

Alternative Means of Compliance



Compliance Monitoring Manager (CMM) and Safety Manager (SM) *AltMoC No. IT-APT.LIME 001*

This document is an Alternative Means of Compliance (AltMoC) issued by ENAC in accordance with Reg. (EU) n. 139/2014, ADR.OR.D.005 Management System, point (b)(11).

Regulatory reference:	
Regulation (EU) n. 139/2014	
Rule paragraph(s)	ADR.OR.D.005 Management System, point (b)(11) AMC2 ADR.OR.D.005 (b)(11) Management System, point (a)(2)

List of Effective Pages:		
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1	Rev.0	10 th June 2019
2	Rev.0	10 th June 2019
3	Rev.0	10 th June 2019

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1	<i>Full description of the AltMoC, which includes reasoning of the AltMoC</i>
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In Bergamo airport (LIME) CMM and SMS functions are performed by the same person, but a functional separation between CMM and SM activities has been assured by the aerodrome operator organization (S.A.C.B.O. S.p.A.).

The independence between CMM and SMS functions has been established by ensuring that audit and inspections are carried out by personnel not responsible for the function, procedure, etc., being audited by an external organization (independent company/external audit) other than S.A.C.B.O. S.p.A.

2	<i>Assessment demonstrating that the IR(s) are met</i>
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A risk assessment has been conducted by the aerodrome operator to demonstrate that related IRs are met.



3 Regulatory wording of the used AltMoC

The text of the AltMoC is the following:

RESPONSIBILITY FOR COMPLIANCE MONITORING

(a) The responsibility for the compliance monitoring should:

(1) be with a person who has direct access to, and is responsible to the accountable manager;

(2) not be with one of the persons referred to in ADR.OR.D.015(b).

The responsibility for the compliance monitoring could be with a person referred to ADR.OR.D.015 (c).

In the case the person responsible for the compliance monitoring acts also as safety manager, the accountable manager should ensure that:

- sufficient resources are allocated to both functions, taking into account the size of the aerodrome operator, and the nature and complexity of its activities;

- the organizational unit clearly defines:

(i) the tasks to be performed by the Safety Management System;

(ii) the tasks to be performed by the Compliance Monitoring System;

- audits and inspections to verify the compliance of the Safety Management System and Compliance Monitoring System are carried out by personnel not responsible for the function, procedure, etc. being audited by an external organization (independent company/external audit).

A defined audit schedule to be completed during a specified calendar period and a periodic review cycle for each area should be established in coordination with the Competent Authority.

In order to demonstrate that the Implementing Rules are met, a safety (risk) assessment should be completed and documented. The result of this safety (risk) assessment should demonstrate that the equivalent level of safety is reached.