Guide to SMS for Part 135

Who is subject to Part 5?

14 CFR Part 5 now applies to those operating under Part 135, Part 91.147, and Part 119.8. Some Part 135 operators may be exempt from specific elements of Part 5, but Part 5 applies to ALL Part 135 operators.

Sole Individual Operation

"Sole Individual Operation" only applies to organizations with a single pilot who is the sole individual performing ALL necessary functions in the conduct and execution related to, or in direct support of, the safe operation of the aircraft.

This does not necessarily include all single pilot aircraft operators. Some single pilot aircraft operators may use additional personnel to support the safe operation of the aircraft, such as a scheduler or administrative assistant, and would not qualify as a Sole Individual Operation.

Regulatory Breakdown

Which sections apply to me? What do I need to know about those sections?

Part 5 is broken up into 6 Subparts

Subpart A: General	Applicability and timeline for compliance.
Subpart B: Safety Policy	How you will show commitment to safety by documenting it in a company policy.
Subpart C: Safety Risk Management	The process you will follow to document, analyze, and respond to safety issues.
Subpart D: Safety Assurance	How you will monitor safety to ensure what you are doing is working.
Subpart E: Safety Promotion	What you will do to ensure everyone in your organization is aware of and able to participate in your SMS.
Subpart F: SMS Documentation and Recordkeeping	What SMS related documents and records you need to keep.

This chart only shows content relevant to Part 135 operators, and does not include items relevant to Parts 91.147, 119.8, or 21.
Note: Part 5, like many CFRs, skips even number sections. You will see items for sections 5.1; 5.3; 5.5, etc., but will not see items for section 5.2; 5.4; 5.6, etc. as they do not exist.

	Section Reference Plain Language Explanation	Examples	Part 135	Part 135 Sole Individual Operation
Subpart A—General	**5.1 Applicability** Part 5 now additionally applies to all Part 135 operators. Some Part 135 operators may be exempt from specific elements of Part 5, but Part 5 does apply to ALL Part 135 operators.	No specific action examples.	✓	✓

Section Reference Plain Language Explanation	Examples	Part 135	Part 135 Sole Individual Operation
5.3 Definitions n/a	No specific action examples.	✔	✔
5.5 General requirements The minimum components of an SMS required under Part 5 are: • Safety policy • Safety risk management • Safety assurance • Safety promotion	We will review each of these parts later in this chart as they correspond to the Subparts of Part 5. Part 5, Subpart B Part 5, Subpart C Part 5, Subpart D Part 5, Subpart E	✔	✔
5.7 Requirements for domestic, flag, and supplemental operations Most of this section is only applicable to Part 121. There is one universally applicable item that states you are required to provide any information and data necessary to the Administrator to demonstrate your compliance with Part 5. Note: The likely intent of this section was to apply to 121 operations only, however the way the section is written allows for interpretation of applicability to 135. This is not problematic as the item is repeated in the next section which is more clearly applicable to Part 135.	No specific action examples.	✔	✔

Subpart A—General

	Section Reference Plain Language Explanation	Examples	Part 135	Part 135 Sole Individual Operation

Subpart A—General	**5.9 Requirements for commuter and on-demand operations or passenger-carrying flights for compensation or hire**
	
	The timeline for required compliance with Part 5 for Part 135 operators is as follows.
	
	→ **If before 5/28/2024** you already held an authorization to conduct operations under Part 135.
	
	  THEN
	  No later than 5/28/2027
	  • You must develop and implement a compliant SMS.
	  • You must submit a declaration of compliance.
	→ **If on or after 5/28/2024** you have an authorization pending or apply for an authorization to operate under Part 135.
	
	  THEN
	  • You must develop and implement a compliant SMS.
	  • Note there is no grace period, and this requirement is applicable starting 5/28/2024.
	
