



NOTICE OF PROPOSED AMENDMENT (NPA) No 2011-18

DRAFT DECISION OF THE EXECUTIVE DIRECTOR OF THE EUROPEAN AVIATION SAFETY AGENCY

**on the development of Acceptable Means of Compliance and Guidance Material
for the implementation and measurement of Safety Key Performance Indicators
(SKPIs) (ATM performance IR)**

EXECUTIVE SUMMARY

The purpose of this Notice of Proposed Amendment (NPA) is to develop Acceptable Means of Compliance (AMCs) and Guidance Material (GM) to Commission Regulation (EU) No 691/2010 (hereinafter referred to as the 'performance scheme regulation') as amended by Regulation (EU) No .../....

The performance scheme regulation for air navigation services and network functions implements Article 11 of the framework regulation [(EC) No 549/2004]. Annex 1 of the performance scheme regulation lists three Safety Key Performance Indicators (SKPIs) to be developed jointly by the Commission, the Member States, EASA and EUROCONTROL and to be adopted by the Commission prior to the first reference period (1 January 2012).

The work for the development of safety KPIs was carried out by the 'E3-Task Force' group associating the Commission, EUROCONTROL and EASA. An extensive consultation process took place, both informal and formal, with two workshops with Member States and stakeholders. The final report of the E3 group was delivered to the Commission on 30.6.2011 and it was also consulted with the Single Sky Committee (SSC) at its 42nd meeting (6–7 July 2011). Based on that, the Commission developed Regulation (EU) No .../... amending the performance scheme regulation which was voted positively by the SSC during its 43rd meeting (28–29 September 2011).

With Regulation (EU) No .../... and in order to facilitate the implementation and measurement of the safety KPIs, EASA — in consultation with the Performance Review Body — was tasked to adopt before the start of the first reference period the Acceptable Means of Compliance and Guidance Material for the three safety KPIs as listed in the amended performance scheme regulation.

In order to comply with the timeframe requested by the Commission (i.e. the adoption of this AMC/GM to be made at the same time with the adoption of the amendment to the performance scheme regulation), the Agency applies for this NPA a reduced consultation period of four (4) weeks.

TABLE OF CONTENTS

A.	EXPLANATORY NOTE	4
I.	GENERAL.....	4
II.	CONSULTATION	5
III.	COMMENT RESPONSE DOCUMENT.....	5
IV.	CONTENT OF THE DRAFT DECISION.....	5
A)	BACKGROUND AND REGULATORY FRAMEWORK.....	5
B)	CONTENT OF AMC/GM	8
I.	GENERAL.....	8
II.	EFFECTIVENESS OF SAFETY MANAGEMENT (EoSM)	8
III.	SEVERITY CLASSIFICATION BASED ON THE RISK ANALYSIS TOOL METHODOLOGY	11
IV.	JUST CULTURE.....	14
V.	REGULATORY IMPACT ASSESSMENT	15
B.	DRAFT ANNEX (v0.4) AMC & GM SKPIS.....	16
C.	APPENDICES	71
I	DRAFT COMMISSION REGULATION (EU) No .../... AMENDING COMMISSION REGULATION (EU) No 691/2010 LAYING DOWN A PERFORMANCE SCHEME FOR AIR NAVIGATION SERVICES AND NETWORK FUNCTIONS.....	71

A. Explanatory Note

I. General

1. The purpose of this Notice of Proposed Amendment (NPA) is to develop Acceptable Means of Compliance (AMCs) and Guidance Material (GM) to Commission Regulation (EU) No 691/2010¹ as amended by Regulation (EU) No .../.... The version of the amendment to Regulation (EU) No 691/2010 (hereinafter referred to as the 'performance scheme regulation') which was voted positively by the Single Sky Committee during its 43rd meeting can be found in Appendix I to this Explanatory Note.
2. The scope of this rulemaking activity is outlined in the Terms of Reference (ToR) ATM.022² (RMT.0408) and is described in more detail below.
3. The European Aviation Safety Agency (hereinafter referred to as the 'Agency') is directly involved in the rule-shaping process. It assists the Commission in its executive tasks by preparing draft regulations, and amendments thereof, for the implementation of the Basic Regulation³ which are adopted as 'Opinions' [Article 19(1)]. It also adopts Certification Specifications, including Airworthiness Codes and Acceptable Means of Compliance (AMCs) and Guidance Material (GM) to be used in the certification process [Article 19(2)].
4. When developing rules, the Agency is bound to follow a structured process as required by Article 52(1) of the Basic Regulation. Such process has been adopted by the Agency's Management Board and is referred to as the 'Rulemaking Procedure'⁴.
5. This rulemaking activity is included in the Agency's Rulemaking Programme for 2012. It implements the rulemaking task ATM.022 (RMT.0408) 'Development of Acceptable Means of Compliance (AMCs) and/or Guidance Material (GM) for Safety Key Performance Indicators (SKPIs) to implement Commission Regulation (EU) No 691/2010 laying down a performance scheme for air navigation services and network functions and amending Regulation (EC) No 2096/2005 laying down common requirements for the provision of air navigation services'.
6. The text of this NPA has been developed by the Agency in consultation with experts from the Commission and EUROCONTROL. It is submitted for consultation of all interested parties in accordance with Article 52 of the Basic Regulation and Articles 5(3) and 6 of the Rulemaking Procedure.
7. The proposed Acceptable Means of Compliance and Guidance Materials have taken into account the development of European Union and international law (ICAO), and the harmonisation with the rules of other authorities of the European Union's main partners as set out in the objectives of Article 2 of the Basic Regulation. As requested by Commission Regulation (EU) No 691/2010, the proposed AMCs/GM have been developed

¹ OJ L 201, 3.8.2010, p. 1. Regulation as last amended by Commission Regulation (EU) No .../... (OJ L xx, xx.xx.201x, p. xx).

² [http://easa.europa.eu/rulemaking/docs/tor/atm/EASA-ToR-RMT.0408_\(ATM.022\)-01-18082011.pdf](http://easa.europa.eu/rulemaking/docs/tor/atm/EASA-ToR-RMT.0408_(ATM.022)-01-18082011.pdf)

³ Regulation (EC) No 216/2008 of the European Parliament and of the Council of 20 February 2008 on common rules in the field of civil aviation and establishing a European Aviation Safety Agency, and repealing Council Directive 91/670/EEC, Regulation (EC) No 1592/2002 and Directive 2004/36/EC (OJ L 79, 19.3.2008, p. 1). Regulation as last amended by Regulation 1108/2009 of the European Parliament and of the Council of 21 October 2009 (OJ L 309, 24.11.2009, p. 51).

⁴ Management Board decision concerning the procedure to be applied by the Agency for the issuing of opinions, certification specifications and guidance material (Rulemaking Procedure), EASA MB 08-2007, 13.6.2007.

on the basis of the existing EUROCONTROL Safety Maturity Survey Framework and the EUROCONTROL Risk Analysis Tool and therefore they include the best practices available.

II. Consultation

8. To achieve optimal consultation, the Agency is publishing the draft decision of the Executive Director on its Internet site. Comments should be provided within four (4) weeks. As already explained in the ToR of the rulemaking task, it is not possible for the Agency to comply with Article 6(5) of the Rulemaking Procedure because the AMCs/GM need to be published at the same time when the publication of the amendment to the performance scheme implementing rule is published in the Official Journal. It was requested in the performance scheme regulation to do so to allow Member States and the air navigation service providers (ANSPs) to apply them in order to comply with the regulation prior to the first reference period (RP1, 2012–2014) of the performance scheme.
9. The Commission, with its letter dated 27th of June 2011, requested the Agency to adopt the AMCs/GM before the first reference period. In order to comply with the timeframe, the Agency applies for this NPA a reduced consultation period of four (4) weeks. Moreover, and as explained below in paragraphs 13 to 15, the safety KPIs were developed by a group of experts from the Commission, EUROCONTROL and EASA and were consulted during two workshops (13th of May 2011 for the Member States, and 17th of June 2011 for all stakeholders).
10. Comments on this proposal should be submitted by one of the following methods:

CRT: Send your comments using the Comment Response Tool (CRT) available at <http://hub.easa.europa.eu/crt/>.

E-mail: Comments can be sent by e-mail only in case the use of CRT is prevented by technical problems. The(se) problem(s) should be reported to the [CRT webmaster](mailto:CRT_webmaster@easa.europa.eu) and comments should be sent by e-mail to NPA@easa.europa.eu.

Correspondence: If you do not have access to the Internet or e-mail, you can send your comments by mail to:

Process Support
Rulemaking Directorate
EASA
Postfach 10 12 53
50452 Cologne
Germany

Comments should be submitted by **18 November 2011**. If received after this deadline, they might not be taken into account. Due to the reasons explained in paragraphs 8 and 9 the CRD will be published together with the Decision of the Agency's Executive Director.

III. Comment Response Document

11. All comments received in time will be responded to and incorporated in a comment response document (CRD). The CRD will be available on the Agency's website and in the Comment Response Tool (CRT).

IV. Content of the draft Decision

a) Background and regulatory framework

12. The European legislative framework for the field of ATM/ANS consists of the following legislative package under the Single European Sky (SES) legislative initiative:

- The framework regulation [(EC) No 549/2004] laying down the framework for the creation of the Single European Sky;
- The service provision regulation [(EC) No 550/2004] on the provision of air navigation services in the Single European Sky;
- The airspace regulation [(EC) No 551/2004] on the organisation and use of airspace in the Single European Sky;
- The interoperability regulation [(EC) No 552/2004] on the interoperability of the European Air Traffic Management network;

and their Implementing Rules (IRs).

These regulations were amended by the SES II legislative package via Regulation (EC) No 1070/2009. The SES II package amended Article 11 of the framework regulation laying down requirements for performance scheme for improvement of the performance of air navigation services.

13. Commission Regulation (EU) No 691/2010 on the performance scheme for air navigation services and network functions (performance scheme regulation) implements Article 11 of the framework regulation. Annex 1 of the performance scheme regulation lists three Safety Key Performance Indicators (SKPIs) to be developed jointly by the Commission, the Member States, EASA and EUROCONTROL and to be adopted by the Commission prior to the first reference period (1 January 2012):

- The first safety KPI shall be the effectiveness of safety management for air navigation service providers and national supervisory authorities respectively, as measured by a methodology based on the ATM Safety Maturity Survey Framework.
- The second safety KPI shall be the application of the severity classification of the Risk Analysis Tool to allow harmonised reporting of severity assessment of Separation Minima Infringements, Runway Incursions and ATM Specific Technical Events at all Air Traffic Control Centres and airports with more than 150 000⁵ commercial air transport movements per year (yes/no value).
- The third European Union wide safety KPI shall be the reporting of the just culture.

No European Union wide targets for the above safety KPIs are required by Commission Regulation (EU) No 691/2010 for the first reference period (RP1, 2012–2014). During RP1, the Commission shall use the data collected to validate these KPIs and assess them to ensure that safety risk is adequately identified, mitigated and managed. On that basis, the Commission shall adopt new safety KPIs for the second reference period (RP2) if necessary, through the revision of Commission Regulation (EU) No 691/2010. Moreover, it is the intention to use the data collected during the RP1 to establish the performance targets for the following reference period.

The safety key performance indicators as required by Commission Regulation (EU) No 691/2010 were developed on the basis of two mentioned tools developed by EUROCONTROL [ATM Safety Framework Maturity Surveys (SFMS) and the Risk Analysis Tool (RAT)].

14. The work for the development of safety KPIs was carried out by the E3 group associating the Commission, EUROCONTROL and EASA. An extensive consultation process took place, both informal and formal, with two workshops in particular (13th of May 2011 for the Member States, and 17th of June 2011 for all stakeholders). The final report (version 3) of the E3 group work was delivered to the Commission on

⁵ This value should be amended with the adoption of Commission Regulation (EU) No .../... (see Appendix I to this NPA).

30.6.2011 and it was consulted with the Single Sky Committee during its 42nd meeting on the 6th and 7th of July 2011.

15. Based on the E3 final report, the Commission has developed and is in the process of adopting the regulation amending the performance scheme regulation (Appendix I to this Explanatory Note). Article 1(e) of the amending regulation mandates to the Agency the development and adoption, in consultation with PRB, of AMCs/GM to it before the beginning of the first reference period (RP1).
16. The EASA rulemaking process can result either in an Opinion to the European Commission containing proposals for amendments to the Basic Regulation or Implementing Rules (IRs) or in Decisions of the Executive Director of the Agency containing Acceptable Means of Compliance (AMCs), Certification Specifications (CSs), or Guidance Material (GM).
17. IRs are directly applicable and binding on persons (e.g. ATCOs, pilots), organisations (e.g. ANSPs, air operators) and competent authorities (e.g. NSAs, NAAs) in their entirety. They are used to establish common requirements and mandate uniform behaviour in relation to the subject being regulated.
18. AMCs are non-binding material. AMCs specify a means by which the requirements contained in the Basic Regulation and in the IRs can be met. AMCs benefit from a presumption of compliance with the IRs, meaning that, by achieving compliance with the AMC, compliance with the related IR is also achieved. However, applicants may decide to show compliance with the requirements using other means, and competent authorities may also produce their own alternative means of compliance. With its Opinion No 03/2011⁶ to the European Commission, the Agency has proposed to formalise the process for the development and acceptance of alternative means of compliance for the field of air operations and flight crew licensing at the level of Implementing Rules. The Agency intends to also propose similar procedure and formalisation for the field of ATM/ANS.
19. GM is also non-binding material but provides an explanation on the requirements in the Basic Regulation or the IRs. It contains information, including examples, to assist the users, regulated persons and organisations, in the interpretation of the IRs.
20. When the final E3 report was delivered to the Commission, not all of the safety KPIs were fully developed. As it is stated in the report, the RAT methodology (second KPI) for ATM-specific occurrences was being redesigned by the EUROCONTROL RAT users group. The final version of this methodology was delivered to the Agency by EUROCONTROL at the end of September 2011.
21. Some parts of the RAT methodology, such as the severity classification of ATM-specific occurrences, were quite recently redesigned and therefore most of the recently developed material has been proposed as GM and the AMCs contain only the essential elements. The Agency considered that in this way the burden on the Member States will be reduced during the application of the AMCs and GM to comply with the Implementing Rule. Based on the experience gained in implementing the performance regulation, a further amendment of this decision with the AMCs and GM could propose to move some GM material into the AMCs. This will be considered together with the overall evaluation of the safety KPIs during RP1.

⁶ <http://easa.europa.eu/agency-measures/docs/opinions/2011/03/Opinion%2003-2011%20AOR.pdf>

b) Content of AMC/GM**i. General**

22. AMC 1 SKPI 'Purpose' describes that AMCs provide the means of compliance but not the only means of measurement of the safety KPIs. If a Member State wishes to use different means of compliance with the performance scheme regulation, they should inform EASA and demonstrate by means of evidence that the outcome of the application of this alternative means of compliance is comparable with this AMC.
23. AMC 2 SKPI 'Objective' provides the acceptable means of compliance for the measurement of the safety KPIs.
24. The content of GM 1 'Definitions and Abbreviations' is self-explanatory.

ii. Effectiveness of Safety Management (EoSM)

25. In accordance with the performance scheme regulation, this safety KPI needs to be developed on the basis of the EUROCONTROL Safety Maturity Survey Framework. As already explained in the E3 report, and it is also contained in the relevant GM, the safety KPI was developed departing from the elements and components of the ICAO State Safety Programme for the States and Safety Management Systems for the ANSPs. In the case of the States, the questionnaire used in the EUROCONTROL Safety Maturity Survey Framework needed to be amended in order to be aligned with the ICAO SSP and the European Regulatory Framework, while in the case of the ANSPs' questionnaire the decision was taken to do very minimal editorial changes in order to align it with the European Regulatory Framework. This also was needed in order to reduce the burden on the regulated organisations.
26. In addition, the performance-based framework in accordance with the performance scheme regulation is very demanding in terms of performance targets for the key performance areas 'capacity', 'economy' and 'environment'. The safety performance indicator 'effectiveness of safety management' needs to ensure that while achieving these performance targets, the safety performance levels of the present ATM system are not degraded. Therefore, the verification mechanism needs to be robust and objective. This verification mechanism needs also to be compatible with other verification systems for other fields of aviation and should be designed to avoid duplication of verification processes. This is necessary to have a more efficient and effective aviation system and therefore a more efficient and effective ATM system. In accordance with the amendment to the performance scheme regulation, the EASA standardisation inspections mechanism is the verification mechanism of the data provided by the competent authorities/National Supervisory Authorities for two reasons: because it is a robust mechanism of verification and because it is important to avoid duplication of processes to make the system more efficient.
27. The Agency is developing the working procedure to be applied for the purpose of the safety KPIs verification in accordance with the amendment to the performance scheme regulation. The procedure is going to be designed so as to avoid duplication of efforts that would require unnecessary extra burden or resources from the competent authorities. Therefore, it is expected that the same questionnaire that will be sent out to standardise other regulations (such as the common requirements or the safety oversight regulation), which is named 'pre-visit questionnaire', could include the questionnaire related to the effectiveness of safety management and also for the just culture of the KPI. However, the answers to the questions related to the safety KPIs will be treated differently by the Agency than the ones used for the purpose of standardisation inspections of other regulations.

