the competent authority.

Volume III (*Second Edition, July 2007, amd. 92*)

Annex 10 vol III
Amendments up to 90 is implemented in Sweden through national legislation.

Volume IV (*Fifth Edition, July 2014, amd. 91*)

Annex 10 vol IV
Amendments up to 90 is implemented in Sweden through national legislation.

Chapter 4

4.3.2 ACAS X provisions not implemented.

4.3.3.3.1.2

4.3.4.2

4.3.4.3.1

4.3.4.3.4.2

4.3.4.6

4.3.4.7

4.3.5.1.2.2

4.3.5.4.2

4.3.5.5.2

4.3.7.1.3

4.3.7.3.4.2

4.3.8.4.2.2.2

4.3.8.4.2.2.3 Not implemented.

4.5.1.6.2 Difference to reduce false alerts for ACAS II ver. 7.1 with hybrid surveillance not implemented

Volume V (*Third Edition, July 2013, amd. 89*)

4.5.1.6.2 No differences.

ANNEX 11 – AIR TRAFFIC SERVICES

(*Fifteenth Edition, July 2018, amd. 53*)

Chapter 1 Definitions according Regulation (EU) No 923/2012 and Regulation (EU) 2017/373.

Chapter 2

2.6.3 A higher speed may be approved by the competent authority for aircraft types which for technical or safety reason cannot maintain the speed limit of 250 kt in airspace class C for VFR flights and in airspace G for IFR and VFR flights.

2.26.5 Time checks shall be given at least to the nearest minute.

Chapter 3

3.3.1 Regulation (EU) No 923/2012). SERA.5010(c) introduces an accurate description of and requirements for special VFR.

3.3.4 Regulation (EU) No 923/2012). SERA.8005(b) in addition to the ICAO provisions requires the agreement of the pilot of the other aircraft, the maintenance of own separation and allow this exception below 3050 m (10000 ft) during climb or descent, during day.

3.7.3.1 Regulation (EU) No 923/2012) In addition to the ICAO standard in point b), point SERA.5015(e)(ii) also includes 'taxi'; in point c), point SERA.5015(e)(iii) also includes 'the newly assigned communication channels'.

- 3.7.3.1.1 Regulation (EU) No 923/2012, paragraph SERA.8015(e)(2), includes 'taxi instructions' in addition to the ICAO requirements to be read back.

Chapter 4

- 4.3.7 Regulation (EU) No 923/2012; SERA.9010(b) of Annex IV (Part-ATS) of Regulation (EU) 2017/373
4.3.8 ATS.TR.230, ATM/ANS.AR.A.015
4.3.9 Braking action will not be provided through ATIS as it is not aligned with the GRF concept, replaced by RCR.

ANNEX 12 – SEARCH AND RESCUE

(Eighth Edition, July 2004, amd. 19)

No differences.

ANNEX 13 – AIRCRAFT ACCIDENT INVESTIGATION

(Twelfth Edition, July 2020, amd. 18)

- 5.12 With regard to the constitutional freedom of information and access public records and
5.12.2 regulation (EU) No 996/2010 of the European parliament and of the Council of 20 October
5.12.3 2010 on the investigation and prevention of accidents and incidents in civil aviation and
5.12.4 repealing Directive 94/56/EC, Sweden will not be able to ensure non-disclosure of recordings,
5.12.4.1 transcripts of recordings and names of persons in every case.
5.12.5
5.12.6

ANNEX 14 – AERODROMES

(Ninth Edition, July 2022)

- 1.1 Arresting system
Definitions of arresting system not incorporated in national regulation. Will be changed in the coming revision of national regulations.
- Autonomous runway incursion system
Definitions of autonomous runway incursion system not incorporated in national regulation. Will be changed in the coming revision of national regulations.
- Foreign object debris (FOD)
Definitions of FOD not incorporated in national regulation. Will be changed in the coming revision of national regulations.
- Hot spot
Definitions of hot spot not incorporated in national regulation. Will be changed in the coming revision of national regulations.
- Instrument runway
Revised definitions for instrument runway as a result of a new approach classification not incorporated. Will be changed in the coming revision of national regulations.
- Non-instrument runway.
National definition state “continue VFR” instead of “continue in visual meteorological conditions”. Will be changed in the coming revision of national regulations.
- 2.6 Strength of pavements.
National regulations in accordance with the previous A14 standards.
RMK. Will be changed in the coming revision of national regulations.
- 3.1.26 Texture depth.
National regulation 0.8 mm.
RMK. Will be changed in the coming revision of national regulations.
- 3.4.7 Runway strips.
For air navigation or “for aircraft safety purposes” frangibility.
RMK. Will be changed in the coming revision of national regulations.
- 3.5.3 Dimensions of RESA.
Or a reduced length when an arresting system is installed.
RMK. Will be changed in the coming revision of national regulations.
- 5.2.8.9 National regulations in accordance with previous A14 standards.
RMK. Will be changed in the coming revision of national regulations.