	→ **Additionally:**
	  • You must maintain your SMS so long as you are authorized to conduct operations under Part 135.
	  • You must furnish information and data to the Administrator, upon request, to demonstrate compliance with Part 5.
	  • If you are the pilot of a single pilot aircraft and the sole individual performing all necessary functions related to the safe operations of the aircraft, then you are exempt from:
	  §§ 5.21(a)(4), 5.21(a)(5), 5.21(c), 5.23(a)(2), 5.23(a)(3), 5.23(b), 5.25(b)(3), 5.25(c), 5.27(a), 5.27(b), 5.71(a)(7), 5.93, and 5.97(d)
		No specific action examples.	✔	✔

Subpart A—General

Section Reference Plain Language Explanation	Examples	Part 135	Part 135 Sole Individual Operation
5.11 Requirements for production certificate holders that are holders or licensees of a type certificate for the same product This section is only applicable to Part 21 production certificate holders, it does not apply to Part 135 operators.	n/a	⊗	⊗
5.13 Requirements for type certificate holders or licensees applying for a production certificate for the same product This section is only applicable to Part 21 production certificate holders, it does not apply to Part 135 operators.	n/a	⊗	⊗
5.15 Requirements for type certificate holders that allow another person to use the type certificate to obtain a production certificate for the same product This section is only applicable to Part 21 production certificate holders, it does not apply to Part 135 operators.	n/a	⊗	⊗
5.17 Organizational system description This section is only applicable to Part 21 production certificate holders, it does not apply to Part 135 operators.	n/a	⊗	⊗

	Section Reference Plain Language Explanation	Examples	Part 135	Part 135 Sole Individual Operation
Subpart A—General	**5.19 Implementation plan** This section is only applicable to Part 21 production certificate holders, it does not apply to Part 135 operators.	n/a	✖	✖

	Section Reference Plain Language Explanation	Examples	Part 135	Part 135 Sole Individual Operation
Subpart B—Safety Policy	**5.21 Safety policy** You are required to have a safety policy.		✔	✔ With differences Items with darker grey background are NOT applicable.
	This safety policy must include: • Safety objectives. • Commitment to fulfill the safety objectives.	You should clearly state: • Who will be responsible for coming up with your safety objectives • How they will be communicated • How they will be measured Additionally, ensure that your safety objectives will be visible and easily identified by everyone in the department. This may be a lot to put into the Safety Policy, so you can put a simpler statement here and refer to a section of your SMS procedures where the details are outlined.		
	• Statement about the provision of necessary resources to implement the SMS.	A statement to your organization that your accountable executive will put forth the appropriate resources to implement and execute the SMS.		
	• An ERP.	State that you have an ERP and where it can be found.		

Section Reference Plain Language Explanation	Examples	Part 135	Part 135 Sole Individual Operation
5.21 Safety policy			

Subpart B—Safety Policy

Section Reference	Examples	Part 135	Part 135 Sole Individual Operation
• A code of ethics that states safety is the organization's highest priority.	List the ways your organization is demonstrating that safety is their highest priority. This may include: • Development of the SMS in compliance with Part 5. • A goal to achieve the highest standards for safety.	✔	✔ With differences Items with darker grey background are NOT applicable.
• A reporting policy. • Employee requirements for reporting of hazards/issues.	Clarify the overall expectation of behavior surrounding reporting. This may include things like: • The requirement to report hazards. • All reports will be investigated. • Timely feedback will be provided for all reports.		
• Unacceptable behavior. • Conditions for disciplinary action.	Often a statement that best practices will be followed as well as the requirement to act in good faith. It is important to state clearly that there will not be disciplinary action for reporting hazards. However, equally important is to be clear that willful or negligent actions are not protected and will be subject to disciplinary action.		
The safety policy must be: • Signed by the Accountable Executive.	See section 5.25 for who can be an "Accountable Executive". For sole individual operators, this would be yourself.		

Subpart B—Safety Policy

Section Reference Plain Language Explanation *5.21 Safety policy*	Examples	Part 135	Part 135 Sole Individual Operation
• Regularly reviewed by the Accountable Executive for relevance.	Review the safety policy annually to ensure it is still appropriate. Changes may include: • How reports will be handled • Location of ERP	✓	✓ With differences Items with darker grey background are NOT applicable.
• Documented. • Communicated throughout the organization.	This may be written up in an SMS manual, GOM, or any other document form. The document/content should be made available to all team members and communications, such as an email, should be made to notify the team to review the policy.		