28. In the context of the safety KPIs verification by the EASA, the answers to the questionnaires could be verified by the EASA using all the safety-related information available in the Agency [e.g. results of ICAO audits, annual reports to be provided in accordance with Regulation (EU) No 691/2010, National Performance Plans, State Safety Programmes, outcome of occurrences evaluated using the Risk Analysis Tool (RAT) methodology, annual reports of accident investigation bodies, reports and recommendations related to accident and serious incidents, etc.]. If necessary, the Agency may collect additional safety information from the respective State. Also it may conduct telephone interviews, undertake ad hoc inspections, or use an already planned inspection of the respective competent authority (NSA) in order to verify the presented results accordingly. Based on these results, EASA and the PRB will jointly review the safety KPIs 'effectiveness of safety management' and 'just culture' and will also assess the interdependencies with the other three key performance areas (capacity, environment and cost-efficiency).
29. In order to verify the safety KPIs reported by the Member States, the Agency intends to produce its ATM/ANS standardisation visit checklists and pre-visit standardisation questionnaire for competent authorities (CAs)/National Supervisory Authorities (NSAs) in a way which shall allow the verification of safety KPIs. The pre-visit standardisation questionnaire and checklists will be made available by the EASA to the CA/NSA ahead of the standardisation visit (e.g. 10 weeks).
30. Throughout the standardisation visit, any safety KPI-related questions will be treated in the same way as other audit questions but should there be any issues, only observations will be raised against them. The draft preliminary report will be produced in the normal manner and observations associated with the safety KPIs will be noted. Thereafter, the report procedure will follow the established routine. If during the standardisation visit it is found that the self-assessed CA/NSA score against the safety KPIs is not correct, the CA/NSA will be required to correct that score.
31. AMCs 3 to 5 and GM 2 to 4 describe how the effectiveness of the safety management KPIs should be measured, evaluated and verified at State and at ANSPs level.
32. AMC 3 SKPI 'Measurement of Effectiveness of Safety Management KPI — General' describes how the EoSM KPI should be measured by verified responses to questionnaires at State/competent authority and at service provision level. It explains that when answering the questions, one of the following levels of implementation should be selected:
- Level A which is defined as 'Initiating';
 - Level B which is defined as 'Planning/ Initial Implementation';
 - Level C which is defined as 'Implementing';
 - Level D which is defined as 'Managing & Measuring'; and
 - Level E which is defined as 'Continuous Improvement'.
- Based on the responses, the following scores should be derived:
- The overall effectiveness score;
 - An effectiveness score for each Management Objective.
33. GM 2 SKPI 'Measurement of Effectiveness of Safety Management KPI — General' describes that Management Objective (MO) has been derived for each of the elements of the ICAO State Safety Programme (SSP) and Safety Management System (SMS).
34. GM 2 SKPI also provides guidance for honest replies to the questionnaires for EoSM and the relation of the EASA standardisation inspections and NSA audits with the completed questionnaires.

35. AMC 4 SKPI 'Measurement of Effectiveness of Safety Management KPI — State level' contains:
- A. Components, Elements and Management Objectives;
 - B. Scoring and Numerical Analysis;
 - C. Mechanism for Verification.

36. AMC 5 SKPI 'Measurement of Effectiveness of Safety Management KPI — ANSP level' contains:
- A. Components, Elements and Management Objectives;
 - B. Mapping between Management Objectives, Study Areas and Questions;
 - C. Scoring and Numerical Analysis;
 - D. Mechanism for Verification.

The only difference in the AMC 5 compared to the content of the E3 report is relevant to management objective 1.3 which was reworded changing '... safety manager to be the responsible and act as focal point for the implementation...' with '... safety management function to be the responsible for the implementation...'. The change was introduced following the comment provided by CANSO which was not reflected in the E3 final report.

37. The questionnaires themselves, the weighting factors and some guidance material for the competent authorities and ANSPs to help the verification of the ANSPs by the competent authorities are provided in the following appendices:
- Appendix 1 to AMC 4 SKPI Questionnaire for Measurement of Effectiveness of Safety Management KPI — State level;
 - Appendix 2 to AMC 4 SKPI — List of Weightings for Evaluation of Effectiveness of Safety Management Questionnaire — State level;
 - Appendix 1 to AMC 5 SKPI — Questionnaire for Measurement of Effectiveness of Safety Management Questionnaire — ANSP level;
 - Appendix 2 to AMC 5 SKPI — List of Weightings for Evaluation of Effectiveness of Safety Management Questionnaire — ANSP level;
 - Appendix 1 to GM 4 SKPI Verification of ANSP EoSM by NSA/competent authority.

Except from few editorial changes, there are no substantial differences in the EoSM questionnaires compared to E3 report.

38. It is the intent of the Agency to publish all the questionnaire templates for EoSM and just culture KPIs in electronic format on its website. The publication shall be done after the adoption of these AMCs and GM.
39. It should be noted that there is a difference in the scoring and numerical analysis at State and ANSP level. When measuring the EoSM at State level, each management objective (MO) is evaluated based on the weightings provided in Appendix 2 to AMC 4 SKPI and the overall score of EoSM is an average of the scores for each MO. The MO measuring at ANSP level is the same using the weightings from Appendix 2 to AMC 5 SKPI, section 2.2. For the overall effectiveness score the weightings from section 2.1 from Appendix 2 to AMC 5 SKPI should be used. The reason for that is that during the consultation of the E3 report, the stakeholders (especially ANSPs) stated their preference for the EoSM at ANSP level to stay unchanged compared to EUROCONTROL Safety Maturity Survey Framework (SMSF).
40. The stakeholders considered that the EoSM based on the EUROCONTROL SMSF at ANSP level has been well validated during its implementation and requested no changes neither

in the appearance nor in the content of the questionnaire at ANSP level. This is the reason why the questions at Appendix 1 to AMC 5 SKPI are numbered as per study areas (SA) as they were in SMSF. The overall effectiveness score at ANSP level is also based on the weightings established during the SMSF implementation.

41. The questionnaire at State level and the scoring was changed by the E3 group, compared to SMSF, based again on the stakeholders' feedback in order to better align with the ICAO SSP framework.
42. It is important to highlight that Appendix 1 to GM 4 'SKPI Verification of ANSP EoSM by NSA/competent authority' repeats the questions which are considered to be AMCs in the other appendices. This has been done for the purpose of better readability to which question the guidance for the verification was provided.
43. The Agency is aware that EUROCONTROL has very recently introduced a different presentation containing additional questions when they have sent their questionnaire to the ANSPs. The Agency has however decided to follow the E3 report presentation and approach as this was agreed by all the organisations consulted and this was the assumption made in order to meet the tight deadlines.

iii. Severity classification based on the Risk Analysis Tool Methodology

44. The application of the Risk Analysis Tool (RAT) severity classification methodology supports and allows for harmonised reporting of the severity classification of occurrences. Therefore, the concept of this indicator, as required by the amendment to the performance scheme regulation, is to prescribe the common methodology for occurrence severity classification by defining detailed criteria and specifications for the assessment of occurrences.
45. The acceptable means of compliance and guidance material for the RAT severity classification methodology KPI are specified in AMC 6 to 10 SKPI and GM 5 to 10 SKPI.
46. AMC 6 SKPI 'Severity Classification Based on the Risk Analysis Tool Methodology — General' provides general description of the methodology which is based on the evaluation of the severity of several criteria. Each criterion has limited number of options to be selected. For each selected option a certain predefined score should be allocated. The overall score is the sum of the scores for each applicable criterion.
47. Further guidance on AMC 6 SKPI is provided in GM 5 SKPI 'Severity Classification Based on the Risk Analysis Tool Methodology — Methodology for Separation Minima Infringements — General Description' where the process for the evaluation of occurrence severity is presented as a diagram. In addition, different occurrence scenarios from those used in EUROCONTROL RAT tool are presented.
48. AMC 7 SKPI 'Severity Classification Based on the Risk Analysis Tool Methodology — Methodology for Separation Minima Infringements' describes the severity classification of Separation Minima Infringements, calculated as the sum of the scores totalled in each of the two main criteria: risk of collision and controllability.
49. Section A of AMC 7 SKPI — Risk of collision determination by the sum of the scores for the following two sub-criteria:
 - Separation — based solely on the minimum distance achieved between aircraft or between aircraft and obstacles.
 - Rate of closure — based on the vertical and horizontal speed, measured at the moment the separation minimum is infringed.

The table for determining the scores of the criteria 'separation' and 'rate' is provided.

50. Section B of AMC 7 SKPI — 'Controllability', the second major criterion describes the 'level of control' maintained over the situation [Air Traffic Controllers (ATCOs) and pilots supported by Safety Nets]. The controllability score should be defined by the following sub-criteria:

- Conflict detection,
- Planning,
- Execution,
- Ground safety nets (STCA),
- Recovery,
- Airborne safety nets (TCAS),
- Pilot execution of TCAS RA.

For each of the above sub-criteria a table is provided for determining their scores, based on the available options.

51. Section C of AMC 7 SKPI provides the table for the final score and severity classification of separation minima infringement occurrences.

52. Section D of AMC 7 SKPI — 'Reliability Factor' gives guidance for establishing if the data considered for the evaluation of the severity of an occurrence is enough for a reliable classification. Every criterion of the methodology should have its own importance for the evaluation of severity. If there is no information for the evaluation of a certain criterion or if the information available is ambiguous or the scoring panel cannot agree on the choice that should be made, then these should be identified as missing elements from the methodology.

53. Each criterion has a predefined value for its reliability factor (RF) which is presented in the tables in section B of AMC 7 SKPI. Furthermore, the way of the RF value allocation is described in case a certain criterion is not applicable or there is not enough information for its evaluation. In such cases the score for the criterion should be 'zero' if not applicable and 'blank' when it cannot be evaluated. The overall value of RF should be the sum of the RF for each criterion and if the overall RF has a value less than 70, the occurrence should be classified as 'Not determined'.

54. GM 6 SKPI 'Severity Classification Based on the Risk Analysis Tool Methodology — Methodology for Separation Minima Infringements — Risk of Collision Score Determination' describes an example for determining the score of 'Risk of Collision' and GM 7 SKPI to 'Severity Classification Based on the Risk Analysis Tool Methodology — Methodology for Separation Minima Infringements — Controllability Score Determination' gives an example for scoring the 'Controllability'.

55. GM 8 SKPI 'Severity Classification Based on the Risk Analysis Tool Methodology — Methodology for Separation Minima Infringements — Final Scores' provides an example for final score determination based on the examples in GM 6 and 7 SKPI together with demonstrating the possibility to distinguish the ATM overall score and severity and ATM ground score and severity.

56. AMC 8 SKPI 'Severity Classification Based on the Risk Analysis Tool Methodology — Methodology for Runway Incursions' provides acceptable means of compliance for the severity classification methodology for Runway Incursions. The severity should be calculated as the sum of the total scores in each of the two main criteria: risk of collision and controllability.

57. Section A 'Risk of Collision' of AMC 8 SKPI describes the methodology for the Risk of Collision severity determination as a sum from the severities of 'Separation' and 'Rate of Closure'. In this case 'Separation' should be interpreted as 'safety margin infringed' with predefined options in a table. The moderation panel/investigators should, based on experts' judgment, choose a score.
58. Section B 'Controllability' of AMC 8 SKPI describes that the logic and elements when evaluating the Controllability of Runway Incursion occurrence are the same as in the Separation Infringements with the following exceptions:
 - STCA is not appropriate for this encounter, hence it should be replaced by more general aerodrome ground safety nets, such as RIMCAS (Runway Incursion Monitoring and Collision Avoidance System);
 - Airborne Safety Nets (TCAS) is not normally available when Runway Incursions occur, therefore only pilot see-and-avoid action should be considered. Lack of see-and-avoid should be scored in the case of low visibility and IMC conditions.
 - All other sections are identical with the previous scenario, with the exception of the Safety Nets where A-SMGCS (Advanced Surface Movement Guidance & Control System) should be considered, and the see-and-avoid part where driver action should also be taken into account, alongside that of the pilot.
59. Sections C 'Final scores' and D 'Reliability Factor' of AMC 8 SKPI are identical in all aspects with section C and D of AMC 7 SKPI.
60. AMC 9 SKPI 'Severity Classification Based on the Risk Analysis Tool Methodology — Methodology for ATM Specific Occurrences' is divided in two sections:
 - Section A 'Overview' providing which criteria should be assessed for severity classification of an ATM-specific occurrence;
 - Section B 'Severity' listing the severity classes for this kind of occurrences.
61. As already explained in sections 20 and 21 of this NPA, the RAT methodology relevant to severity classification of ATM-specific occurrences was redesigned in 2011 by the EUROCONTROL RAT users group (was provided to the Agency at the end of September 2011). For that reason the look-up table of this part of RAT methodology is placed in the Guidance Material. However, the AMC contains the building blocks of the methodology, i.e. the criteria and options for each criterion.
62. GM 10 SKPI 'Severity Classification Based on the Risk Analysis Tool Methodology — Methodology for ATM-specific occurrences' contains three sections:
 - A 'Examples of some criteria for evaluating ATM-specific occurrences';
 - B 'Look-up Table';
 - C 'Examples for ATM-specific occurrences'.
63. Section A of GM 10 SKPI describes several criteria listed in section A of AMC 9 SKPI.
64. Section B of GM 10 SKPI describes the look-up table which may be used for the severity classification of an ATM-Specific Occurrence. The look-up table has a column for each criterion and consists of all possible combinations of options which may be chosen for each criterion. For each combination of options the look-up table provides a predefined severity in its column 'Severity'. The unrealistic combinations of options are marked with 'X' in the 'Severity' column. The look-up table is presented as Appendix 1 to GM 10 SKPI.
65. Section C of GM 10 SKPI provides three typical examples of ATM-specific occurrences severity classification.

66. AMC 10 SKPI 'RAT methodology — verification mechanism' in accordance with Article 1(b) of Regulation (EU) No .../... 'Reporting on the application of the method shall be done for individual occurrences'. The points of contact in the Member States, established in accordance with Directive 2003/42/EC, and Commission Regulation (EC) No 1330/2007, should collect and verify the information regarding the application of the RAT methodology for all reported occurrences. In addition, MS should report the percentage of occurrences the severity of which has been evaluated by the use of the RAT methodology.

iv. Just culture

67. As required in the amendment to the performance scheme regulation, the third national/FAB safety KPI for the first reference period shall be the reporting by the Member States and their air navigation service providers through a questionnaire as referred to in paragraph (e), which measures the level of presence and corresponding level of absence of just culture.
68. The content of the AMCs and GM proposed with this NPA includes the questionnaire and the approach already included in the E3 report. It is important to highlight that due to the novelty of this safety KPI, a very modest approach has been taken in general. The experience gained during RP1 will be certainly used to propose an enhancement of it for RP2.
69. GM 11 SKPI 'Just culture — General' provides some explanation for the reference made to 'State level' instead of 'NSA' and the nature of the questionnaires which should be used for the just culture measurement.
70. AMC 11 SKPI 'Just Culture Measurement at State Level' — Appendix 1 to AMC 11 SKPI contains the questionnaire which should be answered for the evaluation of JC at State level. The format which should be used when States report on the just culture indicator is presented in section A 'Measurement' of this AMC.
71. Section B 'Verification' of AMC 11 SKPI refers to AMC 4 SPI, section C since the verification mechanism for EoSM and JC KPIs at State level is the same.
72. GM 12 SKPI 'Verification of Just Culture Measurement at State Level' — Appendix 1 to GM 12 SKPI contains the questions used in Appendix 1 to AMC 12 SKPI also formatted as a table with an additional column which gives some additional explanation and examples for possible justification which could be provided by the State/competent authority for the answers.
73. AMC 12 SKPI 'Just Culture Measurement at ANSP Level' — Appendix 1 to AMC 12 SKPI contains the questionnaire which should be answered for the evaluation of JC at ANSP level. The format which should be used when ANSP report on the Just Culture indicator is presented in section A 'Measurement' of this AMC.
74. Section B 'Verification' of AMC 12 SKPI refers to AMC 5 SPI, section D since the verification mechanism for EoSM and JC KPIs at ANSP level is the same.
75. GM 13 SKPI 'Verification of Just Culture Measurement at ANSP Level' — Appendix 1 to GM 13 SKPI contains the questions used in Appendix 1 to AMC 13 SKPI also formatted as a table with an additional column which gives some additional explanation and examples for possible justification which could be provided by ANSP for the answers.

V. Regulatory Impact Assessment

76. The purpose of a Regulatory Impact Assessment (RIA) is to assess the impacts and consequences of rules and requirements which are being proposed. The assessment thus would aim to support the decision making process (e.g. among all the possible regulatory options which is the one with the less overall impact on the regulated persons/organisations) in the implementation of the Basic Regulation.
77. The purpose and methodology of a RIA have been explained in several documents, i.e. the RIA on the extension of the competence of the European Aviation Safety Agency (EASA) to the regulation of Air Traffic Management and Air Navigation Services (ATM/ANS).
78. In order to conduct a RIA, several regulatory options should be identified and assess in terms of safety, environmental, economic, social and regulatory harmonisation the impacts to the regulated persons and organisations. However, in this case, there were no alternative options to be assessed because Regulation (EU) No 691/2010 and its amendment already specify the way the safety key performance indicators should be developed. In addition, the E3-Task Force's report has been translated into the content of the proposed draft AMCs and GM. The content of the E3 report was presented during two workshops with the stakeholders on the 13th of May 2011 and on the 17th of June 2011 and it was also presented to the Single Sky Committee at their July 2011 meeting. The stakeholders always indicated that the content of the report should be transposed in the Agency's AMCs and GM without unnecessary changes.
79. Therefore, a RIA has not been undertaken. Still, the Agency would also like to highlight that the content of the AMCs and GM is already known to all the affected stakeholders. In particular, the safety KPIs 'effectiveness of safety management' and the 'application of the severity classification' of the RAT methodology are based on the EUROCONTROL Safety Maturity Framework and the Risk Analysis Tool which are being used by the majority of the stakeholders for a decade now. While the proposed AMCs and GM for just culture safety KPI is new, the content was already consulted widely and is related to the performance scheme regulation whose impacts were assessed by the European Commission before the adoption.
80. In addition, it is important to highlight that the purpose of the proposed AMCs and GM is to help with the implementation of the performance scheme Implementing Rule and also to harmonise the way the Implementing Rule is applied.
81. Finally, the purpose of the performance scheme is to improve the performance of the European ATM system in terms of safety, capacity, cost-effectiveness and environment, therefore the overall impact is expected to be positive.