ANNEX 15 – AERONAUTICAL INFORMATION SERVICES

(Sixteenth Edition, July 2018, amd. 43)

Revisions according amendment 43 will be implemented in conjunction to updated EU-regulation.

- 4.1.1 Contents in AIP AD-section concerning dimensions of runway end safety areas and location and description of arresting system are not provided.
- 5.3.3.3.2 Electronic terrain data and electronic obstacle data is not provided in Area 1.
- 5.3.3.3.8 Electronic terrain and obstacle data is not provided in Area 4.

ANNEX 16 – ENVIRONMENTAL PROTECTION

Volume I *(Eighth Edition, 2017 amd. 13)*

Volume II *(Fourth Edition, 2017, amd. 10)*

Volume III *(First Edition, 2017, amd. 1)*

Volume IV *(First Edition, 2018, amd. 1)*

- 1.6 The Swedish registered aircraft not under EASA responsibility but holding an ICAO CoA do not have the uniform numbering required by this paragraph on their noise certificate.

ANNEX 17 – SECURITY – SAFEGUARDING INTERNATIONAL CIVIL AVIATION AGAINST ACTS OF UNLAWFUL INTERFERENCE

(Twelfth Edition, November 2022, amd. 18)

No differences.

ANNEX 18 – THE SAFE TRANSPORT OF DANGEROUS GOODS BY AIR
(Fourth Edition, July 2011, amd. 12)

- 11.4 *Recommendation:* No detailed provisions for postal operators are implemented. However, Postal Operators needs an approval and are subject to oversight by the Swedish Transport Agency. Detailed provisions for Postal Operators are expected in the next couple of years. **Less protective or partially implemented or not implemented.**

ANNEX 19 – SAFETY MANAGEMENT
(Second Edition, July 2016)

- Chapter 1. Industry codes of practice. Less protective: No formal definition.
Definitions Operational personnel. Less protective: No formal definition.
Safety, Safety performance, Safety performance indicator, safety performance target. Less protective:
No formal definition.

Doc 4444 – PANS-ATM – Procedures for Air Navigation Services – Air Traffic Management.
(Sixteenth Edition, 2016, amd. 12)

Revisions according amendment 12 will be implemented in conjunction to updated EU-regulation.

Chapter 6

- 6.3.2.4 Phraseology regarding clearance for SID and STAR is not implemented.
6.5.2.4 Phraseology regarding clearance for SID and STAR is not implemented.

Chapter 12 Aerodrome information

- 12.3.1.11.a Phraseology regarding aerodrome information also include SLIPPERY WET and SPECIALLY PREPARED WINTER RUNWAY
12.3.1.2 Phraseology regarding clearance for SID and STAR is not implemented.
z) to kk)

- Appendix 1 Runway braking action not reported according Regulation (EU) No 923/2012
1. Reporting instructions APPENDIX 5 TECHNICAL SPECIFICATIONS RELATED TO AIRCRAFT OBSERVATIONS AND REPORTS BY VOICE COMMUNICATIONS, Section 3.
MODEL
AIREP
SPECIAL
Section 3

Doc 8168 – PANS-OPS – Procedures for Air Navigation Services – Aircraft operations.

- Vol I The European rules on Air Operations do not yet address the new ICAO approach classification. Sweden is awaiting future amendments to the European rules on Air Operations. No differences are expected at the end of 2020. **Less protective or partially implemented or not implemented.**
- Vol II Part I General. Section 3. Departure procedures. Chapter 3 departure routes.
(Seventh Edition, 2020, amd. 9.)
- 3.1 General.
3.1.2 b) *The dead reckoning leg of turning departures may exceed 10KM (5.4NM) after turns before track guidance can be expected. The distance approved will be decided individually for each case and published on the approach chart.*

- 3.3 Turning departures.
 3.3.4 Turn parameters, f) bank angle:
Nominal track for turn may be based on maximum bank angle 25° at all altitudes, if the PDG used in the design is at least 6,6 %. Nominal tracks for turns can be used to illustrate a probable route, but are never used for obstacle clearance purposes. Sufficient obstacle clearance is always protected for, based on calculations using PDG 3,3 % alternatively the required minimum PDG for the actual SID, and the less bank angle for the corresponding altitude.

Part I General. Section 4. Arrival and approach procedures. Chapter 2 Arrival segment.

- 2.1 STANDARD INSTRUMENT ARRIVALS
 2.1.1 General
 2.1.1.5 *STAR procedures may end at FAF or FAP.*

Part I General. Section 4. Arrival and approach procedures. Chapter 3 Initial approach segment.