Subpart B—Safety Policy

Section Reference Plain Language Explanation	Examples	Part 135	Part 135 Sole Individual Operation
5.23 Safety accountability and authority The safety policy must also state the accountability of the following roles:		✓	✓ With differences Items with darker grey background are NOT applicable.
• Accountable executive	See section 5.25 for who can be an "Accountable Executive". For sole individual operators, this would be yourself.		
• All members of management. • Employees.			
Management responsibilities addressed must at minimum include: • Hazard identification. • Safety risk assessment. • Assuring effectiveness of safety risk controls. • Promoting safety. • Advising the Accountable Executive on SMS performance and areas for improvement.	List which role(s) will be accountable for and have authority over each function. This may be broadly addressed that "Management" will have responsibility or by specific role titles.		
The safety policy must also state who has the authority to make decisions regarding safety risk acceptance.	For multi-person operations this may be one or more roles such as Director of Aviation, Safety Officer, etc. For sole individual operators, this would be yourself.		

Section Reference Plain Language Explanation	Examples	Part 135	Part 135 Sole Individual Operation

Subpart B—Safety Policy

5.25 Designation and responsibilities of required safety management personnel

You must designate an Accountable Executive.

The Accountable Executive must be someone who:
- Is the final authority over operations of the organization.
- Controls the financial resources required for the operation.
- Controls the human resources required for the operation.
- Retains ultimate responsibility for the safety performance of the operation.

The Accountable Executive is responsible for:
- Ensuring the SMS is:
  - Implemented.
  - Performing across all pertinent areas.
- In regard to the safety policy:
  - Developing the policy.
  - Signing the policy.
  - Communicating the policy.
  - Regularly reviewing the policy.
- Regularly reviewing the safety performance.
- Directing actions required to address substandard safety performance.

Examples

No specific action examples.

Part 135: ✓

Part 135 Sole Individual Operation: ✓

With differences

Items with darker grey background are NOT applicable.

Subpart B—Safety Policy

Section Reference Plain Language Explanation *5.25 Designation and responsibilities of required safety management personnel*	Examples	Part 135	Part 135 Sole Individual Operation

The Accountable Executive must designate sufficient management personnel. Designated management personnel will be responsible for:
• Coordinating implementation, maintenance, and integration of the SMS.
• Facilitating:
  • Hazard identification.
  • Safety risk analysis.
• Monitoring the effectiveness of safety risk controls.
• Ensuring safety promotion.
• Regularly reporting to the accountable executive:
  • Performance of the SMS.
  • Needs for improvement.
		✓	✓
			
			With differences
			
			Items with darker grey background are NOT applicable.

5.27 Coordination of emergency response planning An Emergency Response Plan (ERP) must be developed. The ERP must address at least the following: • How the ERP will coordinate with the ERPs of other organizations the operator would interface with during an emergency. • How emergency authority is delegated throughout the organization. • Assignment of employee responsibilities during an emergency.	You will need to develop an ERP as either a standalone document or incorporated into your GOM. Since the ERP should be a document that is readily available and one that anyone can use, we generally recommend this be a standalone document. The ERP should cover the breadth of emergencies your department may face, this may include, but is not limited to: - Natural disasters - Passenger missing or arrest - Bomb threats - Medical emergencies Appropriate assignment of duties may depend heavily on each emergency situation. You may want to consider a process for listing the roles and, at the time of emergency, writing in names and details.	✓	✓ With differences Items with darker grey background are NOT applicable.

	Section Reference Plain Language Explanation	Examples	Part 135	Part 135 Sole Individual Operation
Subpart C—Safety Risk Management	**5.51 Applicability** (At a minimum, when you need to conduct an analysis to identify hazards) You must apply safety risk management any time you: • Implement a new system. • Revise an existing system.	Any time you implement a new or change an existing process. This may include things like: • Use of new equipment like an aircraft tug. • Starting to use contract personnel. • Change in scheduling software.	✔	✔
	• Develop new operational procedures.	New procedures will often go hand in hand with the implementation of or change to systems. The key is anytime you are changing or creating new procedures in your manuals, pair that with the basic analysis process defined by your SMS.		
	• Identify hazards.	Any time you realize you are facing something new or something existing has changed. You may identify these in the moment, through a safety risk profile analysis or risk assessment, and include things like: • Introduction of new equipment or software to your department. • Loss of personnel, increasing workloads. • Increased congestion at your home FBO.		