B. Draft Annex (v0.4) AMC & GM SKPIs**Draft v0.4****Annex**

**Development of Acceptable Means of Compliance and Guidance Material
for the implementation and measurement
of Safety Key Performance Indicators (SKPIs)**

Table of Contents

B. DRAFT ANNEX (V0.4) AMC & GM SKPIs.....	16
I GENERAL.....	19
AMC 1 SKPI — PURPOSE.....	19
AMC 2 SKPI — OBJECTIVE.....	19
GM1 SKPI — DEFINITIONS AND ABBREVIATIONS	19
II EFFECTIVENESS OF SAFETY MANAGEMENT KPI.....	22
AMC 3 SKPI — MEASUREMENT OF EFFECTIVENESS OF SAFETY MANAGEMENT KPI — GENERAL.....	22
GM 2 SKPI — MEASUREMENT OF EFFECTIVENESS OF SAFETY MANAGEMENT KPI — GENERAL	22
AMC 4 SKPI — MEASUREMENT OF EFFECTIVENESS OF SAFETY MANAGEMENT KPI — STATE LEVEL	23
A. Components, Elements and Management Objectives.....	23
B. Scoring and Numerical Analysis.....	26
C. Mechanism for Verification.....	27
AMC 5 SKPI — MEASUREMENT OF EFFECTIVENESS OF SAFETY MANAGEMENT KPI — ANSP LEVEL	28
A. Components, Elements and Management Objectives.....	29
B. Mapping between Management Objectives, Study Areas and Questions ..	32
C. Scoring and Numerical Analysis	33
D. Mechanism for Verification	35
GM 3 SKPI — MEASUREMENT OF EFFECTIVENESS OF SAFETY MANAGEMENT KPI — ANSP LEVEL — SCORING AND NUMERICAL ANALYSIS	35
GM 4 SKPI — MEASUREMENT OF EFFECTIVENESS OF SAFETY MANAGEMENT KPI — ANSP LEVEL — VERIFICATION MECHANISM	38
III SEVERITY CLASSIFICATION BASED ON THE RISK ANALYSIS TOOL METHODOLOGY	39
AMC 6 SKPI — SEVERITY CLASSIFICATION BASED ON THE RISK ANALYSIS TOOL METHODOLOGY — GENERAL	39
GM 5 SKPI — SEVERITY CLASSIFICATION BASED ON THE RISK ANALYSIS TOOL METHODOLOGY METHODOLOGY FOR SEPARATION MINIMA INFRINGEMENTS — GENERAL DESCRIPTION	39
AMC 7 SKPI — SEVERITY CLASSIFICATION BASED ON THE RISK ANALYSIS TOOL METHODOLOGY — METHODOLOGY FOR SEPARATION MINIMA INFRINGEMENTS.....	41

A. Risk of collision	41
B. Controllability	43
C. Final scores	47
D. Reliability Factor	48
GM 6 SKPI — SEVERITY CLASSIFICATION BASED ON THE RISK ANALYSIS TOOL METHODOLOGY — METHODOLOGY FOR SEPARATION MINIMA INFRINGEMENTS — RISK OF COLLISION — SCORE DETERMINATION	49
GM 7SKPI — SEVERITY CLASSIFICATION BASED ON THE RISK ANALYSIS TOOL METHODOLOGY — METHODOLOGY FOR SEPARATION MINIMA INFRINGEMENTS — CONTROLLABILITY SCORE DETERMINATION	49
GM 8 SKPI — SEVERITY CLASSIFICATION BASED ON THE RISK ANALYSIS TOOL METHODOLOGY — METHODOLOGY FOR SEPARATION MINIMA INFRINGEMENTS — FINAL SCORES	51
GM 9 SKPI — SEVERITY CLASSIFICATION BASED ON THE RISK ANALYSIS TOOL METHODOLOGY — METHODOLOGY FOR SEPARATION MINIMA INFRINGEMENTS — RELIABILITY FACTOR	52
AMC 8 SKPI — SEVERITY CLASSIFICATION BASED ON THE RISK ANALYSIS TOOL METHODOLOGY — METHODOLOGY FOR RUNWAY INCURSIONS	52
A. Risk of collision	52
B. Controllability	54
C. Final scores	54
D. Reliability Factor	54
AMC 9 SKPI — SEVERITY CLASSIFICATION BASED ON THE RISK ANALYSIS TOOL METHODOLOGY — METHODOLOGY FOR ATM-SPECIFIC OCCURRENCES	54
A. Overview	54
B. Options for ATM-specific occurrences	55
C. Severity	58
GM 10 SKPI — Severity Classification Based on the Risk Analysis Tool Methodology — Methodology for ATM-specific occurrences	59
A. Examples of some criteria for evaluating ATM-specific occurrences	59
B. Look-up table	64
AMC 10 SKPI — RAT METHODOLOGY — VERIFICATION MECHANISM	66
IV JUST CULTURE	67
GM 11 SKPI — JUST CULTURE — GENERAL	67
AMC 11 SKPI — JUST CULTURE REPORTING AT STATE LEVEL	67
A. Reporting	67
B. Verification	67
GM 12 SKPI — JUST CULTURE — REPORTING AND VERIFICATION AT STATE LEVEL	67
AMC 12 SKPI — JUST CULTURE — REPORTING AT ANSP LEVEL	68
A. Reporting	68
B. Verification	68
GM13 SKPI — JUST CULTURE — REPORTING AND VERIFICATION AT ANSP LEVEL	68
V APPENDICES	70

1.	APPENDIX 1 TO AMC 4 SKPI — QUESTIONNAIRE FOR MEASUREMENT OF EFFECTIVENESS OF SAFETY MANAGEMENT KPI — STATE LEVEL	70
2.	APPENDIX 2 TO AMC 4 SKPI — LIST OF WEIGHTINGS FOR EVALUATION OF EFFECTIVENESS OF SAFETY MANAGEMENT QUESTIONNAIRE — STATE LEVEL	70
3.	APPENDIX 1 TO AMC 5 SKPI — QUESTIONNAIRE FOR MEASUREMENT OF EFFECTIVENESS OF SAFETY MANAGEMENT KPI — ANSP LEVEL	70
4.	APPENDIX 2 TO AMC 5 SKPI — LIST OF WEIGHTINGS FOR EVALUATION OF EFFECTIVENESS OF SAFETY MANAGEMENT QUESTIONNAIRE — ANSP LEVEL	70
5.	APPENDIX 1 TO AMC 11 SKPI — JUST CULTURE QUESTIONNAIRE — STATE LEVEL	70
6.	APPENDIX 1 TO AMC 12 SKPI — JUST CULTURE QUESTIONNAIRE — ANSP LEVEL	70
7.	APPENDIX 1 TO GM 4 SKPI VERIFICATION OF ANSP EoSM BY NSA/COMPETENT AUTHORITY ...	70
8.	APPENDIX 1 TO GM 10 SKPI — LOOK-UP TABLE FOR SEVERITY CLASSIFICATION OF ATM-SPECIFIC OCCURRENCES	70
9.	APPENDIX 1 TO GM 12 SKPI — JUST CULTURE — STATE LEVEL — POSSIBLE JUSTIFICATION	70
10.	APPENDIX 1 TO GM 13 SKPI — JUST CULTURE — ANSP LEVEL — POSSIBLE JUSTIFICATION	70
C.	APPENDICES	71
I	DRAFT COMMISSION REGULATION (EU) No .../... AMENDING COMMISSION REGULATION (EU) No 691/2010 LAYING DOWN A PERFORMANCE SCHEME FOR AIR NAVIGATION SERVICES AND NETWORK FUNCTIONS	71

I General

AMC 1 SKPI — Purpose

This Annex contains Acceptable Means of Compliance (AMC) and Guidance Material (GM) for measuring the safety Key Performance Indicators (KPIs) in accordance with Commission Regulation (EU) No 691/2010 as amended by Regulation (EU) .../... (hereinafter referred to as the 'performance scheme regulation').

AMCs are non-binding standards adopted by the European Aviation Safety Agency (hereinafter referred to as the 'Agency') to illustrate means to establish compliance with the performance scheme regulation. When this AMC is complied with, the obligations on measurement of the safety KPIs in the performance scheme regulation are considered as met.

However, this AMC provides a means, but not the only means of measurement of the safety KPIs. If the Member States or the Air Navigation Service Providers (ANSPs) wish to use a different means to measure the safety KPIs, they should inform the Agency thereof.

Member States and ANSPs should be able to demonstrate by means of evidence that the outcome of the application of any alternative means maintains the level of compliance with the performance scheme regulation and reaches a result that is comparable with this Annex.

AMC 2 SKPI — Objective

The objective of this Annex is to establish the methodology for the measurement and verification of the following safety key performance indicators (safety KPIs) under the performance scheme regulation:

- a) Effectiveness of Safety Management (EoSM) and Just Culture (JC), which should be measured through a periodic answering of the questionnaires the content of which is provided in Appendices 1 to AMC 4 SKPI, 1 to AMC 5 SKPI, 1 to AMC 11 SKPI and 1 to AMC 12 SKPI. The filled in questionnaires by the entity subject to evaluation, and distributed in accordance with Regulation (EU) .../..., should be verified as guided in AMC 5 and 11 SKPI.
- b) Methodology for severity classification of reported safety-related occurrences. This should be done for each occurrence subject to the application of the methodology and should be verified as guided in AMC 6, 7, 8, 9 and 10 SKPI.

GM1 SKPI — Definitions and Abbreviations

Definitions

'ATM-specific occurrences' are events or situations that can be classified as an inability to provide ATM, ATS, ASM or ATFM services; a failure of communication, surveillance, data processing and distribution, support information or navigation functions; or as ATM/ANS system security.

'ATM/ANS system security' is a situation in which the ATM/ANS services are lost or disrupted as a result of an unforeseen major hazard.

'Major incident' is an incident associated with the operation of an aircraft, in which safety of aircraft may have been compromised, having led to a near collision between aircraft, with ground or obstacles (i.e., safety margins not respected which is not the result of an ATC instruction).

'Not determined': insufficient information was available to determine the risk involved or inconclusive or conflicting evidence precluded such determination.

'Occurrence with no safety effect' is an incident which has no safety significance.

'Reliability factor' is the level of confidence in the assessment (scoring) undertaken, based on the data available.

'Runway Incursion' is any occurrence at an aerodrome involving the incorrect presence of an aircraft, vehicle or person on the protected area of a surface designated for the landing and take-off of aircraft.

'Safety culture' means the shared beliefs, assumptions and values of an organisation.

'Safety plan' is a high level safety issues assessment and related action plan. The safety plan is a key element of the safety programme.

'Safety programme' is an integrated set of regulations and activities aimed at improving safety.

'Separation minima infringement' is a situation in which prescribed separation minima were not maintained between aircraft.

'Serious incident' is an incident involving circumstances indicating that there was a high probability of an accident and is associated with the operation of an aircraft, which in the case of a manned aircraft, takes place between the time any person boards the aircraft with the intention of flight until such time as all such persons have disembarked, or in the case of an unmanned aircraft, takes place between the time the aircraft is ready to move with the purpose of flight until such time it comes to rest at the end of the flight and the primary propulsion system is shut down.

'Significant incident' is an incident involving circumstances indicating that an accident, a serious or major incident could have occurred, if the risk had not been managed within safety margins, or if another aircraft had been in the vicinity.

Abbreviations

A/D MAN	Arrival/Departure Manager
AMC	Acceptable Means of Compliance
ANSP	Air Navigation Service Provider
A-SMGCS	Advanced Surface Movement Guidance & Control System
ATC	Air Traffic Control
ATCO	Air Traffic Controller
ATM	Air Traffic Management
ATS	Air Traffic Services
CISM	Critical Incident Stress Management
CWP	Controller Working Position
EoSM	Effectiveness of Safety Management
FAB	Functional Airspace Block
JC	Just Culture
GM	Guidance Material
KPI	Key Performance Indicator
MO	Management Objective
MTCD	Medium Term Conflict Detection

NSA	National Supervisory Authority
QMS	Quality Management System
RAT	Risk Analysis Tool
RF	Reliability Factor
RI	Runway Incursion
RP	Reference Period
SA	Study Area
SFMS	Safety Framework Maturity Survey
SIA	civil aviation Safety Investigation Authority
SKPI	Safety Key Performance Indicator
SMI	Separation Minima Infringement
SMS	Safety Management System
SSP	State Safety Programme
STCA	Short Term Conflict Alert
TCAS RA	Traffic Collision Avoidance System Resolution Advisory

II Effectiveness of Safety Management KPI

AMC 3 SKPI — Measurement of Effectiveness of Safety Management KPI — General

GENERAL DESCRIPTION

The Effectiveness of Safety Management (EoSM) indicator should be measured by verified responses to questionnaires at State/competent authority and service provision level, as contained in this Annex. For each question the response should indicate the level of implementation, characterising the level of performance of the respective organisation.

EFFECTIVENESS LEVELS AND EFFECTIVENESS SCORE

When answering the questions, one of the following levels of implementation should be selected:

- Level A which is defined as 'Initiating' — processes are usually ad hoc and chaotic;
- Level B which is defined as 'Planning/Initial Implementation' — activities, processes and services are managed;
- Level C which is defined as 'Implementing' — defined and standard processes are used for managing;
- Level D which is defined as 'Managing & Measuring' — objectives are used to manage processes and performance is measured; and
- Level E which is defined as 'Continuous Improvement' — continuous improvement of processes and process performance.

An effectiveness level should be selected only if all the elements described in the questionnaire are fully observed by an ANSP or Member State/competent authority. If an ANSP or a Member State/competent authority has identified elements in various adjacent effectiveness levels, then they should take a conservative approach and select the lower effectiveness level for which all elements are covered.

Based on the responses, the following scores should be derived:

- The overall effectiveness score should be derived from the combination of the effectiveness levels selected by the relevant entity (ANSPs or Member State/competent authority) against each question with the weightings as described in Appendices 2 to AMC 4 SKPI and 2 to AMC 5 SKPI;
- An effectiveness score for each Management Objective for the State/competent authority and for each study area for the ANSP.

GM 2 SKPI — Measurement of Effectiveness of Safety Management KPI — General

A Management Objective (MO) has been derived for each of the elements of the ICAO State Safety Programme (SSP) and Safety Management System (SMS) as described in ICAO Document 9859 'Safety Management Manual', which is also suitable within the European regulatory framework.

For each Management Objective, a question (or questions) has been derived and the levels of effectiveness have been described.

For both State and ANSP levels, EASA and PRB will monitor the performance regarding this indicator based on the received answers and on the results of the verification process by the States and by EASA as presented in Figure 2 in AMC 5 SPI, section D.

The questionnaires' sole intent is to monitor the performance (effectiveness) of Member States/competent authorities and ANSPs regarding ATM/ANS safety management.

Member States/competent authorities and ANSPs are expected to provide honest answers to these questionnaires. The indications provided in the completed EoSM questionnaires should be used with the sole purpose of generating recommendations and associated plans for improvement of the safety management. These indications are not used to generate findings in the context of standardisation inspections/oversights.

In accordance with Commission Regulation (EC) No 736/2006, if during the standardisation inspection a finding is raised by the Standardisation Team, corrective action by the NSA is required. In case that a finding proves that any of the questions in the EoSM questionnaire is scored higher than it should be, the score should be corrected and lowered to the appropriate level of implementation. A similar approach should be applied when the NSA/competent authorities raise findings to the ANSPs.

The outcome of standardisation inspections/oversight is not supposed to be used for corrections of the scores towards higher level of implementation.

The safety key performance indicators for the Reference Period 1 (2012–2014) will be further validated and will be reviewed based on the experience with their use for the Reference Period 2.

AMC 4 SKPI — Measurement of Effectiveness of Safety Management KPI — State level

The answers to the State-level questionnaire should be used to measure the level of effectiveness in achieving the Management Objectives defined in this Annex.

For each question, States should provide to the Agency information on the level of effectiveness (or level of implementation) and evidence to justify their answer.

The following section A defines which should be the corresponding Management Objectives for each component and element of the SSP framework.

The questionnaire which should be answered by the Member States/competent authority is in Appendix 1 to AMC 4 SKPI — Questionnaire for Measurement of Effectiveness of Safety Management KPI — State Level.

A. Components, Elements and Management Objectives

Component 1 — State safety policy and objectives

Element 1.1 State safety legislative framework:

Management objective

1.1 — Implement the EU safety legislative and regulatory framework including, where necessary, the alignment of the national framework.

Element 1.2 State safety responsibilities and accountabilities

Management objective

1.2 — Establish national safety responsibilities and maintain the national safety plan in line with the European Aviation Safety Plan, where applicable. The national safety plan should include the state policy to ensure the necessary resources.

Element 1.3 Accident and incident investigation

Management objective

1.3a — Establish and maintain the independence of the civil aviation safety investigation authorities, including necessary resources.

