

# Consultation regarding the change to UK AMC/GM for Regulation (EU) No. 965/2012 - Safety Risk Assessment of flying over or near a conflict zone

CAP3152

Published by the Civil Aviation Authority, 2025

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First published August 2025  
Second edition

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## Chapter 1

# Purpose and Scope

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## Introduction

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The UK is a signatory State to the Chicago Convention and therefore as an ICAO Member State, has generally adopted the ICAO Annexes and enacted them into UK Law. The Standards and Recommended Practices (SARPs) contained in Annex 6, Part 1 are reflected in UK Law, in the Air Navigation Order 2016 and in UK Regulation (EU) 965/2012 (The Air Operations Regulations) and apply to all UK Operators conducting Domestic and International Commercial Air Transport.

The purpose of this consultation is to seek views on the proposal to update AMC/GM for the Air Operations Regulations to reflect the requirements introduced by amendment 44 to Annex 6, Part 1, International Commercial Air Transport – Aeroplanes.

It is important to the CAA that the everyone has an opportunity to voice their opinion on matters that could affect them. For this reason, we are asking for comments on the proposed changes to the Regulations and the CAA welcomes comments from every sector of the community. This includes the general public, government agencies and all sectors of the aviation industry, whether as an aviator, aviation consumer and/or provider of related products and services.

## Understanding the document

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The following proposals affect the AMC/GM for UK regs (EU) 965/2012, ORO.GEN.200 Management System. The proposal is presented as proposed amendments to the AMC/GM with rationale, indicating the specific addition and changes to Acceptable Means of Compliance (AMC), with the specific text adjustments indicated as follows.

- (a) ~~Text proposed to be deleted, is shown struck through;~~
- (b) New text proposed to be added is underlined in red;
- (c) ~~Text to be deleted is shown struck through,~~ followed by the replacement text, which is underlined in red.

## Chapter 2

## Our Proposals

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### Background

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The MH17 investigation revealed that operators regard the airspace along the intended flight route as being safe, unless otherwise stated. Annex 6, Part I was lacking a provision for the operator to ensure that the flight will not be commenced before it is ascertained by every reasonable means available that the airspace can be safely used for the operation. The proposed AMC amendment substantiates the need for the operator to conduct a risk assessment and, when necessary, to take appropriate risk mitigation measures to ensure a safe and secure flight operation.

The amendment also incorporates reference to information provided to the operator while the aircraft is in flight, in a similar way as information is provided en-route for in-flight re-planning, since this could result in a change to the intended route. The amendment introduced concerning conflict zones to Annex 6, Part I is an important missing element of a number of amendments to the Annex framework related to conflict zones. It will bring Annex 6 in line with a similar amendment proposal for Annex 11 — Air Traffic Services.

The policy objective is to propose additional AMC & GM text, to the existing Implementing Rule, ORO.GEN.200(a)(3). The requirement introduces the need for Operators to conduct a safety risk assessment of flying over or near a conflict zone.

This consultation also includes a dedicated questionnaire, within Chapter 3. Inviting everyone to provide their inputs on potential costs and benefits that need to be considered in the adoption and implementation of the proposed changes, to enable an accurate assessment to be conducted by the CAA.

## Proposed Amendments

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### **AMC2 ORO.GEN.200(a)(3) Management System**

- (a) The operator should ensure that a flight will not commence or continue as planned unless it has been ascertained by every reasonable means available that the airspace containing the intended route from aerodrome of departure to aerodrome of arrival, including the intended take-off, destination and en-route alternate aerodromes, can be safely used for the planned operation. When intending to operate over or near conflict zones, a risk assessment shall be conducted and appropriate risk mitigation measures taken to ensure a safe flight.
- (b) The operator should include as a minimum, guidance provided by the State of the Operator, State of the airspace and of destination. This may include, letters, NOTAMS and other relevant information which may be issued.
- (c) Risk Assessment Manual for Civil Aircraft Operations Over or Near Conflict Zones (Doc 10084) contains further guidance on risk assessment for air operators when flying over or near conflict zones.

### **GM5 ORO.GEN.200(a)(3) Management System**

- (a) Guidance on safety risk assessments is contained in the Safety Management Manual (SMM) (Doc 9859).
- (b) The Risk Assessment Manual for Civil Aircraft Operations Over or Near Conflict Zones (Doc 10084) contains further guidance on risk assessment for air operators when flying over or near conflict zones.

Note: "Reasonable means" is intended to denote the use, at the point of departure or while the aircraft is in flight, of information available to the operator either through official information published by the aeronautical information services or readily obtainable from other sources.

**Rationale:**

AMC2 ORO.GEN.200(a)(3) is the proposed text to be introduced, to demonstrate alignment with Standard 4.1.2 of ICAO Annex 6 Part I.

ORO.GEN.200(a)(3) management System, already requires the identification of aviation safety hazards entailed by the activities of the operator, their evaluation and the management of associated risks, including taking actions to mitigate the risk and verify their effectiveness.

With the introduction of this proposed text, will hopefully, clarify any ambiguity regarding this requirement and direct Operators to the ICAO Doc 10084.



## Chapter 3

## Responding to this consultation and next steps

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### How to respond to this consultation

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Responses to this consultation should be submitted electronically using the CAA online consultation tool Citizen Space, no later than October 24 2025. We cannot respond to questions and/or comments through email and beyond this date.

This chapter gives the opportunity to answer the questions and provide valuable feedback about the proposed regulation. You will be asked to provide personal information, such as name, email address, if the responses reflect your personal views and if you wish the comments and/or responses to be published anonymously. Additionally, you will be asked if you are officially representing an organisation and if you are authorised to submit feedback on behalf of the organisation, and if that is the case, the organisation's name, and to what type/group of organisation do the comments and responses best represent (see below example).

### Next Steps

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At the end of the response period, we will review each comment and submission received. Your feedback will be used to refine the policy, implementation timeline and proposed changes to the UK Air Ops Regulations. We will publish a consultation response document that summarises the feedback we received, explains how we took your views and suggestions into account and sets out our policy decisions.