Subpart C—Safety Risk Management

Section Reference Plain Language Explanation	Examples	Part 135	Part 135 Sole Individual Operation
5.51 Applicability			
• Identify ineffective risk controls.	Any time you put something in place to address a risk and see that change is not having the intended effect. You may identify this upon the risk happening again or during a review of your safety data if you see unexpected trends, such as: • Increasing or stable fatigue factors selected during risk assessments despite the implementation of using contract personnel to improve workloads. • Increasing reports of flight delays despite using new taxi request procedures to circumvent construction work at your home airport.	✓	✓
5.53 System analysis and hazard identification (Requirements for how you analyze the items specified in § 5.51 or during any other safety risk management analysis) You must analyze: • New systems • Existing systems • Operational procedures • Identified hazards • Identified ineffective risk controls This analysis must be used to identify hazards associated with these items that are further evaluated with the SMS to determine risks and implement appropriate mitigations.	Be clear in your procedures about when you should be conducting an analysis and list these items directly in your SMS guidance. You should add descriptions and examples to help provide clarification for each instance. Ultimately your procedures should cover the situations in section 5.51 and any other time something changes with your department.	✓	✓

Subpart C—Safety Risk Management

Section Reference Plain Language Explanation *5.53 System analysis and hazard identification*	Examples	Part 135	Part 135 Sole Individual Operation
When conducting your analysis of these items you must consider: • Function and purpose of the item. • The operating environment of the item. • An outline of the item's processes and procedures. • The personnel, equipment, and facilities necessary for the item. • Interfaces with the item.	When you create your procedures, it will be helpful to list these questions and any others you feel should be asked about the event/change. Be thorough, as well thought out questions will make later steps easier as you consider risks and mitigations.	✓	✓
You must develop and maintain processes for the above analysis to identify hazards.	Don't be shy about setting a process. If you later find that something about the process doesn't work for you, then you can make revisions. The process is not set in stone and should, in fact, change as your operation changes.		

Section Reference Plain Language Explanation	Examples	Part 135	Part 135 Sole Individual Operation

Subpart C—Safety Risk Management

5.55 Safety risk assessment and control

(How you determine risks associated with the hazards identified in your 5.53 analysis and develop and implement mitigations)

You must develop and maintain a process for determining the risk of items after conducting the § 5.53 analysis.

Your process must include a way to:
• Determine an acceptable safety risk.
• Develop and maintain safety risk controls (mitigations).
• Evaluate if the risk will be acceptable with proposed mitigations, without having to actually implement the mitigations to make that determination.

		✔	✔

After identifying hazards in the previous step, you are now going to determine risks associated with the hazards.

Hazards = Elements of situations that could lead to the bad outcomes.
• Congested ramps/hangars
• High density airspace operations
• Unusual crew workload

Risks = The bad outcomes that could happen that may result in damage, injury, or death.
• Mid-air collision
• Collison with hangar door
• Slip and fall
• Loud noise exposure

Your procedures may include activities like:
• Brainstorming scenarios
• Identifying "bad" things that could happen
• Using a severity and likelihood matrix to determine risk level

Subpart C—Safety Risk Management

Section Reference Plain Language Explanation	Examples	Part 135	Part 135 Sole Individual Operation
5.57 Notification of hazards to interfacing persons During your safety risk assessment if you identify a hazard and there is a third person or entity that: • Has the ability to contribute to your organization's safety. • To the best of your knowledge, could address the hazard or mitigate the risk. They are considered an "interfacing person" and you are required to inform that person/entity of the hazard. "Interfacing Persons" may be any organization that you do business with, such as an FBO, repair station, airport, or aircraft manufacturer. Your passengers may not be considered an interfacing person, as they generally do not hold responsibility for nor participate in the safe operation of the aircraft — beyond the request to listen to crewmember instructions.	Your procedures should include: • The conditions under which interfacing persons will be contacted. • The preferred methods of contact. • The information that should be included in the communications. Remember that the interfacing persons may be persons inside or outside of your organization.	✓	✓

Section Reference Plain Language Explanation	Examples	Part 135	Part 135 Sole Individual Operation

5.71 Safety performance monitoring and measurement

You must develop and maintain a process to collect data to monitor your safety. The procedures you develop must include at least a way to:
- Monitor:
  - Operational processes
  - Operational environment changes
- Audit operational processes and systems
- Evaluate the SMS
- Investigate:
  - Incidents
  - Accidents
  - Reports of potential non-compliance with regulations and/or safety risk controls
  - Reports received from external sources
- Analyze the data collected
- Allow for confidential employee reporting of hazards, issues, concerns, occurrence, incidents, and potential solutions.

