

#	Para	Comment Provider	Comment / Justification	Response	Resulting Text
1	CAT.OP.MPA.180/181 AMC2.CAT.OP.MPA.181	TMA	<p>Fuel/Energy Scheme (Performance Class B Operations)</p> <p>Content: The regulation introduces a structured fuel scheme for Performance Class B operations. This includes: An extra 15-minute holding fuel if no alternate is planned</p> <p>Justification: Our current fuel policy includes final reserve fuel, which is used if diversion is needed due to weather or operational changes. The new requirement to carry an additional 15 minutes of holding fuel is not practical in our operation. It would:</p> <ul style="list-style-type: none"> • Increase fuel and aircraft weight unnecessarily • Limit passenger and cargo capacity • Not reflect the nature of VFR seaplane operations with short flight durations and real-time routing decisions <p>TMA intends to retain the current fuel policy and will request to propose for a change to this</p>	<p>Noted. Not Applicable to Performance class B. As specified in AMC2.CAT.OP.MPA.181, to comply with point (c) (5) of CAT.OP.MPA.181 for FRF.</p>	NA

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			requirement. Else, we will have to request an exemption from the 15-minute holding fuel requirement later.		
2	AMC2 ORO.GEN.110(a), GM1 ORO.GEN.110(a)	TMA	<p>Security Training</p> <p>Content Mandates standalone security training for both flight and ground crew, covering topics like threat identification, aircraft search procedures, self-defense, and dealing with unruly passengers.</p> <p>Justification Security training is currently embedded in ESET and is not structured as a standalone program. A new syllabus must be developed and delivered in coordination with regulatory authorities. Recurrent training cycles must also be introduced and aligned with our internal training program and crew scheduling limitations. Request to propose a change to the requirement for conducting a standalone security training. The request is based on the nature of our operations, the low-risk environment, and the fact</p>	Noted. Regulation does not specify a stand-alone program for flight and ground crew. However, operators shall ensure all relevant areas are covered before the implementation date.	NA

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			that relevant security elements are already included within existing training programs.		
3	AMC1 ORO.GEN.110(c) –	TMA	<p>Operational Control Centre (OCC)</p> <p>Content: Requires the operator to establish and maintain a system for operational control over all flights. While licensed dispatchers are not required, if the operator uses Flight Operations Officers (FOOs) or dispatchers, they must be trained in accordance with ICAO Doc 10106 and 9868, which outlines competency-based training requirements.</p> <p>Justification: TMA currently exercises operational control through an established Flight Watch system and dispatch structure tailored to day VFR seaplane operations. Flight operations staff receive theory-based training, but we do not currently provide the competency-based training programme outlined in ICAO Docs 10106 and 9868. Full compliance would require:</p>	<p>Accepted.</p> <p>A reasonable transitional period will be ensured for the existing operators.</p>	Refer to the revised document for the implementation date.

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			<ul style="list-style-type: none"> • Developing a new competency-based training syllabus for FOOs • Designating and preparing qualified trainers • Integrating assessment standards, recurrent training, and proficiency checks <p>These changes involve significant time (2 years) and resource investment, especially given that licensing is not mandatory, and TMA's existing system has proven effective for its operational scope. TMA will request for continuing operations without licensed dispatchers and will retain its current dispatch model under the supervision of Flight Watch. However, we acknowledge the training gap and request additional time to transition to a competency-based programme in alignment with ICAO standards. This includes the design of new training content, development of instructor competencies, and incorporation of skill-based evaluation.</p>		

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4	ORO.FC.231	TMA	<p>Evidence-based training</p> <p>Content: Requires the operator to establish evidence-based training programme for flight crew.</p> <p>Justification: We were not able to review thoroughly the requirement related to evidence-based training for flight crew. These changes involve significant time and resource investment which would not be practicable to implement within the next two years.</p>	<p>Noted.</p> <p>The impact assessment (IA) shows that the implementation of EBT by the operator on a voluntary basis is the preferred option in regulating recurrent training and checking of flight crew.</p>	NA
5	-	TMA	<p>TMA was unable to complete a detailed review of the proposed changes due to the very short timeframe given.</p> <p>TMA will request some more time to review the changes to identify any potential impact on its operation</p>	<p>Accepted.</p> <p>A reasonable transitional period will be ensured for the existing operators.</p>	Refer to the revised document for the implementation date.

Terminology

Accepted	The CAA agrees with the comment and any proposed amendment is wholly transferred to the revised text
Partially accepted	The CAA either agrees partially with the comment, or agrees with it but the proposed amendment is only partially transferred to the revised text.
Noted	The CAA acknowledges the comment but no change to the existing text is considered necessary.
Not Accepted	The comment or proposed amendment is not shared by the CAA.