



SMS

Safety Management System





Wings Airways Safety Policy Statement

Safety is a top priority in all our activities. I am committed to implementing, developing, and improving the Safety Management System and its processes to ensure that all our aviation activities maintain the highest level of safety performance and exceed both national and international standards.

I am committed to:

- Developing and embedding a safety culture in all our aviation activities that recognizes the importance and value of effective aviation safety management and always acknowledges that safety is paramount;
- Clearly defining, for all employees, their accountabilities and responsibilities for the development and delivery of the Safety Management System -and its performance;
- Minimizing the risks associated with our operation to a point that is as low as reasonably practicable and achievable;
- Setting goals and objectives that are realistic and achievable and reviewing these safety policies on an annual basis;
- Complying with and wherever possible, exceeding both legislative and regulatory requirements and standards;
- Ensuring that all staff are provided with adequate and appropriate aviation safety information and training, are competent in safety matters and are only allocated tasks commensurate with their skills;
- Maintaining a non-punitive reporting policy and encouraging all employees to report any hazards or safety concerns. Reporting can be done through our hazard reporting site at mywingsairways.com;
- Provide the necessary human and financial resources to our Safety Management System;
- Behavior that will not be accepted under this policy includes any illegal activity, willful disregard of regulations or gross negligence. Employees that are found to have unacceptable behavior will be subject to disciplinary action up to and including termination;
- We will be prepared for all issues that may affect our operations. We will review and exercise our Emergency Response Plan annually;

As the Accountable Executive, I accept my accountability and responsibility to ensure the Safety Management System is implemented and successful.

Arne Johnson
President, Wings Airways

Section 1: Organization and Administration

1.1.0 Flight Department Management Structure

The following is the organization structure of Wings Airways.

1.2.0 Accountabilities, Duties and Qualifications

The following are the duties, authorities and accountabilities of the management and operating personnel of the Flight Department and the qualifications required to hold those positions.

1.2.1 President / Accountable Executive

The Accountable Executive is accountable for providing the resources required to conduct a safe operation and to implement and maintain the safety management system. The Accountable Executive authorities and responsibilities include:

- Sustaining conditions that promote the safe operation of company aircraft;
- Actively supporting the safety management system;
- Provision and allocation of human, technical, financial or other resources necessary for the effective and efficient performance of SMS and for ensuring the safe operation of company aircraft;
- Direct responsibility for the conduct of the organization's affairs;
- Final authority over operations of the organization;
- Establishment and promotion of the safety policy;
- Establishment of the organization's safety objectives and safety targets;
- Acting as the organization's safety champion;
- Review safety risks and ensure they are reduced to a level as low as reasonably practical (ALARP);
- Annual review and revision of the Safety Policy and Emergency Response Plan;
- Having final responsibility for the resolution of all safety issues; and
- Establishing and maintaining the organization's competence to learn from the analysis of data collected through its safety reporting system.

1.2.2 Director of Operations

A. Accountabilities and Duties

The Director of Operations is accountable for overall operation of the Flight Department, for the safety of the operation and for ensuring that flight department safety management goals are met. The duties of the position include:

- Organizing, staffing and directing:
 - Flight operations;
 - Cabin safety;
 - Crew scheduling
- Controlling operations and operational standards of all aircraft operated;
- Managing functions, which impact on operational control (e.g. maintenance, crew scheduling, load control, equipment scheduling);
- Actively supporting the safety management system;

- Validating and addressing safety-risk management deficiencies in an appropriate and timely manner;
- Ensuring that all operations processes and procedures include risk management mitigation specified in the safety management system;
- Developing and maintaining the Company Operations Manual;
- Developing aircraft checklists and standard operating procedures;
- Liaising with the regulatory authority on all matters concerning flight operations;
- Liaising with any external agencies which may affect aircraft operations;
- Ensuring that flight operations are conducted in compliance with all applicable safety regulations, national and international regulations, standards and company operating policies;
- Working with the Chief Pilot to ensure that flight crews are qualified in accordance with applicable regulations, meets company standards of experience, proficiency and performance for each flight;
- Ensuring that crew scheduling complies with flight and duty time limitations;
- Ensuring that all crewmembers are kept informed of any changes to the regulations and operating standards;
- Working with the Director of Tour Operations to ensure the company standards on qualifications, experience and performance for dock service van drivers and customer service personnel are maintained;
- Receiving and taking action with respect to any aeronautical information affecting the safety of flight;
- Disseminating aircraft safety information, both internal and external;
- Ensuring that flight crew qualifications are current;
- Maintaining a current "read file";
- Overseeing the welfare of flight operation personnel;
- Ensuring that personnel under his/her authority participate effectively in the safety management system.

B. Qualifications

- Holds or has held an appropriate license, or has acquired supervisory experience;
- For airplanes, holds a valid Commercial Pilot License for the category of aircraft operated;
- Is qualified in accordance with the operator's training program to act as a pilot-in-command of company aircraft; and
- Demonstrates knowledge of the content of the Company Operations Manual, Training Manuals, Standard Operating Procedures and the provisions of the Federal Aviation Regulations and standards necessary to carry out the duties and responsibilities of the position.

1.2.3 Chief Pilot

A. Accountabilities and Duties

The Chief Pilot is accountable for the training of pilots and the sustenance of company, local and Federal standards.

- Interviewing and screening flight crew candidates and checking references;

- Evaluating, training and qualifying flight crews in accordance with company, local and Federal regulations.
- Working with operations personnel to ensure each pilot meets company standards of experience, proficiency and performance.
- Ensuring that personnel under his/her authority participate effectively in the safety management system.

B. Qualifications

- Holds or has held an appropriate license, or has acquired supervisory experience;
- For airplanes, holds a valid Commercial Pilot License for the category of aircraft operated;
- Is qualified in accordance with the operator's training program to act as a pilot-in-command of company aircraft; and
- Demonstrates knowledge of the content of the Company Operations Manual, Training Manuals, Standard Operating Procedures and the provisions of the Federal Aviation Regulations and standards necessary to carry out the duties and responsibilities of the position.

1.2.4 Director of Maintenance

A. Accountabilities and Duties

The Director of Maintenance is accountable for ensuring that all aircraft are maintained in accordance with regulatory requirements, for implementing and maintaining related aspects of the safety management system and for ensuring that all maintenance-related safety management goals are met. The duties of the position include:

- Planning and controlling all aircraft maintenance;
- Liaising with the national civil aviation authority on maintenance topics;
- Liaising with all persons or Approved Maintenance Organizations (AMOs) performing maintenance on Wings Airways aircraft;
- Ensuring that all persons or Approved Maintenance Organizations (AMOs) performing maintenance on Wings Airways aircraft have access to all applicable technical and regulatory publications necessary to perform these duties, as well as the applicable portions of the Company Operations Manual which detail the Wings Airways maintenance control system, and ensuring that those publications are kept up to date
- Ensuring that aircraft maintenance records as required by Federal Aviation Regulations, manufacturers and company policies are established and maintained;
- Ensuring that Airworthiness Directives and Service Bulletins that effect Flight Department aircraft are complied with appropriately;
- Removing from service any aircraft that are unsafe, or that do not comply with national regulatory requirements;
- Ensuring that all maintenance processes and procedures include risk management mitigation specified in the safety management system;
- Ensuring that personnel under his/her authority participate effectively in the safety management system;

- Establishing Flight Department safety policies and procedures for ground operations; and
- Assuming any responsibilities delegated by the Accountable Executive.