Document how you will record your data:
- On paper
- Spreadsheet
- Software system

Ensure your procedures stipulate how you will investigate each report and analysis:
- Who will review reports/analysis
- Required response times based on report risk level

Include in your steps that you will analyze data and review for trends.

If you are a sole individual operator the role assignments are less important, but you should still specify response times for yourself and review of data for trends.

Lastly you should determine an interval and basic process for conducting internal audits. We generally recommend small audits throughout the year as these are often more achievable for departments rather than disrupting their operation with one large audit a year.

Part 135: ✓

Part 135 Sole Individual Operation: ✓

With differences

Items with darker grey background are NOT applicable.

Section Reference Plain Language Explanation	Examples	Part 135	Part 135 Sole Individual Operation
5.73 Safety performance assessment You must track and assess your progress toward your safety objectives. In doing this you must assess at least: • Compliance with safety risk controls (mitigations). • The performance of the SMS. • Effectiveness of safety risk controls (mitigations). • Identify: • Safety risk controls that are not working as expected. • Changes in the operational environment. • New hazards. If you discover ineffective safety risk controls or identify new hazards you must use the Safety Risk Management process to evaluate these. (Your procedures from 5.53, 5.55, and 5.57)	Have procedures written up that explain how you will go back to the mitigations you put into place and review related data to determine if the trends you see are showing improvement. Also, include a time and process for reviewing the overall safety of the operation and any improvements or continuing issues. This is commonly done during an annual review and involves reviewing all reports submitted and determining any commonalities or trends among them. This is also a good time to update your initial overall analysis of your department's hazards, risks, and mitigations.	✔	✔
5.75 Continuous improvement You must have procedures developed for correcting safety performance issues identified when you assess your progress toward your safety goals or during any other assessment of your SMS.	For corrections you can follow very similar procedures you already have established for the initial process of identifying hazards, risks, and developing mitigations. You may want to consider adding in an additional step of looking at the data to determine if there are additional risks you didn't take into account the first time or other mitigations that could be more effective.	✔	✔

Subpart D—Safety Assurance

Section Reference Plain Language Explanation	Examples	Part 135	Part 135 Sole Individual Operation
5.91 Competencies and training Everyone in your organization must be trained sufficiently so that they are able to perform their duties as it relates to your SMS.	Include a statement in your policies that all personnel will be trained on the company SMS. If you are a sole individual operation, this provision still applies and you should be trained on your SMS of course. Your commitment to SMS will be key to establishing a strong safety culture and to demonstrating your compliance with Part 5. SMS training should be taken seriously, completed on a recurrent basis, and organizations should ensure their teams are appropriately absorbing the content. Records of training, quizzing, and surveys can help demonstrate your efforts. If you find team members are deficient, then you should have procedures in place to perform additional training and retesting. If you are a sole individual operation, then be sure to still take quizzes. If you can get a third party to generate the quizzes for you that is best, if not, then try to make them and wait a while before taking them. The key is to make sure you and/or your team really does know what is required of you in relation to SMS, the tools used to support your SMS, and how to look up SMS processes and procedures.	✔	✔

Subpart E—Safety Promotion

	Section Reference Plain Language Explanation	Examples	Part 135	Part 135 Sole Individual Operation

Subpart E—Safety Promotion	**5.93 Safety communication**
	
	You must have a process for communicating SMS and safety information.
	
	This process must be built so at a minimum the information communicated:
	• Ensures employees are aware of the following SMS items relevant to their responsibilities:
	  • Policies
	  • Processes
	  • Tools
	• Conveys hazard information relevant to employee responsibilities.
	• Explains why:
	  • Safety actions were taken.
	  • Safety procedures are introduced.
	  • Safety procedures are changed.
		Mention in your procedures how everything related to your SMS will be communicated. This may include things like:
		• Making your SMS manual available on a digital drive accessible to all personnel
		• Providing initial and recurrent training on SMS policies and software
		• How policy and procedure updates will be sent and made available to personnel
		
