

#	Para	Comment Provider	Comment / Justification	Response	Resulting Text
1	Header	Manta	Header should be "MCAR-13B Occurrence Reporting"	<u>Accepted.</u>	Header updated.
2	13B.A.02(d)	Manta	13B.A.02(d) should refer to 13B.A.04(f) instead of 13B.A.06(f).	<u>Accepted.</u>	13B.A.02 (d) amended as ".....required to report occurrences in accordance with 13B.A.04(f)"
3	13B.A.02(j)	Manta	The referenced Annex II could not be found in the regulation.	<u>Accepted.</u>	13B.A.02 (d) amended as "..... having access to information on occurrences;"
4	13B.A.04(g)	Manta	What is the CAA interpretation of "The persons listed in paragraph (f) shall report occurrences within 72 hours of becoming aware of the occurrence"?	<u>Noted</u> The statement is self-explanatory.	No changes.
5	13B.A.04(i)	Manta	My understanding is that, as an organisation, we [the organisation] become aware once the reporter has submitted the report. In Centrik, the 72 hours are calculated based on the report submitted date. So if the new regulation states like this, will the existing set-up in Centrik be sufficient to address this regulatory requirement?	<u>Noted</u> The organisations in para (h) and (i) "become aware" whenever a staff or a contractor of the organisation or a bystander reports to them. Their 72 hours start from this point. The CAA does not see a need for a change to an operator's software. At the same time, operators should exercise care, as if a staff reports to them by other means that is also the organisation becoming aware.	No changes
6	13B.A.05(e)	Manta	Sending voluntary reports to CAA?	<u>Noted</u> Yes. But only when the organisation has evaluated and determined such reports involve an actual or potential aviation safety risk.	No changes

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				<p>Occurrence that meet this criteria are any occurrence which has <i>resulted (actual)</i> in an accident or serious incident; OR an occurrence, of which the safety risk severity level, is classified as <i>Major</i> or above.</p> <p>Note: Here risk severity level definition is as per Doc 9859 definition.</p>	
7	13B.A.05(e)	Manta	The reference to paragraph 1 is not clear	<u>Accepted</u>	Changed to “paragraph (a)”
8	13B.A.07(b)	Manta	What is the “European risk classification scheme”?	<p><u>Noted</u> ERCS is the methodology developed by the European Commission to address the requirements of (EU) 376/2014.</p> <p>Changed to ARMS ERC as there is more information available on the scheme and is used both in the Maldivian industry and CAA.</p>	Changed 13B.A.07 to read “..... classification may be reviewed and if necessary amended by the CAA in accordance with the Aviation Risk Management Solutions (ARMS) event risk classification (ERC) scheme.”
9	13B.A.13(e)	Manta	usually in preliminary report, there are no actions/recommendations included	<p><u>Noted</u> Point (e) specifies “any” to indicate that it may not always be the case.</p>	No changes
10	13B.A.13(h)	Manta	Is it a choice to publish a safety review?	<p><u>Noted</u> Annex 19 Chapter 3.5.2 <i>recommends</i> States to share and exchange safety information with the aviation community. It is not a standard at this time.</p>	No changes
11	13B.A.16(a)	Manta	This [names and address of natural persons] is not only the way others can identify the reporter. there are codes	<p><u>Noted</u> The phrase “includes in particular” is intended to cover these two items quite specifically. This allows flexibility</p>	No changes

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			assigned to pilots, staff Identification numbers etc.	with regards to other possible identifiers while remaining explicit on name and addresses.	
12	-	TMA	Proposal is acceptable without change	<u>Noted</u>	No changes

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.