B. Qualifications

- Demonstrates knowledge of the planning, implementation and direction of the maintenance control system for the aircraft operated; and
- Demonstrates knowledge of the regulations and standards relating to aircraft maintenance operations.

1.2.5 Safety Officer

A. Accountabilities and Duties

The Safety Officer shall be accountable for day-to-day administration of the flight department safety management system. In that role, s/he shall have direct access to the Directors of Operations, Maintenance, Chief Pilot and unfettered access to the Accountable Executive in safety matters and shall be specifically responsible for:

- Developing, implementing and maintaining the safety management systems;
- Monitoring and advising on all operator safety activities that may have an impact on flight and ground safety;
- Establishing and managing the operator hazard identification and tracking system;
- Developing and maintaining a safety awareness program;
- Monitoring industry flight safety concerns, which may have an impact on operations;
- Maintaining close liaison with industry safety associations;
- Developing and maintaining the operator Emergency Response Plan (ERP), and ensuring it is properly coordinated with the emergency response plans of those organizations it must interface with during the provision of its services;
- Conducting ERP training and exercises during the 1st, 2nd and 4th calendar quarter;
- Analyzing hazard reports and other identified safety concerns and making recommendations on appropriate mitigation;
- Investigating and reporting on incidents/accidents, working with functional managers in order to develop the appropriate mitigations, and making recommendations on modifications to the safety management system;
- Making recommendations to the operator's senior management on matters pertaining to the safety management system;
- Chairman of the Safety Committee, organizing Safety Committee meetings and minutes;
- Undertaking safety assurance activities and conducting periodic evaluations of the safety management system and reporting the results to management;
- Monitoring the response and measuring the results of safety initiatives;
- Discussing analysis of measurements with management levels, thereby supporting the decision-making process; and
- Assuming any responsibilities delegated by the Accountable Executive.

B. Qualifications

- The Safety Officer will meet the job description listed in the General Operations Manual (GOM) under Chapter 1, page 1-5 (d) in addition to the following:
 - The Safety Officer should have extensive operational experience and professional qualification in aviation to include aviation safety programs, standards and aviation safety operating practices; based on the scope of operations
 - The Safety Officer shall have a full understanding of the Wings Airways FAA Operations Specifications, General Operations Manual and all appropriate maintenance and airworthiness requirements of 14 CFR Chapter I (parts 1-199).
- Training in the following:
 - Basic concepts of safety and accident causation;
 - Corporate safety culture and Just Culture;
 - Safety management systems principles and practices;
 - The role of the Safety Officer as advisor to senior management;
 - Human factors and the decision making process;
 - Risk management;
 - Accident/incident management and investigation;
 - Emergency response planning; and
 - Accident and incident investigation.

1.2.6 Pilot-in-Command

A. Accountabilities and Duties

The Pilot-in-Command (PIC) is accountable to the Chief Pilot for the safe conduct of assigned flights. The PIC is responsible for the operation, safety and security of the aircraft and the safety of all crew members, passengers and cargo on board. Specific duties and responsibilities include:

- Ensuring that a flight will not be commenced if a flight crew member is incapacitated from performing duties by any cause such as injury, sickness, fatigue, or the effects of any psychoactive substance;
- Ensuring that the flight will not be continued beyond the nearest suitable aerodrome, when a flight crew member's capacity to perform functions is significantly reduced by impairment of faculties from causes such as fatigue, or sickness;
- Responsibility for the security of the aircraft during its operation,
- Checking and assessing weather and all applicable NOTAMs where available;
- Determining fuel requirements;
- Determining the aircraft weight and balance limits;
- Ensuring that all flight planning requirements have been met;
- Ensuring that the aircraft is airworthy, duly registered and that required documentation and operational information are onboard the aircraft;
- Completing an aircraft pre-flight inspection as per the aircraft flight manual;
- Briefing the passengers in accordance with the requirements specified in the Company Operations Manual;
- Operating the aircraft in accordance with Wings Airways procedures and aircraft limitations;

- Completing all post flight duties as specified in the company operations manual, recording flight times and aircraft defects;
 - Notify management and comply with procedures laid forth in the operations manual and the ERP;
 - Ensuring that a suspected communicable disease is reported promptly to dispatch/flight operations or air traffic control, in order to facilitate provision for the presence of any special medical personnel and equipment necessary for the management of public health risks on arrival;
 - Submitting a report to the Accountable Executive and/or the Director of Operation;
 - Completing the required documentation;
 - As soon as possible, report to company Management or Operations any hazardous weather or flight conditions encountered that are likely to affect the safety of other aircraft; and
 - Participating in the Safety Management System.
- B. Qualifications
- The qualifications required to act as PIC is specified in the Company Operations Manual.
- C. The PIC has the authority to refuse transportation of any person or object if their carriage poses any risk to the safety of the aircraft or its occupants.

1.3.0 Personnel Policies

1.3.1 Use of Alcohol and Other Psychoactive Substances

- A. It is extremely important that all persons involved in aviation activities not be impaired in any manner. Therefore, Flight Department personnel shall not at any time be under the influence of any psychoactive substance that might in any way limit their ability to perform their duties in a safe and effective manner.
- B. Aircraft crew and maintenance personnel shall not consume any alcoholic beverage within eight hours and no excessive consumption within 12 hours prior to reporting for duty and shall not use any drug that may impair the person's ability to perform their duties.
- C. Psychoactive substances include alcohol, opioids, cannabinoids, sedatives and hypnotics, cocaine, other psychostimulants, hallucinogens, and volatile solvents, whereas coffee and tobacco are excluded.

1.3.1.1 Problematic Use of Psychoactive Substances

- A. Wings Airways defines the problematic use of psychoactive substances as the use of one or more psychoactive substance by aviation personnel in a way that:
- Constitutes a direct hazard to the user or endanger the lives, health or welfare of others; and/or
 - Causes or worsens an occupational, social, mental or physical problem or disorder.

- B. If a member of the Wings Airways Flight Department engages in the problematic use of psychoactive substance, s/he shall be removed from his/her safety-critical functions as soon as this condition is identified. The case will be evaluated by the Accountable Executive, with the help of specialized professionals. Return to the safety-critical functions may be considered after successful treatment or, in case where no treatment is necessary, after cessation of the problematic use of substances and upon determination that the person's continued performance of the function is unlikely to jeopardize safety. Periodic evaluations shall be performed for a period as long as Accountable Executive deems necessary.

Section 2: Safety Management System

Safety Management Systems are an evolutionary development of the traditional flight safety program that can significantly enhance the safety of an aviation operation. A successfully developed and implemented safety management system (SMS) will ensure that safety is a core value in an organization or flight operation and that safety is integrated into all management systems including operational, maintenance, financial and human resource management. Wings Airways uses an SMS to ensure that the Flight Department consistently provides safe and efficient air transportation that meets customer expectations. The Wings Airways SMS is described in this section.