1.3b — Establish means to ensure that appropriate safety measures are taken after safety recommendations have been issued by a civil aviation safety investigation authority.

1.3c — Ensure that civil aviation safety investigation authorities involve subject matter expertise from the ATM/ANS domain.

Element 1.4 Enforcement policy

Management objective

1.4 — Establish appropriate, transparent and proportionate enforcement procedures, including the suspension, limitation and revocation of licences and certificates and the application of other effective penalties.

Element 1.5 Management of related interfaces

Management objective

1.5a — Ensure adequate management of the internal interfaces within the NSA.

1.5b — Ensure adequate management of the external interfaces with relevant stakeholders.

Component 2 — Safety risk management

Element 2.1 Safety requirements for the air navigation service provider's SMS

Management objective

2.1 — Establish controls which govern how service providers' safety management systems (SMS) will identify hazards and manage safety risks.

Element 2.2 Agreement on the service provider's safety performance

Management objective

2.2 — Agree on safety performance of an individual, national or FAB service provider.

Component 3 — Safety assurance

Element 3.1 Safety oversight

Management objective

3.1a — Attribution of powers to the NSA responsible for safety oversight of air navigation service providers.

3.1b — Establishment of a national safety oversight system and programme to ensure effective monitoring of the air navigation service provider's (ANSP) compliance with the applicable regulations and monitoring of the safety oversight function.

Element 3.2 Safety data collection, analysis and exchange

Management objective

3.2 — Establishment of mechanisms to ensure the capture and storage of data on hazards and safety risks and analysis of that data at ANSP and State level as well as its dissemination and exchange.

Element 3.3 Safety-data-driven targeting of oversight of areas of greater concern or need

Management objective

3.3 — Establishment of procedures to prioritise inspections, audits and surveys towards the areas of greater safety concern or need or in accordance with the identified safety risks.

Component 4 — Safety promotion

Element 4.1 Internal training, communication and dissemination of safety information

Management objective

4.1a — Training of NSA personnel on applicable legislative and regulatory framework.

4.1b — Promotion of awareness of safety information and communication and dissemination of safety-related information amongst the NSAs within a State.

Element 4.2 External training, communication and dissemination of safety information

Management objective

4.2a — Education/training of ANSP personnel and air traffic controllers (ATCO) training organisations on applicable legislative and regulatory framework.

4.2b — Promotion of awareness of safety information and communication and dissemination of safety-related information with external stakeholders.

Component 5 — Safety culture

Element 5.1 Establishment and promotion of safety culture

Management objective

5.1 — Establishment and promotion of safety culture within the competent authority/NSA.

Element 5.2 Measurement and improvement of Safety Culture

Management objective

5.2 — Establishment of procedures to measure and improve safety culture within the competent authority/NSA.

B. Scoring and Numerical Analysis

When scoring the EoSM at State level, each response provided by the State or the competent authority in their questionnaire should be assigned a numerical value from 0 to 4, corresponding to levels A to E.

In addition, each question should be weighted from 0 to 1 according to its relevance to each Management Objective. The list of weighting factors for each question and MO can be found in Appendix 2 to AMC 4 SKPI — List of Weightings for Evaluation of Effectiveness of Safety Management Questionnaire — State level.

Mathematically, the effectiveness score for each Management Objective is calculated from the questionnaire responses and weighting factors as follows:

$$S_j = \frac{100 \sum_{k=1}^{n_j} r_{kj} \cdot w_{kj}}{4 \sum_{k=1}^{n_j} w_{kj}}$$

Where:

- S_j is the effectiveness score for the State in management objective j ;
- r_{kj} is the numeric value of the response of State to question k in management objective j (value 0 to 4);
- w_{kj} is the weight factor of question k to management objective j (value 0 to 1);
- n_j is the number of questions in management objective j for which non-nil responses were provided by the State.

In order to measure the effectiveness of safety management for the State, the following scores should be evaluated and monitored:

- Overall effectiveness score: the overall score for each State estimated by taking the average of the scores over all Management Objectives.
- An effectiveness score for each Management Objective: scores over all Management Objectives, applying the weightings from Appendix 2 to AMC 4 SKPI — List of Weightings for Evaluation of Effectiveness of Safety Management Questionnaire — State level.

C. Mechanism for Verification

The results of the States' filled-in questionnaires are to be verified by means of EASA standardisation inspections.

The coordination between EASA and the competent authority should be done through the national coordinator appointed by the State in accordance with Article 6 of Commission Regulation (EC) No 736/2006. The process is described in Figure 1 below.

The national coordinator should be responsible for coordination within the State authorities and for coordination with the ANSPs to provide the Agency with the responses to the questionnaires (both competent authority and ANSP, aggregated where required).

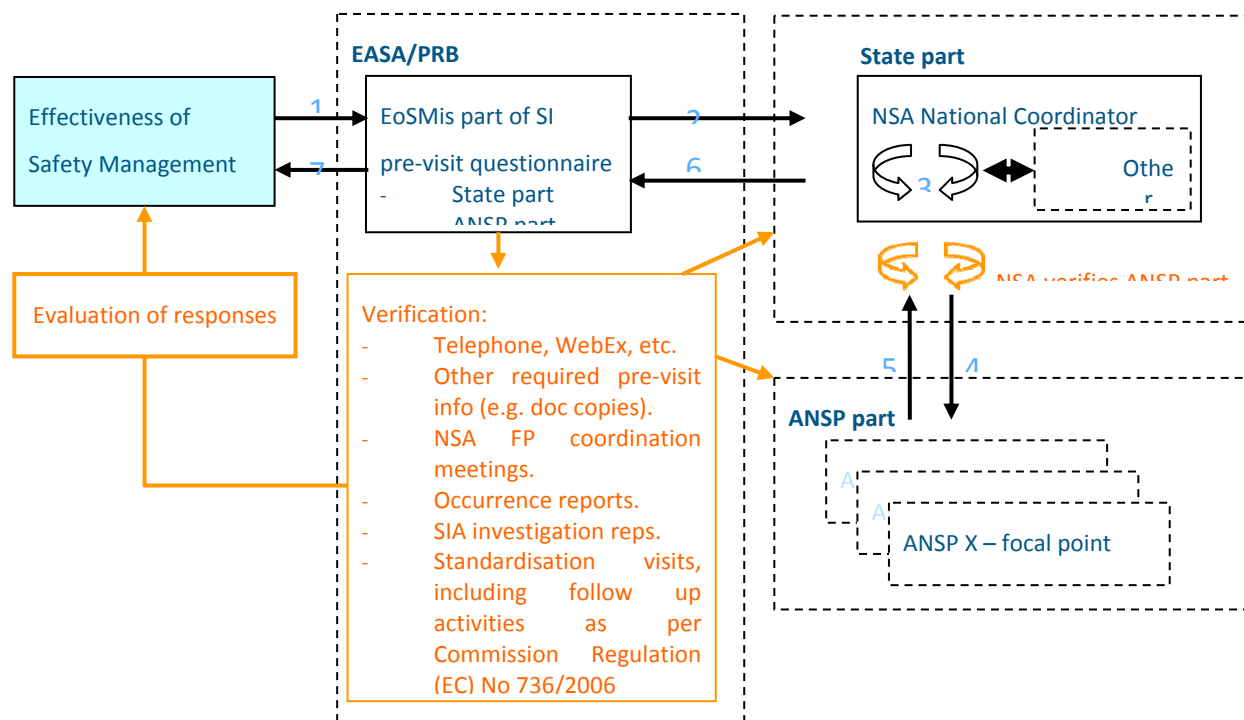


Figure 1 — Visualisation of the Mechanism for Verification at State level

AMC 5 SKPI — Measurement of Effectiveness of Safety Management KPI — ANSP level

The answers to the ANSP-level questionnaire should be used to measure the level of effectiveness in achieving the management objectives defined in this AMC.

For each question, ANSPs should provide to their NSA/competent authority information on the level of effectiveness (or level of implementation) and evidence to justify its answer as indicated below.

Section A defines for each component and element of the ICAO Safety Management Framework the corresponding Management Objectives.

The questionnaire which should be answered by the ANSPs is in Appendix 1 to AMC 5 SKPI — Questionnaire for Measurement of Effectiveness of Safety Management KPI — ANSP level.

A. Components, Elements and Management Objectives

Component 1 — ANSP safety policy and objectives

Element 1.1 Management commitment and responsibility

Management objective

1.1 — Define the ANSP's safety policy in accordance with Regulation (EC) No 2096/2005 (Common Requirements).

Element 1.2 Safety accountabilities — Safety responsibilities

Management objective

1.2 — Define the responsibilities of all staff involved in the safety aspects of service provision and responsibility of managers for safety performance.

Element 1.3 Appointment of key safety personnel

Management objective

1.3 — Define the safety management function to be the responsible for the implementation and maintenance of SMS.

Element 1.4 Coordination of emergency response planning/contingency plan

Management objective

1.4 — Define a contingency plan properly coordinated with the Network Manager, other interfacing ANSPs, other relevant stakeholders and FABs.

Element 1.5 SMS documentation

Management objective

1.5 — Develop and maintain the relevant SMS documentation that defines the ANSP's approach to the management of safety.

Element 1.6 Management of related interfaces

Management objective

1.6a — Ensure adequate management of the internal interfaces.

1.6b — Ensure adequate management of the external interfaces which may influence directly the safety of their services.

Component 2 — Safety risk management

Element 2.1 Safety risk assessment and mitigation

Management objective

2.1 — Develop and maintain a formal process that ensures the management of safety risks.

Component 3 — Safety assurance

Element 3.1 Safety performance monitoring and measurement

Management objective

3.1 — Establish means to verify the safety performance of the ANSP and the effectiveness of safety risk management.

Element 3.2 The management of change

Management objective

3.2 — Establish a formal process to identify changes and to ensure that safety risk assessment and mitigation are systematically conducted for identified changes.

Element 3.3 Continuous improvement of the SMS

Management objective

3.3 — Establish a formal process to systematically identify safety improvements.

Element 3.4 Occurrence reporting, investigation and improvement

Management objective

3.4 — Ensure that ATM operational and/or technical occurrences are reported and those which are considered to have safety implications are investigated immediately, and any necessary corrective action is taken.

Component 4 — Safety promotion

Element 4.1 Training and education

Management objective

4.1 — Establish a safety training programme that ensures that personnel are trained and competent to perform SMS-related duties.

Element 4.2 Safety communication

Management objective

4.2 — Establish formal means for safety promotion and safety communication.

Component 5 — Safety culture

Element 5.1 Establishment and promotion of safety culture

Management objective

5.1 — Establish and promote safety culture within the ANSP.

Element 5.2 Measurement and improvement of safety culture

Management objective

5.2 — Establish procedures to measure and improve safety culture within the ANSP.

B. Mapping between Management Objectives, Study Areas and Questions

The following table contains the mapping between the Management Objectives, Study Areas and the questions:

MO	SA — Q	SA — Q	MO
Safety policy and objectives		Safety culture	
1.1	SA2-3	SA1-1	5.1
1.2	SA2-1, SA2-4	SA1-2	5.2
1.3	SA2-2	SA1-3	3.4
1.4	SA4-3	Safety Responsibilities	
1.5	SA4-1	SA2-1	1.2
1.6a	SA7-1	SA2-2	1.3
1.6b	SA7-2	SA2-3	1.1
Safety risk management		SA2-4	1.2
2.1	SA6-1	Compliance with international obligations	
Safety assurance		SA3-1	3.3
3.1	SA9-1, SA9-2	SA3-2	3.3
3.2	SA6-1	Safety standards and procedures	
3.3	SA3-1, SA3-2, SA10-1, SA11-2	SA4-1	1.5
3.4	SA1-3, SA8-1	SA4-2	4.2
Safety promotion		SA4-3	1.4
4.1	SA5-1	Competency	
4.2	SA4-2, SA8-2, SA8-3, SA9-3, SA11-1, SA11-3	SA5-1	4.1
Safety culture		Risk management	
5.1	SA1-1	SA6-1	2.1, 3.2
5.2	SA1-2	Safety interfaces	
Table 1: Mapping Management Objectives to Study Area questions		SA7-1	1.6a
		SA7-2	1.6b
		Safety reporting, investigation and improvement	
		SA8-1	3.4
		SA8-2	4.2
		SA8-3	4.2
		Safety performance monitoring	

SA9-1	3.1
SA9-2	3.1
SA9-3	4.2
Operational safety surveys and SMS audits	
SA10-1	3.3
Adoption and sharing of best practises	
SA11-1	4.2
SA11-2	3.3
SA11-3	4.2
Table 2: Mapping Study Area questions to Management Objectives	

Given this mapping, at any point an interpretation from Management Objective to Study Area and vice versa should be possible.

C. Scoring and Numerical Analysis

In order to be able to measure the effectiveness of safety management of the ANSP, the answers to the questions should be quantified and weighting factors which link the questions, study areas and the management objectives should be applied.

The responses provided by the ANSP on their questionnaires are assigned a numerical value from 0 to 4, corresponding to levels A to E.

In addition, each question should be weighted:

- from 0 to 5 according to its relevance to each Study Area;
- from 0 to 1 according to its relevance to each Management Objective.

The list of weighting factors for each question, Study Area and Management Objective can be found in Appendix 2 to AMC 5 SKPI — List of Weightings for evaluation of Effectiveness of Safety Management Questionnaire — ANSP level.

Mathematically, the effectiveness score is calculated from the questionnaire responses and weighting factors as follows:

$$S_{ij} = \frac{100 \sum_{k=1}^{n_{ij}} r_{kji} \cdot w_{kj}}{4 \sum_{k=1}^{n_{ij}} w_{kj}}$$

Where:

- S_{ij} is the effectiveness score for ANSP i in Study Area/Management Objective j;
- r_{kji} is the numeric value of the response of ANSP i to question k in Study Area/Management Objective j;

- w_{kj} is the weight factor of question k to Study Area/Management Objective j ;
- n_{ij} is the number of questions in Study Area/Management Objective j for which non-nil responses were provided by the ANSP i .

In order to measure the effectiveness of safety management for the ANSP, the following scores should be evaluated and monitored:

- Overall effectiveness score: the overall score for each ANSP estimated by taking the average score over all Study Areas, using the weighting factors in Appendix 2 to AMC 5 SKPI — List of Weightings for evaluation of Effectiveness of Safety Management Questionnaire — ANSP level, section 2.1.
- An effectiveness score for each Management Objective: scores for all management objectives, applying the weighting of questions described in Appendix 2 to AMC 5 SKPI — List of Weightings for evaluation of Effectiveness of Safety Management Questionnaire — ANSP level, section 2.2.

D. Mechanism for Verification

The verification of the ANSP questionnaires by the NSA/competent authority should take place before the questionnaires and their results are submitted to EASA. The verification mechanism is presented in Figure 2.

ANSPs should assign a focal point for the purpose of the verification process.

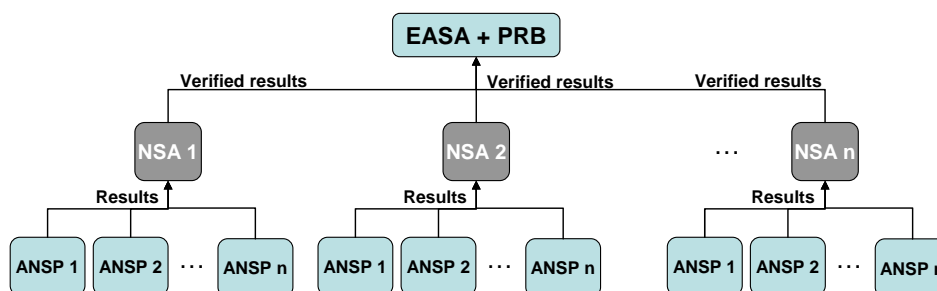


Figure 2 — Representation of verification mechanism of the ANSPs (normal procedure)

The competent authority/NSA may allocate the detailed verification task to a qualified entity or other entity.

GM 3 SKPI — Measurement of Effectiveness of Safety Management KPI — ANSP level — Scoring and numerical analysis

HOW THE SAFETY PERFORMANCE INDICATORS CAN BE APPLIED WITHIN A FAB OR WITHIN MEMBER STATES WHEN THERE IS MORE THAN ONE ANSP TO BE MONITORED FOR THE PURPOSE OF PERFORMANCE SCHEME IN ATM

It is important to clarify the way the safety performance indicators can be applied in an environment where there is more than one ANSP at national level (certified for ATS and/or CNS provision) and for the FAB context. As required by Commission Regulation (EU) No 691/2010 for Reference Period 1 (RP1), the safety performance indicators are to be applied for each State, competent authority and ANSP within each Member State. But there is nothing preventing Member States and ANSPs to aggregate the results for the different national ANSPs or to apply them within the FAB.

As each State and each ANSP in a FAB have different contributions to the service provided within the FAB, and therefore it is expected that they have different contributions to the respective combined KPI, weighting factors could be applied to reflect their respective contribution to the KPI. It should also be noted that States involved in a FAB may designate only one competent authority responsible for the safety oversight of all the ANSPs involved in that FAB and also that all the ANSPs involved in a FAB may decide to have a combined SMS. The safety performance indicators should take into account these arrangements.

Different approaches could be applied towards aggregation and weighting of results for the EoSM indicator both at State and ANSP level within a FAB or between ANSPs providing services in the same State. The following may be possible options:

- The use of weighted averages based on traffic size;
- Use of average scores together with an assessment of the lowest and highest score;
- Applying the lowest score for each management objective (so far this option is considered as the best practice).

