

Third Country Operators (TCO) Authorisation - How to get one (it's free!)

OPSGROUP Team
2 November, 2020



In Short: You need a TCO if you want to operate commercially in the EU. It's **free** and **pretty easy** to get one if you meet ICAO regulations (it just takes a little time to get everything ready to send).

What is it and who needs one?

"Third Country Operator" (or TCO) refers to non-European aircraft operators conducting **commercial** air transport flights **into the EU**. This includes business aviation flights that intend to operate commercial charter flights into the EU.

Private flights are naturally not commercial and are **exempt**. There are also provisions to allow for 'one-off' or short-notice non-scheduled flights by commercial air transport operators that do not hold a TCO authorisation.

The TCO regulation requires TCOs to hold an authorisation issued by the European Aviation Safety Agency (EASA). The purpose of the authorisation is to confirm that the operator meets international operational and safety standards.

You can see a list of operators who already have TCOs [here](#).

What is it measuring?

In one sentence: you are being asked to **demonstrate compliance** with international standards as stipulated in Annexes to the Convention on International Civil Aviation.

In particular Annexes 1 (Personnel licensing), 2 (Rules of the Air), 6 (Operation of Aircraft, Part I (International Commercial Air Transport – Aeroplanes) or Part III (International Operations-Helicopters), as applicable, 8 (Airworthiness of Aircraft), 18 (Dangerous Goods), and 19 (Safety Management).

Some common gotchas:

- Do you have a Safety Management System (SMS)? Even if SMS is not required by your local regulator, EASA expects these applicable international standards to be complied with when, operating to the EU.
- You need a Flight Data Analysis Program (FDAP) if your planes maximum take-off weight is greater than 27,000kgs (59,500lbs).
- Do you comply with the reinforced Cockpit Door Regulations?
- Are you compliant with Mode S Elementary, ADS-B Out and Mode S Enhanced Surveillance? Or do you have a plan in place to retrofit?

If you operate in a regulated environment (i.e. most Western countries) – you won't find too many quirks with ICAO regulations if you are a Part 121 operator. If you are Part 135, you might need to work on a few things.

How closely does EASA look at your compliance?

According to EASA, the deep dive of your compliance follows *“a risk-based approach that takes into account the safety performance of the operator involved, the safety information available for the State of Operator and the State of Registry, and the level of exposure to European citizens.”*

Good news – if you are from Australia for example, you've never had an incident and are flying new planes, you are probably going to be scrutinized far less than say an operator from Syria.

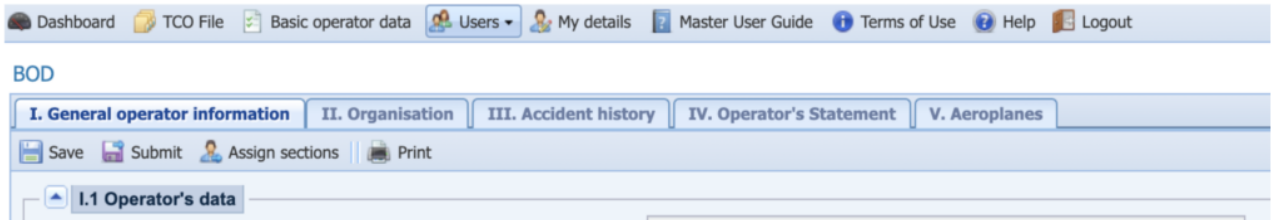
A small note here from my experience. Some will have you believe that IS-BAO certification is required to demonstrate compliance for SMS and other items. **This is not true. You do not need IS-BAO certification.** If you have it, great, but EASA will assess your application on a case-by-case basis and ask for extra information if they need it.

How to get a TCO approval?

So, let's start off with the good news. It's **free** to apply and get authorised.

It's actually pretty simple to apply:

1. Download and Complete the Application Form [here](#). You will need to provide some basic information along with the form and then email it in.
2. You will get setup with a login to the TCO Portal as the Master User. (Pro Tip, setup a second person with access in case you forget your login). Note: The portal is a little prehistoric and cumbersome to use, so hit the “save” button often!
3. You will then need to insert a whole bunch of technical information about your operation and fleet into the Basic Operator Data. This will take several hours and have you searching for AOC's, COA's, Insurance papers etc, but you should have most of it. You can save time by assigning certain sections to others in your company. If you get stuck there is some help available within the portal itself and I have found all my interactions with EASA staff during multiple TCO applications to be really friendly. They seem to respond quickly and are happy to help out if you get stuck or confused.



4. When you submit, they will take up to 30 days to complete the technical evaluation. They actually prompt you if you haven't submitted after a period of time. Naturally they will normally ask some extra technical questions to demonstrate compliance. As you don't send them your operations manuals you normally will need to find the reference to your procedures and send it back to them via the portal.
5. After the back-and-forward and requests for extra information, if they are happy with your submission they will issue your TCO approval! Yay, you did it!

What next?

Well – EASA monitors compliance via ramp checks, amongst other ways – but we already gave you the low down on how to prepare for that a few months back.

Did we miss something? Drop a comment below.

Extra Reading:

- EASA TCO Website
- EASA TCO FAQ
- FAA Circular on TCO
- Pakistan International Airlines recently lost their TCO approval due to what we will call “crew qualification irregularities”!