2.1.0 Safety Policy

- A. The Wings Airways Safety Policy is presented below, and shall be communicated, with visible endorsement, throughout the organization.
- B. The Safety Policy shall be reviewed by the Safety Officer and the Accountable Executive at least once each year to ensure it remains relevant and appropriate to the organization. Additional reviews may be conducted when significant changes occur in the flight department. The Safety Policy Statement can be found in Appendix A.

2.1.1 Safety Accountabilities

- A. The Accountable Executive, irrespective of other functions, has ultimate accountability for the safety performance of the organization.
- B. The Accountable Executive and the Director of Operations are the sole persons that have the authority to make decisions regarding Wings Airways safety risk tolerability.
- C. Safety Manager
 - The Safety Officer has been appointed to administer the SMS. S/He has the experience, competence and qualifications appropriate to the position, being individually responsible for and acting as a focal point for the implementation and maintenance of an effective SMS.
 - The Accountable Executive is responsible for ensuring that the Safety Manager is properly trained and qualified to perform the duties of his/her role.
 - The responsibilities and duties of the Safety Officer are detailed in Section 1.
- D. The Safety Committee
 - The Safety Committee is chaired by the Safety Officer and department management personnel. The Safety Officer will email a list of current hazards to members of the committee monthly or as needed. Standard items in the email will include, but not limited to new hazard reports, awards and other items of interest. If needed the committee will meet in person to discuss specific topics. The Safety Officer will act as recorder of the meetings. Minutes taken at the safety committee meetings will be published and distributed via read files and the employee only web site. Minutes will also be retained electronically by the Safety Officer.
 - The committee may approve, reject or recommend action on any matter brought before it. Committee recommendation(s) will be forwarded immediately to the appropriate manager in writing. The Safety Officer will conduct a follow up meeting with the appropriate manager after the

recommendation(s) have been sent to ensure the recommendations were effective.

- Employee meetings will be conducted on a regular basis and notes of those meetings will be published and distributed via read files and the employee only website. Minutes will also be retained electronically by the Safety Officer.

E. Responsibilities of all flight department personnel, including those responsibilities related with the SMS, are detailed above. Additionally, flight crew members, aircraft maintenance personnel and others involved in the operation are responsible for:

- Adhering to directions contained in the company operations manual and related manuals and procedures;
- Making decisions within that framework that will contribute to the safety and efficiency of the operation; and
- Participating proactively in the safety management system by:
 - Actively seeking, identifying and reporting hazards and safety-risk management deficiencies;
 - Providing timely input to management to ensure that the safety-risk profile is accurate and up-to-date; and
 - When appropriate, applying hazard checklists to make sound decisions.

2.1.2 Coordination of the ERP

- A. The person responsible for overall coordination of emergencies in our organization is the Accountable Executive or Director of Operations. He/she will act on behalf of the Accountable Executive in the task of identifying the need to review existing processes and the need for coordination with other sectors within and outside our company.
- B. The Safety Officer is responsible for reporting to senior management on the measures to be adopted in cases of emergencies, described in the Emergency Response Plan, in order to identify the need to include new actions or amend the existing ones, so as to coordinate and maintain an emergency response plan that ensures:
- Orderly and efficient transition from normal operations to emergency activities;
 - Designation of emergency authority;
 - Responsibilities of members of the company staff involved in ERP activities;
 - Coordination of efforts to handle the emergency; and;
 - Return from emergency activities to normal operations.
- C. The ERP, presented in this manual, details in writing the actions that will be adopted after an accident or serious incident, designating a person responsible for each action. At least once a year, the Safety Officer shall review the ERP to ensure its continuing relevance and effectiveness, and update it as needed.
- D. The Safety Officer is responsible for ensuring that the ERP is properly coordinated with the emergency response plans of those organizations it must interface with during the provision of its services, such as, but not limited to:
- The airport authority;
 - Insurance providers;
 - Accident investigative authorities;

- Federal and state aviation authorities;
- Communication and Public Relations Consultants

2.1.3 SMS Documentation

- A. This manual describes the Wings Airways SMS, including the company's safety policy and objectives, the SMS requirements, processes and procedures, the related accountabilities, responsibilities and authorities, and the expected SMS outputs. The Safety Officer is responsible for the development and maintenance of SMS operational records. SMS records and documentation shall be reviewed annually.
- B. Additional documentation substantiating the existence and ongoing operation of the SMS is kept in the Company Library, under the responsibility of the Safety Officer including:
 - Hazards report register and samples of actual reports;
 - Safety performance indicators and related charts;
 - Record of completed or in-progress safety assessments;
 - SMS internal review or audit records;
 - Safety promotion records;
 - Personnel SMS/safety training records;
 - SMS/safety meeting minutes; and
- C. In keeping with an honest and open safety culture, any safety-related data will be protected from inappropriate use. Methods to protect this data may include password protection or physically locking the data in a filing cabinet.

2.2.0 Safety Management Strategy

Wings Airways Safety Management System is a formal, top-down, organization-wide approach to managing safety risk and assuring the effectiveness of safety risk controls. It includes systematic procedures, practices and policies for the management of safety risk. This is done through safety policy, planning (risk management), safety assurance (improvement) and safety promotion (culture).

2.2.1 Description and Nature of the Operation

Wings Airways conducts regional flight operations in support of charter air services.

- Flight operations focus on glacier tours and exclusive tour access to the Take Glacier Lodge. In addition to normal operations Wings Airways is available for charter service to various regional locations. Wings Airways conducts water landings via their DeHavilland Otters.
- Wings Airways employs a highly skilled maintenance staff that is tasked with regular maintenance and inspections that support its operations.

2.2.2 Safety Risk Profile

A copy of the Wings Airways safety risk profile is attached in Appendix A. It presents the highlights of the hazards and associated risks identified by Wings Airways and linkage to the mitigation that has been developed to manage the level of risk to as low as reasonably practical.

2.2.4 Safety Management Principles

- A. Safety is paramount in all Wings Airways operations and it is the joint responsibility of everyone connected with the operation.
- B. The objective of Wings Airways SMS is to enhance the safety, efficiency and effectiveness of company operations through the management of safety risks. To accomplish that objective, Wings Airways strategy is to mitigate all identified hazards to a level as low as reasonably practical. To achieve this goal, the following safety management principles will be followed:
 - Safety will be recognized by management and employees as an integral and vital part of the successful performance of any job;
 - Safety, being paramount to our operating practice, will be given priority at all times;
 - Direct responsibility for the safety of an operation rests with the supervisor of each operation. During flights the designated Pilot-in-Command (PIC) is the supervisor of the operation and will seek to ensure that all operations are conducted without incident;
 - Each individual employee will perform their duties giving primary concern for their own safety as well as that of their fellow employees, our customers and the property and equipment entrusted to their care;
 - The PIC is the judge as to whether the aircraft shall take-off and where it shall land, taking into account all factors of equipment and weather conditions within the specifications of the Operations Manual and/or the specific Aircraft Flight Manual. S/he will exercise this responsibility effectively and will use all of the resources available to make appropriate and effective decisions;
 - The PIC has ultimate authority to refuse or discontinue a trip which, for reasons of safety or security, he feels should not be attempted or continued. S/he will exercise this responsibility effectively and will use all of the resources available to make appropriate and effective decisions;
 - The Wings Airways SMS must be proactive, ongoing and fully integrated throughout the operation and all of its activities and is based on the following strategies:
 - All Wings Airways personnel will be involved in the flight department safety management system;
 - Employee awareness, compliance, inspection, investigation and education programs will be incorporated into all aspects of the operation;
 - All personnel will endeavor to identify, report and eliminate hazardous conditions;
 - All reported hazardous events will be investigated to determine underlying causes;
 - All proposed new equipment acquisitions, facilities, operations and procedures will be reviewed with safety in mind; and
 - All personnel will comply with all applicable laws and regulations.