EXAMPLE FOR EoSM MEASUREMENT AT ANSP LEVEL

The EoSM KPI is based on the EUROCONTROL Safety Framework Maturity Survey (SFMS) which has been implemented for several years at ANSP level. The numerical analysis at ANSP level has been validated during the implementation of the SFMS by EUROCONTROL and is based on Study Areas (SA). This is the reason why in section B of AMC 5 SKPI the mapping is provided in order to match the Study Areas to the Management Objectives. The overall score of EoSM is using the weightings of the SA as established in SFMS and the scoring of each MO is based on average weightings.

Example:

The following tables represent the results for calculating the scores for EoSM at ANSP level as follows:

- Table 1 presents the association between the selected level of implementation and the numerical value from 0 to 4;
- Table 2 illustrates the score calculated for each Study Area (SA) and the overall effectiveness score (average) of the EoSM at ANSP level; and
- Table 3 presents the effectiveness score for each Management Objective.

QUESTIONS	Selected level	Numerical value	SAs	SA score	MOs	MO score
SA1-1	A	0	1	52.7	1.1	100
SA1-2	E	4	2	57.4	1.2	50
SA1-3	E	4	3	60.3	1.3	75
SA2-1	B	1	4	54.7	1.4	25
SA2-2	D	3	5	52.7	1.5	50
SA2-3	E	4	6	53.5	1.6a	50
SA2-4	D	3	7	47.7	1.6b	25
SA3-1	D	3	8	51.4	2.1	75
SA3-2	D	3	9	51.1	3.1	50
SA4-1	C	2	10	56.0	3.2	75
SA4-2	D	3	11	54.4	3.3	62.5
SA4-3	B	1	average 53,8		3.4	50
SA5-1	D	3			4.1	75
SA6-1	D	3			4.2	51
SA7-1	C	2			5.1	0
SA7-2	B	1			5.2	100
SA8-1	A	0				
SA8-2	C	2				
SA8-3	C	2				
SA9-1	D	3				
SA9-2	B	1				
SA9-3	C	2				
SA10-1	D	3				
SA11-1	C	2				
SA11-2	B	1				
SA11-3	B	1				
Table 1			Table 2		Table 3	

The application of the formula for calculation of the overall effectiveness score

$$S_{ij} = \frac{100 \sum_{k=1}^{n_{ij}} r_{k[j]} \cdot w_{k[j]}}{4 \sum_{k=1}^{n_{ij}} w_{k[j]}}$$

is illustrated for the calculation of the score for SA1 as follows:

$$S_1 = 100 \cdot (0 \cdot 5 + 4 \cdot 5 + 4 \cdot 4 + 1 \cdot 4 + 3 \cdot 2 + 4 \cdot 5 + 3 \cdot 2 + 3 \cdot 1 + 3 \cdot 1 + 2 \cdot 2 + 3 \cdot 3 + 1 \cdot 3 + 3 \cdot 4 + 3 \cdot 4 + 2 \cdot 5 + 1 \cdot 3 + 0 \cdot 5 + 2 \cdot 5 + 2 \cdot 3 + 3 \cdot 2 + 1 \cdot 4 + 2 \cdot 4 + 3 \cdot 4 + 2 \cdot 4 + 1 \cdot 4 + 1 \cdot 5) / (4 \cdot (5 + 5 + 4 + 4 + 2 + 5 + 2 + 1 + 1 + 2 + 3 + 3 + 4 + 4 + 5 + 3 + 5 + 5 + 3 + 2 + 4 + 4 + 4 + 4 + 5))$$

$$S_1 = 52,7$$

In this calculation the numerical values for each question from Table 1 are multiplied by the corresponding weightings for SA1, taken from section 2.1 of Appendix 2 to AMC 5 SKPI:

$$100 \sum_{k=1}^{n_j} r_{kj} \cdot w_{kj}$$

$$4 \sum_{k=1}^{n_j} w_{kj}$$

Then the result is divided by the sum of weights:

GM 4 SKPI — Measurement of Effectiveness of Safety Management KPI — ANSP level — Verification Mechanism

VERIFICATION OF ANSP EoSM BY THE NSA/COMPETENT AUTHORITY

When verifying the questionnaires completed by an ANSP for EoSM, the NSA may organise bilateral interview sessions. In these interview sessions the NSA coordinator may ask the ANSP focal point some additional questions and request some additional proof in order to verify the correctness of the answers provided to the questionnaires. Examples of the verification questions, together with examples of the possible outcome of the fulfilment of the objectives of EoSM for each level of implementation, are provided in Appendix 1 to GM 4 SPI — Verification of ANSP EoSM by the NSA/competent authority.

COORDINATION BETWEEN THE NSAs FOR THE VERIFICATION OF THE ANSPs

The competent authorities/NSAs might need better coordination between them in the verification process in order to achieve consistent and comparable results at European level. Such coordination could be coordinated and facilitated by EASA, supported by PRB and EUROCONTROL. One potential solution could be the extension of the terms of reference of the NSA Coordination Platform (NCP) in the field of harmonisation of the verification mechanism of the safety KPIs at ANSP level.

Notwithstanding the above and notwithstanding the fact that NSA may delegate the verification task to another entity, the responsibility for verification of the safety KPI measurement at ANSP level stays with the overseeing competent authority/NSA.

III Severity Classification Based on the Risk Analysis Tool Methodology

AMC 6 SKPI — Severity Classification Based on the Risk Analysis Tool Methodology — General

GENERAL DESCRIPTION

The severity part of the risk analysis methodology should follow the principle of evaluating several criteria and allocating a certain score to each criterion, depending on how severe each criterion is evaluated to be.

Each criterion should have a limited number of options with corresponding scores. Some criteria have an ATM Ground and an ATM Airborne component and both scores should be counted when evaluating the ATM Overall score. Other criteria should be only relevant either for ATM Ground or ATM Airborne.

The overall score for severity of an occurrence should be the sum of the scores allocated to each applicable individual criterion.

The overall score for the severity of an occurrence should be built from the sum of the score allocated to the risk of collision/proximity (itself a sum of the score allocated to the separation and the score allocated to the rate of closure) and the degree of controllability over the incident. For ATM-specific occurrences (i.e. technical occurrences affecting the capability to provide safe ATM/ANS services) the criteria which should be considered are the service affected, service/function provided, operational function, type of failure, extension of the failure and its scope and duration.

The severity of occurrences reported should be the ATM Overall severity. For ATM-specific occurrences, the ATM Overall coincides with ATM Ground severity.

GM 5 SKPI — Severity Classification Based on the Risk Analysis Tool Methodology Methodology for Separation Minima Infringements — General Description

The process for evaluation of occurrences severity is presented in the following diagram:

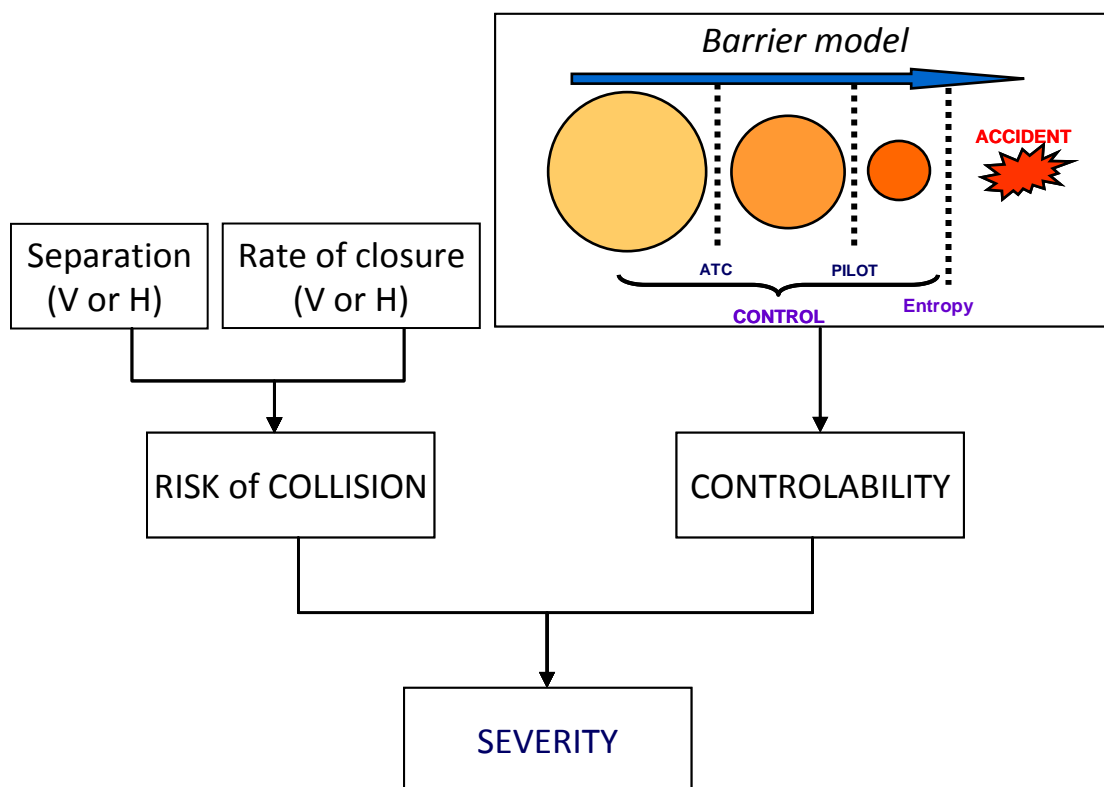


Figure 3 — Visualisation of evaluation of occurrences severity

Distinction between ATM Ground and ATM Overall severity may be done in order to allow ANSPs to identify their own contribution to any occurrence, identify causes and possible mitigation plans and/or corrective actions. In order to be able to fill in all necessary fields for the ATM Overall severity, information not immediately available to ANSPs may be required, such as the information on the existence or not of a TCAS RA on the causal factors on the airborne side.

Different occurrences scenarios may be considered when evaluating severity as it is done in EUROCONTROL Risk Analysis Tool (RAT):

Scenario	Description
1. More than one aircraft	When two or more aircraft are involved in the occurrence and a standard separation is defined — usually for incidents with airborne aircraft, e.g. usually involving separation minima infringements.
2. Aircraft — aircraft tower	When the occurrence is an encounter between two aircraft under tower ATC. This includes situations where a) both aircraft are airborne; b) both aircraft are on the ground; c) one aircraft is airborne and one is on the ground.
3. Aircraft with ground movement	When the occurrence is an encounter between an aircraft and a vehicle (includes towed aircraft). In this situation, the aircraft could be on the ground or it could be airborne.
4. One aircraft	When only one aircraft is involved in the occurrence (e.g. airspace infringement, level bust without involvement of a second aircraft, loss of separation with ground and/or obstacles). This also applies for near-CFIT occurrences.
5. ATM-specific occurrence	To be applied in cases of technical occurrences influencing the capability to provide safe ATM/ANS services.

The following link may be made between the occurrences scenarios as in RAT and the occurrence types referred to in Commission Regulation (EU) No 691/2010 (performance regulation):

- Separation minima infringements: scenario 1;
- Runway incursions: scenarios 2 and 3;
- ATM-specific occurrences: scenario 5.

AMC 7 SKPI — Severity Classification Based on the Risk Analysis Tool Methodology — Methodology for Separation Minima Infringements

The severity of Separation Minima Infringements should be calculated as the sum of the scores totalled in each of the two main criteria:

1. Risk of collision;
2. Controllability.

A. Risk of collision

The risk of collision should be determined by the sum of the scores for the following sub-criteria:

1. Separation — based solely on the minimum distance achieved between aircraft or aircraft and obstacles. The greatest value between the horizontal and vertical in percentage of the applicable separation should be considered.

2. Rate of closure — based on the vertical and horizontal speed, measured at the moment the separation is infringed. The greatest of the predefined intervals for each of the horizontal and vertical speeds should be considered for the evaluation, if the separation is lost after the crossing point (i.e. the aircraft are on diverging headings, then the rate of closure is considered 'none').

The following table should be used to determine the scores of the criteria 'separation' and 'rate of closure':

	Risk of collision	ATM ground	ATM airborne	ATM overall	RF weight
Separation	Minimum separation achieved	0	0	0 ÷ 10 ATM Ground OR ATM airborne	20
	Separation + 75 % minimum	1	1		
	Separation > 50 %, < = 75 % minimum	3	3		
	Separation > 25 %, < = 50 % minimum	7	7		
	Separation <= 25 % minimum	10	10		
Rate of closure	Rate of closure NONE	0	0	0 ÷ 5 ATM Ground OR ATM airborne	10
	Rate of closure LOW (< = 85 knots, < = 1 000 ft/mn)	1	1		
	Rate of closure MEDIUM (> 85 and < = 205 knots, > 1 000 and < = 2 000 ft/mn)	2	2		
	Rate of closure HIGH (> 205 and < = 700 knots, > 2 000 and < = 4 000 ft/mn)	4	4		
	Rate of closure VERY HIGH (> 700 knots, > 4 000 ft/mn)	5	5		

For the risk of collision, either ATM Ground or ATM Airborne severity should be scored. Both ATM Ground severity and ATM Airborne severity should not be scored when evaluating risk of collision. The ATM Airborne severity should be used only in cases where ATC is not responsible for providing separation (i.e. certain classes of airspaces; e.g. close encounter between IFR and VFR flights in Class E airspace).

B. Controllability

Controllability should be the second major criterion of severity and describes the 'level of control' maintained over the situation [Air Traffic Controllers (ATCOs) and pilots supported by Safety Nets].

The controllability score should be defined by the following sub-criteria:

1. Conflict detection,
2. Planning,
3. Execution,
4. Ground safety nets (STCA),
5. Recovery,
6. Airborne safety nets (TCAS),
7. Pilot execution of TCAS RA.

Conflict detection should refer to ATM ground detection; therefore the ATM Overall score should have the same score as ATM Ground. ATM Airborne should not be scored here. There are three possible scenarios:

- 'Conflict DETECTED' includes cases where the conflict is detected but ATC decided to accept the situation.
- 'Conflict detected LATE' when there is not enough time to make and/or execute the plan. It should not be scored whenever separation is lost; consideration should be taken with regard to the circumstances involved. In units with STCA with 'look-ahead' time (predictive STCA) the conflict could be detected due to the predictive STCA. If ATCO became aware of the conflict only through the predictive STCA, then it should be scored as 'Conflict detected LATE'.
- The score 'Conflict NOT detected' is self-explanatory.

In cases such as level busts or other incidents where ATC cannot form prior plan, conflict detection should not be applicable and a zero should be scored to maintain the Reliability Factor tracked as explained in section D.

		ATM ground	ATM airborne	ATM overall	RF weight
Detection	Conflict DETECTED	0		0 ÷ 5 ATM ground	10
	Conflict detected LATE	3			
	Conflict NOT detected	5			

Planning refers to the ATM Ground plan and therefore the ATM Overall score should have the same score as ATM Ground. ATM Airborne should not be scored here. The performance, the timing and efficiency of the ATM Ground planning should be assessed. The plan refers to the first plan developed by ATC to solve the detected hazardous/conflict situation. This plan should be referred to in the subsequent execution steps but not necessarily in the recovery step.

- When the planning is either late or does not lead to a timely and effective resolution of the conflict, then 'Plan INADEQUATE' should be scored.
- When 'Conflict NOT detected' is scored, then 'NO plan' should also be scored.
- Whenever conflict detection is not applicable (such as level bust cases), then the planning sub-criterion is not applicable and a zero should be scored to maintain the Reliability Factor tracked as explained in section D.

		ATM ground	ATM airborne	ATM overall	RF weight
Planning	Plan CORRECT	0		0 ÷ 5 ATM ground	10
	Plan INADEQUATE	3			
	NO plan	5			

Execution refers in general to ATM Ground execution in accordance with the developed plan but it should have ATM Ground and ATM Airborne components. Execution refers to the execution of the first plan developed by ATC to solve the detected hazardous/conflict situation.

When assessing the execution, the time and efficiency of that execution should be assessed. Pilot execution of the received instructions/clearances should be scored as ATM Airborne.

- ATM Ground execution should be scored as 'Execution INADEQUATE' when it is not timely or not effective. It refers to the same plan developed in the planning criterion, prior to the separation infringement. It includes the cases when it is contrary to any prior good planning. The pilot execution should be scored separately as ATM Airborne.
- When no conflict is detected, 'NO plan' and 'NO execution' should apply. 'NO execution' also should comprise cases when there is detection and a plan but this is not implemented at all.
- Whenever conflict detection and planning are not applicable, such as deviation from ATC clearance (e.g. runway incursion due to pilot deviation from ATC clearance), then the execution criterion for ATM Ground should also not be applicable and should be scored 0.
- In case of no pilot deviation from the instructed plan by the ATCO, ATM Overall should have the same score as ATM Ground and ATM Airborne should be scored 0.

		ATM ground	ATM airborne	ATM overall	RF weight
Execution	Execution CORRECT	0	0	0 ÷ 15	10
	Execution INADEQUATE	3	5	ATM ground +	
	NO Execution	5	10	ATM airborne	

Ground safety nets (STCA) (Short Term Conflict Alert or other similar ground safety net) should be scored when the Air Traffic Controller (ATCO) failed to detect the conflict without the safety net's support and consequently failed to plan and execute a correct resolution (the conflict has been observed due to safety nets — useful safety nets warning). Cases of false/nuisance alerts should be disregarded. This sub-criterion should have only ATM Ground element. ATM Airborne should not be scored here.