- 3.1 GENERAL
 3.1.3 *The dead reckoning leg for initial approach segment may exceed 19 KM (10 NM) after turns before track guidance can be expected. The distance approved will be decided individually for each case and published on the relevant approach chart.*

Part I General. Section 4 Arrival and approach procedures. Chapter 4 Intermediate approach segment.

- 4.3 INTERMEDIATE APPROACH SEGMENT BASED ON A STRAIGHT TRACK ALIGNMENT
 4.3.1 AREA
 4.3.1.1 *Length*
 4.3.1.1.1 *Intermediate approach segments may be shorter than the specified minimum distances. There is always a flat segment of minimum 1 NM for Cat A and B aircraft, 1,5 NM for Cat C and D aircraft for non-precision approaches, and 2 NM for all categories of aircraft for precision approaches.*

Part I General Section 4 Arrival and approach procedures. Chapter 5 Final approach segment.

- 5.4 OBSTACLE CLEARANCE ALTITUDE/HEIGHT (OCA/H)
 5.4.1.3 *Non-precision approach procedure (straight-in), b) Reference datum.*
OCH for non-precision approaches is always referenced to the RWY THR elevation, even when the THR ELEV is less than 2 m (7 ft) below the AD ELEV.

- 5.4.6.5 Penetration of visual segment surface may, as a complement to publication in AD 2.23, be promulgated with a note on the instrument approach chart saying: "VSS penetrated. See AD 2.23".

Vol II Part II Conventional Procedures, Section 1 Precision Approaches. Chapter 1 instrument landing systems (ILS).

Table Minimum distance between localizer and glide path interceptions.

II-1-1-1

Minimum distance 2 NM between localizer and glide path interceptions may be applied also for CAT C/D/E at intercept angles up to 90 degrees (or within reversal or racetrack).

Vol III Aircraft Operating Procedures

Section 10 The European provisions on Air Operations meets the same objectives but do not address ICAO provisions on
 Chapter 2 the ICAO repository - Location of an Aircraft in Distress Repository (LADR).

Doc 9868 – PANS-TRG – Procedures for Air Navigation Services – Training
 (Third Edition, 2020, amd. 7)

PANS-TGR UPRT application
 RMK. Differences regarding the UPRT application will exist on 13 November 2014 between the provisions of the PANS-TGR documents and the existing EU-regulations (Commission Regulation (EU) No 1178/2011) and practises (additional AMC and GM).

Doc 10066 – PANS-AIM Aeronautical Information Management
 (First Edition, 2018, amd. 3)

Revisions according amendment 3 will be implemented in conjunction to updated EU-regulation.

Chapter 5 According EU regulation (EU) 2017/373

- 5.2.1.1.3 When the AIP data set (as specified in 5.3.3.1) is provided, the following sections of the AIP may be omitted and reference to the data set availability shall be provided:
- a) GEN 2.5 List of radio navigation aids;
 - b) ENR 2.1 FIR, UIR, TMA and CTA;
 - c) ENR 3.1 Lower ATS routes;
 - d) ENR 3.2 Upper ATS routes;
 - e) ENR 3.3 Area navigation routes;
 - f) ENR 3.4 Helicopter routes;
 - g) ENR 3.5 Other routes;
 - h) ENR 3.6 En-route holding;
 - i) ENR 4.1 Radio navigation aids — en-route;
 - j) ENR 4.2 Special navigation systems;
 - k) ENR 4.4 Name-code designators for significant points;
 - l) ENR 4.5 Aeronautical ground lights – en-route;
 - m) ENR 5.1 Prohibited, restricted and danger areas;
 - n) ENR 5.2 Military exercise and training areas and air defence identification zone (ADIZ);
 - o) ENR 5.3.1 Other activities of a dangerous nature;
 - p) ENR 5.3.2 Other potential hazards;
 - q) ENR 5.5 Aerial sporting and recreational activities;
 - r) ****AD 2.17 Air traffic services airspace;
 - s) **** AD 2.19 Radio navigation and landing aids;
 - t) **** AD 3.16 Air traffic services airspace; and
 - u) **** AD 3.18 Radio navigation and landing aids.

Appendix 1 According EU regulation (EU) 2017/373
Appendix 1 to Annex III

Table A1-1 1. Aerodrome data
Table A1-3 3. ATS Route
Table A1-5 5. Radio navigation aids/systems data

Appendix 2 According EU regulation (EU) 2017/373
PART 2 — Appendix 1 to Annex III
EN-ROUTE PART 2 – EN-ROUTE (ENR)
(ENR)

Appendix 2 According EU regulation (EU) 2017/373
PART 3- Appendix 1 to Annex III
AERODRO- PART 3 – AERODROMES (AD)
MES (AD)
AD 2.19

Appendix 2 According EU regulation (EU) 2017/373
PART 3 — Appendix 1 to Annex III
AERODRO- PART 3 – AERODROMES (AD)
MES (AD)

AD 2.25 Not implemented