2.2.5 Safety Management Goals

In recognition of the Wings Airways safety performance strategy, goals have been established and progress towards them will be measured quarterly. The company Safety Performance Tracker is located in Appendix A.

2.2.6 Other Risk Management Tools

For other than routine flights the Flight Risk Assessment Tool will be completed. The Flight Risk Assessment will be conducted by the PIC and if the score exceeds the maximum allowable limit, the proposed flight will be reviewed by individual exercising Operational Control. The PIC however has authority to cancel the proposed flight without further consultation anytime that they deem it appropriate.

2.3.0 Safety Risk Management Processes

The safety risk management system is composed of:

- Hazard identification;
- Analysis of the hazard to include potential consequences of that hazard;
- Risk assessment, in terms of probability and severity, of the consequences; and
- Mitigation of the risk.

2.3.1 Hazard Identification

- A. The purpose of the hazard identification program is to proactively identify and address potential deficiencies in safety management. The Wings Airways' hazard identification program is composed of a set of reactive, predictive and proactive processes for identifying the hazards, and associated risks, to which the company's operations are subject.
- B. These processes are detailed in the following sections. All Wings Airways employees are expected to participate in the hazard identification program.

2.3.1.1 Occurrence Reports

- A. All accidents / incidents / occurrences involving Wings Airways' operations will be investigated and processed within the organization. Accidents, incidents and occurrences shall be immediately communicated to the Director of Operations / Safety Officer, who is responsible for conducting the internal investigations.
- B. The Director of Operations / Safety Officer shall conduct all investigations in such a manner as to identify active failures as well as contributing factors and hazards. Once investigations are complete, the final reports will be disseminated to the appropriate levels within the company. When required, the Director of Operations / Safety Officer is responsible for disseminating the investigation report to the appropriate civil aviation authority.

2.3.1.2 Voluntary Reports

- A. Reports / observations can be made to the Director of Operations / Safety Officer verbally, but written reports are encouraged. Where verbal reports are provided, the Director of Operations shall prepare a report containing the information. Written reports can be made on the Hazard Report Form located on the employee only website (www.mywingsairways.com), and forwarded to the Director of Operations / Safety Officer.
- B. How to submit a Hazard Report:
 - a. Website address is www.mywingsairways.com. Click on "safety".
 - b. Username is lodge and the password is taku. (lower case)
 - c. Click on "Hazard Report".
 - d. Employees are required to submit a date, location, and a narrative of the hazard. It is strongly encouraged that employees list as much

information as they can to aid in trending data. To remain “anonymous” leave the name cell blank.

- C. Hazard Report Evaluation:
 - a. The Director of Operations / Safety Officer will contact the submitter either by email or personally within three working days, provided the report was not anonymous.
 - b. The Director of Operations / Safety Officer will analyze the report as per the risk assessment and mitigation section of this manual.
 - c. The Director of Operations / Safety Officer will print a hard copy of the report and file indefinitely.
- D. According to the Safety Policy, no action will be taken against any employee who discloses a safety concern through the hazard reporting system, unless such disclosure indicates, beyond any reasonable doubt, gross negligence, a deliberate or willful disregard of regulations or procedures, criminal conduct and/or substance or alcohol abuse.
- E. Self-disclosure: Immunity from punitive actions will be granted to all employees who report on errors incurred by themselves that led to unsafe conditions, unless it becomes clear that self-disclosure is being used as a means of obtaining indemnity for deliberate violations.
- F. Feedback from Hazard Reports, initiatives, responses and any other safety issue can be in several forms to include, but not limited to, email alerts, phone calls, bulletin boards, company mail or in person.

2.3.1.3 External Reports

The Director of Operations / Safety Officer shall periodically review safety reports issued by civil aviation authorities, national aviation associations, aircraft manufacturers, flight safety organizations and other operators. Useful safety information derived from these reports shall be communicated to the affected company personnel as part of the SMS communication process detailed below. Additionally, upon review of these reports, the Director of Operations / Safety Officer shall identify any hazards/risks that might be applicable to Wings Airways operations and report them as appropriate.

- A. NASA (ASRS) Forms: The Aviation Safety Reporting System (ASRS) is a program administered by the National Aeronautics and Space Administration (NASA). The FAA as a basis for adverse action may not use these reports. Timely submission of the ASRS report will sometimes prevent an adverse action by the FAA if the event independently comes to the attention of the FAA. The program is covered in the Aeronautical Information Manual and FAA Advisory Circular 00-46E. The ASRS forms can be downloaded from the following Internet address: <http://asrs.arc.nasa.gov/report/electronic.html>. All pilots are encouraged to review and utilized this system. The Safety Officer will assist those interested in using the ASRS.
- B. Alaska Air Carriers ASAP Program TBD

2.3.2 Risk Assessment and Mitigation

- A. The Director of Operations / Safety Officer or person to whom s/he delegates the task, will analyze and classify all hazard reports in accordance with the procedures identified below. Mitigation actions shall be determined and followed up to ensure its effectiveness.

- B. After completion of the analysis of each report, a response will be provided to the person making the report.

2.3.2.1 Safety Risk Classification

- A. The process of managing safety risk begins with the identification of all possible consequences arising from each identified hazard. The Director of Operations / Safety Officer shall review all identified hazards and analyze them to determine potential consequences of that hazard.
- B. After all possible consequences of the hazard have been identified, the risk associated with each one of these consequences shall be assessed in terms of probability and severity.
- C. The Director of Operations / Safety Officer shall first assess the probability that each of these consequences will manifest from the identified hazard in the context of the organization's operations.
- D. In order to establish this probability, the Director of Operations / Safety Officer may use the company's historical data available in the Safety Library, as well as consult other areas of the company, evaluate public data, surveys of other operators, or any other means deemed appropriate by the Director of Operations / Safety Officer for the development of a coherent assessment towards an accurate probability associated with each event.
- E. Once the Director of Operations / Safety Officer has sufficient elements for an adequate assessment of the probability of occurrence of the analyzed event within the company, s/he shall classify the associated risk according to the table below.

Probability of an Event		
Qualitative Definition	Meaning	Value
Frequent	Likely to occur many times (or has been occurring frequently)	5
Occasional	Likely to occur a few times (has occurred a few times)	4
Remote	Unlikely, but possible to occur (rarely occurs)	3
Unlikely	Very unlikely to occur (no history of previous occurrences)	2
Very Unlikely	Nearly impossible to occur	1

- F. Once the consequences are assessed in terms of probability, the second step towards safety-risk control is the assessment of the severity of the consequences to identified hazards.