- When the conflict is detected by the ATCO before the STCA triggers, then a zero should be scored;
- 'No detection' should be scored when the conflict was not detected or detected late by the ATM Ground and STCA should have been triggered according to its implemented logic, but it failed to function. Hence the ground safety net barrier did not work.

		ATM ground	ATM airborne	ATM overall	RF weight
STCA	Loss of separation detected by ATCO	0		0 ÷ 5	10
	No detection (including by STCA)	5		ATM ground	

Recovery from the actual incident is the phase requiring immediate action to restore the safety margins (e.g. separation) or at least to confine the hazard. Recovery starts from the moment the safety margins have been breached (potentially due to an inadequate or missing initial plan to solve the hazardous situation). This sub-criterion applies to both ATM Ground and ATM Airborne. Therefore, ATM Overall should be **the sum** of the Ground and Airborne values.

From this step (recovery) the plan should be considered as a new one and as different from the first plan established in the detection/planning phase. It is seeking the performance of bringing the system back within its safety envelope (such as re-establishment of the separation minima). Recovery might include, depending on type of occurrence (e.g. airspace in which it occurred and services to be provided), cases where traffic information or avoiding actions were issued by ATC.

- 'Recovery CORRECT' should be scored when the actions taken after the separation minima infringement were adequate and the separation was re-established within a reasonable timeframe.
- Scoring 'Recovery INADEQUATE' indicates that the ATM reaction, after the actual incident is declared, had not improved the situation.
- When scoring 'NO recovery', consideration should be given as to whether a TCAS RA or pilot see-and-avoid action was triggered, as this could be the reason to not follow the ATC instructions. In this case, there should be no penalty on the ATM Airborne part.
- When the aircraft are already diverging, then recovery should be scored as not applicable and a zero value should be given.

		ATM ground	ATM airborne	ATM overall	RF weight
Recovery	Recovery CORRECT	0	0	0 ÷ 25 ATM ground + ATM airborne	10
	Recovery INADEQUATE	5	6		
	NO recovery or the ATM ground actions for recovery have worsened the situation or ATM airborne has worsened the situation	10	15		

Airborne Safety Nets (TCAS) — The TCAS sub-criterion should be scored only for useful TCAS RAs (as per ICAO definitions). A similar logic applies for see-and-avoid environments where TCAS does not function. Note: For this sub-criterion ATM Overall should take the score of ATM Airborne. ATM Ground should be scored for the purposes of Reliability Factor evaluation as described in section D and ATM Ground severity evaluation when done separately from the ATM Overall.

- The 'No TCAS RA' option should be used in situations when the geometry of the encounter would require a TCAS RA (based on ICAO TCAS logic) and that did not occur.
- 'TCAS triggered...' should be scored as not applicable (i.e. a score of zero should be given) if adequate ATC instructions are issued before the pilot reaction due to TCAS RA.
- For cases where TCAS RA contributed significantly to the recovery and re-establishment of separation, 'TCAS triggered...' should be scored.

		ATM ground	ATM airborne	ATM overall	RF weight
TCAS	TCAS triggered or see-and-avoid pilot decision (in the absence of TCAS)	10	0	0 or 10 ATM airborne	10
	NO TCAS RA	0	10		

Pilot execution of TCAS RA (or application of see-and-avoid in cases where TCAS is not applicable) and recovery is a criterion to gather the complementary performance to ATM ground.

- 'Pilot(s) INSUFFICIENTLY followed RA' should apply when pilot action is not reacting fully in accordance with the TCAS RA.
- 'Pilot(s) INCORRECTLY followed RA (or, in the absence of RA, took other inadequate action)' should be scored whenever the pilot actions were either missing or contradictory (e.g. did not follow the RA). A contradictory reaction or non-reaction to a TCAS RA should be considered as the worst possible case.

		ATM ground	ATM airborne	ATM overall	RF weight
Pilot execution of TCAS RA	Pilot(s) followed RA (or, in absence of RA, took other effective action, as a result of see-and-avoid decision)		0	0 ÷ 15 ATM airborne	10
	Pilot(s) INSUFFICIENTLY followed RA		10		
	Pilot(s) INCORRECTLY followed RA (or, in the absence of RA, took other inadequate action)		15		

The score of the controllability criterion should be the sum of the scores of its components: Detection, Planning, Execution, STCA, Recovery, TCAS RA and Pilot Action.

C. Final scores

Once all criteria have been evaluated and scored accordingly, the final score for severity should be the sum of the scores for 'Risk of collision' and 'Controllability'.

When the overall scores have been calculated as above, the equivalence with the severity for ATM Overall should be as follows:

ATM Overall Score	Severity class
Between 0–9	No safety effect (E)
Between 10–17	Significant incident (C)
Between 18–30	Major incident (B)
Higher than 31	Serious incident (A)

D. Reliability Factor

Every criterion of the methodology should have its own importance for the evaluation of severity. If there is no information for evaluation of a certain criterion or the information available is ambiguous or the scoring panel cannot agree on the choice that should be made, then these should be identified as missing elements from the methodology.

In order to record and track the influence of the missing elements on the final severity score, an Overall Reliability Factor (RF) should be calculated in parallel with the severity score. The RF should be based purely on the amount of criteria which are considered when evaluating the severity score.

Each criterion should have its associated RF weight. The predefined RF weight per criterion is presented in the last column (RF) in the tables in sections A and B. The value of the Overall RF should be the sum of the RF weights associated to the criteria which are taken into account for the severity evaluation.

Not all criteria should be always applicable (e.g. units without Safety nets, or Safety nets did not trigger). Any criterion positively known not to be applicable to the particular situation under consideration should be scored with a zero value and its associated RF weight should be added to the overall RF.

In the situation where a certain criterion is applicable but there is not enough information to make a judgement from the investigation report (due to lack of data or lack of clarity of the details), the score for that criterion should have value 'blank'. 'Blank' value for a certain criterion indicates that the relevant RF weight should not take part in the calculation of the Overall RF.

If during the evaluation of two different occurrences a certain criterion is scored in the first case as zero (0) and in the second case as 'blank', the ATM overall severity score in both cases should have the same value but the RF should be lower in the second case.

If a score is recorded for a specific criterion, then its RF weight should be added to the overall RF value as follows:

- For the Separation, Rate of closure, Conflict detection, Planning, Ground safety nets (STCA) criteria, which have only ATM Ground component, full RF value should be added if the ATM Ground value is recorded (except for Separation and Rate of closure where the ATM Ground value could be replaced by ATM Airborne).
- For the Execution, Recovery and Airborne Safety Nets (TCAS) criteria, which have both ground and airborne components, half of the RF value should be added if the ATM Ground value is recorded and half of the weight if the ATM Airborne value is recorded.
- For the Pilot execution of TCAS RA criterion, which has only an airborne component, full RF value should be added if the ATM airborne is recorded.

The RF should reach a value of 100 when all data for all criteria have been entered.

The Overall RF associated to the occurrence should be calibrated in such a way that the results of the severity assessment should be acceptable if the Overall RF has a minimum value of 70. Whenever there is not enough information ($RF < 70$) the occurrence should be categorised as 'Not determined' (D), regardless⁷ of the severity indicated after application of the methodology.

GM 6 SKPI — Severity Classification Based on the Risk Analysis Tool Methodology — Methodology for Separation Minima Infringements — Risk of Collision — Score Determination

Example: If in a Separation Minima Infringement occurrence:

- the minimum separation achieved was 60 % horizontally and 30 % vertically;
 - the rate of closure at separation loss was 160 kts and 3 000 ft/min;
 - ATC was providing radar separation,
- then:
- ATM Ground is scored 3 for separation (highest value of the two separations, i.e. the value for 60 % horizontally);
 - ATM Ground is scored 4 for rate of closure (highest value of the two possible marks, i.e. the value 3 000 ft/min);
 - ATM Overall for Risk of collision is 7 with RF 30.

GM 7SKPI — Severity Classification Based on the Risk Analysis Tool Methodology — Methodology for Separation Minima Infringements — Controllability score determination

The score of controllability may be used to facilitate an evaluation of the amount of hazard or entropy. If the situation is controlled, even if separation is lost, it is nevertheless recovered by the ATM system and not by chance. For this step the typical defence barriers as they apply chronologically may be followed.

The ATM Ground elements may be used to evaluate whether and how ATC (ATC means not only the ATCO, but the ATCO supported by ATM system) worked the conflict situation between the aircraft later involved in the actual occurrence. The global picture should be considered and not only the two aircraft between which separation was lost. In certain cases while trying to work an aircraft pair, ATC could generate an occurrence between another pair. All aircraft relevant to the occurrence under analysis should be considered.

When evaluating the criterion **Airborne Safety Nets (TCAS)** it should be noted that this sub-criterion has an ATM Ground element, but the ATM Overall only takes the value of ATM Airborne. The purpose of the ATM Ground element here is to allow evaluating the ATM Ground value as described in GM 8. When ATM Ground is scored 10, the ATM Airborne and ATM Overall for criterion **Airborne Safety Nets (TCAS)** should be scored zero. In such a case, it is quite possible to have ATM Ground with higher score than ATM Overall and when evaluating severity in accordance with the table in GM 8 SKPI this could result in a higher severity for ATM Ground than for ATM Overall. This indicates the higher contribution to the occurrence of the ATM Ground component compared to the ATM Overall.

⁷ It can be contended that if the occurrence has already reached maximum possible severity, any additional data will not change the severity value. However, the occurrence is still recorded as not determined, since it is important to identify any missing data.

Example of controllability score determination:

Conflict detected, planning inadequate, execution inadequate by ATC, correct by pilot, STCA not applicable, recovery correct by ATC and pilot, TCAS RA needed but not triggered, pilot response not applicable:

	Conflict detection	Planning	Execution	Ground Safety Nets (STCA)	Recovery	Airborne Safety Nets (TCAS)	Pilot execution of TCAS RA	Total score
Ground	Yes	Inadequate	Inadequate	N/A	Correct	N/A		6
	0	3	3	0	0	0		
Airborne			Correct		Correct	No	N/A	10
			0		0	10	0	
<i>RF</i>	<i>10</i>	<i>10</i>	<i>5+5</i>	<i>10</i>	<i>5+5</i>	<i>5+5</i>	<i>10</i>	<i>70</i>

ATM Overall Controllability

= Conflict detection + Planning + Execution + Ground Safety Nets (STCA) + Recovery + Airborne Safety Nets (TCAS) + Pilot Execution of TCAS RA

= 0+3+3+0+0+10+0

= 16

GM 8 SKPI — Severity Classification Based on the Risk Analysis Tool Methodology — Methodology for Separation Minima Infringements — Final scores

Example: Following the score determination in GM 6 and 7 SKPI,

Severity ATM Ground = Risk of collision score Ground + Controllability score Ground = 7 + 6 = 13

Severity ATM Overall = Risk of collision score Overall + Controllability score Overall = 7 + 16 = 23

When evaluating the ATM Ground value only, the table from AMC 7 SKPI, D may be extended as follows:

ATM Ground value	Severity class		ATM Overall value	Severity class
Between 0–9	No safety effect		Between 0–9	No safety effect
Between 10–17	Significant incident		Between 10–17	Significant incident
Between 18–30	Major incident		Between 18–30	Major incident
Higher than 31	Serious incident		Higher than 31	Serious incident

Example:

Severity class ATM Ground for score 13 = Significant incident

Severity class ATM Overall for score 23 = Major incident

GM 9 SKPI — Severity Classification Based on the Risk Analysis Tool Methodology — Methodology for Separation Minima Infringements — Reliability Factor

Example: When scoring 'Not Applicable' as in GM 7 for the Pilot Execution of TCAS RA (because there was no TCAS RA in the example provided), the value of the score is 0. Nevertheless, the relevant value of the RF is added to the RF Overall.

Example: In the examples of GM 6 and GM 7 the RF for each criterion is also recorded. The overall RF based on these examples is calculated to be 100, which means that the severity in this example is evaluated with all necessary data available. In this case, and in other cases where the overall RF is calculated to be 70 or more, the resulting severity may be considered as valid.

The same example as in GM 7 may be presented with some data missing (value 'blank') as follows:

	Conflict detection	Planning	Execution	Ground Safety Nets (STCA)	Recovery	Airborne Safety Nets (TCAS)	Pilot execution of TCAS RA	Total score
Ground	No data	Inadequate	Inadequate	N/A	Correct	No data		6
	blank	3	3	0	0	Blank		
Airborne			No data		No data	No data	No data	10
			blank		blank	Blank	blank	
RF	0	10	5+0	10	5+0	0+0	0	30

If to the RF of Controllability in this example the RF of Risk of Collision from GM 6 is added (30), the Overall RF has a value of 60. Since the Overall RF < 70, the occurrence should be categorised as 'Not determined' (D).

AMC 8 SKPI — Severity Classification Based on the Risk Analysis Tool Methodology — Methodology for Runway Incursions

Applying the severity classification methodology for Runway Incursions, the severity should be calculated as the sum of the total scores in each of the two main criteria:

1. Risk of collision;
2. Controllability.

A. Risk of collision

The risk of collision should be determined by the sum of the scores for the following sub-criteria:

1. Separation. When evaluating the severity of runway incursion this criterion should be interpreted as safety margin infringed. The moderation panel/investigators should, based on experts judgment, choose a score between 0 and 10, based on the perceived safety margin achieved. If there is no agreement on the safety margin, then the moderation panel/investigators will not score the criterion at all and the field should be left blank. This should be reflected in the value of the Reliability Factor by not adding the RF weight for the separation criterion.

Risk of collision		ATM ground	ATM airborne	ATM overall	RF weight
separation	Safety margin achieved	0	0	0 ÷ 10 ATM Ground OR ATM airborne	20
	Safety margin infringed minor	1–3	1–3		
	Safety margin infringed medium	4–6	4–6		
	Safety margin infringed significant	7–9	7–9		
	Safety margin infringed critical	10	10		

2. Rate of closure — based on the vertical and horizontal speed, measured at the moment the safety margin is considered to have been lost. The greatest of the predefined intervals for each of the horizontal and vertical speeds are to be considered for the evaluation.

Depending on the situation, speed intervals should be applied as follows:

- More than one aircraft — no standard separation defined,
- Aircraft with ground movement.

In cases of unauthorised entry on the runway when no other aircraft/vehicle/person was present, the rate of closure should be 'NONE'.

	More than one aircraft — no standard separation defined	Aircraft with ground movement	ATM ground	ATM airborne	ATM overall	RF weight
rate of closure	Rate of closure NONE	Rate of closure NONE	0	0	0 ÷ 5 ATM Ground OR ATM airborne	10
	Rate of closure LOW (<= 50 knots, <= 500 ft/mn)	Rate of closure LOW (<= 20 knots)	1	1		
	Rate of closure MEDIUM (>50 and <= 100 knots, > 500 and <= 1 000 ft/mn)	Rate of closure MEDIUM (>20 and <= 40 knots)	2	2		
	Rate of closure HIGH (>100 and <= 250 knots, > 1 000 and <= 2 000 ft/mn)	Rate of closure HIGH (>40 and <= 80 knots)	4	4		
	Rate of closure VERY HIGH (>250 knots, > 2 000 ft/mn)	Rate of closure VERY HIGH (>80 knots)	5	5		

For the risk of collision, *either* ATM Ground *or* ATM Airborne severity should be scored, and not both ATM Ground and ATM Airborne. The ATM Airborne severity should be used only in cases

where ATC is not responsible for providing separation (i.e. certain classes of airspaces, e.g. close encounter between IFR and VFR flights in Class E airspace).

B. Controllability

The scoring for controllability should follow the same logic as in AMC 7 section B, with only a few exceptions, as follows:

- STCA is not appropriate for this encounter, hence it should be replaced by more general aerodrome ground safety nets, such as RIMCAS (Runway Incursion Monitoring and Collision Avoidance System);
- Airborne Safety Nets (TCAS) is not normally available when Runway Incursions occur, therefore only pilot see-and-avoid action should be considered. Lack of see-and-avoid should be scored in the case of low visibility and IMC conditions.
- All other sections are identical with the previous scenario, with the exception of the Safety Nets where A-SMGCS (Advanced Surface Movement Guidance & Control System) or RIMCAS should be considered, and the see-and-avoid part where driver action should also be taken into account, alongside that of the pilot.

The controllability score should be defined by the following aspects:

1. Conflict detection,
2. Planning,
3. Execution,
4. General ground safety nets, e.g. A-SMGCS,
5. Recovery,
6. Airborne Safety Nets (see-and-avoid),
7. Pilot/driver execution of see-and-avoid.

The controllability scoring should be identical in all aspects with section B of AMC 7 SKPI.

C. Final scores

The final scoring should be identical in all aspects with section C of AMC 7 SKPI.

D. Reliability Factor

The Reliability Factor evaluation should be identical to the description in section D of AMC 7 SKPI.

AMC 9 SKPI — Severity Classification Based on the Risk Analysis Tool Methodology — Methodology for ATM-specific occurrences

A. Overview

The ATM-specific occurrences severity evaluation should be based on a combination of criteria. For each criterion a number of options should be available.

The combination of the chosen options for each criterion should provide the severity of an ATM-specific occurrence.

The following criteria should be considered when determining the severity of an ATM-specific occurrence:

1. Service affected,
2. Service/Function provided,
3. Operational function,
4. Type of failure,
5. Extension,
6. Scope,
7. Duration.