		List the elements that safety communication must include.
			✅	❌

Subpart F—SMS Documentation and Recordkeeping

Section Reference Plain Language Explanation	Examples	Part 135	Part 135 Sole Individual Operation
5.95 SMS documentation You must document and maintain the following: • Your safety policy • Your SMS processes / procedures	We suggest keeping your safety policy in your SMS manual that contains your processes and procedures.	✓	✓
5.97 SMS records You must keep records of the following: Your Subpart C (Safety Risk Management) Activities What you need to keep: • Your analysis of systems and hazards. • Your application and monitoring of risk controls. • Notifications of interfacing persons. Duration: • So long as the related risk control remains relevant to the operation. Your Part D (Safety Assurance) Activities What you need to keep: • Safety performance monitoring • Safety performance assessment • Corrections made to safety performance issues Duration: • A minimum of 5 years.	Whenever possible it is easiest to keep all of your SMS documentation in one location, whether you execute your SMS via paper, digital documents, or software systems. If you can apply a file system, then adding a minimum date through which you must keep the records to the folder name can help prevent accidental deletions. However you plan on keeping your documentation, you might want to consider adding this to your SMS manual procedures so everyone is aware of where everything is kept. Even if you are a sole individual operation you may still want to have this documented just in case you forget.	✓	✓

Subpart F—SMS Documentation and Recordkeeping

Section Reference Plain Language Explanation *5.97 SMS records*	Examples	Part 135	Part 135 Sole Individual Operation

Records of Training
What you need to keep:
• Any training conducted for employees to ensure they are able to perform their duties as it relates to your SMS.
Duration:
• So long as that person is employed by your organization.
 	
Safety Communications
What you need to keep:
• Communications made to ensure employees are aware of the following SMS items relevant to their responsibilities:
  • Policies
  • Processes
  • Tools
  • Conveys hazard information relevant to employee responsibilities.
• Communications made to explain why:
  • Safety actions were taken.
  • Safety procedures are introduced.
  • Safety procedures are changed.
Duration:
A minimum of 24 consecutive calendar months.
 	
Communications to Interfacing Persons
What you need to keep:
• A record of your notification of hazards to interfacing persons.
Duration:
• A minimum of 24 consecutive calendar months.
	Whenever possible it is easiest to keep all of your SMS documentation in one location, whether you execute your SMS via paper, digital documents, or software systems.
	
	If you can apply a file system, then adding in a minimum date through which you must keep the records to the folder name can help prevent accidental deletions.
	
	However you plan on keeping your documentation, you might want to consider adding this to your SMS manual procedures so everyone is aware of where everything is kept. Even if you are a sole individual operation you may still want to have this documented just in case you forget.
		✓	✓
			
			With differences
			↓
			Items with darker grey background are NOT applicable.

Example

The regulations can be hard to translate into your day-to-day operations, so let's walk through an example showing what you would do for each step of your SMS and how that matches up to the regulatory requirements.

The Scenario
You purchased a new, better tug to replace your old one.

5.51 Applicability

Your department purchased a new aircraft tug.

This meets the "Implement a new system" condition of Applicability.

5.53 System analysis and hazard identification

Ask questions that set the foundations and make risk and mitigation development easier.

What is the **function** of the new tug?	Improve and simplify aircraft movements.
In what kind of **operating environment** will it be used?	• Where will the tug be stored? • When/where will it be used (which hangar[s], ramp[s])?
What **processes** will be needed for using the tug?	• Will it be used primarily for the first and last flights of the day? • What weather conditions are required for use?
What **personnel, equipment, or facilities** will be involved in the operation of the tug?	• Who can operate the tug? • What training is required?
Are there any third parties that **interface** with the tug?	• Does the FBO or airport have policies regarding aircraft movements with tugs? • Will there be airport operations or construction that may affect the operation of the tug?

Identify the hazards associated with the tug.
What are the elements about a new tug that could lead to bad outcomes?

Foundation questions	Hazards
What training is required?	We have a new tug; we have not had this model before
Will there be airport operations or construction that may affect the operation of the tug?	Our ramp/hangar are very congested
Will it be used primarily for the first and last flights of the day?	We often have late flights that operate during the Window of Circadian Low
When/where will it be used (which hangar[s], ramp[s])?	There are multiple cracks on the ramp that could affect the tug

5.55 Safety risk assessment and control

Determine associated risks.

Hazards	Risks
• We have a new tug; we have not had this model before • Our ramp/hangar are very congested	• Collison with ground personnel, other aircraft, or objects
• We often have late flights that operate during the Window of Circadian Low	• Personnel injury.

Determine the level of those risks.