- G. The Director of Operations / Safety Officer shall evaluate and determine the seriousness of the possible consequences under analysis. Once the Director of Operations / Safety Officer has sufficient elements for an adequate assessment of the severity of the analyzed event within the company, s/he shall classify the associated risk according to the table below.

Severity of an Event		
Definition (In Aviation)	Meaning	Value
Catastrophic	<ul style="list-style-type: none"> Fatal injuries. Total loss of material goods. 	A
Critical	<ul style="list-style-type: none"> Important reduction of safety margins, injury or increase in workload such that personnel are unable to perform their activities in a complete or effective way. Serious injuries. Significant damages to equipment. 	B
Significant	<ul style="list-style-type: none"> Significant reduction of safety margins, a reduction in the ability of the operator to respond to adverse operating conditions as a result of an increase in workload or of conditions that might prevent his/her effectiveness. Serious incident. Injuries to people. 	C
Small	<ul style="list-style-type: none"> Interference. Operating Limitations. Use of emergency procedures. Minor incidents. 	D
Negligible	<ul style="list-style-type: none"> Light consequences. 	E

- H. Once all safety-risks (for every consequence of occurrence of an event or unsafe condition) are assessed in terms of probability and severity, the third step towards safety-risk control is the definition, by the Director of Operations / Safety Officer, of the "tolerability" of the risks in terms of their consequences for the company operations.
- I. In practice, this evaluation is performed in two steps. The first is to obtain a general assessment of safety-risks by combining the two tables previously presented – for probability and for severity – in array. Then, the safety index obtained in this array is exported to the safety-risk tolerability matrix presented below.

Probability		Severity				
		Catastrophic	Critical	Significant	Small	Negligible
		A	B	C	D	E
Frequent	5	5A	5B	5C	5D	5E
Occasional	4	4A	4B	4C	4D	4E
Remote	3	3A	3B	3C	3D	3E
Unlikely	2	2A	2B	2C	2D	2E
Very Unlikely	1	1A	1B	1C	1D	1E

- J. Depending on the classification of each hazard, the risk is deemed acceptable (green region of the table), acceptable based on mitigation (yellow region of the table) or unacceptable (red region of the table).

2.3.2.2 Safety Risk Mitigation and Control

- A. After the safety-risk tolerability analysis, if the risk is unacceptable, it shall be mitigated to an acceptable level or be somehow eliminated, as decided by the Director of Operations.
- B. Hazards that are initially assessed as unacceptable generate a discussion with the Director of Operations or Accountable Executive in order for this hazard to be precisely classified and immediately mitigated to an acceptable level. If the Accountable Executive so determines, the operation of the company or of the affected area (specific aircraft, particular crew, operating base, type of operation, etc.) may be suspended until the risk has been mitigated to an acceptable level.
- C. Hazards assessed as 'acceptable based on mitigation' will be discussed and mitigated in the Safety Meetings and followed up until the Director of Operations considers it completely mitigated.
- D. During the quarterly Safety Meetings, identified hazards and risks will be discussed and mitigation actions determined for each item.
- E. Personnel will also assess the effectiveness of mitigation actions determined in previous meetings in order to determine the need for additional mitigation actions to achieve satisfactory levels.
- F. All identified hazards shall be tracked by the Director of Operations / Safety Officer in the Risk Management Tracking Form until the remedial action has been completed.
- G. After each Safety Meeting, the Director of Operations / Safety Officer will prepare minutes documenting the main topics discussed and decisions taken. These minutes shall be sent to all personnel and saved by the Director of Operations / Safety Officer in order to allow continuous monitoring of the progress and results of SMS activities.

Note: The effectiveness of the hazard identification and tracking system may be enhanced by the inclusion of quality items. In that case, the Continuous Improvement Opportunity Form may be used.

2.4.0 Safety Assurance

- A. Safety-Risk management requires feedback on the effectiveness of the measures taken, in order to complete the management cycle. Supervision of system results is key to evaluate SMS effectiveness and to perform any changes that might be necessary.
- B. The ongoing monitoring of operational systems, processes and procedures to ensure that they are appropriate and effective is an integral part of an SMS. Wings Airways' safety assurance activities are used to:
 - Ensure that operational systems, process and procedures are appropriate and effective;
 - Ensure that identified problems have been resolved; and
 - Assist in maximizing the efficiency of safety management activities.

2.4.1 Safety Performance Monitoring and Measurement

- A. An SMS defines measurable performance outcomes to determine whether the system is truly operating in accordance with design expectations and not simply meeting regulatory requirements. The safety performance indicators (SPIs) are used to monitor known safety risks, detect emerging safety risks and to determine any necessary corrective actions.
- B. Based on analysis of data collected through the hazard identification program, the change management process and the SMS audits, Wings Airways has developed a set of Safety Performance Indicators which are maintained in a stand-alone document by the Director of Operations / Safety Officer.
- C. An appropriate Safety Performance Target (SPT) is determined for each SPI. These targets accompany each SPI in the Director of Operations / Safety Officer's tracking sheet.
- D. The Safety Performance Objectives, Indicators and Targets will be tracked on the Safety Performance Tracker worksheet.
- E. The Director of Operations / Safety Officer is responsible for updating the Safety Performance Tracker worksheet monthly, based on information derived from the SMS activities. The Director of Operations / Safety Officer will analyze the evolution of these indicators over time so as to assess whether actual SPI safety data trends toward the corresponding Safety Performance Targets (SPTs).
- F. These Safety Performance Indicator values, along with results from trend analysis, will be reviewed by the Director of Operations / Safety Officer in the quarterly meetings so that personnel have visibility of the status of SMS performance throughout the year. This information shall be used by the Director of Operations / Safety Officer to evaluate if changes to the SMS processes and procedures, or to allocation of resources, is necessary in order to achieve the desired Safety Performance Targets.
- G. Safety performance data analyses and the corresponding decisions taken by the Director of Operations / Safety Officer will be recorded in meeting minutes after each quarterly meeting.

- H. In the last meeting of each year, final Safety Performance Indicator values will be analyzed against the corresponding targets. The Safety Performance Indicators and Targets for the following year will then be determined by the Director of Operations / Safety Officer and documented in the upcoming year's Safety Performance Tracker.

2.4.2 Accident / Incident Investigation

- A. ACCIDENTS. All accidental damage to Wings Airways aircraft, docks, vehicles, boat; injury to Wings Airways personnel or customers resulting from aircraft operation; and damage to non-Wings Airways property or injury to other personnel resulting from Wings Airways operations all qualify as accidents and will be immediately reported to company Operations. Operations personnel will notify the appropriate company Managers in accordance with the Emergency Response Plan.
- B. INCIDENTS. The following incidents (but not limited to) will be reported to the company Safety Officer as soon as possible:
 - a. Any system failure or abnormal operation of a system
 - b. Loss of any external part from an aircraft
 - c. Waterway/lane incursion
 - d. Fuel leak or spill
 - e. Fire, explosion, smoke or toxic fumes
 - f. Significant fueling error
 - g. Unsecured load
 - h. Damage to non-company property
 - i. Inadequate or failed ground facilities creating a hazardous situation
 - j. Bird strike
 - k. Near mid-air collision
 - l. Unlawful interference
 - m. Violent or disruptive passengers
- C. OCCURRENCES. An occurrence is an event that does not directly affect the safety of the flight or operations, or qualify as an incident. However, it may be considered not normal or usual practice, and should be brought to the attention of the Company. Such event will be documented accordingly.