B. Options for ATM-specific occurrences

The following options should be considered when evaluating each criterion in AMC 9 SKPI section A:

1. Criterion 'Service affected' — the effect of the system failure should be assigned to one of the following services:
 - a. (Upper) Area Control Centre — ATC service for controlled flights in a block of airspace;
 - b. Approach Control — ATC service for arriving or departing controlled flights;
 - c. Aerodrome Control — ATC service for aerodrome traffic;
 - d. Oceanic Control — ATC service for controlled flights over the high seas;
 - e. Flight Information Service — service provided for the purpose of giving advice and information useful for the safe and efficient conduct of flights.
2. Criterion 'Service/Function provided' — the following options should be available for the Service/Function criterion:
 - a. Communication — aeronautical fixed and mobile services to enable ground-to-ground, air-to-ground and air-to-air communications for ATC purposes;
 - b. Navigation — those facilities and services that provide aircraft with positioning and timing information;
 - c. Surveillance — those facilities and services used to determine the respective positions of aircraft to allow safe separation;
 - d. Air Traffic Services — the various flight information services, alerting services, air traffic advisory services and ATC services (area, approach and aerodrome control services);
 - e. Airspace management — a planning function with the primary objective of maximising the utilisation of available airspace by dynamic time-sharing and, at times, the segregation of airspace among various categories of airspace users on the basis of short-term needs;
 - f. Air Traffic Flow and Capacity Management — the air traffic flow management is a function established with the objective of contributing to a safe, orderly and expeditious flow of air traffic by ensuring that ATC capacity is utilised to the maximum extent possible, and that the traffic volume is compatible with the capacities declared by the appropriate air traffic service providers.
 - g. Information Service — a service established within the defined area of coverage responsible for the provision of aeronautical information and data necessary for the safety, regularity and efficiency of air navigation;

3. Criterion 'Operational function' — the selected option for the criterion 'Service/Function provided' should be considered when selecting the option for the criterion 'Operational function'. The following options should be available:
- a. For Communication services:
 - Air/Ground Communication — two-way communication between aircraft and stations or locations on the surface of the earth;
 - Ground/Ground Communication — two-way communication between stations or locations on the surface of the earth.
 - b. For Navigation service:
 - Navigation Function.
 - c. For Surveillance service:
 - Air Surveillance — those facilities and services used to determine the respective positions of aircraft in the air to ensure safe separation;
 - Ground Surveillance — those facilities and services used to determine the respective positions of aircraft on the ground to allow the detection of conflicts;
 - Surface Movement Guidance and Control — a function providing routing, guidance and surveillance for the control of aircraft and vehicles in order to maintain the declared surface movement rate under all weather conditions within the aerodrome visibility operational level while maintaining the required level of safety.
 - d. For Air Traffic Services:
 - Flight Plan Information — specified information provided to air traffic service units, relative to an intended flight or portion of a flight of an aircraft;
 - Flight Information and Alert — provision of Flight Information (e.g. last position) in support to alerting services;
 - Ops Room Management Capability — the functions which enables to combine/split sectors, assign roles on controllers working position;
 - Decision Making Support Tools — such as Medium Term Conflict Detection, Arrival/Departure Manager, Collaborative Decision Making;
 - Safety Nets — a (ground-based) safety net is a functionality within the ATM system that is assigned by the ANSP with the sole purpose of monitoring the environment of operations in order to provide timely alerts of an increased risk to flight safety which may include resolution advice.
 - e. For Airspace Management:
 - Real Time Airspace Environment — the display on the executive air traffic controller Controllers Working Position of the entire airspace configuration at a given time (e.g. restricted/danger areas).
 - f. For Air Traffic Flow and Capacity Management:
 - Tactical & Real Time — the function that provides traffic prediction, flow monitoring and warning.
 - g. For Support Information Services:
 - Aeronautical Information — provision of aeronautical information and data necessary for the safety, regularity and efficiency of air navigation;
 - Meteorological Information — meteorological report, analysis, forecast and any other statement relating to existing or expected meteorological conditions.

4. Criterion 'Type of failure' — the following options should be available for the 'Type of failure' criterion:
- Total loss of service/function — the service/function is not available to the controller or pilot;
 - Partial loss of service/function — not all of the service/function is available to ATC or pilot (e.g. loss of one or several sub-functions);
 - Redundancy reduction — loss of a technical backup. There are fewer technical ways to provide the service/function;
 - Undetected corruption of service/function — data presented is incorrect but is not detected and used as being correct — if the corruption is detected it means the function will have to be removed totally (total loss of function) or partially (partial loss of function);
 - Loss of supervision — unable to control or monitor the function. If this means that the main function has to be removed, then this would be a total loss;
 - Corruption of supervision — undetected corruption of supervision. It has no impact unless a second action takes place. If left alone there will be no impact. If an operator does something in response to an incorrect indication then a different type of failure could occur.
5. Criterion 'Extension' — the physical extension of the failure should be categorised as one of the following options:
- Controller Working Position — one Controller Working Position (CWP);
 - Sector suite — a set of CWPs which work together to control a sector(s);
 - Multiple suites — self-explanatory;
 - Unit— as applicable, the entire ACC/UAC/APP operations room, the whole Tower, etc.
6. Criterion 'Scope' — the operational scope of the effect should be classified as one of the following options:
- One — one frequency, one aircraft as applicable;
 - Some — as applicable more than one frequency, more than one a/c, etc., and less than all;
 - All — all frequencies, all aircraft as applicable.
7. Criterion 'Duration' — T1 is the time interval between the initiation of the technical event and the moment when it triggers actual or potential operational consequences either for the air traffic controller (ATCO) or the pilot. The value of T1 should be predefined by each ANSP based on inputs provided by the ATCOs and/or pilots.
- Duration less than T1 — this option should be chosen when the technical failure did not last long enough to trigger actual or potential operational consequences on the air traffic controller or the pilot. In such a case the severity of the ATM-specific occurrence should have no impact on the air traffic services and should be classified with severity E. Consequently, there is no need for the user to further apply the RAT methodology for this technical failure (just record the severity E);
 - Duration greater than T1 — this option should be selected when the technical failure lasted longer than T1 and triggered actual or potential operational consequences on the air traffic controller or the pilot.

C. Severity

The severity of ATM-specific occurrences should be classified as follows:

1. AA — Total inability to provide safe ATM services (equivalent to 'Serious incident') — an occurrence associated with the total inability to provide any degree of ATM services, where:
 - a. there is a sudden and non-managed total loss of ATM service or situation awareness;
 - b. there is a totally corrupted ATM service or corrupted information provided to ATS personnel.
2. A — Serious inability to provide safe ATM services (also equivalent to 'Serious incident') — an occurrence associated with almost a total and sudden inability to provide any degree of ATM services in compliance with applicable safety requirements. It involves circumstances indicating that the ability to provide ATM services is severely compromised and has the potential to impact many aircraft safe operations over a significant period of time.
3. B — Partial inability to provide safe ATM services (equivalent to 'Major incident') — an occurrence associated with the sudden and partial inability to provide ATM services in compliance with applicable safety requirements.
4. C — Ability to provide safe but degraded ATM services (equivalent to 'Significant incident') — an occurrence involving circumstances indicating that a total, serious or partial inability to provide safe and non-degraded ATM services could have occurred, if the risk had not been managed/controlled by ATS personnel within safety requirements, even if this implied limitations in the provision of ATM services.
5. D — Not determined — insufficient information was available to determine the risk involved or inconclusive or conflicting evidence precluded such determination.
6. E — No effect on ATM services — occurrences which have no effect on the ability to provide safe and non-degraded ATM services (equivalent to 'No safety effect').

The severity on an ATM-specific occurrence should be established, based on the combination of options chosen for each criterion.

GM 10 SKPI — Severity Classification Based on the Risk Analysis Tool Methodology — Methodology for ATM-specific occurrences

A. Examples of some criteria for evaluating ATM-specific occurrences

Criterion 'Type of failure'

The following figure illustrates Total Loss and Redundancy Reduction in Air-Ground Communication.

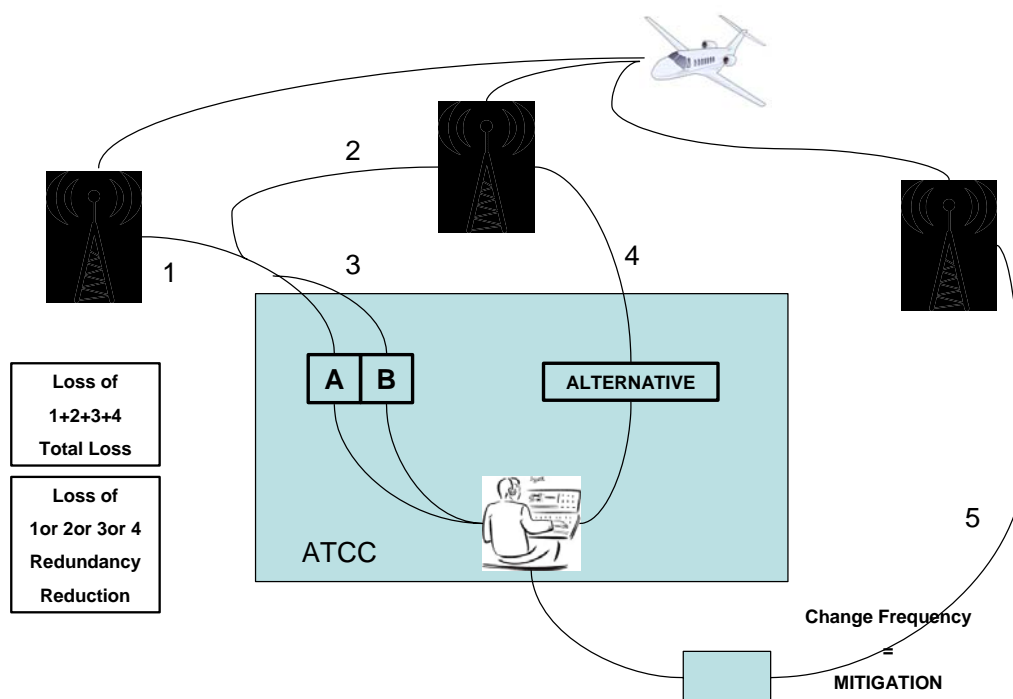


Figure 4 — Total Loss and Redundancy Reduction in air-ground communication

Criterion 'Extension'

The figure below illustrates an ATC unit with several sector suites, each of which consists of 3 Controllers Working Positions (CWP):

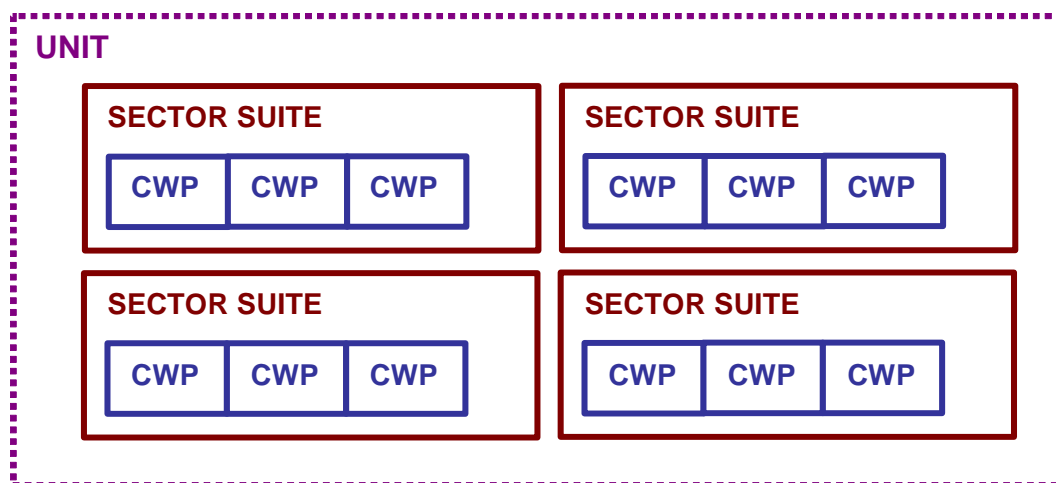


Figure 5 — ATC unit, sectors and suites

Criterion 'Scope'

The table below gives an indication of what one/some/all represents for different operational functions (criterion 'Scope').

Services	Operational functions	Scope (how many ... were impacted)
Communication	Air/Ground Communication	Communication(s) ATCO/Pilot
Communication	Ground/Ground Communication	Communication(s) ATCO/ATCO
Navigation	Navigation	Pilot(s)
Surveillance	Air Surveillance	Displayed Radar Track(s)
Surveillance	Ground Surveillance	Displayed Radar Track(s)
Surveillance	Surface Movement Guidance & Control	Aircraft(s)/Vehicle(s)
Air Traffic Services	Flight Plan Information	Flight Plan(s)
Air Traffic Services	Flight Information & Alert	Flight(s)
Air Traffic Services	Ops Room Management	N/A (extension should be sufficient)
Air Traffic Services	Decision Making Support	Fight(s)
Air Traffic Services	Safety Nets	Conflict(s)
Air Traffic Services	Real Time Airspace Environment	Route(s), Area(s), ...
Air Traffic Flow Capacity Management	Tactical & Real Time	Flight(s)
Information Services	Aeronautical Information	Information Type(s)
Information Services	Meteorological Information	Information Type(s)

Criterion 'Duration'

When criterion 'Duration' is evaluated, T1 should be used for separating technical glitches with no operational consequences from failures that impact the ANSP ability to provide ATM services.

The value of T1 should be predefined by each ANSP based on inputs provided by the ATCOs and/or pilots.

This value cannot be established at European level as it is dependent on the functionalities of the ATM provider's system architecture, airspace complexity, traffic load and concept of operations. When choosing the option 'less than T1' or 'greater than T1' there is no need to know exactly the duration of the event but whether it has a potential or real operational impact, i.e. is greater, or not, than the T1 value established locally.

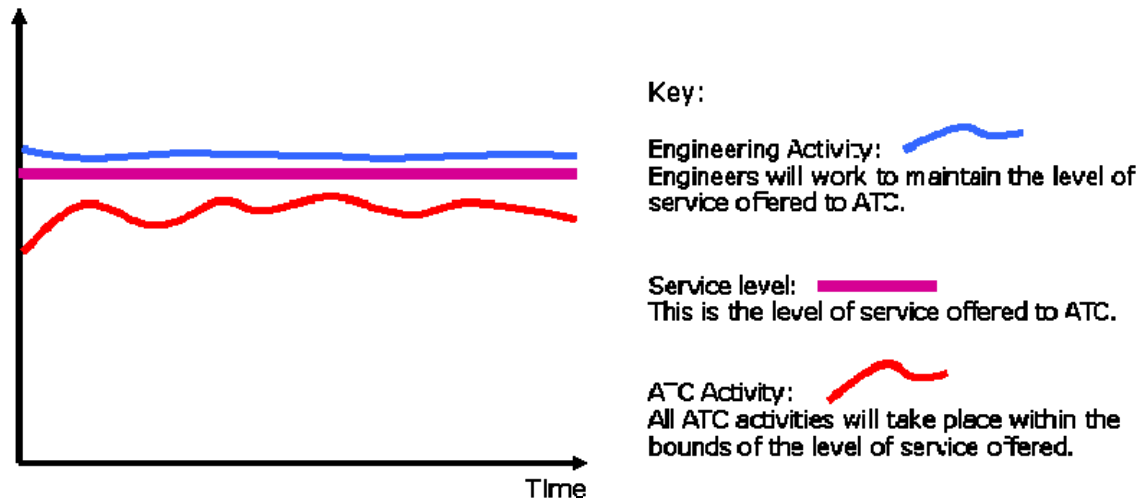
Typical examples of operational impact where 'Duration' is greater than T1:

- ATC/Pilot had to do something different;
- ATC/Pilot is presented with incorrect, reduced or no information;
- Workload increase;
- Capacity reduction;
- Reduced ability to provide safe services;
- ATCO can no longer cope with the situation.

The charts below illustrate the ATM system both in a steady state and failure modes, in order to ease the understanding of the role of T1.

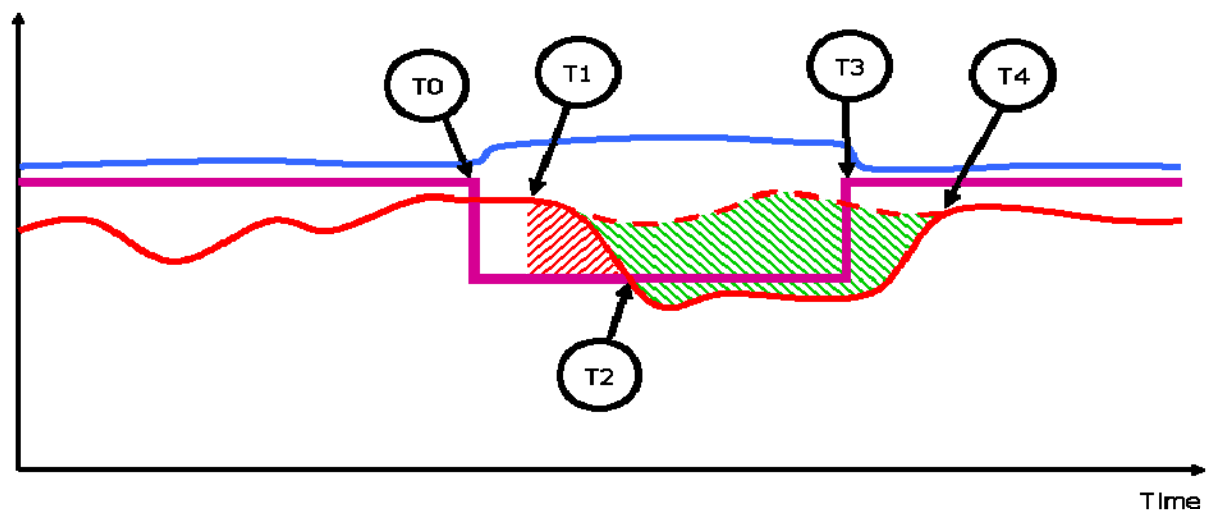
- Steady state of the technical system (no failure)

The chart below illustrates a steady state where the ATM system delivers all operational functions as expected.