Risks	Risk Level
Collison with ground personnel, other aircraft, or objects.	Medium • Severity: Major (serious injury or major damage) • Likelihood: Possibly (might occur at some time)
Personnel injury.	Medium • Severity: Major (serious injury or major damage) • Likelihood: Possibly (might occur at some time)

Develop mitigations.

Risks	Mitigations
Collison with ground personnel, other aircraft, or objects.	• Two wing-walker policy • SOP for clearing area before movement • Recurrent training policy
Personnel injury.	• Use personnel with shortest duty day policy

Re-evaluate Risk Levels with Mitigations.

Risks	Risk Level
Collison with ground personnel, other aircraft, or objects. • Two wing-walker policy • SOP for clearing area before movement • Recurrent training policy	Low Medium • Severity: Major (serious injury or major damage) • Likelihood: Possibly ⟶ Unlikely (might occur at some time)
Personnel injury. • Use personnel with shortest duty day policy	Low Medium • Severity: Major (serious injury or major damage) • Likelihood: Possibly ⟶ Unlikely (might occur at some time)

5.57 Notification of hazards to interfacing persons

Reach out to interfacing parties.

What is the **function** of the new tug?	Improve and simplify aircraft movements.
In what kind of **operating environment** will it be used?	• Where will the tug be stored? • When/where will it be used (which hangar[s], ramp[s])?
What **processes** will be needed for using the tug?	• Will it be used primarily for the first and last flights of the day? • What weather conditions are required for use?
What **personnel, equipment, or facilities** will be involved in the operation of the tug?	• Who can operate the tug? • What training is required?
Are there any third parties that **interface** with the tug?	• Does the FBO or airport have policies regarding aircraft movements with tugs? • Will there be airport operations or construction that may affect the operation of the tug?

Contact the FBO:

• Determine if they have any additional policies related to aircraft movement that need to be taken into consideration.
• Ask if they also have an SMS in place to monitor and analyze issues related to all movements on the airport surface.
• Share any mitigations the airport could put into place to help reduce risks of collisons or equipment issues (e.g., fixes to significant cracks in the airport surfaces).

Compliance Roadmap

The most important thing when getting started is to keep things simple. You can always grow into a more complex SMS down the line.
There are many pathways to Part 5 compliance. It is important for operators to tailor their approach to ensure success — here is an example of one approach.

1

- **Draft your Safety Policy**
  - Include required content.
    - Who will determine your safety objectives, and how will you ensure they are communicated to your entire company?
    - How are you showing your commitment to safety?
    - Will you provide the resources necessary?
    - Where is your ERP documented?
    - What is your organization's code of ethics? Is safety your highest priority?
    - What are the accountability and responsibilities of those in your organization? Specifically, the accountable executive, members of management (if applicable), and all other employees.
      - Who is responsible for reporting hazards and participating in the SMS?
      - Who can make decisions regarding acceptance of safety risks?
    - With regards to safety, what behavior is considered unacceptable and when may disciplinary action be taken?
  - Signed by the accountable executive.
  - Sent/communicated to everyone in your organization.

2

- **Describe your SMS processes for dealing with risks**
  - When are you required to perform the safety risk management process?
  - How will you analyze hazards?
    - What questions are you required to ask?
  - What will you do after identifying hazards to determine the associated risks?
  - How will you determine risk level?
  - What is your process for developing mitigations and updated risk levels?
  - When and how will you notify third parties that share control or responsibility of risks that affect your department?

4

- **Describe how you will communicate with your team about safety**
  - Who must be trained on your SMS?
  - What are the different ways you will communicate safety information to your team?
  - What information needs to be included in your communications?

3

- **Describe how you will ensure your SMS is effective**
  - How will you collect your SMS data?
  - Under what conditions will you review your SMS data and conduct an analysis?
  - What will you do if you find your mitigations or processes have not been working as expected?
  - How will you correct safety issues that persist?
  - How will you assess whether your safety objectives are being met?

5

- **Note how/where you will keep your records**
  - What information will you retain?
  - Where will you keep those records?
  - Who is responsible for saving/archiving the records?

6

- **Draft your Emergency Response Plan**
  - What will you do in the case of various emergencies?
  - How will the flight department coordinate with other organizations' ERPs?
  - How will authority be designated in an emergency?
  - How will duties be assigned during an emergency?