2.4.3 Safety Committee and Meetings

- A. The safety committee is chaired by the Director of Operations / Safety Officer and department management personnel. The Director of Operations / Safety Officer will email a list of current hazards to members of the committee monthly or as needed. Standard items in the email will include, but limited to: past hazard reports, new hazard reports, awards and other items of interest. If needed the committee will meet in person to discuss specific topics. The Director of Operations / Safety Officer will act as recorder of the meetings. Minutes taken at the safety committee meetings will be published and distributed via read files and the employee only web site. Minutes will also be retained electronically by the Director of Operations / Safety Officer. The committee may approve, reject or recommend action on any matter brought before it. Committee recommendation(s) will be forwarded immediately to the appropriate manager in writing. The Director of Operations / Safety Officer will conduct a follow up

meeting with the appropriate manager after the recommendation(s) have been sent to ensure the recommendations were effective.

- B. Employee meetings will be conducted on a regular basis and notes of those meetings will be published and distributed via read files and the employee only website. Minutes will also be retained electronically by the Director of Operations / Safety Officer.

2.4.4 Change Management Process

- A. When a report received through the Hazard Identification and Tracking System or information gained through any other process results in the decision to modify a process, procedure or program the proposed change will be reviewed by the Director of Operations / Safety Officer. If the change is approved it will be implemented in accordance with the following procedures:
 - The change process including the risk assessment, will be recorded;
 - The amended process or procedure or information in the amended program, will be distributed to all flight department personnel by e-mail by the Director of Operations / Safety Officer or person assigned the task; and
 - The operations manual and other associated documentation will be amended and distributed to all document holders.
- B. Prior to undergoing any significant change that could impact the Flight Department, a change management process will be undertaken. Events that will indicate the need for such a process are:
 - The introduction of a new aircraft type;
 - Significant change in the nature of the operation (e.g. dynamic business growth, new operating environment, etc.);
 - Changes in hiring or scheduling practices;
 - Changes to organizational structure;
 - Significant change in aircraft maintenance arrangements, etc.
- C. As soon as it has been determined that the change event will occur, the Company Safety-Risk Profile will be reviewed. On the basis of that assessment, and any other available information, the Director of Operations / Safety Officer, or the person to whom the responsibility is delegated, will develop a Change Management Plan in order to ensure that any safety risks that may arise from the change will be properly identified and managed. The Change Management Plan shall be developed with the participation of the stakeholders involved in the identified change. The Change Management Plan will include:
 - A risk analysis of the change event and an assessment of the changes required to items such as:
 - Operating and maintenance procedures and processes;
 - Personnel training and competency certification;
 - Company Operations Manual;
 - Aircraft SOPs, etc.;
 - A plan for development of the required changes.

- D. When the required changes have been developed, a Safety Management System Audit will be conducted before the change is implemented. After implementation of the change the Director of Operations / Safety Officer will review system performance at regular intervals. If there is any doubt of the effectiveness of the change management process, a more comprehensive post-implementation review or a Safety Management System Audit will be conducted.

2.4.5 Continuous Improvement / Internal & External Evaluation

- A. Regular evaluation of safety performance is an integral part of an SMS. Director of Operations / Safety Officer will conduct internal evaluations at least once per year and will have an audit by an accredited external auditor at least once every two years. The internal evaluations shall be comprehensive and be conducted in accordance with the company internal evaluation processes. The SMS Evaluation Form will be used to record the evaluation results.
- B. A Remedial Action Plan will be developed for any findings made during either the internal evaluation or an external audit and will be tracked in the Corrective Action Plan Form in order to ensure that the Finding has been rectified in an appropriate and effective manner.
- C. When the evaluation is completed, it will be analyzed to ensure that the agreed acceptable level of risk, the safety objectives and targets and related SMS expectations are being achieved.
- D. The results of evaluations, safety surveys and summaries of employee feedback on safety management activities will be reviewed with the Accountable Executive. This information will also be shared with all employees.

2.4.6 Compliance Monitoring

- A. In order to ensure compliance with all applicable regulations, standards, approvals and exemptions Wings Airways will conduct a compliance review at least one each year. The Compliance Monitoring Checklist will be used for the review.
- B. The Director of Operations / Safety Officer is also responsible for monitoring the issue of new revisions to external audit standards and reviewing the changes made whenever a new revision is identified. In this review, the Director of Operations / Safety Officer will verify the applicability of such changes to our company and identify the processes / procedures that will need to be developed or modified in order to ensure continued conformance to the Standard. The Director of Operations / Safety Officer will then coordinate the documentation and implementation of these changes within Wings Airways with the affected department heads.

2.4.7 Auditing Frequently Outsourced Service Providers

- A. One or more of the following service providers may be used to support the needs of the Flight Department.
- Fuel Providers;
 - Ground Transportation provider;
 - The Taku Glacier Lodge;
 - SMS and Manuals Provider;
 - Flight Planning and Weather Service;
 - Dock Installation and removal
 - Other service providers.

- B. The Director of Operations / Safety Officer should periodically audit these providers to ensure they are continually providing the necessary level of support with the minimum level of risk practical.

Note: A service provider should be audited if they experience any major changes, such as new ownership, abnormal employee turnover, accidents / incidents or regulatory violations, etc.

- C. Audits could include, but are not limited to:
- Reviewing contracts and agreements to verify they are still valid and being followed.
 - Researching reputable industry sources for feedback and reviews of the service provider.
 - Speaking with the vendor directly about pertinent topics, requirements, and risks.
 - Conducting an onsite visit of the vendor's facility to ensure it meets appropriate standards for safety, health, security, etc.

2.5.1 Safety Award Program

- A. Wings Airways strongly believes in safety and our SMS. We not only expect our employees to take an active part in the SMS but we also encourage them through our Individual Safety Award Program.
- B. Wings Airways will award \$100.00 to an individual who contributes significantly to our SMS. The contribution may be a single act that prevented damage or injury, or it may be in the form of an investigation, hazard resolution, hazard identification, or anything that significantly enhances the SMS. The single act does not have to be carried out while on duty.
- C. Any employee can initiate a nomination. To do so, they should submit their nomination via the Nomination for Employee Safety Award form. This form can be found on the employee website (mywingsairways.com).
- D. The nomination will be forwarded to the management team for final review.

2.5.2 Safety Communication

- A. Wings Airways will work diligently to ensure that a positive safety culture prevails throughout the organization. In order to achieve that objective, open communication up and down the organization chain will be encouraged and safety information will be shared.
- B. The Director of Operations / Safety Officer shall ensure that consistent feedback is provided to all company personnel who participate in the safety management activities, so as to encourage the future participation of employees in these activities.
- C. Safety-related communication will be performed by the Director of Operations / Safety Officer via email, memo, text or other means of electronic communication. This channel is also permanently available for all company personnel to communicate with the Director of Operations / Safety Officer.