- ATM-specific technical event with a potential or real operational impact

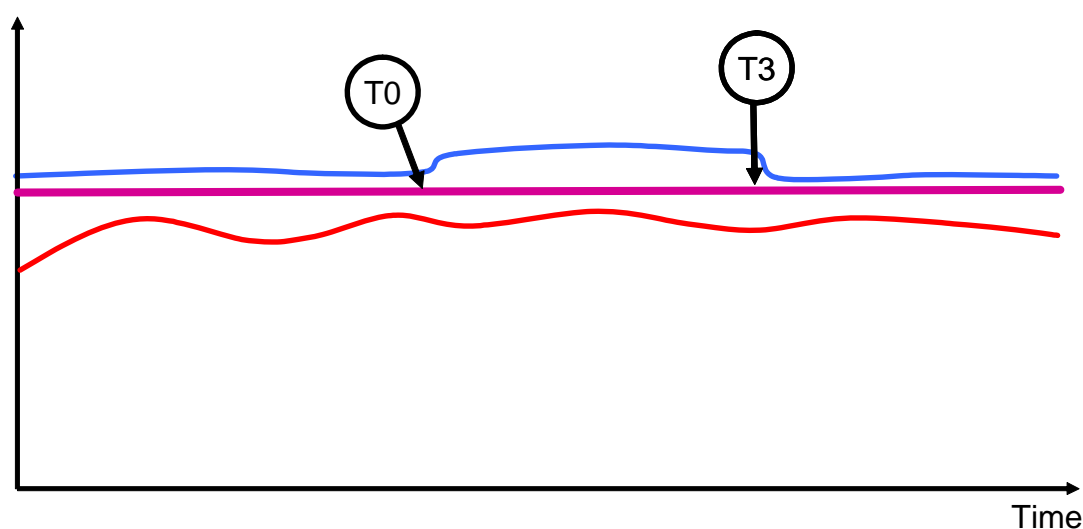
The chart below provides the occurrence timeline in case of a total failure of an operational function. In the given example the failure has an operational impact on the ability to provide ATM services (this could be the case in a total failure of the air-ground communication function, total failure of surveillance function; see examples 1 and 3 below).



T0	ATM-specific technical event commences.
T0 to T1	ATM-specific technical event has no operational impact as the ATC maintain desired traffic level.
T1	ATM-specific technical event triggers operational consequences on ATC controller or pilot.
T1 to T2	Potential safety impact on ATC or pilot.
T3	The ATM-specific technical event finishes.
T1 to T4	Business effect on ATC or Pilot, e.g. regulations applied.
T4	ATC returns to the desired traffic levels.

- Redundancy reduction

The chart below illustrates the occurrence timeline in the case of a redundancy reduction with no operational impact (duration is less than T1). This case could be applied in the Example 2 from section C, the failure on day D.



Key



T0	ATM-specific technical event commences.
T1	Does not take place.
T2	Does not take place.
T0 to T3	ATM-specific technical event has no impact. ATC maintain desired traffic level.
T3	ATM-specific technical event finishes.
T4	Does not take place.

B. Look-up table

Following the selection of criteria options described in this AMC 9 SKPI, the severity for an ATM-specific occurrence may be determined by identifying the appropriate combination in the look-up table presented in Appendix 1 to GM 10 SKPI — Look-up Table for Severity Classification of ATM-specific occurrences and retrieve the predetermined severity in column 'Severity'.

The look-up table contains all the realistic combination of the criteria described in this GM. An occurrence code is uniquely assigned to each combination.

It is to be noted that in case of combination of criteria that are not realistic the severity is marked 'X' in the look-up table. In such case the severity can not be determined (category D). Therefore, the user should try to map a given failure to the credible combination available in the look-up table.

A severity is predefined for each of the identified realistic combinations. A sample of a section of this look-up table is given below:

Code	Service Affected	Services	Operational functions	Type of Failure	Extension	Scope	Ratio	T1	Severity
AR-AGC/000	Area control services	Communication	Air/Ground Communication	Undetected Corruption of function	Unit	All	> T1		AA
AR-AGC/001	Area control services	Communication	Air/Ground Communication	Undetected Corruption of function	Unit	Some	> T1		AA
AR-AGC/002	Area control services	Communication	Air/Ground Communication	Undetected Corruption of function	Unit	One	> T1		A
AR-AGC/010	Area control services	Communication	Air/Ground Communication	Undetected Corruption of function	Multiple Suites	All	> T1		AA
AR-AGC/011	Area control services	Communication	Air/Ground Communication	Undetected Corruption of function	Multiple Suites	Some	> T1		A
AR-AGC/012	Area control services	Communication	Air/Ground Communication	Undetected Corruption of function	Multiple Suites	One	> T1		A
AR-AGC/020	Area control services	Communication	Air/Ground Communication	Undetected Corruption of function	Sector Suite	All	> T1		X
AR-AGC/021	Area control services	Communication	Air/Ground Communication	Undetected Corruption of function	Sector Suite	Some	> T1		X
AR-AGC/022	Area control services	Communication	Air/Ground Communication	Undetected Corruption of function	Sector Suite	One	> T1		B
AR-AGC/030	Area control services	Communication	Air/Ground Communication	Undetected Corruption of function	CWP	All	> T1		X
AR-AGC/031	Area control services	Communication	Air/Ground Communication	Undetected Corruption of function	CWP	Some	> T1		B
AR-AGC/032	Area control services	Communication	Air/Ground Communication	Undetected Corruption of function	CWP	One	> T1		B
AR-AGC/100	Area control services	Communication	Air/Ground Communication	Total Loss of function	Unit	All	> T1		AA
AR-AGC/101	Area control services	Communication	Air/Ground Communication	Total Loss of function	Unit	Some	> T1		AA
AR-AGC/102	Area control services	Communication	Air/Ground Communication	Total Loss of function	Unit	One	> T1		A
AR-AGC/110	Area control services	Communication	Air/Ground Communication	Total Loss of function	Multiple Suites	All	> T1		AA
AR-AGC/111	Area control services	Communication	Air/Ground Communication	Total Loss of function	Multiple Suites	Some	> T1		A
AR-AGC/112	Area control services	Communication	Air/Ground Communication	Total Loss of function	Multiple Suites	One	> T1		A
AR-AGC/120	Area control services	Communication	Air/Ground Communication	Total Loss of function	Sector Suite	All	> T1		A
AR-AGC/121	Area control services	Communication	Air/Ground Communication	Total Loss of function	Sector Suite	Some	> T1		A
AR-AGC/122	Area control services	Communication	Air/Ground Communication	Total Loss of function	Sector Suite	One	> T1		A
AR-AGC/130	Area control services	Communication	Air/Ground Communication	Total Loss of function	CWP	All	> T1		B
AR-AGC/131	Area control services	Communication	Air/Ground Communication	Total Loss of function	CWP	Some	> T1		B
AR-AGC/132	Area control services	Communication	Air/Ground Communication	Total Loss of function	CWP	One	> T1		B
AR-AGC/200	Area control services	Communication	Air/Ground Communication	Partial Loss of function	Unit	All	> T1		C
AR-AGC/201	Area control services	Communication	Air/Ground Communication	Partial Loss of function	Unit	Some	> T1		C
AR-AGC/202	Area control services	Communication	Air/Ground Communication	Partial Loss of function	Unit	One	> T1		C

Figure 6 — Extract of look-up table in Appendix 1 to GM 10 SKPI

C. Examples for ATM-specific occurrences

Example 1

All communications with aircraft were lost in the sector South in the ACC X. The failure lasted 1 min 12 sec.

The service provided was 'Communication'. As the communication was lost with the aircraft, the operational function affected is 'Air-Ground Communication'.

No communication with the aircraft in the sector was possible during that time; therefore the type of failure is 'Total loss of function'. Service affected is 'Area Control Centre'. The sector South was only ACC sector affected by the failure. As such, the extension is 'Sector Suite'. In this case the communication with all aircraft in the sector was lost and therefore the scope is 'All'.

In the ACC x, the T1 is predefined for Total loss of Air-Ground communication function as being T1 = 20 seconds.

As the total duration of failure is 1 min 12 sec, the duration is higher than T1 and therefore the RAT look-up table may be used.

For these selected options the corresponding combination in the look-up table is:

Code	Service Affected	Services	Operational functions	Type of failure	Extension	Scope	Duration	T1	Severity
AR-AGC/120	Area control services	Communication	Air/Ground communication	Total loss of function	Sector suite	All	> T1	~20s	A

Therefore, the Severity for the failure in Example 1 is 'A — Serious inability to provide safe ATM services'.

Example 2

Due to telecom failure there is loss of redundancy of some frequencies affecting several sectors in APP Z. There were two such occurrences at APP Z: one on day D which lasted 5 minutes and the other on day D+2 which lasted two hours.

The service provided was 'Communication'. As the redundancy is for radio communication with the aircraft, the operational function affected is 'Air-Ground Communication'.

The type of failure is 'Redundancy reduction' and affects several sectors and several frequencies; therefore, the extension is 'Multiple Suites' and scope 'Some'.

In the APP Z, the local procedure requires that in case of loss of back-up frequencies (i.e. redundancies), capacity limitations are put in place after 30 minutes, which is our T1.

Therefore, duration of the failure on day D is less than T1 and the severity is directly classified as 'E — No effect on ATM services' and there is no need to use the look-up table.

For the failure on day D+2 the duration is greater than T1 and therefore the look-up table might be used and the corresponding combination is:

Code	Service affected	Services	Operational functions	Type of failure	Extension	Scope	Duration	T1	Severity
AP-AGC/311	Approach control services	Communication	Air/Ground communication	Redundancy reduction	Multiple suites	Some	> T1	1800 s	C

Therefore the Severity for the failure in Example 2 on day D+2 is 'C — Ability to provide safe but degraded ATM services'.

Example 3

Total failure of the radar data processing system (normal and back-up) in an ACC (duration 2 minutes).

Service affected = Area control services

The service is 'Surveillance' and the operational function is 'Air Surveillance in the Area control services'. It is a total loss of function which extends to the whole unit and affects all targets.

For the combination above the T1 is set to ~ 40s, therefore Duration is > T1 and therefore the look-up table might be used and the corresponding combination is:

Code	Service affected	Services	Operational functions	Type of failure	Extension	Scope	Duration	T1	Severity
AR-ASV/100	Area control services	Surveillance	Air surveillance	Total loss of function	Unit	All	> T1	40 s	A

Therefore the Severity for the failure in Example 3 is 'A — Serious inability to provide safe ATM services'.

AMC 10 SKPI — RAT methodology — Verification mechanism

The Member States' points of contact, established in accordance with Directive 2003/42/EC and Commission Regulation (EC) No 1330/2007, should collect and verify the information regarding the application of the RAT methodology for all reported occurrences within the scope of Commission Regulation (EU) No 691/2010 as amended by Regulation .../....

The collection of information relevant to the use of the RAT methodology should make use of existing safety data reporting mechanisms with enhancements where needed.

When the Member States report on the monitoring of the performance plans and targets in accordance with Article 17 of Commission Regulation (EU) No 691/2010, they should report the percentage of occurrences the severity of which has been evaluated by the use of the RAT methodology.

IV Just culture

GM 11 SKPI — Just culture — General

The Just Culture KPI aims at measuring the level of presence and corresponding level of absence of just culture at State and at ANSP level. The metrics have been constructed to respond to the criteria of: clearly defined, auditable, verifiable, repeatable and indicative of the level of just culture being implemented. The just culture KPI consists of metrics in the areas of policy and its implementation, legal/judiciary and occurrence reporting and investigation.

The main aim of the indicator and of the questionnaires is to identify possible obstacles and impediments to the application of the just culture (JC).

Reference is made to the 'State level' instead of 'NSA level' because, although a large number of questions refer to the existing situation in the national authority, a limited number of others deal with elements which go beyond the field of competence of the authority and may have to be addressed at the level of other State entities.

The questionnaires identify several elements related to an effective just culture, each element in turn with a number of sub-elements. These sub-elements are binary, i.e. the answer can only be 'yes' or 'no'. The States and ANSPs may qualify the 'no' answers in their respective completed questionnaire (column 'Justification and remarks') by indicating the related obstacles.

A positive reply gives an indication of a just culture context while a negative reply indicates a potential deficit/obstacles in just culture implementation. However, it is not expected that all replies should be positive but the identification of negative elements would give indication of possible areas of improvement and could be considered as incentives for improving the just culture in a particular State/organisation. State/ANSP may be asked to provide evidence for justification of the answers supported by written documents such as arrangements, procedures, correspondence or other documents.

AMC 11 SKPI — Just culture reporting at State level

A. Reporting

The just culture indicator should be reported by verified responses to a questionnaire at State level. The questionnaire which should be answered by the Member State/competent authority is indicated in Appendix 1 to AMC 11 SKPI — Just Culture Questionnaire — State level (questions P.1 to P.10, L.1 to L.8, and O.1 to O.2). The questions should be answered with 'yes' or 'no'. For each question, the State should provide information and evidence to justify the answers and may add any applicable explanatory remarks.

B. Verification

Questionnaires should be dispatched together with those for the Effectiveness of Safety Management (EoSM) indicator following the same verification process.

The verification mechanism for JC measurement should be the same as in AMC 4 SPI, section C.

GM 12 SKPI — Just culture — Reporting and Verification at State level

Some examples of the possible justification material which support the verification of completed JC questionnaire at State level are provided in Appendix 1 to GM 12 SKPI — Just Culture — State level — possible justification. This appendix consists of the State-level JC questions with an additional column providing possible evidence and some explanatory notes where considered necessary.

In addition to the filled-in questionnaire, the State may report on the just culture indicator using the following format, including an indication of possible areas for improvement.

No of questions answered with:	Yes	No
Policy and its implementation		
Legal/Judiciary		
Occurrence reporting and investigation		
Identification of possible areas of improvement		
Policy and its implementation		
...		
...		
Legal/Judiciary		
...		
...		
Occurrence reporting and investigation		
...		
...		

AMC 12 SKPI — Just culture — Reporting at ANSP level

A. Reporting

The just culture indicator should be reported by verified responses to a questionnaire at ANSP level. The questionnaire which should be answered by the Air Navigation Service Providers is indicated in Appendix 1 to AMC 12 SKPI — Just Culture Questionnaire — ANSP level (questions P.1 to P.13, L.1 to L.3, and O.1 to O.8). The questions should be answered with 'yes' or 'no'.

For each question, the ANSP should provide to the NSA information and evidence to justify its answers and may add any applicable explanatory remarks.

B. Verification

Questionnaires should be dispatched together with those for the Effectiveness of Safety Management indicator following the same verification process.

The verification mechanism for JC measurement at ANSP level should be the same as in AMC 5 SKPI, section D.

GM13 SKPI — Just culture — Reporting and Verification at ANSP level

Some examples of the possible justification material which support the verification of completed JC questionnaire at ANSP level are provided in Appendix 1 to GM 13 SKPI — Just Culture — ANSP level — possible justification. This appendix consists of the ANSP-level JC questions with an additional column providing possible evidence and some explanatory notes where considered necessary.

In addition to the filled-in questionnaire, the ANSP may report on the just culture indicator using the following presentation format, including a self-assessment of possible areas for improvement.

No of questions answered with:	Yes	No
Policy and its implementation		
Legal/Judiciary		
Occurrence reporting and investigation		
Identification of possible areas of improvement		
Policy and its implementation		
...		
...		
Legal/Judiciary		
...		
...		
Occurrence reporting and investigation		
...		
...		

V Appendices

[All ten appendices (including Appendix I — draft Commission Regulation) are published on the EASA's website under <http://easa.europa.eu/rulemaking/notices-of-proposed-amendment-NPA.php>)

1. **Appendix 1 to AMC 4 SKPI — Questionnaire for Measurement of Effectiveness of Safety Management KPI — State level**
2. **Appendix 2 to AMC 4 SKPI — List of Weightings for Evaluation of Effectiveness of Safety Management Questionnaire — State level**
3. **Appendix 1 to AMC 5 SKPI — Questionnaire for Measurement of Effectiveness of Safety Management KPI — ANSP level**
4. **Appendix 2 to AMC 5 SKPI — List of Weightings for evaluation of Effectiveness of Safety Management Questionnaire — ANSP level**
5. **Appendix 1 to AMC 11 SKPI — Just Culture Questionnaire — State level**
6. **Appendix 1 to AMC 12 SKPI — Just Culture Questionnaire — ANSP level**
7. **Appendix 1 to GM 4 SKPI Verification of ANSP EoSM by NSA/competent authority**
8. **Appendix 1 to GM 10 SKPI — Look-up Table for Severity Classification of ATM-specific occurrences**
9. **Appendix 1 to GM 12 SKPI — Just Culture — State level — possible justification**
10. **Appendix 1 to GM 13 SKPI — Just Culture — ANSP level — possible justification**

C. Appendices

- I Draft Commission Regulation (EU) No .../... amending Commission Regulation (EU) No 691/2010 laying down a performance scheme for air navigation services and network functions**