2.5.3 Safety Training (SMS)

- A. As part of the Wings Airways safety promotion activities, a safety training program ensuring personnel are trained and competent to perform their SMS duties will be developed by the Director of Operations / Safety Officer. The training content shall be reviewed at least annually by the Director of Operations / Safety

Officer to verify currency. The scope of the safety training shall be appropriate to the individual employee's involvement in the SMS.

- B. Safety training should follow a building-block approach and will be conducted initially as part of employee indoctrination training. Refresher training will be conducted annually thereafter. All safety training shall be specifically documented in each employee's training record.
- C. The specific requirements are outlined in the sections below:
 - a. Safety Training for Employees: Safety training for employees will address:
 - i. Safety roles and responsibilities, including following all operating and safety procedures, recognizing and reporting hazards, non-punitive policy, anonymous reporting, feedback, safety awards and incentives, Occupational Safety and Health required training, emergency response plan.
 - ii. The Wings Airways safety policies, SMS fundamentals and overview. The contents should include the definition of hazards, consequences and risks, and the safety risk management process.
 - b. Safety Training for Managers: In addition to the training objectives established for employees, training objectives for managers and supervisors will address:
 - i. Safety responsibilities, including promoting the SMS and engaging employees in hazard reporting, compliance with national and local safety requirements, allocation of resources, safety communication, establishing acceptable levels of safety.
 - ii. A detailed knowledge of the safety process, hazard identification and safety risk assessment and mitigation, and change management.
 - iii. Safety data analysis.
 - iv. Emergency Response Plan
 - c. Safety Training for the Accountable Executive: Training should provide the AE with a general awareness of the Wings Airways SMS. Safety training for the AE will address:
 - i. SMS roles and responsibilities.
 - ii. Safety policy and objectives.
 - iii. Safety risk management.
 - iv. Safety assurance.
 - v. Emergency Response Plan
 - d. Safety Training for the Safety Officer: The Safety Officer should include further safety training to broaden his/her knowledge in selected subjects related to safety management. It is recognized that training is an ongoing effort and should not preclude appropriate individuals from assignment as the Safety Officer. The Safety Officer should strive to be trained in the following subjects:
 - i. Formal SMS training*;
 - ii. Accident and incident investigation;
 - iii. Emergency Response Plan;
 - iv. Human factors;
 - v. Aviation safety management;
 - vi. Risk management;
 - vii. Occupational safety and health;
 - viii. Quality management; and

- ix. Recognition of Hazardous Materials/Dangerous Goods.
- *Formal safety management training for the Director of Safety will be attained as soon as practicable.

Section 3: Operational Control

Operational control means the exercise of authority over the initiation, continuation, diversion or termination of a flight in the interest of the safety of the aircraft and the regularity and efficiency of the flight. It also includes any provisions for following of the flight until it arrives at its destination.

The following personnel have been trained and tested by Wings Airways and have been found competent to exercise operational control in the order listed:

- | | |
|----------------------------|-----------------|
| a. Director of Operations | Wayne Love |
| b. Chief Pilot | David Ashe |
| c. President | Arne Johnson |
| d. Director of Maintenance | Donald Bach |
| e. Operations Personnel | Samantha Greene |

3.1 Responsibilities and Authorities

All flights or series of flights away from base must be authorized before departure by the authorized list of management above. The operational control of a flight is delegated to the pilot-in-command.

Wings Airways uses a pilot self-dispatch system. A flight release will be deemed to have been given when the pilot-in-command has determined that:

- A. The Flight may be conducted in accordance with FAA civil aviation regulations and standards.
- B. The validity of all required licenses, permits, certificates, has been verified and the required equipment, documents, manuals and information, including those listed below, are on board the aircraft and accessible on the flight deck:
 - Aircraft Certificate of Airworthiness
 - Aircraft Certificate of Registration
 - Insurance Certificate
 - Radio Telephone License or Permits as necessary
 - Aircraft Flight Manual
 - Checklists
 - Aircraft Weight and Balance
 - Minimum Equipment List
 - Copy of the Company's GOM and Op Specs
 - SMS Program
 - Aeronautical Charts as necessary
- C. All operating requirements specified in the SMS Program have been met.
- D. All required aircraft maintenance work has been completed, the aircraft Certificate of Airworthiness is in force and sufficient time remains on the aircraft before the next required maintenance, to complete the job for which the aircraft is being released.
- E. The meteorological conditions are such that the flight can be conducted safely and within FAA and International regulations and standards as appropriate.

- F. All the equipment aboard the aircraft is operational or is in accordance with the company's MEL.

In the event that a new requirement for a flight develops when operating away from base, the pilot-in-command will have the authority to release the aircraft after having satisfied him/herself that conditions (a) to (f) in the preceding paragraph have been met.

3.2 Flight Planning and Pre-Flight Requirements

A flight shall not be commenced until all pertinent flight data has been compiled.

Under the pilot self-dispatch system, it is the pilot-in-command's responsibility to ensure that all flight planning documents required by the SMS Program have been prepared and filed prior to departure as appropriate. S/he shall also ensure that flight planning requirements and aircraft operating rules of the State of Registry and of the State/States in which the operation is being conducted have been met. The State AIP shall be consulted if there is any doubt as to the State requirements.

3.2.1 Flight Planning Requirements

Before commencing a flight, the PIC shall be familiar with the available flight information that is appropriate to the intended flight. Wings Airways accomplishes this through the Letter of Agreement, Sectional Charts, Alaska Supplement, phone calls and pilot interaction. Operations can let pilots know who is most current or knowledgeable about the subject.

The PIC shall be familiar with all available meteorological information appropriate to the intended flight. A flight, to be conducted in accordance with the visual flight rules shall not be commenced unless current meteorological reports or a combination of current reports and forecasts indicate that the meteorological conditions along the route or that part of the route to be flown under the visual flight rules will, at the appropriate time, be such as to enable compliance with these rules, and VFR charts for the route to be flown are carried on board the aircraft.

3.2.2 Fuel Requirements

A flight shall not be commenced unless, taking into account both the meteorological conditions and any delays that are expected in flight, the airplane carries sufficient fuel and oil to ensure that it can safely complete the flight and land at the intended destination and after that, 30 minutes at normal cruising altitude. For the DHC-3T, the minimum reserve is 25 gallons.

In-flight fuel checks and fuel management shall be performed as detailed below:

- The pilot-in-command shall continually ensure that the amount of usable fuel remaining on board is not less than the fuel required to proceed to an area to which a safe landing can be made with the planned final reserve fuel remaining upon landing.
- The pilot-in-command shall advise dispatch or other Wings' aircraft of a minimum fuel state by declaring MINIMUM FUEL when, having committed to land at a specific destination.

3.2.3 Aircraft Weight and Balance

The pilot-in-command is responsible for the proper loading, including load security, weight and weight distribution. All cargo and carry-on baggage is carried in compliance with FAR 135.87. Small personal items such as cameras and purses are allowed as carry-on baggage provided that they are restrained with a strap that is attached to the passenger or goes around the arm or shoulder of the passenger. They can also be secured with the seatbelt, if as long as they do not block the aisle or an exit.

- A. Actual weights will be used to compute loads.
 - i. Actual passenger weight and hand carried articles.
 - 1. Actual passenger weight may be determined by weighing each passenger and hand carried item.
 - 2. Actual passenger weight may be determined by asking the passenger their weight and adding 10 pounds to that weight. Also add thereto the weight of their hand carried items.
 - ii. Actual passenger baggage weight
 - 1. Actual passenger baggage weight will be determined by weighing the baggage.
 - iii. Actual cargo weight
 - 1. Actual cargo weight may be taken from the bill of lading.
 - 2. Actual cargo weight may be determined by weighing the cargo.
 - ix. Actual crew weight.
 - 1. The actual crew weight will include the actual weight of the pilot and crew baggage.
- B. The pilot-in-command of each flight will ensure that the aircraft is loaded within the appropriate weight and balance limitations and is the final authority as to how the aircraft is loaded.
 - i. The pilot-in-command or operations personnel will determine the weight of the load by using actual weights.
 - ii. The pilot-in-command will use one or more of the following methods to ensure that the aircraft is loaded so that the center of gravity remains within limits.
 - 1. The use of weight and balance information and procedures in the aircraft-operating manual.
 - 2. Observing baggage compartment weight limitations, as appropriate, for the load.
 - 3. The use of a SEE GEE center of gravity calculator.

3.2.4 Aircraft Performance

Prior to flight, PIC shall ensure that aircraft performance will permit the take-off and departure to be carried out safely, complying with:

- A. The approved operating limitations contained in its flight manual,
- B. the terms of its certificate of airworthiness, and
- C. the performance standards described in this section.

Performance calculations shall take account of all factors that significantly affect the performance of the aircraft including water conditions and wind velocity.

Take-off

The airplane shall be able, in the event of a critical power failure at any point in the take-off, either to discontinue the take-off and stop within either the waterway

available, or to continue the take-off and clear all obstacles along the flight path by an adequate margin until the airplane is in a position to return for landing or continue en-route.

Landing

The airplane shall, at the point of intended landing and at any alternate destination, after clearing all obstacles in the approach path by a safe margin, be able to land, with assurance that it can come to a stop to a satisfactorily low speed within the landing distance available. Allowance shall be made for expected variations in the approach and landing techniques.

3.2.5 List of Passengers

The PIC shall ensure that a copy of the passenger manifest is left at the point of departure of a flight or series of flights. If there is any unplanned enplaning or deplaning of passengers, the PIC shall ensure that the company is advised, or a copy of the revised manifest is left at the point of departure.

3.3.0 Aircraft Defects

It is the responsibility of the PIC to ensure that the aircraft Certificate of Airworthiness is in force before commencing a flight. The Certificate of Airworthiness of an aircraft is not in force unless the equipment, systems and instruments prescribed in the applicable airworthiness standard and all required equipment are functioning correctly.

The Certificate of Airworthiness of an aircraft is also not in force if the aircraft has any malfunction or defect, unless the details of the malfunction or defect are recorded in the aircraft log and unmistakable warning is given at the flight crew station by removing, placarding or tagging the affected item. In the case of deferred defects, the PIC shall assure him/her that the affected equipment will still allow the flight to be completed safely.

3.3.1 Mechanical Irregularities

- A. An Aircraft Maintenance Log (AML) will be carried in each aircraft during all flight operations.
- B. The pilot-in-command shall immediately contact Operations and Maintenance to inform them of each mechanical irregularity that comes to the pilot's attention during pre-flight inspections, in flight or post-flight inspections. Then enter or have entered for him/her in the aircraft maintenance log each discrepancy.
- C. The pilot-in-command will ensure that all mechanical irregularities have been corrected by authorized maintenance personnel prior to flight in the aircraft.
- D. The pilot-in-command will ensure that all mechanical irregularities have been corrected by authorized maintenance personnel prior to flight in the aircraft.
- E. The Director of Maintenance or his representative will issue a new aircraft maintenance log upon the return to service of an aircraft following a required airworthiness inspection, and will ensure that:

1. The time and date for the last 100 hour and annual inspection are current and correct.
 2. The aircraft times for the next required airworthiness inspections are current and correct.
 3. Aircraft maintenance log continuation sheets are issued when necessary.
 4. The completed aircraft maintenance log is retained pursuant to the record keeping requirements of the maintenance chapter of the operations manual.
- F. The pilot-in-command will ensure that the Aircraft Maintenance Log is in the aircraft during assigned flight crew duties.

3.3.2 M.E.L. Procedures

- A. The Pilot in Command is responsible for entering all deferrable mechanical irregularities encountered during each leg of each flight in the Discrepancy Log. Prior to making such entries the PIC must contact Maintenance to determine that he/she can defer the item per the MEL.
- B. It is the Pilot in Commands responsibility to check all inoperative equipment as exhibited by placards and entries made in the Deferred Aircraft Maintenance Sheet during the pre-flight inspection.
- C. It is the Pilot in Commands responsibility to review the MEL and ensure compliance with associated operational conditions and/or restrictions to assure safety of flight prior to departure.
- D. The Pilot in Command, in coordination with Maintenance will be responsible for installing INOP placards when deferring an item per the MEL.
- E. No aircraft shall depart in an un-airworthy condition or with less equipment than that specified in the MEL for existing conditions. The final decision to operate the flight lies with the Pilot in Command.
- F. The Pilot in Command must follow the procedures outlined in the GOM Chapter 3 B.3 for any equipment or items that are inoperative that may not be deferred per the MEL.
- G. Prior to flight operations, the pilot-in-command will check the aircraft MEL Deferred Aircraft Maintenance Sheet for any deferred items and the maintenance log and verify that the airworthiness inspections record is complete.
 1. Prior to flight operations, the pilot-in-command will check the aircraft maintenance log and verify that the intended aircraft operation will not exceed any of the airworthiness inspections time limitations.
 2. Prior to flight operations, the pilot-in-command will check the aircraft maintenance log and verify that all the listed mechanical irregularities have been corrected.
 3. The date, current Hobbs time, signature and certificate number of the maintenance person who made the correction constitutes the return to service authorization.
 4. The pilot-in-command is not authorized to operate an aircraft beyond the time limitations of the required airworthiness inspections, or with a known mechanical irregularity, which has not been corrected by maintenance personnel.
 - 5.

3.4.0 Distribution of Operational Information

The Operations Reading Binder is located at the Seadrome office in a three-ring binder and contains

pertinent notices and safety publications. It is mandatory for pilots to find some time each week to read and initial the contents. This is a part of Wings' recurrent training and safety program and consistent participation is required.

3.4.0 Deviations to the SMS Program Provisions

The Director of Operations may approve temporary amendments to the SMS Program or deviations to the provisions contained in it. Before any such deviations are implemented, they will be subject to a risk assessment and procedures implemented to reduce the identified risks to as low a level as reasonably practical. Temporary amendments or deviations will be distributed in the same manner as other operational information. They will be also transmitted to all aircraft crew verbally, via e-mail or text along with information on the conditions under which such deviations may, or must, be used, if such considerations apply.